



October 23, 2020

Pasadena City Council
City of Pasadena
100 North Garfield Avenue
Pasadena, California 91101

RE: Regional Housing Needs Assessment (RHNA) Appeal - SUPPORT

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage would like to thank City Staff and their consultant for putting together a thoughtful and strong RHNA appeal. We have consistently urged the City to appeal our RHNA allocation because we find it to be an unreasonable and unachievable target. We should strive as a City to reach and surpass our goals, but we should not be penalized for failing to live up to unrealistic standards.

A reduction of 2,047 units would give us some breathing room as a City to plan for housing where it makes the most sense, close to jobs and transit. As we start a new chapter and move into to a new RHNA Cycle, Pasadena should also try to provide a greater balance of housing across the needed income levels, not just more units for above-moderate income housing as have been built recently. We would like to remind the City Council that preservation is an important tool in creating and retaining affordable housing. Preservation of the modest multifamily buildings across the City keeps tenants in place. Adaptive reuse of commercial or institutional uses into residential creates new housing, usually at a lower cost, and is more sustainable than new construction. We hope preservation can be used to a greater extent moving forward.

We appreciate the work and effort that has been done to create a compelling appeal. We urge the City Council to authorize the appeal.

Susan N. Mossman
Executive Director

Andrew Salimian
Preservation Director

cc: David Reyes, Director of Planning

10/26/2020
Item 1

Martinez, Ruben

From: Jill Shook <Jill@makinghousinghappen.com>
Sent: Sunday, October 25, 2020 8:32 PM
To: PublicComment-AutoResponse; Hampton, Tyron; Jomsky, Mark; Kennedy, John
Subject: re: for Item #1 on the Oct. 26 agenda.

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Dear Honorable Mayor and City Council,

Yes, the 9,409 RHNA allocation for Pasadena of total new housing units in the next eight years (5,960 to be affordable at various income ranges) is indeed a high number, but not impossible. It's easy to resent the SCAG, but thankfully this time these numbers are reflecting the real need: 23,000 on Pasadena's section 8 waiting list, 50% of Pasadena is spending more than 50% of their income on housing, 527 counted as homeless, and 700 PUSD students experiencing homeless and 19% of all PCC students are homeless. Each of these statistics are outrageous and you have the power to help them become housed. What kind of city do you want? A city known for its compassion or for its exclusion? Please pass a policy that would allow churches to supply a portion of this need. With only the 17 churches interested so far, 1,177 units could be accommodated. Pasadena already has over 740 ADUs – it's part of the historic character of our community. This could be tripled with the right incentives. There are many main corridors with businesses that would appreciate the infusion of more folks close by to help our city thrive, not just survive. Please search your hearts, change your vote, and save our tax payer's money on a needless appeal. Certainly there is enough creativity and compassion in our great city to meet this urgent need.

Thank you!! Jill Shook, director of MHCH—Making Housing and Community Happen

Jill Shook, Missions Door, Catalyst <http://www.missionsdoor.org/missionaries/shook-jill>
Doctor of Ministry, Bakke Graduate School
Blog: makinghousinghappen.net Websites: www.makinghousinghappen.org and makinghousinghappen.com
Author/Editor: *Making Housing Happen: Faith Based Affordable Housing Models*
Jill@makinghousinghappen.com Phone: 626) 675-1316



Martinez, Ruben

From: Connie Millsap <cmillsap@sbcglobal.net>
Sent: Monday, October 26, 2020 9:00 AM
To: PublicComment-AutoResponse
Cc: Jill Shook; Sandy Olewine; Rosalie Niemann; Marilynne Wilander
Subject: 10/ 26 /2020 Agenda Item #1

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Dear Mayor and City Council Members,

I would like to comment on the new RHNA numbers. Though the "affordable " housing numbers are "high," I would like to remind you, that in the recent past, the City has allowed the development of more luxury high-end market units to be built and only a small amount of affordable housing. The housing inventory for affordable units does not come close to the RHNA numbers or the need in the marketplace. The market is glutted and has vacant inventory of the high-end luxury units.

Affordable housing, contrary to recent national political posturing ("suburbs being saved from affordable housing"), is for working professionals such as teachers, fire fighters and architects, as well as for the lower income citizens of the community, many who are essential workers. Affordable housing in the marketplace makes for a healthy and diverse community. In addition, housing pricing overall would be tempered by a healthy diversity of housing stock. When only high-end housing is available, it keeps pricing high overall.

I encourage the City to not fight the State about the new numbers and instead rise to the challenge and responsibility to provide housing that is affordable and make Pasadena a city where all can live.

Blessings,
Rev. Connie Millsap Tamkin
First United Methodist Church, Pasadena
Liaison, Making Housing and Community Happen
Convener, Community Land Trust Committee

Sent from AT&T Yahoo Mail on Android

10/26/2020
Item 1

Martinez, Ruben

From: Fred or Rosalie Niemann ✓
Sent: Monday, October 26, 2020 10:29 AM
To: PublicComment-AutoResponse
Cc: Sandy Olewine
Subject: Fw: 10/ 26 /2020 Agenda Item #1

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Dear Mayor and City Council Members,

I am writing regarding the new RHNA numbers.

The housing inventory for affordable units in Pasadena does not come close to the RHNA numbers or the need in the marketplace. I encourage the City to not fight the State about the new numbers.

As my friend Connie has stated, affordable housing is for working professionals such as teachers, fire fighters and architects, as well as for the lower income citizens of the community, many who are essential workers. Affordable housing keeps the city interesting, diverse and culturally rich.

I urge you to rise to the challenge and responsibility of providing housing that is affordable to make Pasadena a city where all can live.

Sincerely,

Rosalie Niemann

Member, First United Methodist Church

Representative on the Pasadena Partnership

Faith Community Committee

RECEIVED

Linda Vista-Annandale Association 2020 OCT 26 PM 12: 04
Madison Heights Neighborhood Association
West Pasadena Residents' Association

October 25, 2020

Mayor Tornek and Councilmembers

c/o: correspondence@cityofpasadena.net

Re: Pasadena City Council Meeting 10/26/2020;

Agenda Item 1. RHNA Appeal

Mayor Tornek and Councilmembers:

The Linda Vista-Annandale Association (LVAA), the Madison Heights Neighborhood Association (MHNA), and the West Pasadena Residents' Association (WPRA), representing many of Pasadena's historic single-family neighborhoods, comprised of thousands of single-family homes, previously expressed shared concerns with respect to the 2021-2029 SCAG Regional Housing Needs Assessment (RHNA) Allocation, urging Pasadena to appeal. A copy of our prior Joint Letter is attached.

WE CONTINUE TO STRONGLY SUPPORT PASADENA APPEALING THE SCAG DRAFT 2021-2029 RHNA ALLOCATION.

Our three organizations continue to be very concerned that the 2021-2029 RHNA Allocation numbers will result in an untenable number of out-of-scale, out-of-character, dense, large buildings with related traffic and other infrastructure impacts, without producing much in the way of needed Affordable Housing, thus undermining what so many of us love about living in Pasadena. This is the inevitable result primarily of state-mandated Density Bonus development policies, California legislative urban infill mandates, and programs such as RHNA that have negated Pasadena's rights as a Charter City to determine its own land use destiny pursuant to principles of local control. Further, attaining the assigned numbers are not feasible, and state-mandated penalties may be the result--including draconian and punitive measures that the state may adopt in the future and impose upon Pasadena.

We assumed, based on prior public discussion, that the appeal would be prepared pursuant to the strongest arguments possible. We also assumed that Pasadena would consult with and cooperate with other similarly concerned cities in the SCAG jurisdiction, as well as SCAG itself, in the preparation of the appeal. We are disappointed that the appeal arguments appear timid, that the City's proposed RHNA allocation is still unfulfilably and unreasonably high, and that Pasadena, once again, is acting alone.

We are also disappointed: (1) in the timing of this Agenda item, with Council action scheduled at the last minute, despite 6 weeks having elapsed since Council's September 14 instruction to prepare an appeal; (2) that the fully completed appeal form with all attachments, including any consultant's analysis, is not available for public review; (3) that the requested reduction in the Allocation, from

9,409 to 7,362 (i.e. a reduction of 2,047 units), yields an Allocation that still is not feasible and will compromise Pasadena's character and scale; (4) that no detail is provided in the Staff Report on the allocation of the 7,362 units among income categories; (5) that the detailed analysis of the SCAG methodology and required computational analysis is not provided for public review and is now deduced from various written commentaries that the RHNA computations may be flawed, such as the possible use of "double counting" in arriving at the Allocation numbers for the SCAG area and Pasadena; and (5) that there does not appear to be any real effort made to bring the requested total down further to a number that is actually feasible and that preserves local control and the character and scale of Pasadena.

As to "Changed Circumstances", why is this argument limited to Fuller housing? We believe it could reasonably also include current and projected COVID-19 Impacts. Covid-19 may well alter the housing development market to such an extent that it becomes even more infeasible to produce the Allocated numbers of housing units. Once again, we are seeing a population shift to less-dense suburban areas. Pasadena's "jobs/housing" balance may also be impacted. A significant number of Pasadena businesses are in distress and may cut back or close. Potential housing and employment market impacts from COVID-19 should be reflected to a greater extent than are currently in the RHNA Allocation methodology, and these arguments should be included in Pasadena's appeal.


We continue to believe that Pasadena should act with SCAG and other similarly situated cities in asserting our similar RHNA rights and concerns. Pasadena needs to collaborate with other cities in a manner that may make good political sense and change the situation at SCAG and in Sacramento, particularly since we understand that a number of other cities in SCAG also are filing appeals.

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

Respectfully,



Nina Chomsky, President
Linda Vista-Annandale Association



John Latta, President
Madison Heights Neighborhood Association



Dan Beal, President
West Pasadena Residents' Association

ATTACHMENT

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

September 13, 2020

Mayor Tornek and Councilmembers

c/o: correspondence@cityofpasadena.net

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

Agenda Item 20. RHNA and Housing Element Discussion

Mayor Tornek and Councilmembers:

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

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

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

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

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

advised the Commission of one penalty, yet the Staff Report to the Council includes a detailed discussion of potential penalties beginning on Page 3.

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

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

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

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

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

Respectfully,



Nina Chomsky, President
Linda Vista-Annandale Association



John Latta, President
Madison Heights Neighborhood Association



Dan Beal, President
West Pasadena Residents' Association

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

1. Los Angeles: dated November 5, 2019.

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

2. Cerritos: dated February 20, 2020.

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

3. West Hollywood: dated February 20, 2020.

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

4. Santa Monica: dated August 20, 2019.

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

5. Alhambra: dated September 9, 2019.

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

6. South Pasadena: dated September 10, 2019.

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