

Martinez, Ruben

From: Anthony Manousos <interfaithquaker@aol.com>
Sent: Thursday, July 29, 2021 4:07 PM
To: PublicComment-AutoResponse; Gordo, Victor; Madison, Steve; Rivas, Jessica; Hampton, Tyron; Kennedy, John J.; Masuda, Gene; Williams, Felicia
Subject: Fwd: Op ed plus a letter to the city council to be included in their weekend packet

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Dear Honorable Mayor and City Council members,

We appreciate all the work that the City Council has done to provide affordable housing for Pasadena residents, but our City has clearly fallen short of its vision to provide all our residents with “decent, safe and affordable housing.” We at Making Housing and Community Happen feel strongly that the City must enact creative solutions to our city’s affordable housing crisis, such as those recommended by the Pasadena Affordable Housing Coalition.

We agree with Commissioners and City Council members who say that allowing congregations to have affordable housing built on their property should be a top priority. Unlike many of the proposed sites for affordable housing in the draft Housing Element, there is a very real possibility that congregations will have affordable housing built on their land if zoning is changed to permit sufficient density. We urge you to act on this asap. See our op ed piece below.

We also urge you to:

Incentivize affordable ADUs and JADUs. Allow more flexibility on ADUs (build a second story above parking on 1st floor): Make it less costly and less time intensive to develop ADUs. [City of Los Angeles ADU Accelerator Program](#).

Allow housing in commercially zoned areas: Vacant or underutilized commercially zoned areas are opportunities to build housing in Southern California where vacant land is hard to come across. [Berkeley Turner Center Report on Residential Redevelopment of Commercially Zoned Land in California](#).

Streamline the approval of deed-restricted, affordable housing, and permanent supportive housing within 30 days of application. [Habitat of Humanity Report on Streamlining Approvals for Affordable Housing in California](#).

Vacancy Tax: A vacancy tax called the Oakland Vacant Property Tax (VPT) was passed by the City of Oakland in 2018. The VPT Act establishes an annual tax of \$3,000 to \$6,000 on vacant property. The City of Oakland defined its own definition of “vacancy” which each city will do for themselves. The City of Oakland VPT covers both residential and nonresidential property types. [City of Oakland Vacant Property Tax, Report to City of Los Angeles Council about vacancy tax applicability to the city](#).

Create an Affordable Housing Fund funded by an Impact Fee: An impact fee is a development fee whose purpose is to offset the impact of new development on the need for affordable housing. The fees are collected and dedicated towards affordable housing. [Berkeley Turner Center Report on Residential Impact Fees](#). [Grand Nexus Study on Impact Fees in San Mateo County](#).

Community Land Trusts: Housing subsidies can keep affordable housing affordable. However, often these subsidies have a date of expiration, meaning at the time of the subsidies expiration the housing can become market rate housing. Long-term preservation of housing subsidies is needed to ensure that affordable housing, such as community land trusts remain affordable long term. [Source 1 from the Lincoln Institute of Land Policy](#). [Source 2, second report from Lincoln Institute of Land Policy](#).

Anthony Manousos and Jill Shook, Co-founders of MHCH

08/02/2021

Item 11

A Creative Solution to Our Housing Crisis from the Religious Community

By Rev. Bert Newton, Dr. Jill Shook and Dr. Anthony Manousos

Churches across Pasadena want to be part of the solution to our city's growing affordable housing crisis and they are offering to use their land for affordable housing. They are heeding the cry of Isaiah: "Give shelter to the homeless" (Isaiah 58:7). Since most city council members have indicated interest in or expressed approval for letting churches have affordable housing built on their land, we wonder why our city officials are not taking advantage of this generous offer.

An African American congregation, New Life Holiness Church, in a historically Black neighborhood hit hard by gentrification, is partnering with a nonprofit affordable housing developer to build 52 units of affordable housing. In return for the use of land, the church will get an income stream from the ground lease.

Instead of putting this money into the church coffers, they want to use it to help families of any ethnicity at risk of losing their homes to pay their rent or mortgage.

The church has lost members, many of whom who have had to move away due to incomes that could not keep up with soaring housing costs, with rents rising 65% in the last decade.[2] while incomes have not kept pace. If New Life is given a chance, they are also to beautify their neighborhood and bring investment to this divested part of Pasadena.

But to have affordable housing on their church campus, it won't ~~none of this will~~ happen without a zone change, which can be costly and time-consuming. For one affordable housing developer working with a church in Orange County it took three years and half a million dollars to create a one-time general plan amendment to get the zoning right! It should not be this hard and expensive to get permission build affordable housing! Indeed, it does not have to be this way.

The Arroyo Group, a 45-year-old Pasadena firm (that did the plans for Old Pasadena as well as the Civic Center and the Playhouse District) together with the Congregational Land Team of Making Housing and Community Happen (MHCH), studied every religious site in the city and crafted a detailed and nuanced proposal that would rezone religious land citywide, and kick in only if a congregation provides affordable units. There are about seven interested churches in Pasadena. This would add sorely needed affordable units throughout the city. To support these churches, MHCH met with each council member and the mayor, held public online meetings, and worked with Pasadena's Planning Department to assure that this proposal would fit the unique character of our city.

This proposal provides for density and heights that are sensitive to the neighbors around each religious site. To make the sites feasible, the main source of funding for affordable housing-- tax credits—must be applied. Tax credits are competitive and near impossible to win unless the development allows for 40-50 units. In the past, it was not uncommon for affordable housing to be larger scale of 200 or more. These smaller affordable developments, with smaller unit sizes, meet an urgent need at a scale and design that make a community proud. All developments must go through design review.

When the idea came before the City Council, council member Andy Wilson urged the Planning Department to explore it "with a sense of urgency." Three times the public weighed in on this proposal with about 100 to 1 in favor of it. Since then, this idea has been endorsed in a letter signed by the League of Women Voters, Pasadenans Organized for Progress, NAACP, Pasadena for All, Complete Streets Coalition, Abundant Housing, and All Saints Church. MHCH, with over 20 churches in our network, also strongly supports this proposal.

Despite widespread public support, this proposal was taken off the Planning Commission and City Council agenda and put into the Housing Element process. The Housing Element is like a blueprint required by the state that plans for enough housing in every CA city for all income levels—for the next eight years. And Pasadena's need is urgent: nearly 6,000 units of affordable housing!

The recently released draft of the Housing Element includes further study of this proposal but postpones study of it until 2025. This delay makes no sense!

This is an idea whose time has come. The Housing Element mentions SB 899, a state law that would have rezoned religious land across the state. We support a more local approach, tailored to the unique needs of our city. A citywide zoning amendment, applying only to those churches like New Life Holiness that want to bless their community with affordable housing, allows for local control, something that the city council has repeatedly stated it fears losing. If the state passes a bill like SB899 and Pasadena already has an ordinance in place that permits affordable housing on religious land, the state may well carve out an exception for us.

Other cities, such as Sierra Madre, Yorba Linda, Fullerton, and Gardena, are moving forward in creating city-wide rezoning religious land. Seattle recently approved such rezoning for religious land. (See <https://www.seattle.gov/opcd/ongoing-initiatives/affordable-housing-on-religious-organization-property>.) (add the link) Like the rezoning proposed by MHCH, this plan is tailored to fit into the character of diverse neighborhoods, including single family.

The affordable housing crisis is severe and worsening! Families are leaving Pasadena, resulting in schools closing down, and businesses are leaving the state because lower-income employees cannot afford the out-of-control housing costs.[3] Let's give churches a chance to fulfill their mission and address our housing crisis. Let's take to heart the words of Pastor Othella Medlock of New Life Holiness Church: "We don't have a lot of resources like big churches, but we have a valuable asset, our land. In Acts 4, early Christians sold their property and provided for the poor. We want to use our land for the betterment of our community."

On Monday, August 2, the City Council will consider the Housing Element. On that day members of MHCH along with the Pasadena Affordable Housing Coalition will gather on the steps of City Hall to urge the Council to take seriously this proposal along with many other creative solutions to our city's affordable housing crisis. The public is welcome. To find out more, go <https://makinghousinghappen.net/2021/07/29/join-us-for-affordable-housing-rally-at-city-hall/>

Rev. Bert Newton is a Ministry Associate at Pasadena Mennonite Church and the Liaison and Outreach Coordinator for MHCH. Dr. Jill Shook and her husband Dr. Anthony Manousos are co-founders of MHCH. A Quaker peace and justice activist, Dr. Manousos earned his doctorate in British literature and is the author/editor of seven books. A resident of Northwest Pasadena for nearly 30 years, Dr. Shook is the author of Making Housing Happen: Faith-Based Affordable Housing Models.

[1] <https://makinghousinghappendotnet1.files.wordpress.com/2020/01/candidates-booklet-final-version-pdf.pdf>

[2] <https://www.latimes.com/business/real-estate/story/2019-12-27/l-a-rent-rose-65-percent-over-the-last-decade-study-shows>

[3] <https://www.cnbc.com/2018/03/19/californians-fed-up-with-housing-costs-and-taxes-are-fleeing-state.html>

Iraheta, Alba

From: Peggy Renner <peggy@pasadena.gov>
Sent: Monday, August 2, 2021 8:59 AM
To: PublicComment-AutoResponse
Subject: City planning: Protections for renters

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Dear members of City Council,

This is Peggy Renner. I am a resident of Pasadena. I write as a member of the Affordable Housing Coalition to ask that you develop protections for renters as you develop the plan to house them.

Pasadena faces a monumental demand to provide homes for people who work in Pasadena and would like to live here. The state has specified that Pasadena has to provide more than 9,000 homes over the next 8 years. Given the limits to land, I doubt that these homes will be single-family dwellings. We will be building rental units or condominiums. It is likely that most of the people in need of homes cannot afford to buy a condo. That means rental units!

So we need to think ahead of this construction. Ahead of time, we need to provide guidelines and rules covering rentals units so that the residents will enjoy the same securities that you and I enjoy living in a home that is ours. Code needs to cover:

- ✓ Housing security and protections against undue increases in housing costs
- ✓ Tenant protection against illegal harassment
- ✓ Penalties for landlords who illegally abuse tenants
- ✓ Just cause eviction rights
- ✓ A rental registry with details on rent, recent increases, utility services, and parking costs
- ✓ Adequate legal representation for low-income tenants
- ✓ Citywide rent control

Iraheta, Alba

From: Julie McKune <[redacted]>
Sent: Monday, August 2, 2021 8:05 AM
To: PublicComment-AutoResponse
Subject: Affordable Housing ...End this crisis

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Dear Mayor Gordo and City Council members,
My name is ___ Julie McKune_ and I am a member of Neighborhood Unitarian
Universalist Church. I am speaking on item 11, the Housing Element.

I am glad that the City is required by the state to plan for 5,974 units of affordable housing over the next eight years. The need for affordable housing is critical.

My nephew has to move to Arizona this fall to find an affordable apartment to rent. This creates a troubling separation of our family support system. My niece had to move to Oregon last month...far far away from her brother. Our family is stressed and saddened. Lastly, my youngest niece has a massive amount of student debt, which has forced her to live far east of Pasadena so again this impacts our family support system and places preventable stress on all of us.

Item #11 the housing element appears inadequate in our city's 8 year plan. We need a rezoning of church land, a vacancy tax, a safe parking program, community land trusts, housing subsidies, and allow affordable housing in commercially zoned areas.

Please protect families and children. Changing schools often creates social/emotional hardships which can easily be prevented if we create sensible policy.

Thank you for your attention,

Julie McKune
Resident 65 years

Iraheta, Alba

From: Topher Mathers i>
Sent: Monday, August 2, 2021 12:09 AM
To: PublicComment-AutoResponse; Rivas, Jessica; Morales, Margo; Gordo, Victor; Hampton, Tyron; Kennedy, John J.; Wilson, Andy; Madison, Steve; Williams, Felicia
Subject: HOUSING ELEMENT Agenda Item #11, 8/2 City Council Meeting

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Dear Mayor Gordo and City Councilmembers

The climate, housing and homelessness crisis, combined with the racial and economic inequalities that are festering in our society are the results of policy decisions.

Some of these same policy decisions that created these crises can now be addressed by you as elected representatives.

The draft Housing Element doesn't adequately address these issues. Please direct City staff to revise the document and actually plan for the construction of enough affordable housing to achieve our RHNA quota. The Pasadena Affordable Housing Coalition has a list of policy solutions that would help address the crisis. Pasadena can both protect current residents (renters) and build new housing. In Pasadena, market rate housing has been produced, the current RHNA goals put a high emphasis on affordable units, 6,000 units of affordable housing needs to be built in the next decade and the City has to accurately predict that this can be built. Magical thinking will not get us there.

Here are some policies that help us reach our RHNA quota and reduce our dependence on cars.

- Remove Parking Minimums Citywide: Parking minimums increase the developer's cost for building housing, take up space that could be used for more housing units, and disincentivize the use of transit.
- Remove height and FAR restrictions near transit: Encourage developers to build more housing units – including market rate & affordable units – near major public transportation stops.
- Mandate Unbundled Parking Costs from Rent or Purchase Cost: Unbundling parking costs from the cost of housing makes housing more affordable as renters can choose to rent a housing unit without paying for the cost of a parking space. Renters & owners in existing buildings would be incentivized to get rid of a car and rent their unused parking spaces to others
- Allow & Encourage “Missing Middle” housing types within areas currently zoned for SFH: Missing middle housing are buildings (duplexes, fourplexes, cottage courts, courtyard buildings) with multiple units built in walkable neighborhoods.

Topher Mathers (District 5)

Iraheta, Alba

From: Candace Seu · >
Sent: Sunday, August 1, 2021 11:42 PM
To: PublicComment-AutoResponse
Subject: 11. Housing Element Update - Recommended Changes

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Honorable City Council Members:

I have a few questions about the Housing Element Update:

1. Does the City's inventory analysis take into account the **probability of a parcel actually being developed** in this RHNA cycle (the way the City of LA has)? **If not, why not?**
2. On page B-15, why are we not **reforming parking minimums** in view of a) the costs this adds to housing, b) scholarship showing negative externalities to the current system, c) our supposed desire to take the climate crisis seriously?
 - o See e.g., <https://parkade.com/post/donald-shoup-the-high-cost-of-free-parking-summarized>
3. In view of Goal HE-2 (housing supply and diversity), and Program 9 (removing constraints), why does the report only focus on large developments and ADUs? **Why is there no consideration of how to encourage duplex production and no consideration of any zoning changes?**

We have a big job ahead of us, and I'm confused as to why we aren't considering or even talking about all the tools at our disposal for tackling housing. Especially when all of these concerns and strategies were brought up multiple times during public outreach, and when other municipalities are choosing those solutions - why does there appear to be such a lack of response and analysis?

Please direct Staff to study and incorporate the following Pasadena Affordable Housing Coalition policies into the final Housing Element or related policies as appropriate:

- **Remove Parking Minimums Citywide** to reduce housing production costs, enable more units, and encourage transit use
- **Unbundle Parking from Unit Rent/Purchase Cost:** Allow renters and buyers to choose to not pay for the cost of a parking space.
- **Upzone as appropriate to allow more diverse “Missing Middle” housing** (e.g., duplexes, fourplexes, bungalow courts) which remain in-scale with their neighborhoods.

Thank you,
Candace Seu

91101/District 6, resident for 14 years

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Subject: August 2, 2021 Pasadena City Council meeting - agenda item #11 ~~Housing Element~~ ^{2021 AUG - 2 AM 8:42}

Hon. Mayor Gordo and Hon. City Council members:

CITY CLERK
CITY OF PASADENA

The City of Pasadena is now preparing the most important update to the Housing Element in its history. I propose that the Housing Element update should include provisions to incentivize our local institutions (private sector, non-profit organizations & educational institutions) to provide affordable housing to their income qualifying employees and adult students.

Incentivizing affordable housing will help our local institutions attract and retain employees and students and will help the City recruit additional "partners" (some with capital in hand) to help meet a daunting 2028 Regional Housing Needs Assessment (RHNA) requirement imposed by the state.

The incentives for affordable housing developed by our local institutions could include: (1) streamline and fast-track development approvals, (2) reduce costly development impact fees charged by the City, (3) density bonuses, (4) parking reductions, and (5) make excess city-owned land available.

Following are a few examples of opportunities that could be realized by incentivizing our local institutions:

1. Pasadena Unified School District (PUSD) has excess properties, and their district voters recently approved a property assessment to fund facilities bonds. PUSD has stated an interest to use some of the bond proceeds to create affordable housing. PUSD has the capital, properties, need, and the interest. Appropriate incentives including fast-tracked approvals could help them create affordable housing in Pasadena quickly.
2. At Pasadena City College (PCC), we currently don't have any housing plans on the drawing board, but a significant percentage of PCC students are housing insecure and our faculty and staff confront the same housing affordability issues so the need is there. SB 330, which would provide incentives to Community Colleges to provide affordable housing for their employees and students is currently working its way through the legislative process in Sacramento and will help facilitate Community Colleges to provide housing. City incentives would also help.
3. Art Center College of Design has been planning to build student housing at its South Raymond campus for many years but haven't been able to get underway. City incentives could be the tipping point to help get affordable housing built at that location.

The above are just a few examples. Many other opportunities will be created with the proper incentives that will benefit our institutions, residents and the City. Thank you for your consideration.

Jim Osterling
Trustee, Seat #2 - Pasadena City College
Representing NE Pasadena, East Altadena & Sierra Madre

08/02/2021
Item 11

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2021 AUG -2 AM 8:42

CITY CLERK
CITY OF PASADENA

SONJA K. BERNDT
Pasadena, CA 91107
Sonja.berndt19@gmail.com

August 1, 2021

Mayor Victor Gordo
Members of the Pasadena City Council
Pasadena, CA
By Email (correspondence@cityofpasadena.net)

Re: Draft 2021-2029 Housing Element – Agenda #11, Council Meeting 8/2/2021

Dear Mayor Gordo and Members of the City Council,

A. Introduction

I am a longtime Pasadena resident. I have reviewed the current draft Housing Element, listened to the comments of members of the Planning Commission and community members, and participated in the Planning Department’s comment process. The draft Housing Element starts out with hopeful language:

All Pasadena residents have an equal right to live in decent, safe, and affordable housing in a suitable living environment for the long-term wellbeing and stability of themselves, their families, their neighborhoods, and their community. . . . The City is committed to opening doors for people of all income levels, at all stages in their lives, and to creating programs that demonstrate innovation and leadership.

(Draft Housing Element [“Draft HE”], at p. 2.) But the draft Housing Element falls far short of that commitment with regard to providing housing for the hundreds of our residents who have no shelter whatsoever. In fact, the draft Housing Element provides no thoughtful analysis or strategy for adequately providing for the housing needs of our unsheltered residents.

There are many substantial deficiencies of the draft Housing Element, which many others have addressed, and continue to raise at this meeting. In this letter, I address the failure of the draft Housing Element to meet the clear, statutory requirements of Government Code section 65583 with regard to interim housing for the hundreds of our unsheltered residents. The current draft shows a lack of

commitment to provide housing for our most vulnerable population. While staff has vowed to continue to revise the draft Housing Element over the next few months, staff is asking you to send an inadequate and defective document to the California Department of Housing and Community Development. Please deny that request. Our City and our most vulnerable residents deserve so much better.

B. The Draft Housing Element Fails to Meet the Requirements of Government Code Section 65583 with regard to Housing for our Unsheltered Residents

California Government Code section 65583, subdivision (a), provides, in relevant part, as follows:

The housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, mobilehomes, and emergency shelters, **and shall make adequate provision for the existing and projected needs of all economic segments of the community.** The element shall contain all of the following:

(a) An assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. The assessment and inventory shall include all of the following:

...

(4) (A) The identification of a zone or zones where emergency shelters are allowed as a permitted use without a conditional use or other discretionary permit. The identified zone or zones shall include sufficient capacity to accommodate the need for emergency shelter identified in paragraph (7), except that each local government shall identify a zone or zones that can accommodate at least one year-round emergency shelter. . . .

...

(7) An analysis of any special housing needs, such as those of the elderly; persons with disabilities . . . ; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The need for emergency shelter shall be assessed based on the capacity necessary to accommodate the most recent homeless point-in-time

count conducted before the start of the planning period, the need for emergency shelter based on number of beds available on a year-round and seasonal basis, the number of shelter beds that go unused on an average monthly basis within a one-year period, and the percentage of those in emergency shelters that move to permanent housing solutions. . . .

(Emphasis added.) The Staff Report, at page 9, states that the Draft 2021-2029 Housing Element meets requirements for substantial compliance with State Housing Element law. For at least the following reasons, it does not.

1. The draft Housing Element fails to provide “an identification and analysis of existing and projected housing needs” of our unsheltered residents.

As of the 2020 Homeless Count, our City had 527 persons experiencing homelessness, **nearly 300 of which had no shelter at all**. Appendix A of the draft Housing Element (page A-11) mentions the 527 persons experiencing homelessness. There is no mention of our unsheltered residents until a notation in passing in Appendix B.¹ Significantly, the draft **fails to analyze** either the existing or projected interim housing needs of our unsheltered residents. In Appendix A, pages A-11—A-12, the draft Housing element notes that “[t]he following housing options are provided in Pasadena for homeless people” followed by a list of options,² but it fails to identify how many persons for which these options are **actually available** and it fails to acknowledge that these options **are inadequate** as evidenced by nearly 300 unsheltered persons. There is a brief reference in Appendix B to emergency shelters and “transitional housing.” It identifies certain areas where emergency shelters can be “established” by right. No shelters have been constructed on those sites, emergency or otherwise. More importantly, the draft Housing Element fails to disclose the severe limitations of these shelters, which are actually referred to in the City’s ordinance (section 17.50.105) as “Emergency Shelters, Limited.” Under that ordinance, clients can stay only for a maximum of 6 continuous months, while many of our unsheltered residents need interim housing for much longer than that. Additionally, these “limited” shelters are congregate, a shelter model our City recognizes as high-risk due to the pandemic. Government Code section 65583 requires the housing element to **“make adequate provision for the existing and projected needs of all economic**

¹ Appendix B at page B-20 cites the 2019 number of unsheltered persons and incorrectly states that there was no point-in-time homeless count in 2020.

² The list provided is also misleading. For example it states that there are 242 shelter beds available in Pasadena for inclement weather. But last winter, there were NO bad weather shelter beds in Pasadena. Further, for those beds outside our City, our unsheltered residents had to compete with all other Los Angeles County residents in need of shelter from the rain and cold.

segments of the community.” (Emphasis added.) The draft Housing Element does not, and **cannot**, do that because it fails to provide any meaningful analysis of the needs of nearly 300 unsheltered persons in our City.

2. The draft Housing Element provides an inadequate and misleading “statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing” for our unsheltered residents.

The draft Housing Element lists as a 2021-2029 Objective “continue the [Project] Roomkey and [Project] Homekey programs to allow for the permanent conversion of motels to supportive and transitional housing.” First of all, the statement is confusing because Project Roomkey involves securing specific rooms in a motel for unhoused persons and does not involve conversion of motels to supportive and transitional housing. More importantly, the Housing Department reported to the Public Safety Committee on July 21, 2021, (1) that in July 2020, the City **transitioned from** the Project Roomkey program to a “scattered site emergency shelter model using motel vouchers;” and (2) that “the scattered site emergency motel program will fully ramp down on August 31.” (7/21/21 Memorandum from W. Huang to S. Mermell, “COVID-19 Impacts on and City Response Measures Targeted to the Homeless Population,” at p. 3.) So the draft Housing Element is inconsistent with the Housing Department’s representation that Project Roomkey is no longer a program in this City

As for the draft Housing Element’s stated objective to “continue” the Project Homekey program to allow for the permanent conversion of motels to supportive and transitional housing, this statement is baffling because there is nothing to “continue” here in Pasadena. Project Homekey provided grants to counties, cities, and other government entities within California to purchase and rehabilitate housing, including hotels and motels, and convert them into permanent, long-term housing for people experiencing or at risk of homelessness. (Project Roomkey and Project Homekey 10.30.20.pdf (ca.gov).) All funds have now been awarded, totaling more than \$835 million to 48 applicants (93 projects), totaling 6,055 units. (*Ibid.*) Our City did not seek to participate in this program. The Housing and Community Development website page for Project Homekey notes that the 2020 Project Homekey program is closed and additional funding is not yet available.

With regard to the draft Housing Element’s stated objective to “continue to provide weather-activated motel vouchers to people experiencing homelessness” (Draft HE, p. 59), this is misleading because this voucher program **did not meet the need**

this past winter. These vouchers were given to those most vulnerable to serious illness and death. Reports from persons with knowledge of the program this past winter acknowledge that deserving persons were turned away.

The draft housing element's statement of financial resources for the development of housing for our unsheltered residents is also sorely lacking: "Provide support and financial assistance to community service organizations that provide housing opportunities and supportive services for people who are homeless or at risk of being homeless." (Draft HE, p. 22, Policy HE-4.6.) Our Housing Department receives almost no General Fund allocations from the City. So this plan hopes and prays that our City will receive adequate funding from the state and federal governments. Further, while the draft Housing Element notes that the City receives federal and state money for rapid re-housing of persons experiencing homelessness (Draft HE, p. 48), the lack of a concrete plan is evidenced by the statement that the plan for rapid re-housing is to seek more grant funding from non-local sources when "available." (*Id.*, p. 49.)

3. The draft Housing Element fails to provide any analysis of interim housing options that have been shown to be successful in many jurisdictions.

For the draft Housing Element to be construed as a serious attempt to "adequately provide for" the existing and projected needs of our unsheltered residents, it needs to include a discussion of options that are working in other jurisdictions. Day after day, community members hear about tiny home developments being opened in Los Angeles and many other jurisdictions. We have begged and pleaded for a tiny home development in our City as well as for the purchase of a motel/hotel for conversion to interim housing. So far, our pleas have been ignored. In the meantime, our unsheltered residents continue to languish on our streets. Interim housing provides the shelter, meals and services these hundreds of folks need as they wait many months for permanent housing.

Please reject the draft Housing Element and direct the Planning Department to go back and provide a thoughtful and meaningful analysis and strategy for meeting the interim housing needs of our unsheltered neighbors. Thank you.

Sincerely,

/s/

Sonja K. Berndt
Pasadena

Iraheta, Alba

From: cityclerk
Sent: Saturday, July 31, 2021 4:43 PM
To: Flores, Valerie; Iraheta, Alba; Jomsky, Mark; Martinez, Ruben; Novelo, Lilia; Reese, Latasha; Robles, Sandra
Subject: FW: 11. Pasadena Housing Element - Recommended changes
Attachments: 2021-07-31 Annotations on the DRAFT Public Review Housing Element.pdf

From: Jonathan Edwards <>
Sent: Saturday, July 31, 2021 4:39:59 PM (UTC-08:00) Pacific Time (US & Canada)
To: cityclerk <cityclerk@cityofpasadena.net>; PublicComment-AutoResponse <publiccomment@cityofpasadena.net>; HousingElement <HousingElement@cityofpasadena.net>
Cc: Rivas, Jessica <jerivas@cityofpasadena.net>; Madison, Steve <smadison@cityofpasadena.net>; Suzuki, Takako <tsuzuki@cityofpasadena.net>; Thyret, Pam <pthyret@cityofpasadena.net>; Andy Wilson <andy@wilsonforcitycouncil.com>; Gordo, Victor <vgordo@cityofpasadena.net>; De La Cuba, Vannia <VDeLaCuba@cityofpasadena.net>; Felicia Williams <fewiwilliams@gmail.com>
Subject: 11. Pasadena Housing Element - Recommended changes

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RE: Pasadena City Council Agenda Item
11. DRAFT 2021-2029 HOUSING ELEMENT
AUGUST 2, 2021

Please direct staff to make changes to improve Pasadena's Housing Element, the current draft is inadequate.

Specifically, there is a disconnect when comparing **Table C-1: Approved Projects**, to **Table C-2: Proposed Projects** and **Table C-3: Vacant and Underutilized Sites**.

As I understand it, **Table C-1: Approved Projects** represents something somewhat close to *actual reality*—projects that a developer took through the complete planning process and has actually built, or has at least deemed profitable enough to finish the planning process.

The *reality* is that developers built 80% of units at market rate, and only 20% affordable, in accordance with the Inclusionary Housing Ordinance.

However, **Table C-2: Proposed Projects** assumes that in the future, only 27% of the units built will be market rate, and 73% will be affordable (!)

and **Table C-3: Vacant and Underutilized Sites** assumes that only 10% of the units built will be market rate, and 90% will be affordable (!)

WOW! Those assumptions indicate that *developers*, the individuals and corporations who invest millions of dollars to obtain financing, purchase properties, design plans, undertake the planning process, and eventually (years later) actually build units, are going to make radically different choices and investments than they have previously made.

In order for developers to *actually* make such a radical change, the development constraints would have to be radically loosened and/or the financial subsidies & incentives would have to be radically boosted.

This housing element proposes no radical changes, is full of vague “should consider” language, and therefore this change in developer behavior is magical thinking.

Please direct staff to re-do the draft to identify more realistic targets & goals, and make specific commitments to achieve additional housing including a *realistic* opportunity for market-rate housing accompanied by a *realistic* affordable component.

This would entail a mix of upzoning and relaxation of development constraints and additional financial subsidies & incentives.

The Pasadena Affordable Housing Coalition has proposed a list of specific suggestions which should be adopted. In particular, the Housing Element should:

- Remove Parking Minimums Citywide: Parking minimums increase the developer’s cost for building housing, take up space that could be used for more housing units, and disincentivize the use of transit.
- Remove height and FAR restrictions near transit: Encourage developers to build more housing units – including market rate & affordable units – near major public transportation stops.
- Mandate Unbundled Parking Costs from Rent or Purchase Cost: Unbundling parking costs from the cost of housing makes housing more affordable as renters can choose to rent a housing unit without paying for the cost of a parking space. Renters & owners in existing buildings would be incentivized to get rid of a car and rent their unused parking spaces to others.
- Allow & Encourage “Missing Middle” housing types within areas currently zoned for SFH: Missing middle housing are buildings (duplexes, fourplexes, cottage courts, courtyard buildings) with multiple units built in walkable neighborhoods.

In addition, to successfully achieve the RHNA housing growth goal, the housing element needs to fairly estimate how much capacity the city has for housing growth under current law.

To do this, cities must estimate how much theoretical zoned capacity they have, but also how likely it is for individual parcels to be redeveloped in the coming years. That way, cities can rezone

enough parcels to meet the RHNA housing growth goal - the same way that UCLA admits a class of 4,000 students when they want 2,000 students to attend.

Los Angeles is doing this. LA's site inventory analysis includes a thorough quantitative model that estimates this likelihood, and the housing element acknowledges that significant rezoning is needed for LA to achieve its RHNA goal.

Professor Chris Elmendorf has a more detailed explanation here:

<https://twitter.com/CSElmendorf/status/1411037893297012739>



Chris Elmendorf

[@CSElmendorf](#)



LA's draft housing element just dropped. It's an exemplar, a huge deal not only for LA but for cities across California.

LA is the first city to realistically assess development potential under current zoning, and the results are stunning. 1/18

planning.lacity.org/plans-policies...

7/2/21, 12:03 PM



Chris Elmendorf

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As I've explained many times before, cities' assessment of capacity traditionally assumed that every site with near-term development potential *will* be developed during planning period: $P(\text{dev}) = 1$. This assumption is patently false. 2/n

7/2/21, 12:03 PM



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I and co-authors argued in this paper that recent changes to state law empower [@California_HCD](#) to require cities to discount site capacity by a rough estimate of the site's likelihood of development during planning period. 3/n

ecologylawquarterly.org/print/making-i...

twitter.com/CSElmendorf/st...

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Subsequently, [@California_HCD](#) issued guidance that embraces our idea, but equivocates on whether it's a requirement or a recommendation. 4/n

twitter.com/CSElmendorf/st...

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The first big city to submit a housing plan this cycle, San Diego, relied on the old $p(\text{dev}) = 1$ assumption. HCD told San Diego to submit amendments addressing likelihood of development. City's response was a dud. It should be decertified. 5/n

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Chris Elmendorf

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LA, by contrast,
recruited [@issiromem](#) & [@TernerHousing](#) to model sites'
likelihood of development as function of base and density-bonus
zoning, price, and several other predictors. 6/n

planning.lacity.org/odocument/1511...pic.twitter.com/GbJM7Rbt4P

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Table 4.4

Regression Model Variables
Factors Considered in Model
Number of base-zoned units allowed (per zoning)
Number of bonus-zoned units allowed (the sum of base-zoned units and any additional units allowed per development bonus)
Ratio of existing units to base-zoned units
Indicators for residential market area type
Existing use
Age of existing structure
Floor Area Ratio (FAR) utilization of existing structure
Applicability of City's Rent Stabilization Ordinance (RSO) to existing structures
Ratio of total permitted units to total based-zoned units in the Community Plan Area (CPA), over a 5-year period
Typical estimated home value in the zip code area (Zillow Home Value Index)
Typical estimated asking rent in the zip code area (Zillow Observed Rent Index)
Average rental vacancy rate in the Census Public Use Microdata



Chris Elmendorf

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Study shows that if you assume $p(\text{dev}) = 1$, LA has enough excess capacity under current zoning to accommodate ***the entire ~1.4m unit "regional need" of Southern California***, even w/o density bonuses. 7/n pic.twitter.com/OI5PQfJKfN

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1.2. Zoned capacity for housing in th

The City of Los Angeles currently in the sample of parcels considered that allowed for housing was rec maximum number of allowable in the City would more than double increased since 2010, especially to the introduction of the City's program.



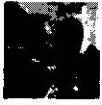
Chris Elmendorf

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But analysis also shows that share of sites w/excess capacity that get developed in any given year is tiny, roughly 0.012 for the 5-year period from 2015-2019. 8/n pic.twitter.com/hJ10rHPoIT

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The fitted model yields site-specific probabilities of development over the next 5 years ranging from 0 to 0.12.

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Percentile	Predicted probability of having new units permitted		
	All parcels	Base-zoned	
		1-4 units	5-50 units
1st	0.04%	0.04%	0.04%
5th	0.11%	0.13%	0.13%
10th	0.19%	0.24%	0.24%
25th	0.45%	0.52%	0.52%
50th	0.89%	1.01%	1.01%
75th	1.95%	1.95%	1.95%
90th	3.26%	3.26%	3.26%
95th	4.30%	4.30%	4.30%

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Adjusting the projection period from 5 to 8 years, and incorporating estimates of number of units conditional on development, LA projects that it has realistic capacity for about 47,000 new units on these sites (well shy of 1.4m!).

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In effect, LA's housing plan assumes that it will realize (as new housing units) only 3.5% of aggregate zoned density of its sites. San Diego, by contrast, assumed that it will realize 90% of zoned density. 11/n twitter.com/CSElmendorf/st...

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And whereas San Diego's ludicrous assumptions allowed it to claim that it has no need to rezone in order to accommodate its share of regional housing need, LA promises a massive rezoning program. 12/n pic.twitter.com/RMvkJcke8z

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121. RHNA Re-Zoning (NEW)

Goal #: 1

Lead Agencies: LACP

Supporting Agencies: HCID

Funding Source: REAP Grant

Objective: Citywide Rezoning to meet RHNA Target reporting to indicate any loss in capacity from additional rezoning.

To accommodate the remaining RHNA of 219,732 units, L/ recommend rezoning for a minimum of 97,851 moderate and above moderate income (VLI and LI) units by October 2029. 50% of lower income rezoning will occur on sites with exclusiv

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allowing 100% residential uses. All lower income sites will have a density allowance of at least a minimum 20 units per acre. Rezoned sites will permit owner-occupied and rental multifamily uses by right pursuant to CA Govt. Code § 65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households and will be selected from sites identified in the parcel listing (Appendix 4.7). As reflected in Appendix 4.7 (Under Development), each site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided.

The Rezoning Program is anticipated to be implemented through a number of work efforts including updates to up to 16 Community Plans (four West LA plans and six SE/SW Valley plans, two Downtown plans, Boyle Heights, Hollywood, Harbor-Gateway and Wilmington), two Specific Plans (CASP and Slauson TNP) as well as at least one citywide ordinance that will create additional zoning capacity through an expansion of affordable housing incentive programs (Density Bonus Update - See Program 48) or other zoning code amendments.

The Program will respond to the findings of the AFFH analysis in Chapter 4 by including strategies that advance equity. It is anticipated to focus a majority of the additional capacity in Higher Opportunity areas with good access to jobs and/or transit, with protections for vulnerable communities and ecologically sensitive areas. The program will carefully consider the creation of a diversity of housing types to expand more naturally affordable and deed-restricted affordable options. The Program will pursue the creation of enhanced community benefits for rezoned properties, including longer affordability terms, more affordable units of a greater income mix, strengthened housing replacement and right to return requirements, sustainability features, as well as additional incentives for projects being developed by community land trust, public agencies, cooperatives, non profits, etc.

Specific Rezoning Program concepts that will be further developed with significant community input include focusing rezoning strategies on commercial and residential corridors, areas zoned for Parking (P), transitional residential areas off commercial boulevards, in existing regional centers, on public and religious-owned land, and in other areas where multifamily, and therefore affordable housing, is not permitted today. The Rezoning Program may also include more flexible zoning and incentives for existing single-family or lower density residential areas to create opportunities for a variety of "missing middle" low-scale housing typologies including fourplexes

City's affordable housing incentive programs (including Density Bonus, TOC, among others) to include a wider array of areas and project types and create more inclusive developments. Opportunities for greater streamlining will also be explored through expansion of adaptive reuse and micro unit housing, current value capture efforts and additional incentives for 50-100% affordable and supportive housing projects, senior housing, and special needs housing. The Program will examine housing opportunities in areas that have been historically downzoned; areas served by jobs and transit, including commercial corridors served by Metro NextGen; lower density areas residential areas fronting Boulevards and Avenues, certain industrial areas; and properties with certain characteristics including alleyways, large lots, and/or residential corners, etc.



Chris Elmendorf

[@CSElmendorf](#)



LA also forthrightly acknowledges that distribution of its realistic capacity is now skewed toward low-income neighborhoods. In connection w/ AFFH program, city promises to create "zoning budgets" for each of its community plan areas. [@ProfSchleich](#) [@RickHills2](#) 13/n pic.twitter.com/Ak7eRu8Ha4

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49. Targeted Zoning Allocations by Community Plan Area

Goal #: 1

Lead Agencies: LACP

Supporting Agencies: HCID

Funding Source: REAP

Objective: Create a Citywide Housing Needs Assessment by Community Plan Area, including a methodology to allocate housing targets, including Affordable Housing units, regarding equity, access to opportunity, and anti-displacement

Pursue the creation of a community housing needs assessment process that allocates the citywide RHNA to Community Plan Areas based on a methodology that reflects citywide priorities, including traditional growth criteria (proximity to transit, jobs and amenities) as well as considerations regarding equity, access to opportunity, and anti-displacement. More guidance should also be provided regarding the development of local incentive programs and policies to address local needs. Consider other ways to align regional, citywide, and local planning for housing, such as aligning capacity methodologies and assumptions. Identify the housing needs of each community when

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Housing Goals, Policies, Objectives and Programs

each Community Plan is updated and address them in alignment with Citywide Housing Priorities. Concurrently, HCID is developing an Affordable Housing Sites Analysis tool, intended to complement citywide RHNA, that will identify parcels that are most competitive for local, state and federal funding programs and meet low-income housing goals.

As part of the current Housing Element update, adopt a program for the future update to the City's General Plan growth strategy to create a new community housing needs assessment methodology to establish housing goals and zoning targets for each Community Plan Area, by income category. The process could be based upon citywide housing production goals and utilize a methodology that would balance traditional factors such as job and transit access with a new prioritization for high opportunity areas, anti-displacement and other equitable housing considerations. The outcome of this process would include the creation of numerical housing goals and zoning targets for each Community Plan Area, and subareas, by income category.

124. Affirmatively Furthering Fair Housing (AFFH) Program (NEW)

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Chapter 6
Housing Goals, Policies, Objectives and Programs

Goal #: 4,1

Lead Agencies: LACP, HCID
Supporting Agencies: HACLA
Funding Sources: REAP Grant
Objective: Compliance with US Housing and Urban Development (HUD) and AB 686 (2018).

Promote and affirmatively further fair housing (AFFH) opportunities throughout the community in all housing, planning and community development activities. Take a variety of actions to overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity to promote diverse communities that grant all Angelenos access to housing. Increase place-based strategies to encourage community revitalization and protect existing residents from displacement through various policies, programs, and goal setting (e.g. AFH Plan).

The following specific actions are either ongoing activities or will be undertaken by HCID and/or LACP as part of actions to address AFFH issue areas in partnership with key local stakeholders:

- 1) *Significant Disparities in Housing Needs and Access to Opportunity*
 - a) Prioritize those with the greatest housing needs including those with the lowest incomes, persons with disabilities, seniors, large families when updating affordable housing incentive programs (Program 54).
 - b) With all new housing projects and land use initiatives that require General Plan consistency findings, follow the guidance set by the Housing Element's Goals, Objectives and Policies that have been enhanced to place greater emphasis on advancing racial equity, expanding access to Higher Opportunity and protecting Angelenos from displacement.
 - c) Through the RHNA Rezoning Program, develop Zoning Code amendments and Community Plans that incentivize and encourage the development of more affordable housing in areas of high need and Higher Opportunity (see Program 120).
 - d) Carry out Equitable Development and Anti-Displacement Studies that includes recommendations relating to land use, the City's growth strategy, and opportunities to build affordable housing and prevent displacement of protected classes(see Program 121).

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2) *Replacing Segregated Living Patterns with Truly Integrated and Balanced Living Patterns and Transforming Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) into Areas of Opportunity*

- a) Introduce context specific reforms to zoning and land use practices that perpetuate racial exclusion and inequities including but not limited to single family / low density zoning, minimum lot size requirements, and subjective design review standards.
- b) Introduce more flexible zoning and incentives for existing lower density residential areas to create opportunities for more "missing middle" low-scale housing typologies, particularly in Higher Opportunity Areas.
- c) Promote a more equitable distribution of affordable housing opportunities throughout the city, with a focus on increasing Affordable Housing in Higher Opportunity Areas and in ways that further Citywide Housing Priorities.
- d) Prioritize housing capacity, resources, policies and incentives to include Affordable Housing in residential development, particularly near transit, jobs, and in Higher Opportunity Areas.
- e) As part of the effort to update the City's growth strategy, or General Plan Framework Element, create a new community housing needs assessment methodology that would allocate citywide housing targets across Community Plan areas in a way that seeks to address patterns of racial and economic segregation, promote jobs/housing balance, provide ample housing opportunities, and affirmatively further fair housing. (Program 50)
- f) Prioritize local resources, such as funding and public land, in areas of high opportunity, and evaluate revisions to funding metrics or policies that may act as a barrier to projects locating in high resource areas. Seek partnerships with other public and private entities to facilitate new potential development sites in these areas for affordable housing
- g) Prioritize local resources, such as funding and public land, in areas of high opportunity, and evaluate revisions to funding metrics or policies that may act as a barrier to projects locating in high resource areas. Seek

But my understanding is that Pasadena isn't including any analysis of the likelihood of development, which allows Pasadena to pretend that we don't have to rezone to meet the RHNA goal. It's a recipe for failure and continued housing scarcity

Under California's Regional Housing Needs Assessment, our city is required to update the housing element in a way that encourages historically high housing growth, while affirmatively furthering fair housing opportunities and undoing patterns of discrimination in housing. We can't miss this opportunity to fix our city's housing crisis.

I urge you to ensure that our city creates a transformative, high-quality housing element that fully accords with state law and expert recommendations. This must include a fair, accurate assessment of the site inventory's realistic capacity, providing an appropriate estimate of future housing production on parcels where redevelopment is likely to occur.

Again, the City of Los Angeles has set the bar high by incorporating a high-quality, data-driven site inventory analysis in its draft housing element. The City collaborated with economists and subject matter experts at the Turner Center for Housing Innovation at UC Berkeley to create a thorough quantitative model that estimates sites' likelihood of redevelopment, providing a fair estimate of the City's current realistic capacity for new housing. The housing element also acknowledges that significant rezoning is needed for LA to achieve its RHNA goal. Every city in our region should follow LA's lead.

Every city in Los Angeles County needs to adopt high-quality housing elements that fully accord with state law and expert recommendations, and this includes a fair estimate of realistic capacity and development likelihood. We need this in order to solve our housing affordability crisis, and to create a city where everyone can thrive.

ATTACHED PDF:

"2021-07-31 Annotations on the DRAFT Public Review Housing Element.PDF"

Jonathan Edwards, resident
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