

		<p>public affordable housing monies.</p> <p>Establish the funding of extremely low .very low and low income housing as priorities for public funds at least until the RHNA goals are met.</p> <p>Acknowledge that Pasadena's need for affordable housing is larger the identified RNHA goals, i.e. that there are 21,000 Pasadena households currently in need of affordable housing.</p>			<p>By January, 2009</p> <p>September, 2008</p>	
9b. Land Assemblage/ Write Downs	Issue RFP's for development of affordable housing commission-owned sites.	<p>Set a goal for the number of units and sites to be developed on CDC owned land per year.</p> <p>At least 80% of the units to be developed on city owned land should be rental housing for low, very low and extremely low households.</p>	Housing Dept.	GF	By the end of 2008	Ongoing
9c. Fee Waivers and Modification	Continue to provide reduced development fess in support of affordable housing. Examine appropriateness of the \$125,000 cap on affordable housing fee reductions.	<p>Establish an affordable housing schedule for Department of Water and Power fees. No cap should be imposed.</p> <p>Eliminate the \$125,000 cap on the Department of Planning and Development's affordable housing fee reductions.</p> <p>Provide at least the same fee reductions as provided historic properties.</p>	Departments of Planning and Development and Water and Power	GF	<p>April, 2009</p> <p>April 2009</p> <p>April 2009</p>	Ongoing
10a. Green Building Design	Provide outreach and education to developers, contractors, architects, and business owners to provide information on how to incorporate sustainability in project design.	To the extent that building green involved unfunded or increased costs on affordable housing, the City should work with developers to cover costs.	Dept. of Planning and Development Building Division	GF	By December, 2009	Ongoing
10b. Design Review	Continue to implement design review to ensure maintenance of Pasadena's architectural character, quality of the built environment	Amend project objective to include specific action steps to inform developers of the consolidated design review process	Dept of Planning and Development Building Division	GF	April 2009	Ongoing
10c. Garden Standards	Implement City of Garden standards as a tool to enhance the quality and compatibility of multiple family housing developments.	<p>Make available the consultant's review of the impact of ordinance on the production and preservation of affordable housing.</p> <p>Reduce the garden requirements to 20% of coverage, as compare with approximately 32%</p>	Dept. of Planning and Development Planning Division	GF	<p>September 2008</p> <p>September 2009</p>	Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
11a. Homebuyer Education and Counseling	Provide homebuyer education and foreclosure counseling to 200 prospective homebuyers on an annual basis.		PNHS	HOME; RDA		Ongoing
11b. Homeownership Opportunities	Continue implementation and consider program modifications make the program more flexible to market conditions. Serve up to four households annually.	Implement the Family Self Sufficiency program , so that Section 8 recipients may use their rent subsidy to purchase dwellings. Serve up to four households annually.	Housing Dept	IHTF; RDA; HOME; State	January 2009	Ongoing
11c. Mortgage Credit Certificate	Continue to advertise the MCC Program in conjunction with homebuyer education and assistance programs, and maintain a current listing of participating lenders.		County of Los Angeles	MCC		Ongoing
11d. Limited Equity Cooperatives	Invite outside experts to present educational information to Housing staff and City Council on limited equity cooperatives model. Utilize limited equity co-ops as a tool to facilitate affordable homeownership.	Invite outside experts to present educational information to the public, Housing staff and City Council on limited equity cooperatives model. Utilize limited equity co-ops as a tool to facilitate affordable homeownership..	Housing Dept.	GF	April 2009	Ongoing
12a. Housing Choice Voucher	Continue to assist 1,330 households.	Determine the number of returned subsidies and assess reasons recipients are unable to utilize the Housing Choice, Shelter + Care and other rent subsidies. Do more education to encourage more landlords to participate. Advocate on the federal level for the creation of additional subsidies	Housing Dept.	Section 8	September 2009 As appropriate	Ongoing
12b. Home Tenant-Based Rental Assistance	Assist up to 90 households during the planning period.	Educate housing providers on availability of program. Advocate with HUD to extend the subsidy period. As the subsidy period nears, give HOME subsidy recipients priority for Section 8 assistance.	Housing Dept.	HOME		Ongoing
12c. Emergency Rental Assistance Deposit	Assist 300 households	Assist 1,000 households.	Housing Dept.	HOME; IHTF; RDA	January 2009	Ongoing
13a. Collaborative Partnerships	Continue to work with and seek additional partners to achieve City housing goals.		Housing Dept.	GF		Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
13b. Pasadena Housing Nonprofit	Conduct an evaluation of establishment of a Pasadena Housing Development Corporation, including administrative structure, funding, and options for program oversight. Present findings to City Council along with staff recommendations.		Housing Dept.	GF	April 2009	Ongoing
13c. Funding Program	Seek additional funding sources to meet City housing goals.	Develop a plan to better leverage Housing Trust funds, including the facilitation of access to tax credits and refinancing City owned properties to create additional affordable housing monies	Housing Dept.	GF	By June, 2009	Ongoing
14a. Fair Housing Services	Continue to provide fair housing services and tenant-landlord mediation.	Evaluate the effectiveness of the program, especially as the services relate to low and very low income households. Work with Neighborhood Legal Services to provide legal representation to low income tenants in subsidized housing, individuals with disabilities seeking reasonable accommodations/modifications and low income persons alleging discrimination.	Housing Dept.	CDBG	April, 2009 April 2009	Ongoing
14b. Fair Housing Outreach	Develop a Plan of Action to address fair housing for persons with disabilities.	Develop a Plan of Action to address fair housing for persons with disabilities. Develop a plan of action to ensure that low income households of color are not displaced in disproportionately high numbers.	Housing Dept. HRC Housing Dept. HRC	CDBG	April, 2009 June 2009	2009
14c. Tenant Protections	Continue to implement the Tenant Protection Ordinance.	Assess the impacts of a good cause eviction ordinance Assess the impacts of ordinance limiting rent increases to one a year	Housing Dept.	GF	June, 2009 September 2009	Ongoing
15a. Family Self Sufficiency	Provide ongoing assistance to 25 households.	Modify the plan for the re-use of the Desiderio land to allow for 3 of the Habitat units to be occupied by Family Self Sufficiency graduates, and allow them to use Section 8 for their mortgage payments. Advocate on the federal level for the creation of additional subsidies	Housing Dept.	Section 8	October 2008 As appropriate	Ongoing
15b. Shelter Plus Care	Provide ongoing assistance up to 90 households during the planning period and apply to HUD for additional shelter plus care certificates as they become available.	Advocate on the federal level for the creation of additional subsidies	Housing Dept.	S + C	As appropriate	Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
15c. Housing Opportunities for People with AIDS	Assist 35 households.	Advocate on the federal level for the creation of additional subsidies	Housing Dept.	HOPWA	As appropriate	Ongoing
16a. Homeless Prevention	Provide supplemental resources to 85 households at risk of homelessness on an annual basis through the Homelessness Prevention Program. Ensure implementation of the 10-year Strategy to End Homelessness through preparation of Annual Action Plans.	Fully fund and staff the monthly Homeless Prevention Program intervention	Housing Dept.	RDA	January, 2009	Ongoing
16b. Emergency Shelter Program	Continue program implementation.	Establish areas where providers of emergency shelters may do so as a matter of right Determine the City's need for emergency shelters	Housing Dept.	ESG; IHTF	January 2009	Ongoing
16c. Transitional and Permanent Supportive Housing	Continue program implementation.	Adopt a housing first model for housing homeless individuals. Provide 25 units/year of permanent supportive housing.	Housing Dept.	ESG; IHTF	January 2009 Commencing January 2009	Ongoing
16d. Sites for Emergency Shelter	Amend the Zoning Code to define a zone to permit emergency shelters by right in the CG district and/ or other districts and develop objective standards to facilitate, encourage, and regulate shelters.		Dept. of Planning and Development Planning Division	GF	January 2009	2009
17a. Reasonable Accommodation	Implement the Reasonable Accommodation ordinance. Periodically analyze the City's process to identify any constraints to the development, maintenance, and improvement of housing for persons with disabilities and take corrective measures.		Dept of Planning and Development Planning Division	GF	September 2009	Ongoing
17b. Universal Design/ Visitability	Evaluate the feasibility of incorporating concepts of visitability, universal design, and other accessibility requirements for new and rehabilitated housing.	Incorporate concepts of visitability, universal design, and other accessibility into requirements for new and rehabilitated housing.	Dept. of Planning and Development Building Division	GF	September 2009	2010

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
17c. Housing Accessibility Assistance	Continue to provide assistance to disabled homeowners in making accessibility improvements to their homes. Seek ways to expand the program to renters.	Provide financial and technical assistance to homeowners and renters in making accessibility improvements to their dwellings.	Dept. of Planning and Development Building Division	GF	June, 2009	Ongoing
18a. Development of Housing for Families	Evaluate establishing incentives within the Inclusionary Housing Ordinance and allocation within the Housing Opportunities Fund for large family units.	Establish incentives within programs and the allocation procedures for public funds for large family units.	Housing Dept.		September, 2009	2010
18b. Pasadena Transition Partners	Support Pasadena Transition Partners to improve access to housing and supportive services for youth emancipating from foster care and institutional living.	Support Pasadena Transition Partners to improve access to housing and supportive services for youth emancipating from foster care and institutional living. Evaluate program annually. Establish incentives within programs and the allocation procedures for public funds for emancipated youth units.	Dept. of Planning and Development Building Division	GF	September 2009	Ongoing
18c. Housing for Students	Work with educational institutions to process and approve Master Plans that are consistent with the General Plan.	Develop policies and procedures to ensure that student housing is not developed at the expense of moderate, low and very low income City residents	Dept. of Planning and Development Building Division	GF	September 2009	Ongoing
19a. Senior Housing	Continue to support the provision of senior housing in the community.	Determine the need for segregated senior housing, in comparison to senior housing integrated with family housing and in comparison to the need for family housing, in general. Set priorities accordingly.	Dept. of Planning and Development Building Division		June 2009	
19b. Life/Care Facilities	Continue to support the provision of life/care housing in the community.	Determine the need for affordable life/care housing for seniors and others. Set priorities accordingly.	Dept. of Planning and Development Building Division	GF	2010	
19c. Senior Services	Continue to support the provision of senior services in the community.	Determine the need.	Dept. of Planning and Development Building Division	GF	2010	



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identification purposes

September 8, 2008

Gary Johnston, Chair
Members of Planning Commission
Planning Commission of Pasadena
175 North Garfield Avenue
Pasadena, CA 91109

Re: Pasadena Affordable Housing Group Comments on Draft Housing Element

Honorable Planning Commissioners:

In preparation for the September 10th meeting, the Pasadena Affordable Housing Group (PAHG,) a grassroots organization of housing professionals and community members that advocate on behalf of low and no income residents of Pasadena, submit these comments. Our comments consist of this cover letter, which summarizes our major concerns, and an attachment that tracks with the Draft Element chapters, detailing our concerns.

PAHG commends the Planning and Development staff for the work done on the Draft Housing Element, as well as staff's willingness to work with PAHG and respond to our requests for documentation. The Draft Element includes programs designed to allow elders to age in place and to prevent homelessness; these new components to the Element are not required under the State standards, but greatly enhance the document. The inclusion of programs of this kind not only distinguishes Pasadena among its peers, but keeps faith with the City's Housing Vision, which states, in relevant part:

All Pasadena residents have an equal right to live in decent and safe 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 Pasadena housing vision is to maintain a socially and economically diverse community of homeowners and renters which are afforded this right.¹

¹ The City of Pasadena and Pasadena Community Development Commission shall achieve this vision by utilizing its resources to:

- a. Support and provide fair and equal housing opportunities for all persons regardless of race, age, income, disability, sexual orientation, marital status, household size, ancestry, national origin, religion, or color;
- b. Provide an adequate supply and range of housing opportunities throughout the City by assisting in the development of new housing units, preservation of the existing housing stock and being responsive to the special housing needs of certain resident populations;
- c. Reduce or mitigate the constraints (public and private) which hinder the production or preservation of housing, particularly affordable housing, for Pasadena residents;
- d. Ensure that Pasadena residents, especially those with very low to moderate incomes and special needs, are assisted in meeting their housing requirements through the provision of assistance for rental, residential rehabilitation, homeownership, housing counseling, economic/employment development and infrastructure improvements.

PAHG, however, has a number of concerns which include the following:

Lack of Accurate Updated Census Data: A major flaw in the Draft is that it is grounded primarily upon 1990 and 2000 data. The City gentrified significantly between 2000 and 2007; thereafter the sub-prime market debacle occurred. These phenomena indicate that reliance upon 1990 and 2000 data is misplaced; using the earlier data paints too rosy a picture - especially as it relates to affordable housing for low and no income Pasadena residents. City planners agree that federal census data is not and will not be refined enough for local planning purposes for some time, if ever. Because the available 1990 and 2000 federal census data are not presently adequate to meet Pasadena's local planning needs, **the City should conduct a demographic survey** that assesses local housing and housing related conditions.

General Plan Principles: Retention of lower income families has not been a priority for the City. Until the onset of the recent round of gentrification, such an emphasis was not necessary. Although circumstances have changed markedly, the Element does not acknowledge the magnitude of the havoc wrought on Pasadena's lower income residents when 2,300 low income students and their households were recently displaced. The fact that 89% of these students lived in rental housing in Northwest Pasadena and Altadena and 30% of PUSD's African American students have now been displaced is not sufficiently addressed or rectified in the planning set forth in the Draft Element.

Policies and programs that welcome and retain a diverse racial, ethnic and economic population must be fortified to address the ramifications of our City's population displacement patterns. One way to elevate the importance of Housing Element is to include affordable housing and diversity principles in the General Plan. To this end, PAHG recommends that the following principles be added to those governing the General Plan:

- Pasadena will be a city where there is affordable housing adequate to meet the needs of its residents, and
- Pasadena celebrates the racial, ethnic, cultural and income diversity of its residents.

To support these General Plan principles, the Element should recommend a shift in our fiscal and programmatic affordable housing priorities, away from a disproportionately high amount of funding of for-sale units that benefit moderate income and work force level purchasers towards the preservation and production of extremely low, very low and low income units. At this point 21,000 of Pasadena's lower income households are in need of affordable housing. This number is significantly in excess of the SCAG-established regional housing needs assessment (RHNA) goals.

However, using the modest RHNA goals as a standard, Table 2-7 reveals that Pasadena:

- Has exceeded its market rate and work force RHNA goal
- Is close to meeting its moderate income RHNA goal, and
- Is far from meeting its low and very low income RHNA goals.

Income Levels	RHNA Goal	Units Produced	Remaining RHNA	% of Compliance
Very Low	711	103	608	14.5%
Low	452	118	334	26%
Moderate	491	396	95	81%
Market	1,215	3,734	-2,519	307%
Total	2,869	4,361		

Public Input on Affordable Housing Funding and Other Decisions: The General Plan’s seventh guiding principle states that “community participation will be a permanent part of achieving a greater city.” Community participation in significant City affordable housing decision making is discouraged. Some examples of affordable housing decision making with little or no public input are set forth below:

- Unlike in other areas of public funding decision making, City Council goes into closed session to discuss affordable housing project deal points, where the Council members also give instructions to staff. These deal points are not shared with the public. The agreements are then privately negotiated between staff and the developer; copies of the agreements are never shared with the public. Thus, affordable housing public funds are routinely expended without public input or review.
- The City has at least two ways to fund affordable housing projects - one through the Housing Division/Department where there have been funding caps and other guidelines established - and another through the Planning and Development Department where there do not appear to be any established caps or guidelines. These competing funding mechanisms have resulted in a disproportionate amount of funding being funneled to certain for-sale projects serving moderate and work force level, while rental projects of similar size designed to serve low and no income households receive considerably less funding. Because there are no publicly approved funding guidelines and the deals are negotiated and executed behind closed doors, there is no public recourse to promote the interests of the City’s most needy residents, who are at extreme risk of displacement.
- In the course of the Housing Element preparation process, the planning staff held a number of workshops. At each of these workshops, there was overwhelming support expressed for the City adopting a rent control and/or just cause eviction ordinance. The Planning and Development staff, acting as gatekeepers, decided that, despite that, despite the overwhelming public support expressed, the Draft Element would neither discuss nor recommend rent control as an affordable housing preservation strategy. Many affordable housing activists refused to participate in the workshop process because they did not believe their input would be heard or valued.

In order for there to be appropriate public input and monitoring of the City’s affordable housing policies, implementation and funding of projects, Council, Commission and staff actions must be performed with greater transparency.

Barriers to Affordable Housing: PAHG supports the preservation of the City’s unique historic beauty. However, the current guidelines unreasonably frustrate the development of affordable housing. For example, the development standards for second units in single family areas are designed to frustrate the development of this type of affordable housing. Since the adoption of the City’s Second Unit Ordinance

in 2003, only two families have built second units. While the Draft calls for a reconsideration of the development criteria, it does not recommend a reconsideration of the prohibition against building second units in landmark districts. The attachment to this letter sets forth more specific recommendations to eliminate these and other land use barriers to affordable housing.

Housing Element as the City's Seminal Planning Document, with Specific Goals and Timelines: It is disturbing that Planning Department does not view the Element as the City's primary housing planning document, but rather something produced primarily to appease State lawmakers. The Element should represent the community's articulation of innovative, sensible, and cohesive housing policies, which City Council and its staff is charged with implementing. The planning staff admitted to viewing the Element as a historic, rather than a future planning, document. The document contains very few hard and fast timelines. The Housing Element should be treated, and actually function, as the City's seminal planning document. The Housing staff did not participate in the public workshops; the absence of Housing staff raises questions about how much ownership of this document among Housing staff.

Overall Goals and Overarching Housing Policy: In light of the City's housing vision, PAHG recommends the City set the following housing goals:

- At least 15% of the City's entire housing stock, including its existing units, will be affordable, giving priority to those units where the City failed to meet even its RHNA goals
- Establish a policy of preserving existing units occupied by moderate, low, very low and extremely low households or arranging for the 1-for-1 replacement of such units.
- Spend no more than 10% of its discretionary housing funds on for-sale units.

These goals benefit our community and are attainable. Other cities, such as Irvine, CA, have set similar goals. Europe has dealt with its affordable housing issues without stigmatizing lower income families. In order for Pasadena to remain a cutting edge, a world class green city, with housing sufficient housing close to work for all income levels represented among our populace, we must adopt overarching housing policies designed to meet the challenges of an ever widening income divide among our residents.

PAHG deeply appreciates your attention to our recommendations and thank you for your dedicated service to our great City of Pasadena.

Respectfully submitted,

Pasadena Affordable Housing Group

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Attachment

The following questions/concerns are raised by the various chapters of the Draft Housing Element narrative:

Chapter 1: Involving Our Community

The first chapter of the Housing Element sets forth the work that has been undertaken by many committee and commission meetings and workshops related to affordable housing. Implicit in this section is the assumption that City Council has acted upon and adopted the majority of the recommendations of these bodies. In truth, although the Housing Affordability Task Force met for almost a year in 2002 and produced weighty recommendations, the Council has yet to calendar the most of all the Task Force's recommendations. The Agenda for Action first called for the City to develop a common vision of what the City should look like in 2025, by engaging in a process similar to that undertaken in conjunction with the adoption of the 1994 General Plan. Like the Affordability Task Force recommendations, the Agenda for Action basic recommendation was ignored.

Pasadena residents who rent should be treated with the same deference as homeowners; renters should receive all the notices that are routinely sent to homeowners. In addition, there are some issues that are citywide in scope, such as the disposition of the Desiderio and St. Luke properties. In those instances, notice should be to all residents.

Page 1-4: The community has not been informed of the recommendations of the 2007 Workforce Housing Task Force.

Page 1-7: The General Plan vision does not include anything related to affordable housing or retaining the economic, racial and ethnic diversity of the City. *The City General Plan should include the following principles:*

Pasadena will be a city where there is affordable housing adequate to meet the needs of its residents.

Pasadena promotes the racial, ethnic, cultural and income diversity of its residents.

Chapter 2: Housing Needs

A. Page 2-1, et seq.: Reliance Upon Outdated Data

The Housing Element is based on outdated data. The 1990 and 2000 census data reflect a better economic picture for low and moderate income households than the subsequent era. The gentrification of the City has resulted in significant rent raises and overcrowding and ultimate displacement. On all fronts, there has been an intensification of affordable housing needs among moderate, low, very low and extremely low income Pasadena residents.

Pasadena Unified School District (PUSD) has documented the loss of 2,300 low income students, 89% of whom resided in Northwest Pasadena and Altadena rental units. More than 30% of the African American students were displaced. The Latino parental education group APPLE further documented that the overwhelming majority of the families migrating out of Pasadena did so because of

a shortage of affordable housing. Students emigrating out of the District took with them the ADA—Average Daily Attendance (how the district is funded) causing PUSD serious financial losses.

Coupled with the crisis of affordability that is grounded in the City's galloping gentrification are the impacts of the subprime debacle. The subprime financial ramifications are still unfolding. We are not expected to hit bottom for at least two years, but housing financing is already negatively impacted. In addition, foreclosed upon homeowners are/will be competing with lower income households for rental units, thereby driving up the rental rates still further. Because Pasadena does not have any rent stabilization protections, rents can be increased 9% per month on the basis of a 30-day notice and 10%+ on the basis of the 60-day notice.

B. Page 2-7: "Work Force" Housing The term "work force" housing is used throughout the document, but not defined. Many reviewers were under the impression that "work force" housing referred to units affordable to janitors and other work-a-day residents. In truth, it refers to households making 121% to 180% of the area median. The 2006 adjusted median income for a Pasadena married couple was \$87,000/year. A "work force" level married couple makes between \$105,270/year and \$156,600/year. In comparison, Affordable Housing Services' households of four are more likely to make between \$18,000/year and \$20,000/year.

In truth, the term is but another name for market rate housing. In fact, in certain parts of the City, "work force" housing is more expensive than market rate housing. The nomenclature is, at a minimum, misleading.

C. Page 2-3, et. seq.: Fair Housing Ramifications of Data. The City is a recipient of federal housing and community development funds, and, as such, is charged with affirmatively furthering the housing choices of racial and ethnic minorities, persons with disabilities, families with children and others specially identified under the federal fair housing laws. At a minimum, this means that the City is required to analyze the ramifications of its programs and policies by race, national origin, families with children and other relevant criteria. The Housing Element provides only the most rudimentary racial and large family data, and no relevant analyses.

In addition, there should be set forth in the Housing Element relevant discussion of the findings made in the City's Impediments to Fair Housing Choice. It provides none of these findings and documentation. For example, it notes a continuing decline in African Americans, with increases in White, Latino and Asian populations. It cannot be discerned from the document whether the decreasing African American population has demographics similar to those who are increasing. The reasons for the differences among groups in housing retention within the City are not set forth, nor are any programs designed to address these racial disparities.

D. Housing Type While the Element identifies housing types that are occupied by middle and upper income households, it does not identify the kind and number of housing units that are typically utilized by low and no income Pasadena households, *i.e.*, single room occupancy, group homes, congregate housing and board and care dwellings. Without such comparative data, the public is without the ability to monitor the City's efforts to produce affordable housing for its lower income households.

Table 2-7 should set forth the comparative 2000 and 2008 data for the above referenced categories, especially since the City is so far from meeting its Regional Housing Needs Assessment (RHNA) goals for extremely low, very low and low income households. According Table 4-9, Pasadena has exceeded its fair share of market rate and luxury housing, *i.e.*, the housing types set forth in Table 2-7, by 2,519

units. On the other hand, none of the modest lower income RHNA goals have been met. The City's status with regard to RHNA compliance is as follows:

<u>Income Levels</u>	<u>RHNA Goal</u>	<u>Units Produced</u>	<u>Remaining RHNA</u>	<u>% of Compliance</u>
Very Low	711	103	608	14.5%
Low	452	118	334	26%
Moderate	491	396	95	81%
Market	<u>1,215</u>	<u>3,734</u>	<u>-2,519</u>	<u>307%</u>
Total	2,869	4,361		

Of course, the RHNA numbers, which are produced by regional planners, do not recount the complete Pasadena story; these numbers constitute the floor, not the ceiling, of the City's affordable housing need. Planners looking specifically at the City's needs documented that there are 21,000 lower income families in need of affordable housing, *i.e.*, paying too much for their housing, living in overcrowded or substandard conditions. Table 4-9 should detail the needs of the 21,000 households in need of affordable housing, not just the RHNA goals.

D. Page 2-9: Tenure The Housing Element notes that, according to the 2000 census, 54% of the City are renters. Many of the units 4,361 units produced since 2006 are occupied by renters, so the majority margin of renters may have increased substantially. The City traditionally only sends its land use and other Planning Department notices to homeowners, and not to renters. The failure to forward notices to renters results in homeowners having a disproportionately significant role in municipal decision making. The Housing Element should analyze the impact of the preferences awarded homeowners over renters that is played out in this and other ways.

E. Page 2-9: Vacancy The United States Postal Service reports that Pasadena had a 2008 overall vacancy rate of 1.3%. It would helpful for the Element to identify what the vacancy rate is in Pasadena's affordable housing.

F. Page 3-3: Homeownership Prices (Page 2-11) and Development Costs. The housing market has changed. It is no longer "normal" for buyers to put 5% down; financial institutions are more typically requiring a 20% down payment. This increase in required down payments is playing havoc with the City's for-sale assistance/silent second programs. The Housing Affordability Task Force (HATF) reached the conclusion that it was inappropriate for the city to spend more than 10% of its discretionary housing funds on for-sale units. This recommendation has never been calendared for discussion in either the EDTech Committee or Council. The Element should set forth:

- The bases for the HATF recommendation in this regard
- The failure of the Council to deliberate the issues involved
- The comparative for-sale/rental subsidies
- The leveraging ramifications of the City's subsidies
- The fair housing ramifications of the City's subsidy decisions.

The recently imposed requirement by conventional financial institutions that buyers put down 20% instead of 5% has negatively impacted the City's silent second and buyer assistance programs. These impacts should be outlined in the Element. If this or other responses to the subprime meltdown have

resulted in the City providing or planning to provide additional funding for for-sale units, these ramifications should be set forth in the Element.

G. Lack of Comparative Data

The Draft is most helpful in providing the public with updated, comparative statistical and other information to be used in setting housing priorities. For example, knowing that portions of Pasadena’s population are experiencing housing overpayment problems is relevant. More important for priority and policy setting purposes, is a description of the segments of the City’s population who are most hard hit by the phenomenon of moderate and severe overpayments. Table 2-6 should provide data broken down by race, family size, persons with disabilities, etc.

Overpayments impact a household’s ability to meet emergencies, but also its ability to buy food, clothing and other daily necessities. Because of such overpayments, the City’s food banks are experiencing record demands on their stocks.

Similarly, the overcrowding and other data ramifications should be broken down by race, age, family size, etc. of households affected.

Chapter 3: Housing Constraints

There are additional constraints that should be addressed in Chapter 3. These additional constraints include the following:

- Page 3-5: Home Mortgage Disclosure Act. No analysis of the racial and income implications discernible from this data. These analyses should be set forth to assist in policy and priority setting.

- Page 3-6 and 3-7: Inclusionary Housing Ordinance.

The City initially set an in lieu fee that is conspicuously low; only recently has the fee been set at 100% of the affordability gap - as compared with the cost of constructing a comparable unit. The fee is still too low to compensate for the developer’s failure to build units; if it is retained, it should be increased to an amount that would cover the cost of building units.

The City Attorney has said that an in lieu fee is not required, yet the Council has not eliminated the fee as an option, thereby requiring developers too either build on-site, build off-site or donate land - all of which are designed too more quickly facilitate the production of affordable units. The Element should discuss the implications of both retaining and eliminating the fee.

The fee varies according to where the housing is to be built. Building in Northwest Pasadena (NWP) is encouraged because the fee is so low for that area and once the fee is paid, none of the other options need be exercised. Until recently, NWP was home to 64% of the City’s affordable housing. This percentage has dropped, in part because there is no requirement that developers building in NWP avoid displacement of low and very low income households. The Housing Element should detail the reasons for the displacement of NWP area 2,300 low income students and role that the operation of the Inclusionary Housing ordinance played.

Although the City has made a number of modifications to the ordinance, it has yet to require percentages of housing required for “very low “or “extremely low” income groups - the very groups that are being largely displaced out of Pasadena and those whose RHNA goals the City is furthest from achieving. The Element should examine the impacts of requiring such set asides, especially in combination with discontinuing the payment of in lieu fees.

- Page 3-9: Specific Plan. Although there is a statement that the General Plan precludes an affordable housing cap in Specific Plan areas, it should be noted that there is such a cap included in the Fair Oaks/Orange Grove Specific plan. This cap is at variance with the General Plan and should be lifted.
- Page 3-12: Second-Unit Ordinance.
 This discussion does not detail the fair housing implications of the ordinance's various components, especially the 15,000 s/f lot size or the requirement for a two-car garage. The fair housing ramifications should be set forth.
 Also, not included in the description is the prohibition against issuing permits for new second units in historic districts. The City should reconsider this prohibition along with other aspects of the ordinance.
- Page 3-13 to 3-16: Special Needs Housing. Under SB 2, the City must designate an area where shelters may be established as a matter of right. According to the implementation strategy, the necessary re-zoning will not go into effect until 2009 - 3 years after SB 2 was adopted. In the interim since 2006, a number of agencies have been frustrated in their attempts to establish shelters.
- Pages 3-13 and 3-14: Housing for persons with disabilities.
 There is no discussion of universal design. If the City requires universal design features (*i.e.*, doors at least 36" wide, accessible electrical outlets and switches, accessible bathrooms, etc.) in new construction and units that are substantially rehabilitated, wheel chair users will, at a minimum, be able to visit the first floors of units. Such changes in design standards would represent little or no cost to owners/developers.
 At least 5% of each component of the City's affordable housing programs is supposed to be wheel chair accessible. The Housing Element does not address whether the City is in compliance with this standard. This information should be made available, so that priorities can be set.
- Page 3-16 Single Room Occupancies (SROs).
 Centennial Place does not enjoy a good reputation as a housing provider. Many homeless individuals concerned with maintaining their sobriety will not agree to live there. On site supportive services were previously available; it is our belief that these services are no longer available. If there are, in fact, supportive services available, they need to be increased substantially to address the many concerns that have been raised about the facility. The Draft should acknowledge the need to assist the tenants in securing supportive services.
 It would be helpful to have a listing of the locations and characteristics of the other SRO projects underway and their affordability levels.
- Page 3-18: Parking Standards. The parking constraints recently imposed by Council are not addressed, *i.e.*, routinely requiring two full-sized, covered parking spaces for units larger than 650 s/f. Previously, developers had the option of providing tandem or compact-sized parking. Now, in order to deviate from the full-sized parking space requirement, an affordable housing developer must use one of its regulatory concessions. This full-sized parking space requirement impedes the development of affordable housing and antithetical with encouraging smaller, more energy efficient vehicles.

- Page 3-19: City of Gardens. The City contracted with an expert to review the efficacy of the City of Garden requirements. The Element should outline the recommendations made and whether they were implemented.
- Pages 3-21 and 3-22: Historic Preservation.
The Draft does not set forth the increased difficulty that a historic designation causes affordable housing development. The Element should analyze those difficulties and explore solutions designed to balance the historic preservation and affordable housing interests.
This section also does not deal with the fact that permit and other fee schedules for historic preservation and affordable housing projects are different; historic preservation is favored significantly over affordable housing, for example, a \$125,000 cap on the Planning Department fee reductions that an affordable housing project may receive. It is believed that there is no corresponding cap on fee reductions that apply to historic dwellings.
- Page 3-24-3-25: Accessibility. There is no discussion of the impediments to providing affordable housing for persons with disabilities created by City's Group Home Ordinance. Despite a State Attorney General opinion stating that municipalities may not require spatial separations between group homes, the City adopted such an ordinance. The Element should, at a minimum, set forth why this Attorney General opinion is inapplicable.
- Pages 3-29 to 3-31: Development Fee and Tax Constraints.
The Draft does not address the Department of Water and Power (DWP) fees and costly requirements. Although DWP is a City department, it does not reduce any of its fees to facilitate the development of affordable housing.
In addition to the failure of DWP to develop an affordable housing fee schedule, it should be noted that some its new construction and rehabilitation requirements are more costly than typical of other jurisdictions. For example, the DWP requires a subterranean vault and electric transformer if the needs of the complex require 200 amps or more. Other jurisdictions do not require such an upgrade until the complex reaches the 400 amp threshold.
Affordable housing developers wind up assuming City loans so that they can pay City fees. The Element should address the existing constraints and analyze the ramifications of reducing or eliminating DWP fees for affordable housing complexes and otherwise address the appropriateness of the DWP requirements, in the same manner that the City of Gardens ordinance was reviewed.

Chapter 4: Housing Resources

No Expenditure of Pasadena General Funds to Produce Affordable Housing

- Pasadena does not invest any of its general funds in affordable housing for its residents. It depends entirely upon the largess of the federal and state coffers to fund and otherwise subsidize dwellings and amenities for lower income households. The City does not utilize any of the construction tax revenues for affordable housing.
- Conversely, the City diverts a minimum of \$9 million/year Old Pasadena and Downtown redevelopment funds that would normally go into affordable housing to meet general fund obligations, *i.e.*, City contributions to police and fire fighter pensions. In addition, the Council obligated \$28 million of City general funds to provide parking for the Paseo Colorado luxury

condominiums. There was not one affordable housing unit produced in exchange for the \$28 million obligation.

- Given the level of gentrification in the City, the Draft should recommend the development of a continuously renewing \$25 million Trust Fund, utilizing City general funds to augment available federal and state funding.
- The Draft does not deal with this year's diminution of state and federal funds, and the likelihood that affordable housing funding may not be available in significant amounts for at least another year - given the wars being waged and the state of California's economy.
- The Draft also does not address the ramifications of State's failure to set aside General Funds to subsidize affordable housing.

Comparative Spending on Rental Housing for Lower Income Households and For-Sale Housing for Moderate and Work Force Housing

According to the authors of the Draft, Pasadena has 21,000 households in need of affordable housing. They did not specify how many units are necessary to accommodate these 21,000 households, but it is clear that the number will exceed those units identified under the RHNA formula. RHNA's modest lower income goals for the City have not been met, *i.e.*, only 14.5% of its very low income, 26% of the low and 81% of the moderate income goals has been achieved. Typically, low and very low income households cannot afford to purchase housing. Subsidized rental housing is generally provided for low and very low income households. Pasadena has been providing a disproportionate high amount of its scarce affordable housing funds to subsidize for-sale units. The Element should detail:

- How much local, state and federal public funding have been utilized to subsidize for-sale housing
- The number and size of housing units produced or in the process of being produced
- The number, size and income level of the households subsidized
- The amount of subsidy per unit broken down by rental and sales units.

Only with information of this type can public policy be developed and its implementation monitored.

Chapter 5: Program Evaluation

- Pages 5-13 and 5-14: Condominium Conversions. The proposed modifications reflect the staff's perspectives (which were twice rejected by the Planning Commission and by the City Council when a moratorium). It fails to set forth the recommendations supported by a majority of the Condominium Conversion Task Force.

The evaluation also does not evaluate the impact of the City approving the conversion of subsidized rental units to condominium units. These units were to remain affordable rental units for at least 55 years. Instead, Housing Division officials waived this requirement and allowed the developer to convert the units designed for low-income households to be sold to moderate and work force income buyers.

This conversion was completed without appropriate notice to the public, especially affordable housing advocates and renters generally. The first time most advocates became aware

of this City practice was when the Task Force reviewed condominium conversions generally. A City supported convention of subsidized rental units that are covenanted for 55-years is a major deviation from policy that should have been debated in a public forum.

- Page 5-18 and 5-19 Rental Assistance.

Development of housing for low and no income households is complicated by the fact that Section 8 rent subsidies cannot be used in conjunction with HOME financing. This prohibition should be listed as a constraint.

Some Housing Choice voucher holders have returned their vouchers because they have not been able to find housing. Thus, notwithstanding the fact that there is a 98.4% lease up rate, it is important that the Draft detail how many vouchers were returned unutilized, so that the lease up rate is put into context. In addition, it is important that the Draft reveal where the vouchers are being utilized, to determine whether there is an over-concentration in a certain area. Finally, for a period exception rents were disallowed. The Element should detail how long a period this disallowance was in effect and the ramifications of same.

Chapter 6: Community Initiatives

- Page 6-2: 2007 Work Force Housing Task Force Advocates are unaware of the activities of this Task Force. (It would be helpful to have a copy of their report/recommendations.)
- Page 6-3: RHNA numbers are used when referring to the affordable housing unmet need. The City's "unmet need" should depict the units needed to house the 21,000 households in need of affordable housing.
- Table 6-1: Lists the programs that were purportedly suggested in the course of the community workshops. At each of these public workshops, the public recommended the City protect its low income households by adopting a rent control ordinance. Nowhere is this protection discussed or evaluated. It appears that the staff has acted as gatekeepers in deciding which public recommendations would and would not be included. All the recommended initiatives should be listed and evaluated.
- Page 6-3: Joint Powers recommendation is described and assessed. The assessment suggests that Planning routinely expedites affordable housing projects and normally assigns case managers to these projects. It is our understanding that affordable housing projects are not expedited unless the Housing Division/Department requests same. In addition, we are not aware of any case managers having been assigned to affordable housing projects. Documentation is requested to support these statements. If such programs are truly in effect for all affordable housing projects, additional information should be distributed to both developers and advocates on these programs. It is, however, our understanding that such case managers are assigned to large projects.

Page 6-11: Housing Division/Department Funding Application. The application exists primarily as a paper requirement. Although the documentation outlined in the application is eventually produced, it is not required that all of it be produced before the application is reviewed and processed. In addition, there are at least two ways for developers to secure Housing Trust funds. One is through the Housing Division/Department; another is through the Planning and

Development Department. The rules that apply to Housing (such as a cap of subsidizing no more than \$150,000/rental unit) do not apply to the Planning Department. There should not be different rules depending upon which department is processing an application for funding. The Draft assesses the differences between the Housing and Planning deals, setting forth:

1. Whether the units are for-sale and rental
2. The number, type and affordability level(s) of the units
3. The amount and type(s) of funding provided
4. The amount of leveraging in the project

- Page 6-11 Fee Waivers for affordable units.

This assessment section discusses proposed waives as if “work force” housing is “affordable” housing. This is incorrect. In fact, “work force” housing is market rate housing in most sectors of the City and higher than market rate housing in certain areas, such as Northwest Pasadena.

There are no waivers available through the Department of Water and Power. A schedule should be developed and the \$125,000 reduction cap should be eliminated.

Affordable housing projects should be allowed the same fee waivers as historic dwellings.

- Page 6-12, Social diversity. The City’s ability to meet its obligations to affirmatively further housing choices should be assessed.

Chapter 7

For your convenience, PAHG has set forth its recommendations in chart form, along side the Planning staff proposals are PAHG recommendations in column three and PAHG recommended timeframes are set forth in column five.

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
1a. Citywide Code Enforcement	Continue program implementation	Reform the code enforcement process so that it not solely or primarily individual complaint driven. Ensure that code enforcement is not used to or has the effect of unfairly displacing or targeting low-income households. Set up an appropriate evaluation of the program.	Dept of Planning and BNR Division	CDBG; GF	By the end of 2009	Ongoing
1b. Emergency Enforcement	Continue program		City Prosecutor	CDBG; GF		Ongoing
1c. Neighborhood Revitalization	Continue program	The Draft states that the City solicits public support by organizing projects, securing volunteers, conducting neighbor-hood outreach. This was true in the past, but needs to happen again.	Dept of Planning and BNR Division	CDBG; GF		Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
2a. Neighborhood Impact	Provide assistance to 25 households; continue to program parameters to use and address housing.	Conduct a housing conditions survey, link the program's marketing efforts with NRP Program and evaluate recent marketing efforts	Pasadena Neighborhood Housing Services	CDBG	By September 2009	Ongoing
2b. Rebuilding Together Pasadena	Provide assistance to 12 households annually under Rebuilding Together.	Evaluate the program and increase funding if needed	Rebuilding Together Pasadena	CDBG; HOME		Ongoing
2c. Neighborhood Organizations	Continue program implementation	Change the standards for the recognition of neighborhood associations; only those groups whose decision making structures reflect the racial and socio-economics of their service areas should be recognized.	Human Services and Recreation Dept.	GF	By the end of 2009	Ongoing
3a. Occupancy Inspection	Continue program		Dept. of Planning and Development and BNR Division	GF		Ongoing
3b. Quadrennial Inspection	Continue program		Dept of Planning and Development and BNR Division	GF		Ongoing
3c. Lead-based Paint Hazards	Train code compliance and inspectors to identify hazards. Conduct community and outreach on lead hazards and prevention.		Public Health Dept.	GF		Ongoing
4a. Maintenance Assistance to Homeowners	Provide assistance to 20 households on an annual basis.	Improve path by which trainees become employed within a timely manner. Design method of trainee and employee participant evaluations.	Dept. of Planning and Development BNR Division	CDBG	By the end of 2009	Ongoing
4b. Multi-family Rental Rehabilitation	Evaluate modifications to enhance utilization.	Loan public funds with the requirement that affordability must be in perpetuity. Work with HUD to eliminate the prohibition against the use of Section 8 funds in HOME financed units.	Housing Dept.	HOME; State		End of 2009
4c. Multi-family Acquisition and Rehabilitation	Establish program guidelines for an acquisition/rehabilitation program, and specific goals and work plan for the first two years.	Develop a vision for what the City should look like in 2015. Loan public money with the requirement that rental affordability is in perpetuity. Amend program objective to ensure establishment of project parameters, defining the process, and identification of a dedicated funding stream.	Housing Dept. and City Council	IHTF; RDA; State; Federal	By June 2009	End of 2009

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
5a. Historic Preservation	Implement the Historic Preservation Ordinance.	Allow for Second Units in Landmark Districts. Amend program to include: (1) study the impacts of historic preservation on the stock of affordable housing. (2) ameliorate or eliminate any constraints on affordable housing and (3) balance historic and affordable housing needs.	Dept. of Planning and Development Planning Division	GF	Re-evaluation of the Second Units on Historic Properties by June, 2009. Complete study of impacts on affordable housing by end of 2009.	Ongoing
5b. Historic Preservation Incentives	Advertise available incentives for historic preservation and assist property owners in determining incentives for their properties.	Evaluate how historic preservation may function as a barrier to affordable housing.	Dept. of Planning and Development Planning Division	GF	By end of 2009	Ongoing
5c. Historic Home Rehabilitation	Continue Program	Produce documentation on the nature and benefits of program	Dept. of Planning and Development Planning Division	CDBG; GF	End of September 2008	Ongoing
6a. Preservation of At-Risk Housing	Contact property owners of at-risk projects to initiate preservation discussions. Based on outcome, 1) Provide preservation incentives; 2) Work with priority purchasers; 3) Provide technical assistance; 4) education to affected tenants; 5) Provide financial assistance	Revisit Rent Control as a method to preserve affordable housing. Establish a program objective of preserving all 800 affordable units at risk of conversion. Establish a goal that at least 15% of all of the city's housing stock, including its existing units, will be affordable. Establish the policy of preserving or arranging for a 1-for-1 replacement of units now housing low, very low and extremely low residents.	Housing Dept. and City Council	IHTF; RDA; State; Federal	By the end of 2009 By April 2009 By September 2009 By the end of 2009	Ongoing
6b. Condominium Conversions	Provide tenant protections through implementation of the City's current Condominium Conversion Ordinance. Provide City Council with the Task Force analysis of models to link affordability requirements to condominium conversions, and prepare ordinance revisions as directed.	Allow condo conversions only if one-third of the tenants in the complex qualify to stay. Adopt the recommendations that the majority of the Condo Conversion Task Force supports.	Housing Dept.	GF	By end of 2008	End of 2008
7a. Land Use Element and Sites	Continue to provide appropriate land use designations consistent with regional housing needs for mixed use and infill development near transit and other amenities. Maintain an inventory of potential sites to provide to developers in conjunction with information on development incentives for affordable units.	Have a team visit the sites to make sure they are appropriate. Ensure that the land use and open space elements, which will be developed in late 2008/2009, are consistent with the goal of preserving and producing at least 15% of the City's housing stock as affordable	Dept. of Planning and Development Planning Division	GF	By Oct. 2008 By Oct. 2008	Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
7b. Housing Diversity	Continue to facilitate and encourage the broadest range of housing types.	Explore Community Land Trust and co-op housing as additional housing opportunities. Until the RHNA goals are met, give funding priority to facilitating housing for extremely low, very low and low income housing.	Dept. of Planning and Development Planning Division	GF	By end of 2010	Ongoing
7c. Second Units	Review the City's second-unit standards, and evaluate changes to the ordinance to better facilitate second units in the context of maintaining neighborhood quality.	Use the same incentives as is provided for historic preservation (p. 7-13). Reduce the lot size from 15,000 to 5,000 s.f. if a unit is created within the foot print of the home; reduced to 6,500 if the unit is attached to the home and if detached at 10,000 or above	Dept. of Planning and Development Planning Division	GF	By June, 2009	Ongoing
8a. Inclusionary Housing	Continue to monitor the effectiveness of the Inclusionary Ordinance and expenditure of Inclusionary Housing Trust Funds, including preparation of an Annual Performance Assessment. By 2009, study modifications to the inclusionary program in light of the City's housing needs and market dynamics.	Eliminate the in-lieu fee and require that units will be built on or off site, or that developers provide a land donation. . . Increase the percentage to 30% along transportation corridors and at least 20% elsewhere. Until the City's RHNA goals are met, developers of rental housing should aside 10% for very low income households and 10% for low income households.	Housing Dept.	IITF; GF	By the end of 2009	
8b. Density Bonus Ordinance	Continue program implementation	Amend language to include quantified objectives of number of projects using the Density Bonus over the planning period and more specific steps by which to publicize the incentives available under this program to developers	Dept. of Planning and Development, Planning Division	GF	By the end of 2008	Ongoing
8c. Parking Incentives for Housing	Continue program implementation	Eliminate the requirement that affordable housing developers provide two full sized spaces. Allow affordable housing developers the option of providing compact or tandem parking without having to exercise a waiver. Reduce the parking spaces required for second units.	Dept. of Planning and Development, Planning Division	GF	By the end of 2008	Ongoing
8d. Consolidated Affordable Housing Review	Assess the development review process for affordable housing projects	Provide a consolidated affordable housing review	Housing Dept.	GF	By June 2009	By 2010
9a. Housing Opportunity Fund	Continue to provide financial support for affordable housing through the Housing Opportunities Fund. Develop an Affordable Housing Strategy to guide expenditure of funds consistent with Pasadena's housing needs.	Develop a Housing Trust that has \$25 million annually available, utilizing City general funds if necessary. Discontinue the diversion of Downtown Redevelopment affordable housing funds to pay for City employee pensions. Provide for transparency and public input on the use of these	Housing Dept.	GF	By the end of 2010 By June 30, 2009 By September, 2008	By 2010

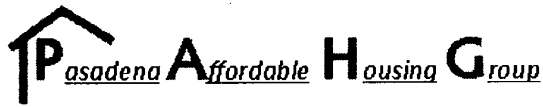
		<p>public affordable housing monies.</p> <p>Establish the funding of extremely low .very low and low income housing as priorities for public funds at least until the RHNA goals are met.</p> <p>Acknowledge that Pasadena's need for affordable housing is larger the identified RNHA goals, i.e. that there are 21,000 Pasadena households currently in need of affordable housing.</p>			<p>By January, 2009</p> <p>September, 2008</p>	
9b. Land Assemblage/ Write Downs	Issue RFP's for development of affordable housing commission-owned sites.	<p>Set a goal for the number of units and sites to be developed on CDC owned land per year.</p> <p>At least 80% of the units to be developed on city owned land should be rental housing for low, very low and extremely low households.</p>	Housing Dept.	GF	By the end of 2008	Ongoing
9c. Fee Waivers and Modification	Continue to provide reduced development fess in support of affordable housing. Examine appropriateness of the \$125,000 cap on affordable housing fee reductions.	<p>Establish an affordable housing schedule for Department of Water and Power fees. No cap should be imposed.</p> <p>Eliminate the \$125,000 cap on the Department of Planning and Development's affordable housing fee reductions.</p> <p>Provide at least the same fee reductions as provided historic properties.</p>	Departments of Planning and Development and Water and Power	GF	<p>April, 2009</p> <p>April 2009</p> <p>April 2009</p>	Ongoing
10a. Green Building Design	Provide outreach and education to developers, contractors, architects, and business owners to provide information on how to incorporate sustainability in project design.	To the extent that building green involved unfunded or increased costs on affordable housing, the City should work with developers to cover costs.	Dept. of Planning and Development Building Division	GF	By December, 2009	Ongoing
10b. Design Review	Continue to implement design review to ensure maintenance of Pasadena's architectural character, quality of the built environment	Amend project objective to include specific action steps to inform developers of the consolidated design review process	Dept of Planning and Development Building Division	GF	April 2009	Ongoing
10c. Garden Standards	Implement City of Garden standards as a tool to enhance the quality and compatibility of multiple family housing developments.	<p>Make available the consultant's review of the impact of ordinance on the production and preservation of affordable housing.</p> <p>Reduce the garden requirements to 20% of coverage, as compare with approximately 32%</p>	Dept. of Planning and Development Planning Division	GF	<p>September 2008</p> <p>September 2009</p>	Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
11a. Homebuyer Education and Counseling	Provide homebuyer education and foreclosure counseling to 200 prospective homebuyers on an annual basis.		PNHS	HOME; RDA		Ongoing
11b. Homeownership Opportunities	Continue implementation and consider program modifications make the program more flexible to market conditions. Serve up to four households annually.	Implement the Family Self Sufficiency program , so that Section 8 recipients may use their rent subsidy to purchase dwellings. Serve up to four households annually.	Housing Dept	IHTF; RDA; HOME; State	January 2009	Ongoing
11c. Mortgage Credit Certificate	Continue to advertise the MCC Program in conjunction with homebuyer education and assistance programs, and maintain a current listing of participating lenders.		County of Los Angeles	MCC		Ongoing
11d. Limited Equity Cooperatives	Invite outside experts to present educational information to Housing staff and City Council on limited equity cooperatives model. Utilize limited equity co-ops as a tool to facilitate affordable homeownership.	Invite outside experts to present educational information to the public, Housing staff and City Council on limited equity cooperatives model. Utilize limited equity co-ops as a tool to facilitate affordable homeownership..	Housing Dept.	GF	April 2009	Ongoing
12a. Housing Choice Voucher	Continue to assist 1,330 households.	Determine the number of returned subsidies and assess reasons recipients are unable to utilize the Housing Choice, Shelter + Care and other rent subsidies. Do more education to encourage more landlords to participate. Advocate on the federal level for the creation of additional subsidies	Housing Dept.	Section 8	September 2009 As appropriate	Ongoing
12b. Home Tenant-Based Rental Assistance	Assist up to 90 households during the planning period.	Educate housing providers on availability of program. Advocate with HUD to extend the subsidy period. As the subsidy period nears, give HOME subsidy recipients priority for Section 8 assistance.	Housing Dept.	HOME		Ongoing
12c. Emergency Rental Assistance Deposit	Assist 300 households	Assist 1,000 households.	Housing Dept.	HOME; IHTF; RDA	January 2009	Ongoing
13a. Collaborative Partnerships	Continue to work with and seek additional partners to achieve City housing goals.		Housing Dept.	GF		Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
13b. Pasadena Housing Nonprofit	Conduct an evaluation of establishment of a Pasadena Housing Development Corporation, including administrative structure, funding, and options for program oversight. Present findings to City Council along with staff recommendations.		Housing Dept.	GF	April 2009	Ongoing
13c. Funding Program	Seek additional funding sources to meet City housing goals.	Develop a plan to better leverage Housing Trust funds, including the facilitation of access to tax credits and refinancing City owned properties to create additional affordable housing monies	Housing Dept.	GF	By June, 2009	Ongoing
14a. Fair Housing Services	Continue to provide fair housing services and tenant-landlord mediation.	Evaluate the effectiveness of the program, especially as the services relate to low and very low income households. Work with Neighborhood Legal Services to provide legal representation to low income tenants in subsidized housing, individuals with disabilities seeking reasonable accommodations/modifications and low income persons alleging discrimination.	Housing Dept.	CDBG	April, 2009 April 2009	Ongoing
14b. Fair Housing Outreach	Develop a Plan of Action to address fair housing for persons with disabilities.	Develop a Plan of Action to address fair housing for persons with disabilities. Develop a plan of action to ensure that low income households of color are not displaced in disproportionately high numbers.	Housing Dept. HRC Housing Dept. HRC	CDBG	April, 2009 June 2009	2009
14c. Tenant Protections	Continue to implement the Tenant Protection Ordinance.	Assess the impacts of a good cause eviction ordinance Assess the impacts of ordinance limiting rent increases to one a year	Housing Dept.	GF	June, 2009 September 2009	Ongoing
15a. Family Self Sufficiency	Provide ongoing assistance to 25 households.	Modify the plan for the re-use of the Desiderio land to allow for 3 of the Habitat units to be occupied by Family Self Sufficiency graduates, and allow them to use Section 8 for their mortgage payments. Advocate on the federal level for the creation of additional subsidies	Housing Dept.	Section 8	October 2008 As appropriate	Ongoing
15b. Shelter Plus Care	Provide ongoing assistance up to 90 households during the planning period and apply to HUD for additional shelter plus care certificates as they become available.	Advocate on the federal level for the creation of additional subsidies	Housing Dept.	S + C	As appropriate	Ongoing

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
15c. Housing Opportunities for People with AIDS	Assist 35 households.	Advocate on the federal level for the creation of additional subsidies	Housing Dept.	HOPWA	As appropriate	Ongoing
16a. Homeless Prevention	Provide supplemental resources to 85 households at risk of homelessness on an annual basis through the Homelessness Prevention Program. Ensure implementation of the 10-year Strategy to End Homelessness through preparation of Annual Action Plans.	Fully fund and staff the monthly Homeless Prevention Program intervention	Housing Dept.	RDA	January, 2009	Ongoing
16b. Emergency Shelter Program	Continue program implementation.	Establish areas where providers of emergency shelters may do so as a matter of right Determine the City's need for emergency shelters	Housing Dept.	ESG; IHTF	January 2009	Ongoing
16c. Transitional and Permanent Supportive Housing	Continue program implementation.	Adopt a housing first model for housing homeless individuals. Provide 25 units/year of permanent supportive housing. Expand Transitional housing for families and children to the amount indicated in the 10 year strategy to end homelessness.	Housing Dept.	ESG; IHTF	January 2009 Commencing January 2009	Ongoing
16d. Sites for Emergency Shelter	Amend the Zoning Code to define a zone to permit emergency shelters by right in the CG district and/ or other districts and develop objective standards to facilitate, encourage, and regulate shelters.		Dept. of Planning and Development Planning Division	GF	January 2009	2009
17a. Reasonable Accommodation	Implement the Reasonable Accommodation ordinance. Periodically analyze the City's process to identify any constraints to the development, maintenance, and improvement of housing for persons with disabilities and take corrective measures.		Dept of Planning and Development Planning Division	GF	September 2009	Ongoing
17b. Universal Design/ Visitability	Evaluate the feasibility of incorporating concepts of visitability, universal design, and other accessibility requirements for new and rehabilitated housing.	Incorporate concepts of visitability, universal design, and other accessibility into requirements for new and rehabilitated housing.	Dept. of Planning and Development Building Division	GF	September 2009	2010

Program	City Objective	PAHG Recommendations	Responsible Agency	Funding Source	PAHG Timeframe	Time Frame
17c. Housing Accessibility Assistance	Continue to provide assistance to disabled homeowners in making accessibility improvements to their homes. Seek ways to expand the program to renters.	Provide financial and technical assistance to homeowners and renters in making accessibility improvements to their dwellings.	Dept. of Planning and Development Building Division	GF	June, 2009	Ongoing
18a. Development of Housing for Families	Evaluate establishing incentives within the Inclusionary Housing Ordinance and allocation within the Housing Opportunities Fund for large family units.	Establish incentives within programs and the allocation procedures for public funds for large family units.	Housing Dept.		September, 2009	2010
18b. Pasadena Transition Partners	Support Pasadena Transition Partners to improve access to housing and supportive services for youth emancipating from foster care and institutional living.	Support Pasadena Transition Partners to improve access to housing and supportive services for youth emancipating from foster care and institutional living. Evaluate program annually. Establish incentives within programs and the allocation procedures for public funds for emancipated youth units.	Dept. of Planning and Development Building Division	GF	September 2009	Ongoing
18c. Housing for Students	Work with educational institutions to process and approve Master Plans that are consistent with the General Plan.	Develop policies and procedures to ensure that student housing is not developed at the expense of moderate, low and very low income City residents	Dept. of Planning and Development Building Division	GF	September 2009	Ongoing
19a. Senior Housing	Continue to support the provision of senior housing in the community.	Determine the need for segregated senior housing, in comparison to senior housing integrated with family housing and in comparison to the need for family housing, in general. Set priorities accordingly.	Dept. of Planning and Development Building Division		June 2009	
19b. Life/Care Facilities	Continue to support the provision of life/care housing in the community.	Determine the need for affordable life/care housing for seniors and others. Set priorities accordingly.	Dept. of Planning and Development Building Division	GF	2010	
19c. Senior Services	Continue to support the provision of senior services in the community.	Determine the need.	Dept. of Planning and Development Building Division	GF	2010	



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

October 13, 2008

Mayor Bogaard and City Council Members:

All Pasadena residents have an equal right to live in decent and safe affordable housing in a suitable living environment for the long-term well-being and stability of themselves, their families, their neighborhoods and their community. ~ Office of the City Manager, Housing and Community Development, "Housing Vision."

The measure of a city's greatness is how it treats its most vulnerable residents.

Pasadena Affordable Housing Group commends the City Council for continuing to discuss the needs of the most vulnerable. We applaud City Commissioners who see the urgency of meeting some of these needs through the Draft Housing Element of the City's General Plan.

At their September 10th meeting, the Planning Commission passed five additions to the Draft. These provisions included target dates that will help provide accountability.

1. To create a nonprofit that would purchase foreclosed properties by the end of the current calendar year.
2. To create a Community Land Trust by the first quarter of 2009.
3. To revisit the Cal Trans properties by the end of 2009.
4. To add language to the Housing Element's Inclusionary Housing Ordinance emphasizing low-income residents.
5. To revisit the Second Unit Ordinance making the property size much more reasonable for homeowners to take advantage of it by the first quarter of 2009.

PAHG hopes that you will agree with each of these recommendations and vote accordingly.

We also bring to your attention PAHG's in-depth analysis of the Housing Element Draft and our recommendations found in the letter provided to each council member on September 15, 2008. We have attached that letter here in electronic form for your convenience and reference. Please consider another City Council workshop that would again involve outreach to the populations most in need and further engage the community in providing additional input to the Draft.

Evelyn Adams
Former Public Official
Karina Arabolaza
*Director of Outreach & Education
Housing Rights Center**
Arthur Cobian
*Rapid Housing Specialist
Door of Hope**
Remy De La Peza
*Staff Attorney
Public Counsel Law Center**
Peter Dreier
*Director
Urban & Environmental Policy Inst.
Occidental College**
Jill Fosselman
*Chair, Government Relations Comm.
Union Station Homeless Services**
Monica Hubbard
*Co-Chair, Women's Issues Comm.
All Saints Church, Pasadena**
Adam Murray
*Executive Director
Inner City Law Center**
Kristin Ockershauser
*President
Pasadena Foothills Chapter ACLU**
Patricia O'Reilly
*Executive Director
ECPAC**
Tim Peters
*Executive Director
Door of Hope**
Rev. Hannah Petrie
*Neighborhood Church**
Ashley Phillips
*Community Outreach Coordinator
YWCA Pasadena-Foothill Valley**
Marvin Schachter
*Executive Council AARP CA
Co-Chair,
Senior Advocacy Council**
Jill Shook
*First Baptist Church
& Missions Door**
Al Sorkin
*Executive Director
URDC Human Services**
Greg Spiegel
*Western Center on Law & Poverty**
Sieglinde von Deffner
*Housing Works CA**
Michelle White
*Executive Director
Affordable Housing Services**

**Affiliations listed for
identification purposes*

To supplement PAHG's analysis of the Draft Housing Element, we list recommended short, medium and long-term proactive housing goals that are aligned with the Vision Statement above. We request that these goals be included in the Housing Element Draft **before** it is sent to the State.

Goal 1. Clearly identify the need. 21,000 households are in need of affordable housing, according to Mark Hoffman, consultant with The Planning Center. Break this number into income categories: no income, extremely low, very low, low and moderate income.

Goal 2. Become entrepreneurial. Take advantage of foreclosures and reduced housing prices to purchase homes and apartment units and set them aside for affordable housing for the most vulnerable. Consider creating a Housing Authority, a Community Land Trust, or other entity that will enable the large scale purchase of properties so they can be taken off the speculative market and preserved for affordable housing.

Goal 3. Section 8 voucher and shelter plus care certificate holders need options. Residents holding vouchers and certificates are unable to use them due to the housing shortage. Find creative solutions so that all Section 8 vouchers can be used by Pasadena residents holding them.

Goal 4. Include accountability by adding specific time frames on each of the objective stated in the Draft. Few dates are provided. Without them there is no accountability.

Goal 5. Eliminate the In Lieu Fee for the Inclusionary Ordinance. This is a recommendation that has been proposed countless times by Planning Commissioners and City Council members, but has not been acted upon.

Goal 6. Set an affordable housing goal to have 15% of all housing stock as affordable. This goal has been adopted by Irvine and other cities.

Goal 7. Spend 90% of the discretionary fund for rental housing and 10% for homeownership. This goal was proposed by the Affordability Housing Task Force and needs to be adopted.

Thank you for your consideration of these recommendations as we all work together to help ensure that all citizens of Pasadena, regardless of income level, have a roof over their heads.

Sincerely,

Pasadena Affordable Housing Group



HOUSING + EMPLOYMENT + LIFE SKILLS

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www.unionstationhs.org

Programs
Passageways
Adult Center
Family Center
Euclid Villa
Sources

November 19, 2008

To Mayor Bogaard and Members of City Council:

- The Program Committee of Union Station Homeless Services (USHS) supports the concepts of the revised Housing Element for the City of Pasadena being considered.
- We feel strongly, however, that there should be *specific strategies* for implementation of the plan to meet the goals and targets that have been set for the City.
- In particular, the Union Station Homeless Services Program Committee would anticipate specific strategies for housing the homeless individuals and families of Pasadena.
- The City would establish specific timelines for project goals.
- There would be an identified level of accountability & transparency regarding project status.

Sincerely,

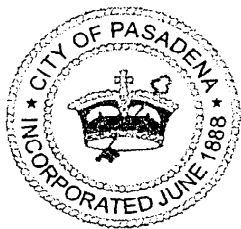
A handwritten signature in cursive script that reads "Betsey Tyler".

Betsey Tyler, Chair
Union Station Homeless Services Program Committee

A handwritten signature in cursive script that reads "Marvin Gross".

Marvin Gross
Executive Director

We are pleased to announce our new name, Union Station Homeless Services. Please update your records to reflect our new website and e-mail address.



PLANNING COMMISSION
PLANNING & DEVELOPMENT DEPARTMENT

November 20, 2008

Mayor Bill Bogaard and City Council
City of Pasadena
100 North Garfield Avenue, S241
Pasadena, CA 91101

Subject: Review of the Draft 2008-2014 Housing Element

Dear Mayor Bogaard and Members of the City Council:

On September 10, 2008, at the second of two meetings, the Planning Commission recommended the Council authorize staff to submit the Draft Housing Element to the state's Housing and Community Development Department for comments. The Commission also recommended five changes to the list of programs that are presently included in the Draft Element. The need for affordably priced housing and the current historic opportunity to increase the long-term supply require that the City act quickly.

The Commission recommends five changes as amendments, either to modify programs already proposed in the Draft Element or to add new programs:

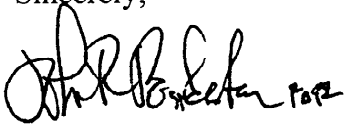
- Modification - Complete the reconsideration of standards for second units in single-family districts (Program 7C) by March 2009, rather than by December 2009;
- Modification - Actually create a Pasadena Housing Nonprofit by December 2008, rather than committing to consider creation of a Housing Nonprofit (Program 13B) sometime during the 2008-2014 planning period;
- Modification - Add an emphasis on low- and very low-income rental housing in the proposal (Program 8A) to study modifications to the Inclusionary Housing Ordinance during 2009;
- New - Add a program (Program 9D) to develop an Affordable Housing Land Trust by December 2008, concurrent with creating a Housing Nonprofit; and

- New - Add a program (Program 6C) to analyze by December 2009 the alternatives for the disposition of 710 right-of-way housing owned by Caltrans.

Each of the five modifications and additions is intended to accelerate production of affordably priced housing or to protect affordability in the future. Changes to the City's second unit ordinance would allow development of units on sites and in neighborhoods where they may be appropriate but are not now allowed. Creation of a Housing Nonprofit with an Affordable Housing Land Trust could provide greater flexibility and efficiency in assisting affordable housing. More emphasis in the Inclusionary Housing Ordinance on low- and very low-income housing might help with the current shortage for lower-income Pasadena residents. Finally, the housing units now owned by Caltrans have the potential to meet a share of the growing need for affordably priced units, if the City actively participates in their future disposition.

The Planning Commission considers submittal of the Draft Housing Element an opportunity to initiate important housing programs. The programs described above will not by themselves resolve the difficulties our residents have with the costs of housing, but they are valuable additions to those that are included in the Draft Element.

Sincerely,



Gary Johnston
Chair