

ATTACHMENT A

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2021 AUG -2 AM 8:42

CITY CLERK
CITY OF PASADENA

PUBLIC REVIEW DRAFT
2021-2029 HOUSING ELEMENT



CITY OF PASADENA
100 North Garfield Ave.
Pasadena, CA 91101

JULY 26, 2021

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. Housing Resources

Table C-1: Approved Projects

| Project Name and/or Status | Affordability Level | | | | Total |
|---|--------------------------|-------------------------|-------------------------------|-----------------------------------|--------------|
| | EL/VL Income (0-50% AMI) | Low Income (50-80% AMI) | Moderate Income (80-120% AMI) | Above Moderate Income (120%+ AMI) | |
| Outside of Specific Plan Areas | | | | | |
| CBG Homes (2488 Mohawk St.) | 1 | 0 | 0 | 20 | 21 |
| National Community Renaissance (143 Mar Vista Ave.) | 19 | 0 | 0 | 1 | 20 |
| 947 E California Blvd. | 0 | 0 | 0 | 4 | 4 |
| 233 N Hill Ave. | 8 | 0 | 50 | 0 | 58 |
| 1153 Bresee Ave. | 0 | 0 | 0 | 1 | 1 |
| 690 N Orange Grove Blvd. | 0 | 8 | 0 | 58 | 66 |
| <i>Sub Total</i> | 28 | 8 | 50 | 84 | 170 |
| Within Specific Plan Areas | | | | | |
| MW Lofts (744 E. Walnut St.) | 10 | -- | -- | 105 | 115 |
| 100 West Walnut | -- | -- | -- | 475 | 475 |
| 690 N Orange Grove Blvd. | -- | -- | -- | 11 | 11 |
| 843 N Fair Oaks Ave. | -- | -- | -- | 9 | 9 |
| 765 N Orange Grove Blvd. | 21 | -- | 14 | 13 | 48 |
| 1435 Lincoln Ave. | -- | -- | -- | 8 | 8 |
| 209 S El Molino Ave. | -- | -- | -- | 11 | 11 |
| 3452 E Foothill Blvd. | 21 | -- | -- | 213 | 234 |
| 737 E Walnut St. | 3 | -- | -- | 39 | 42 |
| 99 N El Molino Ave. | -- | -- | -- | 40 | 40 |
| 95 N Madison Ave. | 10 | -- | 90 | -- | 100 |
| <i>Sub Total</i> | 65 | 0 | 104 | 924 | 1,093 |
| Total | 93 | 8 | 154 | 1,008 | 1,263 |

REALITY:

MARKET RATE UNITS
have been
 $1,008/1,263 = 80\%$
of what gets actually built,
given **EXISTING DEVELOPMENT CONSTRAINTS**
and financial incentives.

Housing Resources

HUH?? Developers are suddenly now intending to build only 27% of units at market rate?

What changes to EXISTING DEVELOPMENT CONSTRAINTS and financial incentives would spark such a dramatic shift in behavior by developers?

Table C-2: Proposed Projects

| Project Name | Affordability Level | | | | Total |
|---------------------------------------|--------------------------|-------------------------|-------------------------------|-----------------------------------|--------------|
| | EL/VL Income (0-50% AMI) | Low Income (50-80% AMI) | Moderate Income (80-120% AMI) | Above Moderate Income (120%+ AMI) | |
| Outside of Specific Plan Areas | | | | | |
| 673 E California Blvd. | -- | -- | -- | 8 | 8 |
| 170 N Parkwood Ave. | -- | -- | -- | 58 | 58 |
| 936 N Los Robles Ave. | -- | -- | -- | 3 | 3 |
| 1027 N Altadena Dr. | -- | -- | 9 | -- | 9 |
| 93 N Craig Ave. | -- | -- | 6 | -- | 6 |
| 154 Mar Vista Ave. | -- | -- | 6 | -- | 6 |
| 41 S Daisy Ave. | -- | -- | 3 | -- | 3 |
| 488 E Villa St. | 227 | -- | -- | -- | 227 |
| 264 N Chester Ave. | -- | -- | 5 | -- | 5 |
| 1075 N Los Robles Ave. | -- | -- | -- | 2 | 2 |
| 439 N Hill Ave. | -- | -- | 13 | -- | 13 |
| 244 N Michigan Ave. | -- | -- | 15 | -- | 15 |
| 256 N Michigan Ave. | -- | -- | 16 | -- | 16 |
| Sub Total | 227 | -- | 73 | 71 | 371 |
| Within Specific Plan Areas | | | | | |
| 100 E Green St. | 15 | -- | -- | 108 | 123 |
| 540 S Lake Ave. | -- | 10 | 62 | -- | 102 |
| 105 S Catalina Ave. | -- | -- | 137 | -- | 137 |
| 740 E Green St. | 4 | -- | 269 | -- | 273 |
| 19 E Orange Grove Blvd. | -- | 22 | 65 | 7 | 94 |
| 141 S Lake Ave. | 89 | -- | 89 | -- | 178 |
| 127 N Madison Ave. | -- | 4 | 45 | -- | 49 |
| 130 N Fair Oaks Ave. | -- | -- | 38 | -- | 38 |
| 136 S Oak Knoll Ave. | -- | -- | 16 | -- | 16 |
| 150 E Colorado Blvd. | 2 | -- | -- | 96 | 98 |
| 150 S Oak Knoll Ave. | 21 | -- | 14 | -- | 35 |
| 253 S Los Robles Ave. | 90 | -- | 0 | -- | 90 |
| 254 E Union St. | -- | -- | 59 | -- | 59 |
| 272 N Los Robles Ave. | -- | -- | 105 | -- | 105 |
| 274 N Oakland Ave. | -- | -- | 201 | -- | 201 |
| 3202 E Foothill Blvd. | 58 | -- | -- | 492 | 550 |
| 340 S Madison Ave. | -- | -- | 8 | -- | 8 |
| 444 N Fair Oaks Ave. | 206 | -- | -- | -- | 206 |
| 747 E Green St. | 72 | -- | -- | -- | 72 |
| 86 S Fair Oaks Ave. | 87 | -- | -- | -- | 87 |
| 913 Boston Ct. | -- | -- | 12 | -- | 12 |
| Sub Total | 644 | 36 | 1120 | 703 | 2,533 |
| Total | 871 | 36 | 1,193 | 774 | 2,904 |

Housing Resources

MAGICAL THINKING!

Are all of the sites identified going to be re-developed in the next 10 years by developers who are only interested in building 10% market rate units (90% affordable)??

projects of scale in Pasadena and at densities approaching the maximum permitted.

The sites inventory includes properties within Specific Plan areas that, similar to properties that have been redeveloped over the past eight or so years, are characterized by: 1) single-story commercial or industrial buildings that have not had significant investment in many years, 2) parking lots not needed to support demand of associated uses, and 3) retail commercial and office buildings for which property owners have inquired with City Planning staff regarding reuse potential.

Table C-3 summarizes the number of units, by RHNA income category, that can be accommodated by vacant and underutilized sites within and outside of the Specific Plan areas.

Table C-3: Vacant and Underutilized Sites

| Areas | Affordability Level | | | Total |
|---------------------------------------|---------------------------|-------------------------------|-----------------------------------|--------------|
| | Lower Incomes (0-80% AMI) | Moderate Income (80-120% AMI) | Above Moderate Income (120%+ AMI) | |
| Outside of Specific Plan Areas | | | | |
| Vacant | -- | 18 | 18 | 36 |
| Underutilized | 154 | 640 | 476 | 1,270 |
| <i>Sub Total</i> | 154 | 658 | 494 | 1,306 |
| Within Specific Plan Areas | | | | |
| Central District | 1,470 | 512 | 0 | 1982 |
| East Colorado | 154 | 107 | 0 | 261 |
| East Pasadena | 777 | -- | 13 | 790 |
| Fair Oaks/Orange Grove | 101 | 52 | 4 | 157 |
| Lamanda Park | 133 | 102 | -- | 235 |
| Lincoln | -- | 39 | -- | 39 |
| North Lake | 171 | 27 | 2 | 200 |
| South Fair Oaks | 56 | 5 | -- | 61 |
| <i>Sub Total</i> | 2,862 | 844 | 19 | 3,725 |
| Total | 3,016 | 1,502 | 513 | 5,031 |

What changes to EXISTING DEVELOPMENT CONSTRAINTS and financial incentives would spark such a dramatic shift in behavior by developers?

Adequacy of the Sites Inventory

Overall, the sites inventory identified in this Appendix totals 10,443 units, 4,872 of which are in the very low- and low-income RHNA categories. Overall, the City can adequately accommodate—and have excess capacity for—the RHNA under existing land use regulations. Table C-4 shows a shortfall of 789 Above Moderate-income units, but those can be addressed with the surplus of site capacity in the Lower- and Moderate-income categories.

Iraheta, Alba

From: Heather Richardson < >
Sent: Sunday, August 1, 2021 6:35 PM
To: PublicComment-AutoResponse
Subject: Please Put Congragarional Land Use Back on the Agenda and other housing element considerations

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Dear Mayor Gordo and City Council Members,

My name is Heather Richardson and my family and I live in District 2. I am speaking on Item 11, the Housing Element.

I am so glad the city is required to plan for almost 6000 units of affordable housing over the next 8 yrs. The need for affordable housing in Pasadena is very important and there is an urgent need for many who need it in our city.

Over this past week I became aware of many of the personal stories, besides my own, of those who desperately need or have once needed affordable housing throughout our city at an event called Living Pasadena. It's purpose was to promote affordable, acessible and liveable places to live throughout our entire city. I heard diverse stories of people who had come from many different backgrounds This showed me again the significance of community and the support I want to be to help make this situation better for those living in Pasadena.

First of all, it shouldn't take MANY years to find affordable places to live in our city. There are some solutions that can and must be implemented to speed this process up. My daughter and I have spoken to Council Woman Felicia Williams and Commissioner Delgado on the Pasadena Housing Task Force about my family's own affordable housing story. We are so thankful for their engagement with us and hope to be able to be a partnering and bring other partners who want to see big changes in our city in regards to the development of affordable housing and caring community connections.

Being able to provide a stable place for my family to live in hasn't been easy but without our affordable rent we surely would not have been able to live, work, and enjoy the beauty, diversity, and loving relationships we have built within this community over the past 18 yrs. We want this to continue for us and especially our daughter and the generations to come who are finding it harder to stay in this city on their own.

One way we would like to start seeing affordable housing developed is through the necessary rezononing of congregational land. There are several churches in our city who want to build affordable homes on their land. I know after talking to some people about this including, Council Woman Williams there are some objections to this being done among some in our city. However, this issue needs to be put back on the agenda for consideration and appropriate implementation as soon as possible, because there are also some, such as myself and those I encountered this past week who find this delay unnecessary and have urgent need of affordable living.

08/02/2021
Item 11

If it is going to take years to decide its usefulness for our city, when churches like New Holiness Church have developers ready to build but because of rezoning ordinances to the commercial property it is on are being held up, changes need to be made to the zoning of this city. This issue needs to be put on the agenda, prioritized, and passed as quickly as possible.

If tougher discussions need to be had about the objections to the use of congregational land than I say "so be it." Compromises can be made and mutual solutions can be found if we work together as community. If there are discrepancies, concerns, questions, and ideas for its implementation then these need to be addressed too. This cannot be done if it is not on the agenda and up for public discussion and decisions based upon these conversations are not acted upon sooner than later. They should also be put in the housing element as long as it doesn't cause further delay.

I was told by someone recently who opposes churches getting involved in affordable housing development that they should "leave housing up to the city". Who is "the city"? Or as one artist who was featured at Living Pasadna's art exhibit profoundly expressed "Who does a city belong too?" Churches are people who come together in the city they are located in and many have congregants who live in the city as well. The fact of the matter is even churches are seeing church members move because of the affordable housing crisis in our city. I know what this is like first hand and it is painful, unfortunate, and preventable with affordable housing solutions such as this one and others. I don't wish to see more friends and family leave my city, state, and especially our churches

This person's objections helped solidify my desire for further conversations with others in our city who may or may not see churches as a solution for affordable housing and how new parameters for developing and managing affordable homes on church property is necessary if rezoning is permitted. This cannot be done or even considered a feasible solution unless this item is put back on the agenda.

Furthermore, there are several other items that need to be considered in the housing element including making it less expensive and lengthy to build ADUs and JADUs, allowing affordable housing in vacant or underutilized commercial lots, shortening the process of deed-restricted, affordable housing and permanent supportive housing to be within 30 days of application, considering a vacancy tax of land or property after so many years of vacancy, charging an impact fee that can create an affordable housing fund that can offset costs of more affordable housing, and granting long term community land trusts that keep subsidies from expiring and that keep affordable housing affordable for many years to come.

Thank you for your time. I look forward to partnering with you in being a part of the solution of helping others find affordable housing in our city.

Sincerely,
Heather Richardson



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2021 AUG -2 AM 9:38
CITY CLERK
CITY OF PASADENA

To: Mayor of Pasadena and Members of City Council
From: Pasadena Tenants Union
Date: July 31, 2021

This comment is submitted on behalf of the Pasadena Tenants Union (PTU), those 62% of Pasadena's residents who are renters. Despite the fact that renters constitute such an overwhelming majority of the city's population and renters are experiencing most acutely under the present COVID crisis, the proposed Housing Element (HE) policies and programs - which purport to provide "a comprehensive blueprint for city housing policy" - are, at best, anemic in addressing renters' needs. We urge that staff be directed to redraft significant portions of the HE to be more responsive to the needs of its residents.

The minimal attention paid to renters in the HE is a reflection of the city's power brokers consider tenants transitory and non-voting, who do not have a real commitment to the city. The city's leadership also believes that funding for rental housing programs should come from elsewhere - the federal or State governments - not from the city's general funds. Those monies should be reserved primarily for the Police Department. There is also a belief that renters just want to be homeowners, so it is a wiser investment to fund homeowner and historic preservation programs rather ones directed at creating and maintaining renter stability.

Renters are rarely appointed to Pasadena's commissions and task forces. The Housing Task Force ("Task Force") and Planning Commission are charged with specific obligations rearguing the HE. The seventeen-person Task Force includes only one tenant and the Planning Commission includes none. Tenant perspectives on housing and housing stability are decidedly different from those of homeowners - perspectives that should be respected and are deserving participation in the planning for the city.

The duties of the Task Force revolve primarily around the preservation of city's historic edifices, development of affordable and other units, single family ownership and multifamily ownership.¹

¹ The Task Force is responsible for studying and recommending:

- Policies to preserve Pasadena's historic residential neighborhood fabric while meeting responsibilities to target growth to meet the city's Regional Housing Needs Assessment (RHNA) allocations.
- Policies, incentives and strategies to leverage funding for the construction of sufficient affordable housing to meet the city's RHNA allocations.
- Policies and incentives to facilitate adaptive reuse of underutilized commercial and institutional structures for housing where densities are compatible with adjacent neighborhoods. Policies and programs for the preservation of existing affordable housing.

Not included in the Task Force's mission is securing housing stability for renters, the elimination of displacement of low- and moderate-income residents, or combating gentrification. The paucity of renter input is at variance with the General Plan's seventh guiding principle of full community participation because the public was excluded from Task Force meetings.²

For decades the city has paid scant attention to renter concerns in the HE process. For more than twenty years, renters have raised the need for addressing rent control, just cause eviction and other protections in connection with HE planning. City planners refused to include these tenant calls for such protections in the HE because they considered it a useless exercise; the planners knew that the City Council would not consider their inclusion.

Local programs that would assist the city's hard hit renters are barely mentioned in the proposed HE, even in this time of renters' most critical needs related to the COVID crisis. The fact that advocates garnered more than 10,000 signatures to support the amending of the city's charter to include rent control and just cause eviction protections two years ago appears of no relevance to city leadership. Under PROGRAM #14: RENTAL HOUSING ASSISTANCE, City planners list "Investigation the feasibility of enacting local rent stabilization controls that reflect conditions unique to Pasadena" as an "ongoing" effort. Although renters have sought such protection for more than twenty years, they are unaware of any such ongoing investigation. PTU suggests that this misstatement should be corrected.

Even before COVID, the housing circumstances of Pasadena renters were severely compromised; more than 50% of Pasadena's tenants were rent burdened, *i.e.*, spending more than 30% of their household income on rent, and 27% of the City's tenant households spending more than 50% of their incomes on rent. HUD considers the ability of rent burdened households to be compromised with respect to buying food, medicine and other essentials.

The issue of unduly burdensome rents is not confined to a small sector of Pasadena's population. The impact on lower income Pasadenans is especially dire. 89% of Pasadena renters making between \$10k and \$50k per year are rent burdened, and 60% of such renters spend more than half their incomes on rent. As a result, many families are forced to cut back on essential

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- Opportunities to broaden home ownership in furtherance of Pasadena's values and the community's well-being.
 - Opportunities to join with owners of existing multi-unit housing in need of renovation, restoration, and revitalization as a means of retaining affordable housing.
 - Opportunities for use of underutilized public lands for affordable housing.
 - Other policies, programs, funding mechanisms, and innovative approaches that will promote the goal of ensuring that all Pasadena residents have access to safe and decent housing.

²The exclusion of the public from the Task Force is contrary to the "robust" community participation that the HE calls for in the 7th principle which provides that "community participation will be a permanent part of achieving a greater city. Citizens will be provided with timely and understandable information on planning issues and projects; citizens will directly participate in shaping plans and policies for Pasadena's future."

expenditures, such as food and medical care, just to keep a roof over their heads. In addition, 70% of Pasadena's Black households and 68% of Latinx households are renters; a significant number of these households are lower income, translating into a fair housing concern for the city. These ramifications were not addressed as part of "Program #20: Fair Housing" in the HE.

Before the onset of the COVID pandemic, the problem was growing worse each year. The median gross rent in Pasadena increased by 32% (from \$1,287 to \$1,669) between 2012 and 2018, while the Consumer Price Index (CPI) increased by 12% over the same period. The price of housing outpaced other costs (food, transport, etc.), and vastly outpaced wages during this period.

The onset of COVID stripped even more tenants of their housing stability and further exacerbated their risks of homelessness. The Eviction Defense Network, which represents tenants facing eviction, estimates that 500,000 Los Angeles County renters are behind in their rent because of income losses due to COVID. Our City planners have not estimated how many Pasadena renters have fallen behind in their rent and are at an increased risk of homelessness.

It has been suggested that the COVID crisis should not be considered as a component of this year's HE analysis. For the last 18 months, many low wage, COVID-impacted renters have hardly been able to sustain themselves. Their viability is neither analyzed nor included in the HE. Instead, the draft HE notes:

During the COVID-19 pandemic of 2020-2021, temporary rental assistance and rental forgiveness programs at the federal, State, and local level provided safety nets for residents who lost their jobs during the economic shutdown. Those programs are not anticipated to continue during this sixth cycle Housing Element and therefore are not discussed here as programs to be carried through 2029.

The fact that federal and state COVID crisis funding may not continue through to 2029 does not change the fact that the city's low wage renters are city residents and are likely to continue be unable to pay their rent or will have their credit compromised for many years to come. It also does not relieve Pasadena of its obligation to address this issue in its HE. There is also a belief that COVID will be short-lived and that the soon-to-be-ended federal and state funds are likely to make tenants (and landlords) whole. In addition, there are reports of many jobs going begging, so low wage workers are likely to be soon re-employed.

Renters beg to differ with regard to this rosy assessment of their futures. Many tenants who are currently behind in their rent are low wage workers and employed in the restaurant and other industries that have been severely hit by the pandemic. Many of these workers are likely to return to old jobs only after a long absence or not at all. Others may only be offered part time

employment instead of the full time work they had. Their situations are further complicated by the absence of affordable child care. More often than not, women are designated primary child care providers and are likely not to return to work soon, thereby diminishing the family's income for an unknown amount of time.

In addition, low wage workers, in an attempt to keep at least current with the 25% of rent they are required to pay under the present moratorium criteria, have been borrowing from payday lenders, credit cards companies and other entities, thereby putting their credit further at risk. Another condition that compromises many low-income tenants is that they typically have jobs that do not allow them to work from home. They often live in neighborhoods where Wi-Fi is not reliably available, thus, even if many low wage renters could work from home, the digital infrastructure in Northwest Pasadena and other low-income communities do support this option.

These conditions suggest that low wage workers/renters will remain at risk long after middle- and higher-income workers, who have been able to work from home throughout the pandemic and reportedly have a choice of numerous jobs, regain their economic stability.

In addition to the impacts on low wage workers unable to pay their rent, there is another concern that promises to further compromise the City's existing stock of privately held affordable rental housing. Corporate real estate entities presently lay in wait to devour available apartment buildings and single-family dwellings. While these institutional landlords present themselves as representing the interests of small landlords when making arguments before legislative bodies, they are far from the "mom and pop" landlords who have an interest in working with their tenants. Institutional real estate entities escalate rents at a minimum rate of 8% or 9% per year—far in excess of the ability of most low wage tenants to pay. Once existing tenants are displaced, these real estate giants then further increase rents to market rates and hold the units vacant until affluent tenants apply. These entities will use methods similar to those employed during the 2008 housing crisis to create an economic debacle which will have far reaching fair housing ramifications for the City. Displacement of this kind has been especially hard hitting for households of color.

Under Program #22: Neighborhood and Community Preservation, city planners observe that

...the City has adopted strategies and programs to address residents' concerns, such as expanding the middle-income housing supply and providing opportunities for renters to purchase the units they live in. Through the public engagement process for this Housing Element, residents and neighborhood advocates asked for additional actions to allow long term residents to remain in their neighborhoods of choice.

Planners propose to implement these “solutions” to take place over the next eight years. None of these “programs” are designed to address the needs of existing renters; they are instead designed to have the city stand by and watch as existing lower income renters are replaced with middle to higher income homeowners, with the city as agent of gentrification which permanently displaces lower income tenants and destroys neighborhoods. Attached is an outline of specific sections of the draft HE that are particularly insensitive to tenant needs. PTU trusts you will take our comments into account and direct a redrafting of the HE to better meet the needs of the majority of its residents.

Respectfully submitted,

Pasadena Tenants Union

Attachment

Attachment to Pasadena Tenants Union Letter Concerning the Draft Housing Element

This attachment is meant to further clarify PTU's position on various concerns set forth in the draft Housing Element (HE) as well as our suggested solutions.

Section: INTRODUCTION
Issues: The HE promises only there would be "robust community participation" with respect to its drafting and approval.

In the course of adopting the 2017 HE, housing advocates pressed for the establishment of an affordable housing commission; they argued that the Planning Commission did not have adequate time to devote the necessary attention to affordable housing, homelessness and housing stability issues. Notwithstanding advocates' concern, the Council designated the Planning Commission as the city's affordable housing body, and instructed it to hold occasional hearings and report its findings and recommendations to the Economic Development and Technology Committee (EDTech) of the Council. The expectation was that EDTech would, in turn, make recommendations to the Council.

Concerns: "Robust community participation" is a far cry from the standard set forth in General Plan for staff engagement and community participation. The Plan states that

community participation will be a permanent part of achieving a greater city. Citizens will be provided with timely and understandable information on planning issues and projects; citizens will directly participate in shaping plans and policies for Pasadena's future.

While staff and consultants provided educational workshops, they did not make the draft HE language available until 72 hours before the Commission meeting.

Instead of allowing the public an opportunity to "participate in shaping" the HE plans and policies, the primary advisor to the process, the Housing Task Force met behind closed doors to give input to the Planning staff working on the HE. All but one of the Task Force and Commission members are comparatively well healed homeowners; none of these members are currently affiliated with Pasadena's tenant advocacy groups.

For many renters, the Commission hearing was their first exposure to a HE. The document is hardly user-friendly and is full of "planner speak."

The Council will consider the Element on August 2, 2021, in a meeting that is to commence at 4:30 P. M. and can only be viewed by zoom or Charter cable TV viewers. If individuals are lucky enough to be employed, the timing is hardly conducive to their participation. In addition, the digital infrastructure in parts of Pasadena where lower income renters are likely to live is wanting. For example, residents of Northwest Pasadena routinely complain that they lose access to zoom and other connections.

The appointment of the Planning Commission as the city's affordable housing advisory body was a failed experiment. The Planning Commission members educated themselves on affordable housing issues, but did not make recommendations; no actions based on Commission recommendations were taken by EDTech or the Council as a result. Expecting the Planning Commission to take on but another responsibility of this significance was ill conceived and again left lower income renters and unhoused persons without a public body to address their housing concerns.

Recommendations: Now that the HE language is available, PTU recommends that there be another round of review, during which time PTU and other members of the public are permitted to "directly participate in shaping plans and policies for Pasadena's future." Thereafter, the draft HE should be re-presented to city Council for consideration.

PTU again calls for the establishment of an advisory body to study how to establish and maintain housing stability for the city's renters and unhoused persons and to address our housing affordability issues. The members of this body should include a majority of renters and housing stability experts, as well as unhoused persons and those at risk of homelessness. Its hearings and deliberations should be open to the public.

Section: PROGRAM #9: REMOVAL OF CONSTRAINTS
PROGRAM #22: NEIGHBORHOOD AND COMMUNITY PRESERVATION

Item: The draft HE projects a review of the impact on the city's stock of affordable housing of short-term rentals by 2025 and "monitoring" of market conditions and gentrification.

Concerns: Delaying a review of the impacts of short-term rental units on the housing instability of low and moderate income renters until 2025 is inordinately long. The study of housing instability of renters, including gentrification, displacement, etc., is a critical need. When the short term rental regulation went into effect, there

was not even a cursory review of the impacts of these units on housing affordability or housing stability for lower income persons.

The city largely takes the position that it can do little to address housing market economics and gives up without even trying. After decades of displacement of African American households and low income renters, only now does staff suggest “monitoring” displacement and gentrification trends. Monitoring is a pitiful response to the drastic changes in our neighborhoods.

Recommendations: The staff should institute a study of—not just monitoring of—the housing instability, displacement of long-term residents, and gentrification within the city and develop proposed solutions. Components of this study should include the impacts of short-term rentals and gentrification, the net loss of our existing stock of affordable housing units and an increase in renter instability, as well as the impacts of institutional real estate interests holding units vacant to secure rents at or above market rate. This review should be mandated and completed by 2023. This expanded study should be considered critical.

Section: PROGRAM #13: HOMEBUYERS ASSISTANCE PROGRAMS

Concerns: The city proposes to fund home buyer assistance in the form of “silent” seconds, down payment assistance and other home buyer financing at a time when a vast, but undetermined, number of Pasadena tenants are at risk of eviction because of the COVID crisis or because they are rent burdened or severely rent burdened and/or homeless.

The staff has identified the targets of the home buyer programs are those who are “extremely low, very low, low, and moderate-income households.” Expecting extremely low, very low, and low income families to purchase homes is a misplaced goal.

Recommendation: In light of the hardships renters and homeless persons are presently suffering, the city should not divert local funds into creating private wealth for moderate income households through home ownership. The city should use all its general and unrestricted housing funds to improve the housing opportunities and maintenance for renters and persons/households who are homeless.

Since the targets of the home buyer programs are moderate income persons/households, the language should be amended to reflect same.

Section: PROGRAM #14: RENTAL HOUSING ASSISTANCE
PROGRAM #20: FAIR HOUSING

Concerns: The draft HE does not propose to set aside any local funds to assist renters who, through no fault of their own, have been impacted economically by the COVID 19 pandemic. However at the same time, the city proposes to increase funding to the Police Department, which already commands the lion's share of the city's general funds. Without financial assistance, an untold number of residents of our city will be evicted. The welfare of our residents is ultimately the city's responsibility; looking out for the welfare of the city's renters should not just be undertaken when federal, state, or county funds are available.

Even before the onset of the COVID crisis, more than 50% our city's renters were considered rent burdened, *i.e.*, could not afford to pay rent and other essentials, such as food and medical care, and 27% of the city's renters spent half their incomes on housing. Between 2012 and 2018, the cost of goods and services increased 12%, while Pasadena rents increased 32%.

Most renters cannot afford to pay for legal services to avoid eviction, resulting in 90% of the landlords being represented in eviction actions and only 10% of tenants. Only approximately 10% of tenants successfully defend themselves in eviction courts.

There has been an uptick in retaliation against, and harassment of, tenants by landlords, and some landlords still refuse to accept Section 8 and other vouchers. These actions are illegal in California. An increasing number of landlords are attempting to evict tenants for other illegal causes of action. The city continues to use the "carrot" approach of cajoling landlords to accept subsidized tenants; this approach has not been entirely successful. It also needs to incorporate a "stick" approach.

AB 1482, which was adopted in 2019, defined rent gauging as increasing rents above 5% plus CPI for one's county. In Los Angeles County, CPI generally ranges between 3% and 4% per year. CPI currently stands at 3.6%. Under AB 1482 rents can increase up to 10% per year. Most low wage earners cannot afford 8-10% increases per year. In nine years, these rents will double and still be considered legal. AB 1482 also established a limited form of just cause eviction protections which will expire in 2030.

Recommendations: Pasadena should aggressively advocate for landlord/tenant reforms on the state and federal levels that are designed to provide rent forgiveness and protect the credit histories of those renters who resorted to taking out

payday loans and increasing their credit card debt to remain housed during the COVID crisis.

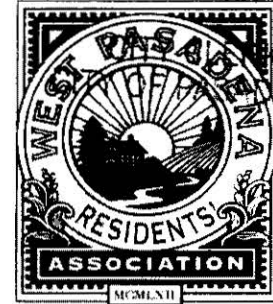
If there is less than adequate federal, state and county funds to make COVID-impacted renters whole and continue to be housed, local funds should be used to assist our residents.

The city should provide at least some kinds of legal representation for low income renters: i) funding to meet our low income residents' need for representation from legal services agencies with expertise in landlord/tenant matters and ii) establishment of a legal unit as part of the city infrastructure, similar to that funded by Santa Monica, to address housing discrimination and consumer fraud issues. This increased legal assistance will help renters address Section 8 and source of income discrimination and maintain their housing.

The city Council should adopt the Pasadena Tenant Justice Coalition proposed amendment to the city charter to provide city tenants with rent control, just cause eviction and other critical protections.

RECEIVED

2021 AUG -2 AM 8:43



July 30, 2021

Mayor Victor Gordo
Members of the City Council
City of Pasadena
VIA EMAIL

Dear Mayor Gordo and Council Members:

The West Pasadena Residents' Association submits herewith our response to the July 26, 2021 draft 2022-2029 Housing Element. WPRAs considers this draft to be an overall good start to a difficult task, one that provides a platform for further engagement and revision. Our thanks go to the elected officials, commissioners, Task Force members, staff, consultants, community leaders and hundreds of residents who have contributed so far. We also commend the thoughtful contributions of our fellow associations in Linda Vista-Annandale and Madison Heights.

One overarching message from this effort seems clear: we can enhance our city and provide for, facilitate and accelerate the housing that all Pasadenans need and deserve, without disruption and degradation of the extraordinary and special fabric of Pasadena.

Attached are:

- Our overall policies on the Housing Element update (Appendix 1)
- Specific comments on portions of the draft to date (Appendix 2)
- A detailed discussion of the critical need for the Housing Element to respond to the challenges of climate change and water shortages (Appendix 3)

Thank you for your consideration of our points of view.

Respectfully,

A handwritten signature in cursive script that reads "Dan Beal".

Dan Beal, President
For the Board of Directors

C: Steve Mermell, City Manager
David Reyes, Director, Planning and Community Development
Bill Huang, Director, Housing

08/02/2021
Item 11

Appendix 1

WEST PASADENA RESIDENTS' ASSOCIATION CITY HOUSING ELEMENT UPDATE POLICIES

July 7, 2021

- WPRA acknowledges the need for additional housing, especially affordable housing, so that people and families of all income levels can live in Pasadena. Affordable housing should be the primary focus.
- WPRA urges the City to pursue housing solutions tailored to Pasadena's unique characteristics by adhering to its own design guidelines as well as the Land Use Goals and Policies of the Land Use Element of the General Plan and Specific Plans stressing architectural compatibility and excellence in design and materials.
- WPRA urges the creation of more incentives for the development of 100% affordable housing projects and supports the city's concessions menu, while discouraging use of the excessive State Density Bonus.
- WPRA advocates a priority for adaptive reuse to convert vacant or underutilized commercial and industrial properties to dwelling or multi-use units. Adaptive reuse conserves resources and land, and produces less environmental impact.
- WPRA supports maximizing the benefits of public transit accessibility by concentrating additional residential construction in proximity to rail and high-capacity bus service.
- WPRA supports requiring upgrades or increases to existing infrastructure capacity for the construction or conversion of additional residential units in a given area, including adequate street, driveway and parking capacity and traffic impact assessment and mitigation.
- WPRA urges the City to promote the replenishing and maintenance of our dwindling urban forest footprint and encourage the care and expansion of public green spaces. Street trees and protected trees on private land must be protected from construction encroachment and neglect.

APPENDIX 2: SPECIFIC COMMENTS ON THE JULY 14, 2021 DRAFT HOUSING ELEMENT

Table HE-1 and narrative – apparently the RHNA numbers can be more than met by new construction alone (10,338 units) while rental assistance and workforce housing contribute much less and the other categories' contributions are minimal. Does this result in over-dependence on new construction? Does this new construction include adaptive re-use such as use of repurposed commercial structures and motels?

Goal HE-1 and Policies HE-1.5 (Community Services) and HE 1.6 (Green Spaces) speak to maintaining and preserving schools, public safety, community centers, green spaces, parks, trees and other public amenities with the planning and development of housing.

“Maintaining and preserving” must include no reduction in the current inventory, which in many areas is already insufficient. It must also include expanding the inventory to assure provision to underserved areas *and also* expanding the inventory proportionate to new housing construction. New housing construction must not be used to justify reduction in or destruction of public amenities.

Policy HE 2.2 “Direct new residential development into the Central District, transit villages, neighborhood villages...” (similar language is found in several places in the draft).

“Transit villages” and “neighborhood villages” are frequently cited together within goals and narrative, but they are distinctly different places as defined in the Land Use Element of the General Plan:

Transit Villages. Moderate to high density mixed-use clusters of residential and commercial uses developed in an integrated “village-like” environment with buildings clustered on common plazas and open spaces in proximity to Metro Gold Line stations capitalizing on their induced market demands and land values, facilitating ridership, and reducing automobile use while increasing walkability.

Neighborhood Villages. Lower density mixed-use clusters of residential and commercial uses developed in an integrated “village-like” environment with buildings clustered on common plazas and open spaces designed as communal places that are walkable from surrounding neighborhoods.

Conflating these definitions could result in neighborhood villages being targeted for considerably more and denser housing development than the General Plan and the concept of a “neighborhood” village intend, without the transit and other infrastructure to support it.

The Housing Element should also designate specific neighborhood villages, and specify how they relate to the eight Specific Plan areas.

Development in any of these areas should step gracefully into surrounding lower-density areas and not present a multi-story wall to adjacent neighborhoods.

Program #6: Housing Sites: 2021-2029 Objectives – There is a passing reference to “no net loss” as a component of the tracking system. “No net loss” must be pursued as an overarching commitment of the Housing Element, not just something to be tracked. The concept needs to be defined and specifically focused on the protection of older, affordable structures.

Program #7 – Mixed Use/TOD Strategy – Mixed Use Development definitions and parameters need to be quantified; reducing open space and allowing a larger building envelope (than what?) raise concerns. Is the reference intended to give room for State Density Bonus Law or beyond? Does this mean increased footprint and heights and reduced setbacks, little open space and few trees, etc?

Program #7 – Mixed Use/TOD Strategy – This reference defines Transit Oriented Development areas as within a quarter-mile radius of Pasadena’s six light rail transit (LRT) stations, and in the central area. This definition should not be subject to “mission creep” by including bus service, as it apparently does in the definition of TOD on p. 5, unless that service approaches LRT capacity and headways, as the proposed Metro Bus Rapid Transit line may. Local, circulator and regional bus services on long headways do not qualify an area as TOD.

Program #9: Removal of Constraints: Implementation – the first bullet under 2021-2029 Objectives suggests streamlining or *eliminating* CEQA review for “certain” design review processes. “Eliminating CEQA review” is not included under Development Review on the previous page, and should not be included here or anywhere in the Housing Element. Streamlining may or may not be appropriate in given circumstances, but eliminating CEQA review is fraught with serious problems, including eliminating a great deal of the public engagement and response that the Housing Element purports to support. Similar concerns exist with other suggested streamlining or elimination of the review processes.

Calling for diminution or dilution of design review and open space, setbacks, City-of-Gardens codes, open space, heights, and “other” development standards not named are not minor variances.

Program #10: Regulatory Incentives: Parking Incentives – Allowing or requiring developments to build less parking than the almost-certain demand for it should be approached with great caution. Once a structure is built, the parking allocation usually can’t be changed within the structure. These are life-of-the-building decisions.

Even if the occupants of a unit can get by initially with one or no personal vehicles, circumstances change, and they may reasonably need a vehicle, or another vehicle, even in TOD areas. The result, frequently, is increased competition for parking on nearby streets, which often have none to give – and which externalizes what should be an internal cost. Assuming a perpetual lack of need for vehicles fraught with assumptions, including that one’s lifestyle is and will remain compatible with limited choices in employment, education, recreation, health, shopping, entertainment, food, and others that are within a walking or transit radius. It also sends mixed messages when public policy encourages EV’s that greatly reduce energy use and GHG production, but which require the same number of parking spaces and additionally, shared charging areas.

Another possibility is designing in flexible space that at least initially would be used for other than residents' parking purposes (such as for personal storage, exercise, EV charging, small retail, hourly paid parking) and repurposed for resident parking if the demand assumptions don't pan out, or kept for non-parking uses if they do. Or allow residents to monetize spaces that they don't need (for example, sharing daytime parking with businesses, or unbundling, or renting their spaces if they don't need them at the time).

Program #24: Resource Conservation - Within the 2021-2029 Housing Element, Pasadena needs a separate and dedicated program category defining radical climate change and California's draughts, then listing specific preemptive policies which reconcile the expanded draw on dwindling water resources as the city strives to accommodate RHNA demands. (This issue is more fully articulated in Appendix 3, following)

The current Housing Element draft states:

Program 4: Pasadena encourages sustainable development that reduces energy conservation, protects the environment, and facilitates production of affordable housing.

Water and Sewer Services

The 2015 General Plan EIR concluded that adequate water supplies are available to meet the projected level of growth, with which this Housing Element conforms. However, statewide drought conditions associated with climate change can be expected to strain water supply. As required by State law, the City has policies in place (City Council resolution #8621) to grant priority for service allocations to proposed projects that include low-income housing.

This last sentence is vague but implies that new buildings which contain only market rate units will be subject to possible water restrictions, as opposed to affordable units that have priority. If water supply is in fact rationed, this scenario seems highly infeasible and unenforceable. Still, if this water rationing is law, developers of 100% market rate housing should be made aware of potential water restrictions to their tenants and buyers. Priority access to adequate water service to affordable housing can be an incentive to build more of it.

WPRA strongly recommends that Pasadena Planning and Development expand the 2021-2029 Housing Element to include a fully articulated strategy for dealing with the threat of inadequate water supply and how we will reconcile the demand for more housing with the need to conserve water usage.

APPENDIX 3: WATER AND CLIMATE SUSTAINABILITY

Within the 2021-2029 Housing Element, Pasadena needs a separate and dedicated program category defining radical climate change and California's draughts, then listing specific preemptive policies which reconcile the expanded draw on dwindling water resources as the city strives to accommodate SCAGs hugely increased RHNA demands.

The current Housing Element draft states:

PROGRAM 24: Resource Conservation

Pasadena encourages sustainable development that reduces energy conservation, protects the environment, and facilitates production of affordable housing.

Water and Sewer Services

The 2015 General Plan EIR concluded that adequate water supplies are available to meet the projected level of growth, with which this Housing Element conforms. However, statewide drought conditions associated with climate change can be expected to strain water supply. As required by State law, the City has policies in place (City Council resolution #8621) to grant priority for service allocations to proposed projects that include low-income housing.

This last sentence (underlined by WPRA) is vague but implies that new buildings which contain only market rate units will be subject to possible water restrictions, as opposed to structures with affordable units that have priority access to adequate water supply. If water supply is in fact rationed, this scenario seems highly infeasible and unenforceable. Still, if this water rationing is law, developers of 100% market rate housing should be made aware of potential water restrictions to their tenants and buyers. Priority access to adequate water service to affordable housing can be an incentive to build more of it. Additionally, WPRA recommends that the state law for priority service allocations be made available by the city for public review.

Program 24 – 2021–2091 Objectives: Implement Climate Action Plan strategies related to...water use reduction.

The above water use objective, as written, is too broad to have relevance. Although Pasadena's Housing Element is a policy statement, when it comes to pending water shortages, definitions of mitigation measures and strategies must be explicitly explained for the following reasons:

From Bloomberg Green - June 23, 2021

"The famed farming valleys of California are being swept into what feels like permanent dryness... From May 2020 to April 2021, the state posted its driest-ever 12-month period."

From U.S. Dept. of Interior, Bureau of Reclamation – July 9, 2021

Key findings for Lake Powell in the June 5-year projections are:

- *There is a 79% chance that Lake Powell will fall below its target water-surface elevation of 3,525 feet sometime next year.*
- *There is a 17% chance that Lake Powell will fall below minimum power pool elevation of 3,490 feet in 2024.*

- *In the Lower Basin, the updated projections for Lake Mead continue to affirm the high likelihood of a first-ever shortage condition in the Lower Basin in 2022.*
- *There is a 58% likelihood of Lake Mead declining to the critical elevations of 1,025 by 2025.*

From the National Integrated Drought Information System (Drought.gov)

98.53% of Los Angeles County is in D-3 Extreme Drought

From Office of the Governor Gavin Newsom – April 21, 2021

Governor Newsom said. “Climate change is intensifying both the frequency and the severity of dry periods. This ‘new normal’ gives urgency to building drought resilience in regions across the state and preparing for what may be a prolonged drought at our doorstep.”

Despite these dire warnings, California’s Department of Water Resources takes on a laissez-faire, not-much-we-can-do-about-it approach.

From California Dept. of Water Resources – Current

California is no stranger to drought; it is a recurring feature of our climate. We recently experienced the 5-year event of 2012-2016, and other notable historical droughts included 2007-09, 1987-92, 1976-77, and off-and-on dry conditions spanning more than a decade in the 1920s and 1930s. Paleoclimate records going back more than 1,000 years show many more significant dry periods.

Unfortunately, the scientific skill to predict when droughts will occur...is currently lacking. Improving long-range weather modeling capabilities is an area of much-needed research.

California’s general 2018 water policy assumes droughts are cyclical, that we can’t predict them, and based on history, we again will emerge from this current crisis. Yet *California’s Water Resources Sustainability Report* tells a different story and is not only in conflict with our state’s hope-for-the-best water policy, but with California’s building surge and population growth objectives. Read below. Underlining is WPRA’s.

From California’s Water Resources Sustainability Report

Water resource issues in California are complex and dynamic, and the planning we do as a department must ensure that Californians will enjoy clean water and thriving ecosystems far into the future. Some of the water supply sustainability challenges we face include:

- *Climate change, which impacts water supply and delivery*
- *Increasing population and demands on finite water resources*
- *Ecosystem fragmentation and decline, which has put many species on threatened or endangered lists, requiring regulations to protect them*
- *Increasing sources of contaminants that impact water quality*
- *Invasive species that disrupt operation of water delivery systems*

As noted above, both climate change and the increasing demands on finite water source must be addressed. But California's water plan, shown below, passes on the responsibility of dealing with draughts and water shortage to everyone else beyond the agency's self-limiting purview.

California's Water Plan:

- *Is updated every five years and provides a way for various groups to collaborate on findings and recommendations and make informed decisions regarding California's water future:*
 - *Elected officials*
 - *Government agencies*
 - *Tribes*
 - *Water and resource managers*
 - *Businesses*
 - *Academia*
 - *Stakeholders*
 - *General public*
- *Can't mandate actions or authorize spending for specific actions*
- *Doesn't make project- or site-specific recommendations nor include environmental review or documentation as would be required by the California Environmental Quality Act (CEQA)*
- *Requires policy- and law-makers to take definitive steps to authorize the specific actions proposed in the plan and appropriate funding needed for their implementation*

And there we have it – our elected officials – state and local, our Water Master, Cal Tech and JPL, Pasadena's residents and businesses, plus anyone who turns on a garden hose, we are all entrusted to mitigate the challenges for our local water needs. Pasadena government must confront this possible, and even probable, serious water problem NOW.

WPRA realizes that California's water sustainability policies are in conflict with its increased housing policies. Yet Pasadena cannot ignore this obvious oxymoron when conceiving of its own Housing Element. We no longer can assume that somehow, someway, there will always be adequate water supply as we increase the need for it. Therefore, WPRA strongly recommends that Pasadena Planning and Development expand the 2021-2029 Housing Element to include a fully articulated strategy for dealing with the threat of inadequate water supply and how we will reconcile the demand for more housing with the need to conserve water usage.

Iraheta, Alba

From: Gloria Newton
Sent: Friday, July 30, 2021 10:14 PM
To: PublicComment-AutoResponse
Subject: 8.2.2021 Agenda Item 11 - 2021 Housing Element: Act, Don't Investigate on the Rezoning of Congregational Land

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Dear Mayor Gordo and City Council Representatives,

Over a year ago I attended a Zoom meeting with my council representative, John Kennedy, about the proposal to rezone religious land to allow for the building of affordable housing. Conversations with other council representatives were happening at that time and in subsequent months. This proposal has been reviewed by both the Planning Commission and the Planning Department. It was even on the agenda of one city council meeting last fall. On February 24, 2021, the text of this proposal was on the agenda to be reviewed by the Planning Commission, but it was taken off the agenda because Mayor Gordo asked that it be a part of the Housing Element Task Force's work. While I understand why this makes a certain amount of sense, there is no reason that this proposal had to wait to be acted on until the Housing Element Task Force had submitted their 8-year plan. This has caused 12 to 18 months' further delay in the approval of this proposal. The draft Housing Element is no help here; it recommends that the city "**create standards and a review process** for the establishment of affordable housing via a Religious Institution Housing Ordinance or other zoning process" with a target date of 2025. And even then there is no guarantee that an ordinance will even be passed.

Meanwhile, the housing crisis continues unabated, and the churches in Pasadena who wish to help alleviate it by building housing on their land are forced to wait. New Life Holiness Church on N. Fair Oaks Ave, has already selected a developer to build 52 units of affordable housing, but if the proposal to rezone religious land is not approved soon, their developer is going to have to pull out of the project and the church will have to start over from the beginning. I find this as tragic as it is absurd.

Please put the proposed zoning amendment for congregational land back on the City Council agenda. This small step will make a big difference in the lives of Pasadena residents and faith communities, and it needs to be taken as soon as possible.

Thank you for your concern and attention. I very much appreciate all that you do for our citizens.

Sincerely,
Gloria M. Newton, homeowner in District 3

Pasadena, CA 91101

08/02/2021
Item 11

"Each time a person reaches across caste and makes a connection, it helps to break the back of caste. Multiplied by millions in a given day, it becomes the flap of a butterfly

wing that shifts the air and builds to a hurricane across an ocean."--Isabel Wilkerson,
Caste

Iraheta, Alba

From: Marjorie Lindbeck
Sent: Friday, July 30, 2021 9:37 PM
To: Brian
Cc: PublicComment-AutoResponse; Colleen Carey; arashbus@gmail.com; Wayne Hunt
Subject: Re: Aug 2 Council Item 11 Comment

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Thanks, Brian! So glad you are keeping on this!

Sent from my iPhone

On Jul 30, 2021, at 4:42 PM, Brian < >:

Dear Mayor and City Council:

The Playhouse Village Association has expressed through various comment opportunities during the Specific Plan and Housing Element processes of the importance to change the land use and zoning along North Lake Avenue between Colorado Boulevard and the Lake Avenue Metro station to allow housing. The corridor's dire economic conditions are ripe for housing development while avoiding adverse impacts to sensitive neighborhoods. While the Specific Plan Update process does not yet reflect this necessary change, the Housing Element can also serve as an appropriate place to support the change.

Currently, however, the Draft Housing Element document does not specifically address the importance of maximizing the potential for adaptive reuse and new mixed-use development on these blocks of North Lake Avenue. Although there are policy references for the need for adaptive reuse, transit-oriented development and mixed-use as part of the City's overall housing needs fulfillment approach, the draft document has an opportunity to make more emphatic recommendations for how to expand these opportunities. Such policy statements can ensure that future policy revisions to the General Plan and Central District Specific Plan may ultimately find a basis of mutual support in the Housing Element.

To this end, please consider incorporating the following additions to the list of objectives for 2021-2029 under Program 6:

Enact zoning changes for areas identified in ongoing or subsequent community planning efforts [such as near the Lake Avenue Metro station] to allow housing development where current prohibitions exist.

and/or Program 7:

08/02/2021
Item 11

Expand areas where mixed-use and TOD are allowed to include appropriate locations where housing development is currently prohibited [such as near the Lake Avenue Metro station].

In addition, such parcels located along Lake Avenue between Colorado Boulevard and Corson Street could also be listed in the sites list as potential sites, pending future zoning revisions.

Thank you for your consideration.

Brian Wallace
Executive Director

Playhouse Village
709 E Colorado Blvd, Ste 160
Pasadena, CA 91101
626.744.0340
playhousevillage.org

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July 30, 2021

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

RECEIVED
 2021 AUG -2 AM 8:44
 CITY CLERK
 CITY OF PASADENA

RE: Draft 2021-2029 Housing Element

Dear Honorable Mayor and Members of the City Council:

Pasadena Heritage has reviewed the Draft Housing Element and is pleased by its comprehensiveness and the identification of the many housing challenges Pasadena currently faces. We submitted some comments and suggestions at the recent Planning Commission review of the document, and we were pleased to hear some of our suggestions discussed. There are many engaged groups who have been staunch advocates as part of this update process, and we commend city staff and their consultant for their ability to find common ground between these diverse viewpoints.

As preservationists, we believe that preservation and adaptive reuse will be critical in creating and retaining affordable housing in the next eight years. It is a simple truth that historic buildings are often more affordable than new construction and preserving them is more ecologically sound. The City must plan for 5,974 affordable housing units at three different income levels. It is safe to say that the majority these units will not be created through new construction, though some will be created through our strong Inclusionary Housing Ordinance or by dedicated affordable housing developers. It is likely that the remainder will be created by the conversion of market-rate units to deed-restricted units or through adaptive reuse of commercial space or hotels/motels. The most cost-effective, environmentally sustainable affordable housing utilizes existing building stock. And since Pasadena has so much historic building stock, which we want to preserve and maintain for many reasons, it only makes sense to investigate, encourage and incentivize its use for housing.

In a separate item tonight, you will be considering the CSCDA's proposed conversion of 95 units of market-rate housing to affordable housing. We believe that framework demonstrates how affordable housing can be created in the next eight years. We thank you for your dedicated efforts on this important issue, which affects all Pasadenans.

Sincerely yours,

Susan N. Mossman
Executive Director

Andrew Salimian
Preservation Director

Iraheta, Alba

From: Brian <brian@cityofdenver.com>
Sent: Friday, July 30, 2021 4:42 PM
To: PublicComment-AutoResponse
Cc: Marjorie Lindbeck; Colleen Carey; arashbus@gmail.com; Wayne Hunt
Subject: Aug 2 Council Item 11 Comment

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Dear Mayor and City Council:

The Playhouse Village Association has expressed through various comment opportunities during the Specific Plan and Housing Element processes of the importance to change the land use and zoning along North Lake Avenue between Colorado Boulevard and the Lake Avenue Metro station to allow housing. The corridor's dire economic conditions are ripe for housing development while avoiding adverse impacts to sensitive neighborhoods. While the Specific Plan Update process does not yet reflect this necessary change, the Housing Element can also serve as an appropriate place to support the change.

Currently, however, the Draft Housing Element document does not specifically address the importance of maximizing the potential for adaptive reuse and new mixed-use development on these blocks of North Lake Avenue. Although there are policy references for the need for adaptive reuse, transit-oriented development and mixed-use as part of the City's overall housing needs fulfillment approach, the draft document has an opportunity to make more emphatic recommendations for how to expand these opportunities. Such policy statements can ensure that future policy revisions to the General Plan and Central District Specific Plan may ultimately find a basis of mutual support in the Housing Element.

To this end, please consider incorporating the following additions to the list of objectives for 2021-2029 under Program 6:

Enact zoning changes for areas identified in ongoing or subsequent community planning efforts [such as near the Lake Avenue Metro station] to allow housing development where current prohibitions exist.

and/or Program 7:

Expand areas where mixed-use and TOD are allowed to include appropriate locations where housing development is currently prohibited [such as near the Lake Avenue Metro station].

In addition, such parcels located along Lake Avenue between Colorado Boulevard and Corson Street could also be listed in the sites list as potential sites, pending future zoning revisions.

Thank you for your consideration.

Brian Wallace
Executive Director

Playhouse Village
709 E Colorado Blvd, Ste 160
Pasadena, CA 91101
626.744.0340
playhousevillage.org

Playhouse
Village
In the heart of Pasadena

Martinez, Ruben

From: Anthony Manousos
Sent: Thursday, July 29, 2021 6:38 PM
To: PublicComment-AutoResponse; Gordo, Victor; Madison, Steve; Rivas, Jessica; Hampton, Tyron; Kennedy, John J.; Masuda, Gene; Williams, Felicia
Subject: Corrected version of Op Ed

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Dear Honorable Mayor and City Council Members,
I inadvertently sent an earlier version of this Op Ed. This is the revised version I meant to send you. Sorry for any inconvenience. -- Anthony Manousos

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, 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 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. In addition to wanting to provide sorely needed affordable housing, New Life is also committed 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 happen without a zone change, which can be costly and time-consuming. For a 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 or this expensive to get permission build affordable housing! And, 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 at the same time be sensitive to each neighborhood. This zoning would kick in only if a congregation provides affordable units. There are about seven interested churches in Pasadena. This would add greatly 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 take into account the heights of homes and building around each religious site. To make the religious 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 the 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>.) 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/>

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[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.cnn.com/2018/03/19/californians-fed-up-with-housing-costs-and-taxes-are-fleeing-state.html>