

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

October 25, 2020

Mayor Tornek and Councilmembers

c/o: correspondence@cityofpasadena.net

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

**Agenda Item 1. RHNA Appeal**

Mayor Tornek and Councilmembers:

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

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

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

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

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

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

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

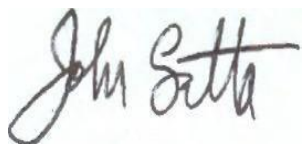
We continue to believe that Pasadena should act with SCAG and other similarly situated cities in asserting our similar RHNA rights and concerns. Pasadena needs to collaborate with other cities in a manner that may make good political sense and change the situation at SCAG and in Sacramento, particularly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

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

Respectfully,



Nina Chomsky, President  
Linda Vista-Annandale Association



John Latta, President  
Madison Heights Neighborhood Association



Dan Beal, President  
West Pasadena Residents' Association

**ATTACHMENT**

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

September 13, 2020

Mayor Tornek and Councilmembers

c/o: correspondence@cityofpasadena.net

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

Agenda Item 20. RHNA and Housing Element Discussion

Mayor Tornek and Councilmembers:

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

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

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

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

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

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

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

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

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

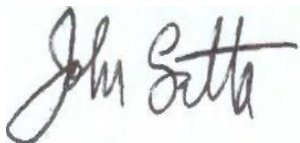
Our Associations are in favor of Affordable Housing. But we also advocate maintaining the character and livability of Pasadena.

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

Respectfully,



Nina Chomsky, President  
Linda Vista-Annandale Association



John Latta, President  
Madison Heights Neighborhood Association



Dan Beal, President  
West Pasadena Residents' Association

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

1. **Los Angeles:** dated November 5, 2019.

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

2. **Cerritos:** dated February 20, 2020.

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

3. **West Hollywood:** dated February 20, 2020.

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

4. **Santa Monica:** dated August 20, 2019.

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

5. **Alhambra:** dated September 9, 2019.

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

6. **South Pasadena:** dated September 10, 2019.

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