

Greater Pasadena Affordable Housing Group

1516 Navarro Avenue, Pasadena, CA 91103

October 30, 2013

Mayor of Pasadena
Pasadena City Council
City Hall
100 Garfield Avenue
Pasadena, CA 91109

Honorable Mayor Bill Bogaard and Members of City Council:

The Greater Pasadena Affordable Housing Group (GPAHG) has reviewed the Draft Housing Element (HE) and prepared comments based on the document submitted to the Planning Commission on October 9, 2013. We understand that since that date, another draft will have been submitted to the City Council. GPAHG has not had the benefit of reviewing the draft HE submitted to Council or the minutes from the Oct. 9th Planning Commission meeting.

GPAHG recognize that staff has been required to perform lengthy duties in connection with the development of the draft HE while short staffed. We are pleased to note several proposed inclusions in the draft, such as:

- θ Studying the possibility of enhancing provisions under the City's inclusionary housing ordinance for transit oriented developments.
- θ Further study of the allowance of second units in areas zoned as single housing.
- θ The addition of an affordable housing education component for staff and the public.

Some of these changes reflect recommendations from our group. We thank city staff and the consultant for carefully considering our suggestions.

At the limited number of workshops held, a series of complex issues were discussed; which would benefit from further research, consideration and input from the public, especially from the 54% of the city that are renters and the City's existing 23,000 lower income households who are in need of affordable housing. Such households deserve to be heard on issues of such importance to their future. In the few short months set aside by Sacramento for the drafting of the HE there was only

time to raise concern and offer ideas. Solutions could not be forged. Some of the concepts that participants discussed included:

1. Designating the City's existing lower income households in need of affordable housing, presently numbering approximately 23,000, as one of the HEs critical special needs categories.
2. Designating recently released prisoners who are being re-integrated into our community as a special needs category.
3. Exploring incentives and disincentives permissible under the Ellis Act and other statutes for preserving Pasadena's affordable housing stock.
4. Exploring tenant protections that will preserve the City's diversities while not overly burdening housing providers.
5. Determining how often HE progress reports to City Council would be appropriate.
6. Determining the appropriate placement of second units in various city neighborhoods.
7. Exploring the appropriateness of no net loss of affordable housing and one-for-one replacement of affordable housing in Pasadena.
8. Setting affordable housing funding priorities (*e.g.*, homeownership assistance versus rental assistance, single person household assistance versus family assistance.)
9. Dedicating local funds for affordable housing.

We heartily endorse the Planning Commission's recommendation that a body be formed to move the Housing Element agenda toward becoming more fully implemented and to make recommendations worthy of City Council consideration. Since we have not had an opportunity to review the revised draft of the HE, GPAHG does not know whether the Planning Commission's unanimous recommendation was included for City Council review. GPAHG also urges that the recommendation of an Affordable Housing Subcommittee be included as a recommendation for City Council review.

We emphasize our support for that recommendation for a number of reasons. Because of the short timetable under which staff was forced to work to produce this draft, outreach to low income renters, special needs groups, businesses, and others was less than optimal. Materials were not translated into any language other than English.

If the Planning Department's recommendation is found to be infeasible, GPAHG proposes that the HE include a provision that:

- a) Extends the jurisdiction of an existing Commission - such as Historic Preservation, Human Services, Northwest or Code Enforcement – to include affordable housing concerns, or
- b) A continuing series of ad hoc committees or task forces be created to address key aspects of how to best promote affordable housing and the Housing Element’s Goals and Objectives.

This body is needed because the Planning Commission notes that it routinely reviews housing issues only once every four years, the EDTECH usually reviews housing deals and the Community Development Committee’s, Housing Subcommittee no longer exists. There should be a body that routinely considers issues that the Planning Commission, EDTECH and City Council take up on only an occasional basis.

In addition we have specific suggestions for changes in the wording of the draft Housing Element as follows:

- * HE-3.4 (Preservation of Affordable Housing). Change “lower income households” to “low and moderate income households” to expand the scope of that policy, consistent with others in the HE. In addition, delete “consistent with state law” because that phrase refers to everything in the HE, not just this one section.
- * HE 4.6 (Homeless Housing and Services). Delete “subject to funding availability,” since all programs are subject to funding availability. We question why this limitation would only be called upon when referring to homelessness.
- * Program #16 (Rental Housing Assistance). We should add an objective to seek more funding for Section 8 households, to relieve the number of households on the City’s huge waiting list.
- * Program#17 (Affordable Housing Preservation). In the description of Market Rate Affordable Housing, there is a statement that an objective will be “to study options for preserving non deed restricted affordable housing and tenant protections.” We laud and endorse this objective. However, there appears to be an oversight because the Implementation section on that page fails to list this objective or a target date for completion.
- * Program #23 (Fair Housing). We are pleased that a study of strengthening provisions of the Tenant Protection Ordinance is an objective of the Housing Element. However, no target date is given for its completion, which means we might have to wait eight years. A date of 2016 would be appropriate. (The HE should be reviewed to see if there are other objectives without target dates.)

- * Program #24 (Housing Education Efforts). Modify the frequency of the Housing Element Review from every four years to every year.
- * Watch out for and/or clarify technical language and acronyms such as MFI (pg. 14) “protected status” in HE-4.7, and IHTF (pg.25.)

GPAHG sincerely thanks the Planning Department for its gracious cooperation during this process and urges the Council to adopt its recommendations before the draft is forwarded to Sacramento for adoption.

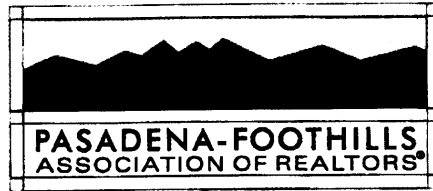
Respectfully submitted,



Darrell Cozen

On behalf of the Greater Pasadena
Affordable Housing Group

cc: GPAHG members
Denver Miller



Proudly serving our members and communities since 1907

October 31, 2013

Mayor and City Council Members
City of Pasadena
City Hall
P.O. Box 7115
Pasadena, CA 91109

Dear Mayor and City Council Members:

The Pasadena-Foothills Association of REALTORS has partnered with the City in many ways to support housing of all types. Over the years, we have advocated for the Inclusionary Housing Ordinance, sponsored and helped organized the Housing Summit, sponsored and helped organized the Foreclosure Prevention Event, participated on the Housing Affordability Task Force, donated \$55,000 for use as a "Closing Cost Fund" to help first time homebuyers manage those extra closing fees, and donated to the local Habitat for Humanity chapter. Our members sell housing, and rent and manage housing within the city and we remain vitally interested in the state of all types of housing in the City.

To that end, we have reviewed the draft Housing Element and testified at the Planning Commission hearings on it. Staff is proposing a number of 'study groups' for further discussions on some controversial issues. We have volunteered to be part of, and most certainly hope to be included in, those discussions:

- a. Study of requirements to increase inclusionary housing units to TODs. We believe the current ordinance does an excellent job of balancing production of affordable units while still allowing developers their right to make a profit. Increased requirements will both disturb that balance and make housing even more expensive for those who do not qualify under the affordability rules.
- b. Changes to the 2nd Unit ordinance. We have long been advocates for reasonable changes to this ordinance which would allow construction of 2nd units on those properties able to meet current development standards regarding lot coverage, FAR, setbacks, and height.
- c. Changes to current tenant protection ordinance. We were part of the discussions which developed the current tenant protections enjoyed by the city's renters. We believe they are reasonable. Our members who own or manage rental property are most concerned about an idea floating around that would require 'just cause eviction'. This is just a plain bad idea and one that should go no further. A review of today's protections is reasonable and we believe will conclude that the City already has a good ordinance.

We look forward to continuing to work with the City Council, Planning Commission and City Staff as we all strive to make Pasadena an even better place to live.

Sincerely yours,

Shannon Miller
President