

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

September 7, 2020

Felicia Williams, Chair, Planning Commission
Members of the Planning Commission
c/o Tess Molinar: tmolinar@cityofpasadena.net

**Re: SCAG Regional Housing Needs Assessment (RHNA) Allocations
Agenda Item 5 Planning Commission Meeting 9/9/2020**

Chair Williams and Planning Commissioners:

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

WE REQUEST THAT THE PLANNING COMMISSION URGE THE CITY OF PASADENA TO OPPOSE THE SCAG DRAFT 2021-2029 RHNA ALLOCATION AND TO APPEAL THE ALLOCATION.

At a recent City Council Legislative Policy Committee meeting, Planning Director David Reyes led an update and discussion of the current Draft RHNA Allocation for Pasadena. The discussion included a comparison of the 2014-2021 Allocation totaling 1,332 housing units with the new Draft Allocation totaling **9,409 units**. The City has produced 2,589 units through 2019, more than the current RHNA Allocation. However, the excess is due to a large production of "Above Moderate" units in contrast to Affordable Housing, result which has exacerbated rising community criticism of out-of-scale, out-of-character dense, large buildings, and related traffic impacts—undermining what so many of us love about living in Pasadena without producing much in the way of needed Affordable Housing.

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

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

However, Director Reyes indicated that the City probably will NOT appeal due to what appears to be no bases for appeal, in Mr. Reyes' opinion and that of the City Attorney and outside counsel.

Many cities in the SCAG jurisdiction, including Los Angeles, Santa Monica, Cerritos, South Pasadena, Alhambra and West Hollywood, have sent detailed letters of criticism to SCAG and appear ready to formally appeal and resist the new RHNA Allocation numbers. The Los Angeles letter includes a resolution opposing the Allocation for Los Angeles passed by the Los Angeles City Council.

There is another risk: failing to oppose and resist the new Allocations may have unexpected consequences. If any cities are successful in reducing their new Allocations, the reductions will be reallocated to other cities possibly resulting in an increase in Pasadena's already-excessive Allocation.

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


Our Associations are in favor of Affordable Housing. But we are also trying to maintain the character and livability of Pasadena.

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

Respectfully,



Nina Chomsky, President
Linda Vista-Annandale Association



John Latta, President
Madison Heights Neighborhood Association



Dan Beal, President
West Pasadena Residents' Association

C: Councilmember Steve Madison
Councilmember Andy Wilson
City Manager Steve Mermell
Director of Planning and Development David Reyes