



California Housing and Community Development
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Regarding: South Pasadena Housing Element, Third Draft

To Whom It May Concern:

Care First South Pasadena (www.carefirstsouthpas.com) is a grassroots coalition in South Pasadena that advocates for reimagining public safety, and realigning our city's budget away from policing and toward community services. We write to provide feedback about South Pasadena's third draft of the Housing Element.

The city has made meaningful progress in its Housing Element. We particularly appreciate the revisions to Section 6.4.6. As revised, it situates South Pasadena's affluence and its lack of ethnic and racial diversity—relative to Los Angeles County at large, and relative to South Pasadena's neighbors to the west and south—in its history as a sundown town. The city's exclusion of non-white people was accomplished through overt discrimination, such as racially restrictive covenants and harassment, into the 1960s.¹ Since then, South Pasadena has privileged single family residential zoning over multi-family development and catered to NIMBYism, which has kept it largely inaccessible to Black and Latinx people.² The third draft of the Housing Element acknowledges the "racist overtones" of the limits on growth South Pasadena has imposed since at least 1963.

Despite the city's recognition of its racist history, the third draft of the Housing Element is underwhelming. It provides a few vague proposals about how it will affirmatively further fair housing that stop far short of what is needed.

Protections for renters

South Pasadena is comprised of more than 50% renters. Renters account for most of the demographic and economic diversity in South Pasadena. The Housing Element acknowledges that many are rent-burdened, and rents are rising faster than mortgages. It contains some provisions aimed at protecting renters, but not enough. Care First calls on the city to commit to doing the following:

1. Enact more robust tenant protections, including by adopting an urgency ordinance before January 1, 2023 to amend South Pasadena's no-cause eviction ordinance to require landlords to pay tenants relocation assistance if they are being evicted.
2. Use Community Development Block Grant funding to offer financial assistance to low- and moderate-income tenants and prospective tenants, including Section 8 voucher holders, for security deposits and rent.

¹ The Anti-Racism Committee of South Pasadena created an extensive timeline of South Pasadena's history of racial exclusion: <https://arcsouthpasadena.org/racist-history-of-south-pasadena/>.

² Racial covenants in South Pasadena property deeds are unenforceable. But racist housing laws resulted in a wealth gap between white homeowners and Black and Latinx families that effectively bars many Black and Latinx individuals from purchasing a home in South Pasadena's very expensive market.



3. Enact a rent control ordinance.
4. Establish a fund and/or favorable financing for property owners of below-market rental units in South Pasadena to receive support to bring older units up to code in exchange for landlords' covenants not to evict existing tenants or raise rents excessively.
5. Engage in meaningful outreach to landlords in the city to encourage acceptance of Section 8 vouchers.

Affordable housing development

Care First South Pasadena advocated for the enactment of South Pasadena's Inclusionary Housing Ordinance (IHO) in April 2021. South Pasadena's IHO requires new developments to set aside 20% of the units for low- and very low-income renters.

HCD's July 8, 2022 letter raised concerns that the IHO's requirements—in conjunction with other land use restrictions such as the 45' height limit—may make development infeasible in some locations. HCD asked the city to “address the 20 percent requirement and cost impacts, 10 unit threshold, in lieu fees and cost of a comparable unit and how the inclusionary relates to State Density Bonus Law.”

In response, the city's third draft Housing Element commits to amending the IHO to require new developments set aside just 15% of units for affordable housing. Many cities in California require 15% affordable units, and some stakeholders have complained that the 20% set aside will disincentivize development. But Pasadena has a successful IHO requiring 20% affordable units in new construction. This issue requires further consideration. The IHO is barely one year old, and its effects are relatively untested—particularly if the city intends to remove other zoning barriers to density, such as the height restriction.

If the city intends to reduce the IHO's required percentage of affordable units to 15%, Care First urges the city to actively recruit 100% affordable developments through non-profit low-income housing developers (*i.e.* bolster its commitment to Program 2.h).³ We would like the Housing Element to identify at least four (4) viable locations for 100% affordable developments, and identify potential financial and regulatory incentives the city could offer such developers.

During the last housing element cycle, only 10 affordable units were constructed out of 93 new units. The city must stay laser focused on adding affordable housing stock.

Height limit ballot initiative

Care First South Pasadena supports putting the building height limit on the ballot. The height restriction was passed in 1983, before many current South Pasadena voters were even born. It merits reevaluation. We support more flexibility to build up.

³ The city's previous position was that it would simply work within the San Gabriel Valley Housing Trust to build affordable housing in the region. Care First is encouraged to see that the third draft of the housing element takes a more proactive approach.



Further, Care First is not in favor of concentrating dense housing in just a small sliver of downtown and/or on major corridors. The City is attempting to avoid allowing development of multi-unit residential housing in areas currently zoned for single-family houses, and cabin dense development into a few small pockets of the City. Concentrating dense housing—which will be more affordable for low- and moderate-income folks—in certain limited areas is antithetical to affirmatively furthering fair housing. It undermines meaningful housing integration in this exclusionary town.

Connecting Housing Element to Environmental Goals

The latest version of the Housing Element is devoid of any discussion of how it relates to locally and state adopted environmental requirements and goals.

As an example, the city’s own [Climate Action Plan](#) calls for developing shared, public, and active transportation strategies to reduce vehicle miles travelled in the city. It further calls for electrifying all new and existing buildings by maximizing use of renewable energy to build local community resilience largely by installing rooftop solar systems. Yet the Housing Element is devoid of any discussion of how density and reduced parking space requirements are related to reducing vehicle miles travelled and related emissions. It also does not address how density can actually mitigate water demand by minimizing the need for irrigated landscaping.

Additionally, the Housing Element’s aim of maintaining existing single-family houses, particularly historic homes, does not account for the impacts on energy efficiency. Designation of homes as historic is often the enemy of energy efficiency.⁴ For instance, requiring wood window replacements is extremely expensive, and creates a disincentive to adopt more efficient double glazed windows; many homeowners subject to such requirements opt to merely install inefficient single glazed windows. This contributes to greenhouse gas emissions. The latest Housing Element should be revised to squarely address how the Housing Element will help meet local and state environmental policy goals.

A more inclusive path forward

There are a small but vocal group of homeowners dominating the current conversation around the Housing Element (among other housing issues) in South Pasadena. They call for preservation of South Pasadena’s small town feel. They are concerned about encroachment of housing development into the “neighborhoods” of South Pas.⁵

We must place “historical preservation” in the context of South Pasadena’s assiduous exclusion of non-whites until the 1960s, and its efforts in more recent decades to freeze the landscape

⁴ Historic designation also exacerbates the housing affordability crisis. Historic designation raises the price of the historic house and neighboring properties, which further excludes moderate- and low-income residents.

⁵ The idea that inclusion of multi-unit housing in predominantly single-family zoned areas will burden the “neighborhood” does not stand scrutiny. The argument relies on an outmoded definition of a neighborhood as a collection of single-family homes on a tree-lined street. A neighborhood, and the neighbors inside it, can look many different ways.



constructed during that era. When we do, safeguarding the “character of the neighborhood” and “small town charm” is not wholesome—it is exclusionary and discriminatory.

Many of our neighbors lament that the city’s schools, roads, water and power cannot accommodate the newcomers who will move to South Pasadena if the City allows development. At the same time, they celebrate South Pasadena as distinctive for its ability to prevail against great odds—harkening back to the successful fight to prevent completion of the 710 freeway.

Care First also believes South Pasadena is a special community; it’s full of plucky, spirited people who support one another. For that reason, South Pasadena *can* welcome more residents. This community can rally the State for the resources needed to continue to offer an excellent education to our kids. We can find climate-friendly solutions to infrastructure challenges. **We can organize to grow and share South Pasadena’s abundance, rather than to protect the status quo for those fortunate enough to already live here.**

Care First urges the city to build consensus around a new way forward, rather than capitulate to the resistant few. Often in City Council and stakeholder meetings, City leaders betray dissatisfaction with state laws aimed at boosting housing production, and suggest the RHNA requirement is not feasible. City leaders often remind constituents that the city only has to *plan* for RHNA units, not ensure they are actually built. Perhaps that is why the City has not submitted a compliant housing element to date.

In February 2021, the City Council enacted a Sundown Town resolution apologizing for its legacy of racism, and committing to “evaluate policies...to foster an unbiased and inclusive environment where no person or group is subject to discrimination, harassment, or disproportionate economic harm.” The City must consider that commitment going forward in this process. The housing element presents a tremendous opportunity to reimagine South Pasadena and make it more accessible and welcoming to people who have been excluded for decades.

Thank you for the opportunity to provide feedback. We look forward to participating in the process as it proceeds.

Best regards,

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Steering Committee Members