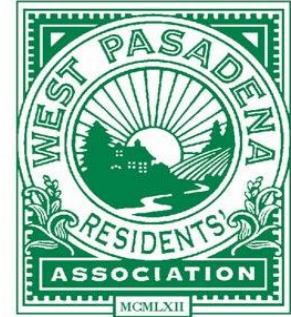


July 30, 2021

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. WPRA 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,

Dan Beal, President  
For the Board of Directors

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

## 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.