

Reynoso, Vanessa

From: ADAM Bray-Ali <reply-to+3047a71c85c4@crm.wix.com>
Sent: Thursday, August 26, 2021 12:56 PM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

CAUTION: This email originated from outside your organization.

ADAM Bray-Ali just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: ADAM

Last Name: Bray-Ali

Email: Adam@propertybyadam.com

Enter your comments on the Draft Housing Element here. (1,000 characters): On Page 104, there is a reference to the Howard Street property that the city developed. It appears that the property address is incorrect. there is no 534 Howard but there is a 536 Howard and a 538 Howard. Each address has 4 units inside. Can you provide more clarity on when those were sold, who was permitted to buy them and what restrictions may exist to keep these as affordable in the future?

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To edit your email settings, go to your Inbox on desktop.



Reynoso, Vanessa

From: ADAM Bray-Ali <reply-to+0606fe6aff73@crm.wix.com>
Sent: Thursday, August 26, 2021 12:57 PM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

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ADAM Bray-Ali just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: ADAM

Last Name: Bray-Ali

Email: Adam@propertybyadam.com

Enter your comments on the Draft Housing Element here. (1,000 characters): On Page 104, there are several projects in proposal/undertaking stages that do not appear to be held to any particular schedule or timeline. Can more information be provided and improved grammar be used for the last bullet point? Who is Related California, what APN/Parcel on Chapel is being proposed, what timeline is expected?

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Reynoso, Vanessa

From: ADAM Bray-Ali <reply-to+5a18a9c5b448@crm.wix.com>
Sent: Thursday, August 26, 2021 1:35 PM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

CAUTION: This email originated from outside your organization.

ADAM Bray-Ali just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: ADAM

Last Name: Bray-Ali

Email: Adam@propertybyadam.com

Enter your comments on the Draft Housing Element here. (1,000 characters): On page 128, there is a description of the down payment assistance program. From discussions with city staff, there was zero funding for this program in 2021 and I was told that there was only one grant per year for the entire city available in prior years. The details of this program are not easy to find and there does not appear to be any accountability for this.

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From: [Kimberly Thacker](#)
To: [Housing Element](#)
Subject: Draft housing
Date: Saturday, August 28, 2021 2:13:58 PM

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Considering Alhambra's population has a large number of elderly 65+, multigenerational households, the 65+ as low income, and the cost of housing raising above the means of so many...

I think it makes sense that Alhambra continue to streamline the ADU process and

ADD funding loans help residents pursue ADUs. There is still no Federal or State loans that assist homeowners, only HELOC and HELoan, Credit Card Laons or Bank Construction loans...all of which DO NOT make the process affordable.

Alhambra should create its own ADU loan program so that so homeowners can affordable build ADUs.

Sent from ProtonMail mobile

Reynoso, Vanessa

From: David Bond <reply-to+34ac201e57c8@crm.wix.com>
Sent: Wednesday, September 8, 2021 7:26 PM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

CAUTION: This email originated from outside your organization.

David Bond just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: David

Last Name: Bond

Email: djb85511@gmail.com

Enter your comments on the Draft Housing Element here. (1,000 characters): After review of the Housing Element, and discussing the draft with ECONorthWest during the Community Meeting, there were no constraints for the city, working with the state and federal government, to provide public owned and managed housing, however there is no action recommending public housing in this element. The profit motive, the extra regulatory efforts, and the funding efforts are all costs for affordable development described by ECONW. If these can all be mitigated by the public housing option, and the fear is that affordable housing unit availability isn't likely to be met, then why don't we include public housing in this element?

If you think this submission is spam, [report it as spam](#).

To edit your email settings, go to your Inbox on desktop.



Reynoso, Vanessa

From: Brandon Young <brandon@mitchtsailaw.com>
Sent: Wednesday, September 8, 2021 4:10 PM
To: Housing Element
Cc: Mitchell Tsai; Greg Sonstein; Cindy Pain
Subject: SWRCC - [City of Alhambra, 6th Cycle Housing Element Update] - HE Workshop Comment Letter
Attachments: 20210908_AlhambraHEU_ComtyMeetingComments_Signed_Complete.pdf

CAUTION: This email originated from outside your organization.

Dear Community Development Department,

Please see the attached comment letter on City of Alhambra's 9/8/2021 Housing Element Workshop and confirm receipt of this email and its attachment.

Thank you,

Brandon Young

Office Manager
Mitchell M. Tsai, Attorney At Law
139 South Hudson Avenue, Suite 200
Pasadena, CA 91101
Office: (626) 381-9248
Fax: (626) 389-5414
Email: brandon@mitchtsailaw.com
Website: <http://www.mitchtsailaw.com>

*** Our Office Has Recently Moved. Please Note New Mailing Address ****

CONFIDENTIALITY NOTICE: This e-mail transmission, and any documents, files or previous e-mail messages accompanying it, may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this message is STRICTLY PROHIBITED and may violate applicable laws including the Electronic Communications Privacy Act. If you have received this transmission in error, please immediately notify us by reply e-mail at mitch@mitchtsailaw.com or by telephone at (626) 381-9248 and destroy the original transmission and its attachments without reading them or saving them to disk. Thank you.

P: (626) 381-9248
F: (626) 389-5414
E: info@mitschsailaw.com



Mitchell M. Tsai
Attorney At Law

139 South Hudson Avenue
Suite 200
Pasadena, California 91101

VIA U.S. MAIL & E-MAIL

September 8, 2021

City of Alhambra
Community Development Department
111 South First Street
Alhambra, CA 91801
Em: housingelement@cityofalhambra.org

RE: 2021-2029 Housing Element Update

To Whom it May Concern,

On behalf of the Southwest Regional Council of Carpenters (“**Commenter**” or “**Carpenter**”), my Office is submitting these comments on the City of Alhambra’s (“**City**”) 2021-2029 Housing Element Update (“**Project**”).

The Southwest Carpenters is a labor union representing 50,000 union carpenters in six states and has a strong interest in well ordered land use planning and addressing the environmental impacts of development projects.

Individual members of the Southwest Carpenters live, work and recreate in the City and surrounding communities and would be directly affected by the Project’s environmental impacts.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters expressly reserves the right to supplement these comments at or prior to hearings on the Project, and at any later hearings and proceedings related to this Project. Cal. Gov. Code § 65009(b); Cal. Pub. Res. Code § 21177(a); *Bakersfield Citizens*

for Local Control v. Bakersfield (2004) 124 Cal. App. 4th 1184, 1199-1203; see *Galante Vineyards v. Monterey Water Dist.* (1997) 60 Cal. App. 4th 1109, 1121.

Commenters incorporates by reference all comments raising issues regarding the EIR submitted prior to certification of the EIR for the Project. *Citizens for Clean Energy v City of Woodland* (2014) 225 Cal. App. 4th 173, 191 (finding that any party who has objected to the Project’s environmental documentation may assert any issue timely raised by other parties).

Moreover, Commenter requests that the Lead Agency provide notice for any and all notices referring or related to the Project issued under the California Environmental Quality Act (“**CEQA**”), Cal Public Resources Code (“**PRC**”) § 21000 *et seq*, and the California Planning and Zoning Law (“**Planning and Zoning Law**”), Cal. Gov’t Code §§ 65000–65010. California Public Resources Code Sections 21092.2, and 21167(f) and Government Code Section 65092 require agencies to mail such notices to any person who has filed a written request for them with the clerk of the agency’s governing body.

The City should require the use of a local skilled and trained workforce to benefit the community’s economic development and environment. The City should require the use of workers who have graduated from a Joint Labor Management apprenticeship training program approved by the State of California, or have at least as many hours of on-the-job experience in the applicable craft which would be required to graduate from such a state approved apprenticeship training program or who are registered apprentices in an apprenticeship training program approved by the State of California.

Community benefits such as local hire and skilled and trained workforce requirements can also be helpful to reduce environmental impacts and improve the positive economic impact of the Project. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. Local hire provisions requiring that a certain percentage of workers reside within 10 miles or less of the Project Site can reduce the length of vendor trips, reduce greenhouse gas emissions and providing localized economic benefits. As environmental consultants Matt Hagemann and Paul E. Rosenfeld note:

[A]ny local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of

construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling.

Skilled and trained workforce requirements promote the development of skilled trades that yield sustainable economic development. As the California Workforce Development Board and the UC Berkeley Center for Labor Research and Education concluded:

. . . labor should be considered an investment rather than a cost – and investments in growing, diversifying, and upskilling California’s workforce can positively affect returns on climate mitigation efforts. In other words, well trained workers are key to delivering emissions reductions and moving California closer to its climate targets.¹

Local skilled and trained workforce requirements and policies have significant environmental benefits since they improve an area’s jobs-housing balance, decreasing the amount of and length of job commutes and their associated greenhouse gas emissions. Recently, on May 7, 2021, the South Coast Air Quality Management District found that that the “[u]se of a local state-certified apprenticeship program or a skilled and trained workforce with a local hire component” can result in air pollutant reductions.²

Cities are increasingly adopting local skilled and trained workforce policies and requirements into general plans and municipal codes. For example, the City of Hayward 2040 General Plan requires the City to “promote local hiring . . . to

¹ California Workforce Development Board (2020) Putting California on the High Road: A Jobs and Climate Action Plan for 2030 at p. ii, *available at* <https://laborcenter.berkeley.edu/wp-content/uploads/2020/09/Putting-California-on-the-High-Road.pdf>

² South Coast Air Quality Management District (May 7, 2021) Certify Final Environmental Assessment and Adopt Proposed Rule 2305 – Warehouse Indirect Source Rule – Warehouse Actions and Investments to Reduce Emissions Program, and Proposed Rule 316 – Fees for Rule 2305, Submit Rule 2305 for Inclusion Into the SIP, and Approve Supporting Budget Actions, *available at* <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2021/2021-May7-027.pdf?sfvrsn=10>

help achieve a more positive jobs-housing balance, and reduce regional commuting, gas consumption, and greenhouse gas emissions.”³

In fact, the City of Hayward has gone as far as to adopt a Skilled Labor Force policy into its Downtown Specific Plan and municipal code, requiring developments in its Downtown area to requiring that the City “c]ontribute to the stabilization of regional construction markets by spurring applicants of housing and nonresidential developments to require contractors to utilize apprentices from state-approved, joint labor-management training programs, . . .”⁴ In addition, the City of Hayward requires all projects 30,000 square feet or larger to “utilize apprentices from state-approved, joint labor-management training programs.”⁵

Locating jobs closer to residential areas can have significant environmental benefits. . . As the California Planning Roundtable noted in 2008:

People who live and work in the same jurisdiction would be more likely to take transit, walk, or bicycle to work than residents of less balanced communities and their vehicle trips would be shorter. Benefits would include potential reductions in both vehicle miles traveled and vehicle hours traveled.⁶

In addition, local hire mandates as well as skill training are critical facets of a strategy to reduce vehicle miles traveled. As planning experts Robert Cervero and Michael Duncan noted, simply placing jobs near housing stock is insufficient to achieve VMT reductions since the skill requirements of available local jobs must be matched to those held by local residents.⁷ Some municipalities have tied local hire and skilled and

³ City of Hayward (2014) Hayward 2040 General Plan Policy Document at p. 3-99, *available at* https://www.hayward-ca.gov/sites/default/files/documents/General_Plan_FINAL.pdf.

⁴ City of Hayward (2019) Hayward Downtown Specific Plan at p. 5-24, *available at* <https://www.hayward-ca.gov/sites/default/files/Hayward%20Downtown%20Specific%20Plan.pdf>.

⁵ City of Hayward Municipal Code, Chapter 10, § 28.5.3.020(C).

⁶ California Planning Roundtable (2008) Deconstructing Jobs-Housing Balance at p. 6, *available at* <https://cprroundtable.org/static/media/uploads/publications/cpr-jobs-housing.pdf>

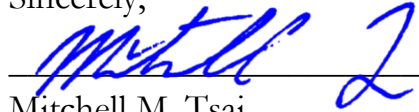
⁷ Cervero, Robert and Duncan, Michael (2006) Which Reduces Vehicle Travel More: Jobs-Housing Balance or Retail-Housing Mixing? *Journal of the American Planning Association* 72 (4), 475-490, 482, *available at* <http://reconnectingamerica.org/assets/Uploads/UTCT-825.pdf>.

trained workforce policies to local development permits to address transportation issues. As Cervero and Duncan note:

In nearly built-out Berkeley, CA, the approach to balancing jobs and housing is to create local jobs rather than to develop new housing.” The city’s First Source program encourages businesses to hire local residents, especially for entry- and intermediate-level jobs, and sponsors vocational training to ensure residents are employment-ready. While the program is voluntary, some 300 businesses have used it to date, placing more than 3,000 city residents in local jobs since it was launched in 1986. When needed, these carrots are matched by sticks, since the city is not shy about negotiating corporate participation in First Source as a condition of approval for development permits.

The City should consider utilizing skilled and trained workforce policies and requirements to benefit the local area economically and mitigate greenhouse gas, air quality and transportation impacts.

Sincerely,



Mitchell M. Tsai

Attorneys for Southwest Regional
Council of Carpenters

Attached:

March 8, 2021 SWAPE Letter to Mitchell M. Tsai re Local Hire Requirements and Considerations for Greenhouse Gas Modeling (Exhibit A);

Air Quality and GHG Expert Paul Rosenfeld CV (Exhibit B); and

Air Quality and GHG Expert Matt Hagemann CV (Exhibit C).

EXHIBIT A



Technical Consultation, Data Analysis and
Litigation Support for the Environment

2656 29th Street, Suite 201
Santa Monica, CA 90405

Matt Hagemann, P.G, C.Hg.
(949) 887-9013
mhagemann@swape.com

Paul E. Rosenfeld, PhD
(310) 795-2335
prosenfeld@swape.com

March 8, 2021

Mitchell M. Tsai
155 South El Molino, Suite 104
Pasadena, CA 91101

Subject: Local Hire Requirements and Considerations for Greenhouse Gas Modeling

Dear Mr. Tsai,

Soil Water Air Protection Enterprise (“SWAPE”) is pleased to provide the following draft technical report explaining the significance of worker trips required for construction of land use development projects with respect to the estimation of greenhouse gas (“GHG”) emissions. The report will also discuss the potential for local hire requirements to reduce the length of worker trips, and consequently, reduced or mitigate the potential GHG impacts.

Worker Trips and Greenhouse Gas Calculations

The California Emissions Estimator Model (“CalEEMod”) is a “statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects.”¹ CalEEMod quantifies construction-related emissions associated with land use projects resulting from off-road construction equipment; on-road mobile equipment associated with workers, vendors, and hauling; fugitive dust associated with grading, demolition, truck loading, and on-road vehicles traveling along paved and unpaved roads; and architectural coating activities; and paving.²

The number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.³

¹ “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

² “California Emissions Estimator Model.” CAPCOA, 2017, available at: <http://www.aqmd.gov/caleemod/home>.

³ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

Specifically, the number and length of vehicle trips is utilized to estimate the vehicle miles travelled (“VMT”) associated with construction. Then, utilizing vehicle-class specific EMFAC 2014 emission factors, CalEEMod calculates the vehicle exhaust, evaporative, and dust emissions resulting from construction-related VMT, including personal vehicles for worker commuting.⁴

Specifically, in order to calculate VMT, CalEEMod multiplies the average daily trip rate by the average overall trip length (see excerpt below):

$$\text{“VMT}_d = \Sigma(\text{Average Daily Trip Rate}_i * \text{Average Overall Trip Length}_i)_n$$

Where:

n = Number of land uses being modeled.”⁵

Furthermore, to calculate the on-road emissions associated with worker trips, CalEEMod utilizes the following equation (see excerpt below):

$$\text{“Emissions}_{\text{pollutant}} = \text{VMT} * \text{EF}_{\text{running,pollutant}}$$

Where:

$\text{Emissions}_{\text{pollutant}}$ = emissions from vehicle running for each pollutant

VMT = vehicle miles traveled

$\text{EF}_{\text{running,pollutant}}$ = emission factor for running emissions.”⁶

Thus, there is a direct relationship between trip length and VMT, as well as a direct relationship between VMT and vehicle running emissions. In other words, when the trip length is increased, the VMT and vehicle running emissions increase as a result. Thus, vehicle running emissions can be reduced by decreasing the average overall trip length, by way of a local hire requirement or otherwise.

Default Worker Trip Parameters and Potential Local Hire Requirements

As previously discussed, the number, length, and vehicle class of worker trips are utilized by CalEEMod to calculate emissions associated with the on-road vehicle trips required to transport workers to and from the Project site during construction.⁷ In order to understand how local hire requirements and associated worker trip length reductions impact GHG emissions calculations, it is important to consider the CalEEMod default worker trip parameters. CalEEMod provides recommended default values based on site-specific information, such as land use type, meteorological data, total lot acreage, project type and typical equipment associated with project type. If more specific project information is known, the user can change the default values and input project-specific values, but the California Environmental Quality Act (“CEQA”) requires that such changes be justified by substantial evidence.⁸ The default number of construction-related worker trips is calculated by multiplying the

⁴ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14-15.

⁵ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 23.

⁶ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

⁷ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

⁸ CalEEMod User Guide, available at: <http://www.caleemod.com/>, p. 1, 9.

number of pieces of equipment for all phases by 1.25, with the exception of worker trips required for the building construction and architectural coating phases.⁹ Furthermore, the worker trip vehicle class is a 50/25/25 percent mix of light duty autos, light duty truck class 1 and light duty truck class 2, respectively.”¹⁰ Finally, the default worker trip length is consistent with the length of the operational home-to-work vehicle trips.¹¹ The operational home-to-work vehicle trip lengths are:

“[B]ased on the *location* and *urbanization* selected on the project characteristic screen. These values were *supplied by the air districts or use a default average for the state*. Each district (or county) also assigns trip lengths for urban and rural settings” (emphasis added).¹²

Thus, the default worker trip length is based on the location and urbanization level selected by the User when modeling emissions. The below table shows the CalEEMod default rural and urban worker trip lengths by air basin (see excerpt below and Attachment A).¹³

Worker Trip Length by Air Basin		
Air Basin	Rural (miles)	Urban (miles)
Great Basin Valleys	16.8	10.8
Lake County	16.8	10.8
Lake Tahoe	16.8	10.8
Mojave Desert	16.8	10.8
Mountain Counties	16.8	10.8
North Central Coast	17.1	12.3
North Coast	16.8	10.8
Northeast Plateau	16.8	10.8
Sacramento Valley	16.8	10.8
Salton Sea	14.6	11
San Diego	16.8	10.8
San Francisco Bay Area	10.8	10.8
San Joaquin Valley	16.8	10.8
South Central Coast	16.8	10.8
South Coast	19.8	14.7
Average	16.47	11.17
Minimum	10.80	10.80
Maximum	19.80	14.70
Range	9.00	3.90

⁹ “CalEEMod User’s Guide.” CAPCOA, November 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/01_user-39-s-guide2016-3-2_15november2017.pdf?sfvrsn=4, p. 34.

¹⁰ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 15.

¹¹ “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 14.

¹² “Appendix A Calculation Details for CalEEMod.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/02_appendix-a2016-3-2.pdf?sfvrsn=6, p. 21.

¹³ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-84 – D-86.

As demonstrated above, default rural worker trip lengths for air basins in California vary from 10.8- to 19.8- miles, with an average of 16.47 miles. Furthermore, default urban worker trip lengths vary from 10.8- to 14.7- miles, with an average of 11.17 miles. Thus, while default worker trip lengths vary by location, default urban worker trip lengths tend to be shorter in length. Based on these trends evident in the CalEEMod default worker trip lengths, we can reasonably assume that the efficacy of a local hire requirement is especially dependent upon the urbanization of the project site, as well as the project location.

Practical Application of a Local Hire Requirement and Associated Impact

To provide an example of the potential impact of a local hire provision on construction-related GHG emissions, we estimated the significance of a local hire provision for the Village South Specific Plan (“Project”) located in the City of Claremont (“City”). The Project proposed to construct 1,000 residential units, 100,000-SF of retail space, 45,000-SF of office space, as well as a 50-room hotel, on the 24-acre site. The Project location is classified as Urban and lies within the Los Angeles-South Coast County. As a result, the Project has a default worker trip length of 14.7 miles.¹⁴ In an effort to evaluate the potential for a local hire provision to reduce the Project’s construction-related GHG emissions, we prepared an updated model, reducing all worker trip lengths to 10 miles (see Attachment B). Our analysis estimates that if a local hire provision with a 10-mile radius were to be implemented, the GHG emissions associated with Project construction would decrease by approximately 17% (see table below and Attachment C).

Local Hire Provision Net Change	
Without Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,623
Amortized Construction GHG Emissions (MT CO ₂ e/year)	120.77
With Local Hire Provision	
Total Construction GHG Emissions (MT CO ₂ e)	3,024
Amortized Construction GHG Emissions (MT CO ₂ e/year)	100.80
% Decrease in Construction-related GHG Emissions	17%

As demonstrated above, by implementing a local hire provision requiring 10 mile worker trip lengths, the Project could reduce potential GHG emissions associated with construction worker trips. More broadly, any local hire requirement that results in a decreased worker trip length from the default value has the potential to result in a reduction of construction-related GHG emissions, though the significance of the reduction would vary based on the location and urbanization level of the project site.

This serves as an example of the potential impacts of local hire requirements on estimated project-level GHG emissions, though it does not indicate that local hire requirements would result in reduced construction-related GHG emission for all projects. As previously described, the significance of a local hire requirement depends on the worker trip length enforced and the default worker trip length for the project’s urbanization level and location.

¹⁴ “Appendix D Default Data Tables.” CAPCOA, October 2017, available at: http://www.aqmd.gov/docs/default-source/caleemod/05_appendix-d2016-3-2.pdf?sfvrsn=4, p. D-85.

Disclaimer

SWAPE has received limited discovery. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,

A handwritten signature in blue ink that reads "Matt Hagemann".

Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink that reads "Paul E. Rosenfeld".

Paul E. Rosenfeld, Ph.D.

EXHIBIT B



Paul Rosenfeld, Ph.D.

Principal Environmental Chemist

Chemical Fate and Transport & Air Dispersion Modeling

Risk Assessment & Remediation Specialist

Education

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

Professional Experience

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)
UCLA School of Public Health; 2003 to 2006; Adjunct Professor
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator
UCLA Institute of the Environment, 2001-2002; Research Associate
Komex H₂O Science, 2001 to 2003; Senior Remediation Scientist
National Groundwater Association, 2002-2004; Lecturer
San Diego State University, 1999-2001; Adjunct Professor
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor
King County, Seattle, 1996 – 1999; Scientist
James River Corp., Washington, 1995-96; Scientist
Big Creek Lumber, Davenport, California, 1995; Scientist
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermol and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

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Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

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Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

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Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

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Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

Rosenfeld, P.E., J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

Rosenfeld, P. E., M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

Rosenfeld, P.E., and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

Rosenfeld P. E., J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

Rosenfeld, P.E., and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

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Rosenfeld, P.E., Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office, Publications Clearinghouse (MS-6)*, Sacramento, CA Publication #442-02-008.

Rosenfeld, P.E., and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

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Rosenfeld, P.E., C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

Rosenfeld, P.E., and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

Rosenfeld, P.E., and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

Rosenfeld, P. E. (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

Rosenfeld, P. E. (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

Rosenfeld, P. E. (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

Rosenfeld, P. E. (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

Rosenfeld, P. E. (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

Presentations:

Rosenfeld, P.E., Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Rosenfeld, P.E. (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

Rosenfeld, P.E. (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States” Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

Rosenfeld, P. E. (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23rd Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld, P. E. (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23rd Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

Rosenfeld P. E. (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

Rosenfeld P. E. (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florida, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

Paul Rosenfeld Ph.D. (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

Paul Rosenfeld Ph.D. (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

Paul Rosenfeld Ph.D. (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

Paul Rosenfeld Ph.D. (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

Paul Rosenfeld Ph.D. (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld Ph.D. (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

Paul Rosenfeld, Ph.D. (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

Paul Rosenfeld, Ph.D. (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

Rosenfeld, P. E., Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

Paul Rosenfeld, Ph.D. and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

Paul Rosenfeld, Ph.D. (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

Paul Rosenfeld, Ph.D. (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

Rosenfeld, P.E. and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

Rosenfeld, P.E. and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

Rosenfeld, P.E. (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

Rosenfeld, P.E. (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

Rosenfeld, P.E. (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

Rosenfeld, P.E., C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

Rosenfeld, P.E., C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

Rosenfeld, P.E., C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

Teaching Experience:

UCLA Department of Environmental Health (Summer 2003 through 2010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

Academic Grants Awarded:

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

Deposition and/or Trial Testimony:

- In the United States District Court For The District of New Jersey
Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.
Case No.: 2:17-cv-01624-ES-SCM
Rosenfeld Deposition. 6-7-2019
- In the United States District Court of Southern District of Texas Galveston Division
M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”
Defendant.
Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237
Rosenfeld Deposition. 5-9-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants
Case No.: No. BC615636
Rosenfeld Deposition, 1-26-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants
Case No.: No. BC646857
Rosenfeld Deposition, 10-6-2018; Trial 3-7-19
- In United States District Court For The District of Colorado
Bells et al. Plaintiff vs. The 3M Company et al., Defendants
Case: No 1:16-cv-02531-RBJ
Rosenfeld Deposition, 3-15-2018 and 4-3-2018
- In The District Court Of Regan County, Texas, 112th Judicial District
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants
Cause No 1923
Rosenfeld Deposition, 11-17-2017
- In The Superior Court of the State of California In And For The County Of Contra Costa
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants
Cause No C12-01481
Rosenfeld Deposition, 11-20-2017
- In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants
Case No.: No. 0i9-L-2295
Rosenfeld Deposition, 8-23-2017
- In The Superior Court of the State of California, For The County of Los Angeles
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC
Case No.: LC102019 (c/w BC582154)
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018
- In the Northern District Court of Mississippi, Greenville Division
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*
Case Number: 4:16-cv-52-DMB-JVM
Rosenfeld Deposition: July 2017

In The Superior Court of the State of Washington, County of Snohomish
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants
Case No.: No. 13-2-03987-5
Rosenfeld Deposition, February 2017
Trial, March 2017

In The Superior Court of the State of California, County of Alameda
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants
Case No.: RG14711115
Rosenfeld Deposition, September 2015

In The Iowa District Court In And For Poweshiek County
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants
Case No.: LALA002187
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Iowa District Court For Wapello County
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants
Law No.: LALA105144 - Division A
Rosenfeld Deposition, August 2015

In The Circuit Court of Ohio County, West Virginia
Robert Andrews, et al. v. Antero, et al.
Civil Action NO. 14-C-30000
Rosenfeld Deposition, June 2015

In The Third Judicial District County of Dona Ana, New Mexico
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward
DeRuyter, Defendants
Rosenfeld Deposition: July 2015

In The Iowa District Court For Muscatine County
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant
Case No 4980
Rosenfeld Deposition: May 2015

In the Circuit Court of the 17th Judicial Circuit, in and For Broward County, Florida
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.
Case Number CACE07030358 (26)
Rosenfeld Deposition: December 2014

In the United States District Court Western District of Oklahoma
Tommy McCarty, et al., Plaintiffs, v. Oklahoma City Landfill, LLC d/b/a Southeast Oklahoma City
Landfill, et al. Defendants.
Case No. 5:12-cv-01152-C
Rosenfeld Deposition: July 2014

In the County Court of Dallas County Texas
Lisa Parr et al, *Plaintiff*, vs. Aruba et al, *Defendant*.
Case Number cc-11-01650-E
Rosenfeld Deposition: March and September 2013
Rosenfeld Trial: April 2014

In the Court of Common Pleas of Tuscarawas County Ohio
John Michael Abicht, et al., *Plaintiffs*, vs. Republic Services, Inc., et al., *Defendants*
Case Number: 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)
Rosenfeld Deposition: October 2012

In the United States District Court of Southern District of Texas Galveston Division
Kyle Cannon, Eugene Donovan, Genaro Ramirez, Carol Sassler, and Harvey Walton, each Individually and on behalf of those similarly situated, *Plaintiffs*, vs. BP Products North America, Inc., *Defendant*.
Case 3:10-cv-00622
Rosenfeld Deposition: February 2012
Rosenfeld Trial: April 2013

In the Circuit Court of Baltimore County Maryland
Philip E. Cvach, II et al., *Plaintiffs* vs. Two Farms, Inc. d/b/a Royal Farms, Defendants
Case Number: 03-C-12-012487 OT
Rosenfeld Deposition: September 2013

EXHIBIT C



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Matthew F. Hagemann, P.G., C.Hg., QSD, QSP

**Geologic and Hydrogeologic Characterization
Industrial Stormwater Compliance
Investigation and Remediation Strategies
Litigation Support and Testifying Expert
CEQA Review**

Education:

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

Professional Certifications:

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

Professional Experience:

Matt has 25 years of experience in environmental policy, assessment and remediation. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) while also working with permit holders to improve hydrogeologic characterization and water quality monitoring.

Matt has worked closely with U.S. EPA legal counsel and the technical staff of several states in the application and enforcement of RCRA, Safe Drinking Water Act and Clean Water Act regulations. Matt has trained the technical staff in the States of California, Hawaii, Nevada, Arizona and the Territory of Guam in the conduct of investigations, groundwater fundamentals, and sampling techniques.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

Senior Regulatory and Litigation Support Analyst:

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 100 environmental impact reports since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, Valley Fever, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at industrial facilities.
- Manager of a project to provide technical assistance to a community adjacent to a former Naval shipyard under a grant from the U.S. EPA.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.
- Expert witness on two cases involving MTBE litigation.
- Expert witness and litigation support on the impact of air toxins and hazards at a school.
- Expert witness in litigation at a former plywood plant.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.

- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

Executive Director:

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

Hydrogeology:

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

Policy:

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9. Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

Geology:

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

Teaching:

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt taught physical geology (lecture and lab and introductory geology at Golden West College in Huntington Beach, California from 2010 to 2014.

Invited Testimony, Reports, Papers and Presentations:

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

Hagemann, M.F., 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

Hagemann, M.F., 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

Hagemann, M.F., 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

Hagemann, M.F., 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

Hagemann, M.F., 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

Hagemann, M.F., 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

Hagemann, M.F., 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

Hagemann, M.F., 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

Hagemann, M.F., 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

Hagemann, M.F., 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

Hagemann, M.F., 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

Hagemann, M.F., 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

Hagemann, M.F., 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

Hagemann, M.F., 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

Hagemann, M.F., and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

Hagemann, M.F., 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

Hagemann, M.F., 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

Hagemann, M.F., and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

Hagemann, M.F., Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

Hagemann, M. F., Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

Hagemann, M.F., 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

Hagemann, M.F. and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

Hagemann, M.F., 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

Hagemann, M.F., 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

Other Experience:

Selected as subject matter expert for the California Professional Geologist licensing examination, 2009-2011.

Reynoso, Vanessa

From: Ray Gonzales <reply-to+7ef795b6a974@crm.wix.com>
Sent: Wednesday, September 8, 2021 8:08 AM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

CAUTION: This email originated from outside your organization.

Ray Gonzales just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: Ray

Last Name: Gonzales

Email: gonzarayray@gmail.com

Enter your comments on the Draft Housing Element here. (1,000 characters): I am an Alhambra resident and I read the Housing element draft. On the face of it, it seems like a good thing???Promote the maintenance of the existing housing supply, and try to increase the amount of low to moderate-income housing so that it???s not all in one part of the city.

If you think this submission is spam, [report it as spam](#).

To edit your email settings, go to your Inbox on desktop.



Reynoso, Vanessa

From: Ted Slaughter <tslaughter@charlesdunn.com>
Sent: Monday, September 13, 2021 3:37 PM
To: Reynoso, Vanessa
Subject: Alhambra Housing Element Draft Report and Recommendations

CAUTION: This email originated from outside your organization.

Vanessa,

Although I have not had the opportunity to thoroughly review all the details of the entire Draft Housing Element document, which was made available to the public a few days ago, I have noted a consistency of several valid report observations with many of the sound planning recommendations contained in this draft report, including; 1.) Consolidation of small lots for purposes of developing appropriately-sized multi-family residential projects, 2.) Densification of multi-family and mixed commercial/residential uses in the Downtown CBD and Valley Blvd. areas, 3.) Placement of new multi-family residential developments on major commercial thoroughfares having access to public transportation and walkable amenities, and 4.) Preservation and protection of single family homes located in R-1 zoned neighborhoods. Unfortunately, many of these draft recommendations and observations directly contradict numerous former planning decisions and actions undertaken by prior Alhambra Planning Commissions, and Alhambra City Councils. Nevertheless, I am very encouraged with the thorough and detailed process which has preceded the issuance of the Draft Housing Element report, and I wish to respectively offer the following observations, comments, and recommendations for inclusion in the Final Alhambra Housing Element Report. But first, a bit of history...

In addition to several other Alhambra commercial development partnerships, I am the Managing Partner of Hillcrest Main Street Associates, LP, located at 410 to 412 East Main Street, which property consists of the existing LA Fitness, and Dog Haus Restaurant, and is situated on approximately 100,000 square feet of commercially zoned property, fronting on both Main and Chapel Streets, in what has been referred to as The Central Business District (CBD) Planning area of Alhambra for at least the past 50 years. I am also the Managing Partner of Hillcrest Monterey Associates, LP, which developed the current Ross Dress for Less store in the CBD at 201 East Main Street, at Monterey Street. Both of these CBD commercial projects were planned and developed in conjunction with the City's simultaneous construction of the Chapel Street parking structure to the north of the Ross store, and extending all the way to Chapel Street. These two Alhambra CBD development projects were completed in 1997, and resulted from our company's highly complex private assemblages of land, and subsequent cooperative transfers of a portion of this land to the City, for purposes of the City's construction of this public parking structure, which structure provides 100% of the City code required parking for the Ross Dress for Less, and over 50% of the City code required parking for the LA Fitness and Dog House Restaurant.

At the suggestion of senior City staff, in 2005, and then again in 2009, we approached two neighboring property owners of the LA Fitness Dog House surface parking lots for the purpose of purchasing these under utilized properties to expand our existing site to approximately 135,000 sq. ft., and thereby allow for development of another major national retailer at the southeast corner of Main and Chapel Streets, plus development of badly needed multi-family housing above this ground level Main Street retail, and additional structured public parking to the south of this proposed 5 story, mixed-use CBD project. Although we were unsuccessful in negotiating the acquisition of both of these neighboring properties, we continued to attempt these land purchases and parcel consolidation, until the Alhambra Redevelopment Agency was disbanded by the State in late 2012, resulting in a series of City senior staff changes, and subsequent decline of focus on vital economic development and housing production by the City.

In 2015, a group of homeowners residing in a single family neighborhood near Main Street, at the eastern border of the city, immediately adjacent to the planning area east of the CBD, then referred to as Main Street Commercial district, (MSC- Main Street, between Almansor Street and the City of San Gabriel border) became concerned with a proposed high density, multi-story, multi-family development application submitted for a very small commercial MSC lot located on Main Street, immediately adjacent to their R1 zoned single family homes. Although this proposed multi-family use was conditionally permitted in the MSC zone, the homeowners' legitimate concerns about the immediate proximity of this proposed high density multi-story development to their single family homes resulted in an appropriate response by these homeowners to apply pressure on the then City Council to reject this multi-family development, and pass a new city ordinance banning ALL multi-family development on these small MSC area commercial lots, which directly abutted single family homes, in R1 zoned neighborhoods.

Unfortunately, what resulted from this very well intentioned, but rushed effort by these residents living in close proximity to these small MSC zoned and R1 adjacent commercial properties, (as well as the then Planning Commission and City Council) was the highly improper, and likely unlawful 2015 passage of The East Main Street Corridor Ordinance, which ordinance not only eliminated ALL future housing and hospitality uses from the entire MSC zoned area, regardless of parcel size or adjacency to single-family R1 zoned homes, but also improperly attempted to expand the MSC zoning area, by use of this flawed ordinance, with the goal of significantly down-zoning all CBD zoned properties, located on Main Street, between Chapel and Almansor Streets, by attempting to improperly include these CBD zoned properties into the East Main Street Corridor Ordinance.

As was correctly pointed out in the recently released Alhambra Housing Element Draft Report, many of the properties located at the westerly portion of the MSC zoned area are larger in size than the smaller Main Street lots located close the eastern border of the City, which larger parcel sizes would make these westerly MSC Main Street lots more suitable for mid-rise, medium density residential development, even though several of these larger Main Street properties abut single family homes in R1 zoned areas.

These westerly MSC zoned areas, with larger size properties, generally lie between Almansor Street and Granada Avenue, and have been recommended in the Housing Element Report to be zoned for up to 30 residential units per acre of land. Nevertheless, there do exist several large properties, or potential large land assemblages, located on Main Street, east of Granada which I believe should also be considered for potential appropriately-sized low to mid-rise, medium density multifamily residential or mixed-use development, even if these larger Main Street properties abut single family homes in R1 zoned areas.

With respect to the very large CBD zoned properties fronting Main Street, between Chapel and Almansor Streets, were an improper attempt was made to include these properties in The East Main Street Corridor Ordinance, these large CBD properties, which do NOT abut any R1 zoned property, or single family residences, should be legally entitled to develop multifamily housing at the same density, in the same manner, and under the same criteria, as all other properties located within the CBD zoning area. Furthermore, in light of the Draft Housing Element report's findings and recommended housing zoning for the EMC, I propose that this highly flawed East Main Street Corridor Ordinance be either entirely overturned, or at a minimum, be amended through the ongoing East Main Street Corridor Study Project, to specifically and correctly exclude those CBD zoned properties between Chapel and Almansor Streets, which properties include those owned by Hillcrest Main Street Associates, LP.

Finally, as noted and recommended in the Draft Alhambra Housing Element Report, the City should exercise all reasonable means available to it in order to consolidate smaller properties, which are suitable for multifamily development, into larger assembled parcels, which can be more properly and efficiently developed with badly

needed housing. Unfortunately, with the loss of Redevelopment in 2012, the City has been without any means, or authority to facilitate the assemblage of smaller parcels for purposes of encouraging and facilitating residential development.

Although the draft report does not make any definitive recommendations as to means by which the City might best undertake this recommended parcel assemblage and housing development program, I highly recommend that Final Housing Element report include a specific recommendation for the establishment of a City controlled Housing Authority, or other legal housing production entity, which would provide the City with the legal and financial means to facilitate the timely and efficient acquisition and consolidation of property suitable for residential development, as well as the ability to facilitate both City sponsored acquisition and development financing of this badly needed housing, and resulting economic uplift created by new housing.

Thank you for your time and consideration of my long-winded observations and recommendations pertaining to the Draft Alhambra Housing Element Report. I welcome any comments from City staff or Councilmembers, and look forward to the completion and certification of the Alhambra Housing Element Final Report, The East Main Street Corridor Plan, and subsequent Alhambra Zoning Code Update.

Regards

Ted Slaughter | Lic. #00817465
Senior Managing Director: Charles Dunn Company, Inc.
Managing Member: Hillcrest Development Partners, LLC
Cell: [\(213\) 804-9144](tel:2138049144) | L #01201641

800 West 6th Street, Suite 600, Los Angeles, CA 90017

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From: [David Anderson](#)
To: [Housing Element](#); Imyles@cityofalhambra.org
Subject: Housing Density Alhambra
Date: Wednesday, September 22, 2021 11:21:14 AM

CAUTION: This email originated from outside your organization.

The following are some of the density issues suggested by the Chamber, but I have long felt too much weight has been put on those who advocate NIMBY and wish to return to the 1950's.

Regards, David

I'm a business owner in the City of Alhambra, and I'm asking that you include the following in the City's final Housing Element submitted to the State:

- 1. The commercial areas along East Main Street from Almanson to Chapel should be returned to the Central Business District (of which it was originally part) and the housing allowed there should match the CBD.*
- 2. Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada.*
- 3. We believe higher densities than currently recommended on Valley Blvd. would maximize the available property for housing production. The repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd. is a positive first step.*

Thank you for your consideration. Denser housing in our commercial corridors will support a strong, local workforce as well as a larger, local customer base - a benefit to the city for decades to come.

From: [Jo's Garage Inc.](#)
To: [Housing Element](#)
Date: Wednesday, September 22, 2021 12:33:51 PM

CAUTION: This email originated from outside your organization.

To whom it may concern,

I'm a business owner in the City of Alhambra, and I'm asking that you include the following in the City's final Housing Element submitted to the State:

- 1. The commercial areas along East Main Street from Almansor to Chapel should be returned to the Central Business District (of which it was originally part) and the housing allowed there should match the CBD.*
- 2. Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada.*
- 3. We believe higher densities than currently recommended on Valley Blvd. would maximize the available property for housing production. The repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd. is a positive first step.*

Thank you for your consideration. Denser housing in our commercial corridors will support a strong, local workforce as well as a larger, local customer base - a benefit to the city for decades to come.

Thank you for your time,

--

Javier Mendez

Jo's Garage Inc.

120 E. Valley Blvd. | Alhambra, CA 91801

ph: (626) 872-0705 | fax: (626) 872-0698

www.josgarage.com

From: [Anthony Dedousis](#)
To: [Housing Element](#); [Myles, Lauren](#)
Cc: [Leonora Camner](#); [Jon Wizard](#); [Henry Fung](#)
Subject: Alhambra housing element - comment letter
Date: Friday, September 24, 2021 2:17:31 PM
Attachments: [210924 Alhambra HE Comment Letter.pdf](#)

CAUTION: This email originated from outside your organization.

Dear Councilmembers and Planning staff:

Hope your week is going well. I'm reaching out to share a letter from Abundant Housing LA and YIMBY Law regarding Alhambra's draft housing element. We applaud the City for undertaking a high-quality, analytical approach to estimating the city's sites inventory and assessing rezoning needs in a way that properly meets the state's guidelines. Nevertheless, our letter expresses major concerns about portions of the City's intended approach to updating the housing element, which we believe must be amended before finalizing the housing element.

The attached letter contains a detailed explanation of where we view the City as having fallen short of HCD's standards and state law. We request the opportunity to discuss our concerns.

Thank you for your consideration.

Regards,

Anthony

--

Anthony Dedousis

Director, Policy and Research
Abundant Housing LA
515 S Flower Street, 18th Floor
Los Angeles, CA 90071
516-660-7402



September 24, 2021

Alhambra City Council
Alhambra City Hall
111 South 1st Street
Alhambra, CA 91801

Dear Councilmembers:

Thank you for the opportunity to comment on the process of updating the housing element of Alhambra's general plan. We are writing on behalf of **Abundant Housing LA** and **YIMBY Law** regarding Alhambra's 6th Cycle housing element update. **Abundant Housing LA** is a pro-housing, nonprofit advocacy organization working to help solve Southern California's housing crisis, and **YIMBY Law's** mission is to make housing in California more accessible and affordable through enforcement of state housing law. We support more housing at all levels of affordability and reforms to land use and zoning codes, which are needed in order to make housing more affordable, improve access to jobs and transit, promote greater environmental sustainability, and advance racial and economic equity.

Last autumn, AHLA shared a letter with the City, providing guidance on how Alhambra should fulfill both the letter and the spirit of housing element law. We have reviewed the City's draft Housing Element, and we are encouraged that the City has incorporated a sophisticated, data-driven site inventory analysis and rezoning plan in its draft housing element. In particular:

- **The City's approach to estimating the site capacity and assessing rezoning needs properly meets guidelines and should serve as a model for other jurisdictions.** The City's collaboration with ECONorthwest resulted in a rigorous, high-quality quantitative model that uses economic data to identify parcels whose existing use is relatively likely to be discontinued, estimates each parcel's likelihood of redevelopment, and makes reasonable assumptions about how many units would be built on a parcel if redevelopment occurs. This citywide approach provides a fair estimate of Alhambra's current realistic capacity for new housing, and recognizes that significant rezoning is necessary in order to accommodate the RHNA target. Per the housing element, "It is clear that under existing zoning, Alhambra falls well short of having zoned capacity to meet its allocated share of regional housing need for the 2021-2029 planning period."¹
- **The housing element estimated and reported most nonvacant parcels' likelihood of development** (the element refers to this factor as "Redevelopment Strength")². This recognizes that Assembly Bill 1397 (2017) requires cities to discount sites' capacity by the sites' probability of development during the planning period, as argued by experts in housing element law.

¹ Draft Housing Element, pg. 158

² Draft Housing Element, pg. 180

- **The housing element reported the proportion of sites from the 5th Cycle housing element's inventory that were developed during the previous planning period.** The housing element states that only 20% of 5th Cycle sites were subsequently developed³, providing a useful data point to stress-test the 6th Cycle site inventory's assumptions.
- **The housing element commits to implementing its rezoning program in 2022.** As the housing element states, "Land-use changes that occur at the beginning of the planning period (in contrast to the three-year window that is allowed by State Law) are more likely to have an impact on development and increase the likelihood of redevelopment during the planning period."⁴ We applaud the City for proposing to act swiftly.

Nevertheless, we still have concerns about the City's plan to meet its state-mandated RHNA targets. Portions of the draft housing element contain major inconsistencies with HCD's instructions and the requirement that housing element updates affirmatively further fair housing under Assembly Bill 686, and does not provide a detailed, specific, and credible plan for paring back constraints on housing production, as required under Government Code Section 65583(c).

The following issues are of particular concern to us:

1. The housing element does not adequately prioritize rezoning in transit-rich, job-rich, and high-resource neighborhoods, including single-family zoned areas. This is necessary to expand affordable housing opportunities while minimizing the impact on existing renters in multifamily-zoned areas.

AB 686 (2018) requires housing element updates to "affirmatively further fair housing", which is defined as "taking meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and fosters inclusive communities free from barriers that restrict access to opportunity based on protected characteristics." The City must address the issue of residential segregation by accommodating the lower-income RHNA targets in a way that conforms with AFFH requirements.

HCD requires that a housing element's site inventory and rezoning programs must not concentrate opportunities for affordable housing development in areas of segregation or high poverty. Rather, "sites must be identified throughout the community in a manner that affirmatively furthers fair housing."⁵ HCD recommends that jurisdictions distribute affordable housing opportunities throughout the jurisdiction, and first identify development potential for affordable housing in its best-resourced neighborhoods⁶, as defined in the TCAC/HCD Opportunity Map. Additionally, HCD's AFFH Guidance Memo defines "high-opportunity" holistically, defining areas with strong access to public transportation and job centers as being locations where affordable housing should be promoted through the housing element.⁷ These

³ Draft Housing Element, pg. 165

⁴ Draft Housing Element, pg. 159

⁵ HCD Site Inventory Guidebook, pg. 9

⁶ HCD Site Inventory Guidebook, pg. 3

⁷ HCD, AFFH Guidance Memo, pg. 48

policies will create more affordable housing in well-resourced areas, promoting inclusion of people of all backgrounds and income levels in formerly exclusionary neighborhoods.

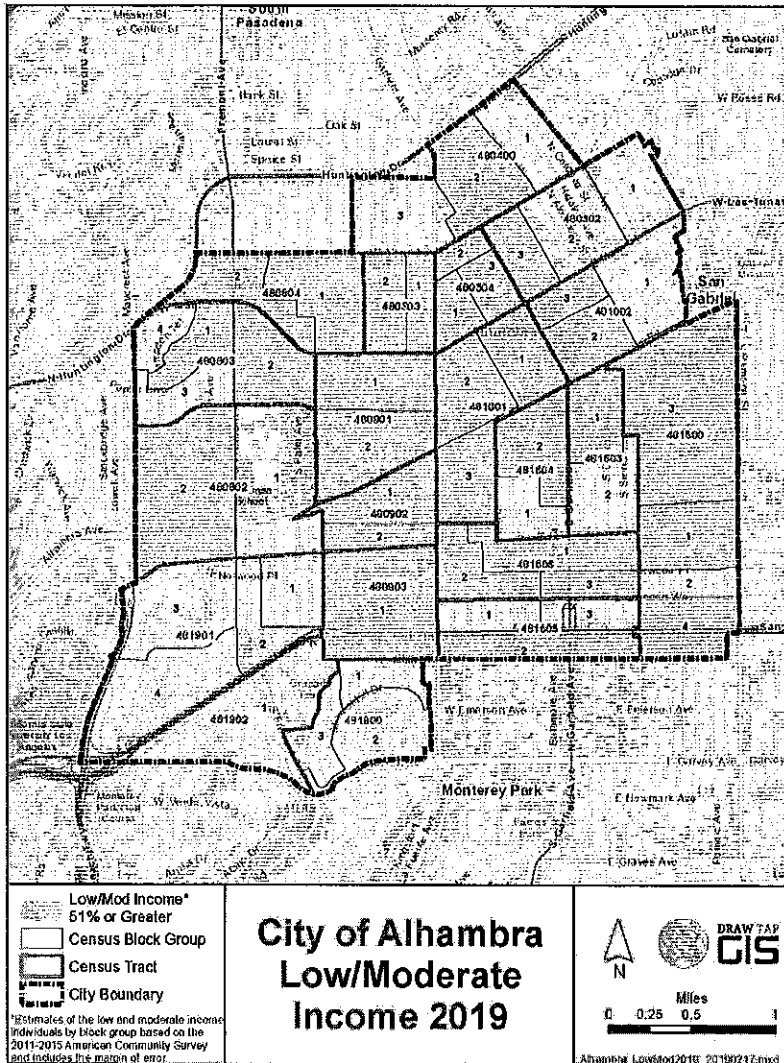
This is important because in our region, housing policy and land use perpetuate racist exclusion. Redlining and restrictive covenants, which restricted where Black, Latino/a/x, Indigenous people, and Asian Americans could live, were once common in Los Angeles County. Discrimination in housing takes other forms today: even after *de jure* segregation was banned, opponents of neighborhood change in prosperous areas weaponized zoning policy to make apartment construction illegal in much of Los Angeles County, especially in high-income areas. Restrictive zoning has perpetuated historic patterns of segregation and exclusion, and continues to push affordable housing opportunities away from wealthy, high-opportunity cities and neighborhoods.

While the City has proposed a thorough and well-grounded rezoning program, it has only proposed rezoning parcels that are already zoned for multifamily residential or mixed-use development, and has not proposed the legalization of apartments in R1-zoned areas, which today make up 76% of the City's residentially-zoned land. The City has not even proposed allowing apartments on R1-zoned parcels near high-frequency bus lines that run along Valley Boulevard, Main Street, and Atlantic Boulevard. The City's proposed site inventory and rezoning program therefore doesn't do enough to create housing in high-resource neighborhoods, and is unlikely to advance the goal of socioeconomic integration or greater housing affordability.

Single-family zoning is particularly prevalent in higher-income neighborhoods of western and northeast Alhambra. These census tracts are defined as "High Resource" under the state's TCAC methodology, and are places where a majority of households earn an above-median income. But due to widespread single-family zoning, new housing opportunities, including housing that is affordable to lower- and moderate-income families, are effectively blocked in these areas. This helps to explain why few of the City's proposed redevelopment sites are in higher-resource areas, except along major roads.

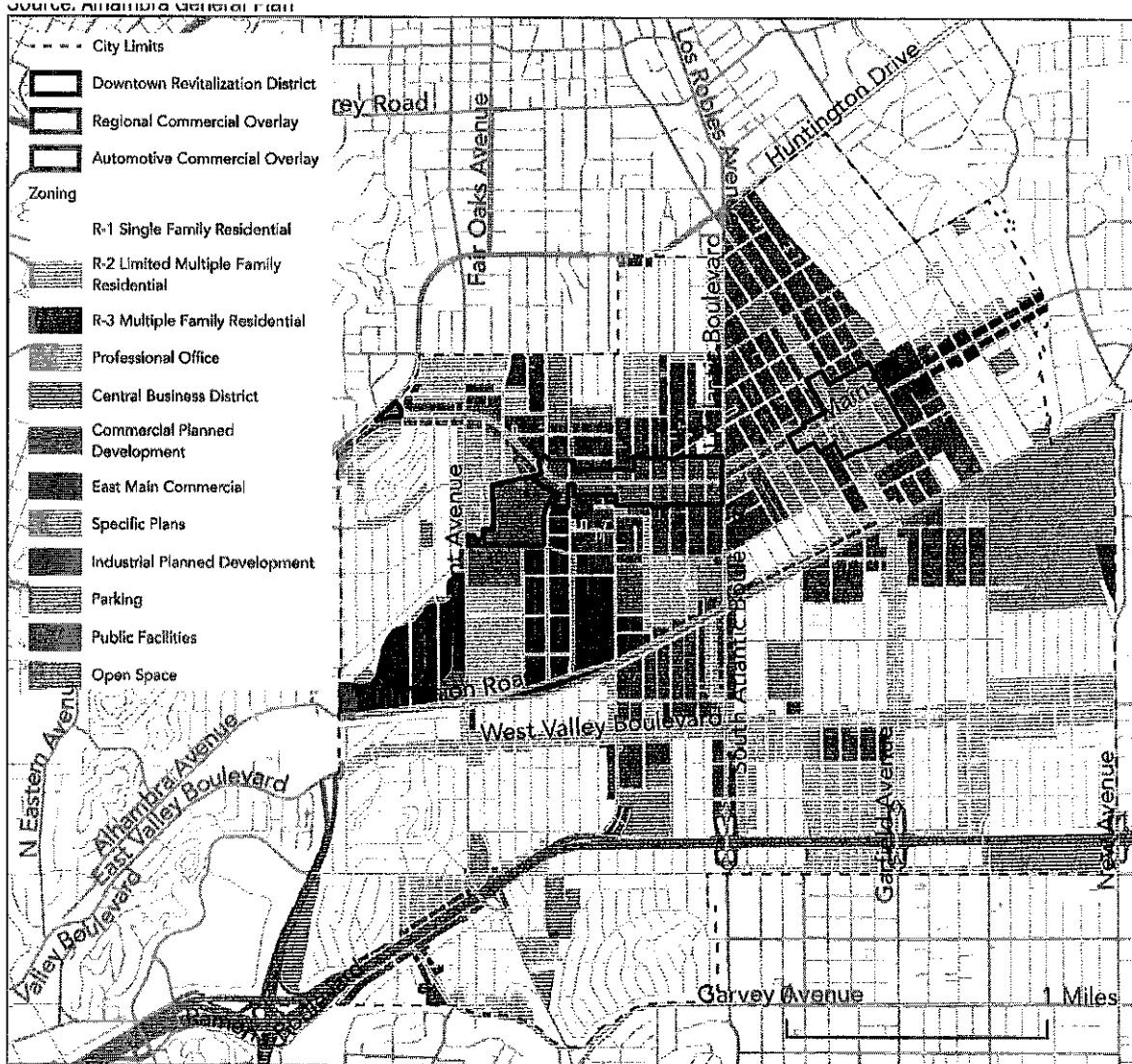
Census Tracts by majority-LMI status

Tracts in orange are majority-LMI



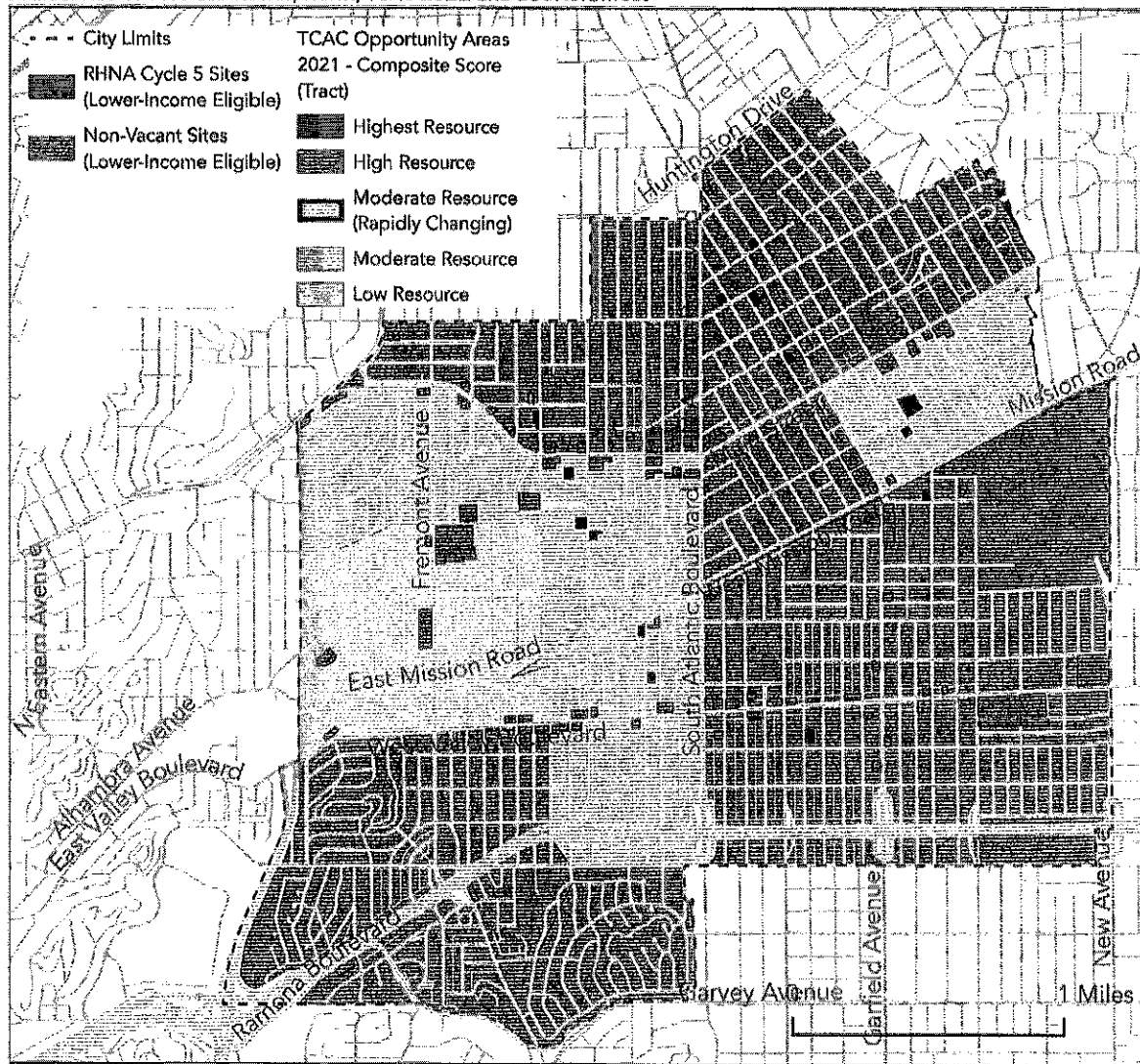
Zoning map of Alhambra

Areas in pale yellow are zoned R1 (single-family)



Census tracts by TCAC category with overlay of proposed nonvacant sites

Areas in blue are high-resource; areas in red are proposed nonvacant sites



Ending exclusionary zoning is necessary for the housing element to advance socioeconomic integration and greater housing affordability, especially given the heavy existing concentration of lower-income households in low-resource neighborhoods within Alhambra. The final housing element must make a stronger effort to affirmatively further fair housing and rezone sites in high-resource areas of Alhambra to increase affordable and lower-income units in these neighborhoods, particularly near transit corridors.

The housing element's Program 17 proposes to "conduct a study exploring in detail the feasibility of residential redevelopment along corridors and in high-density residential areas", and Program 30 proposes to "review and amend the Zoning Code and applicable design guidelines to encourage and promote a mix of dwelling types and sizes, specifically missing

middle-density housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) in the R-2 and R-3 zones to create housing for middle- and moderate-income households.⁸ These worthwhile proposals should be expanded to also assess allowing missing middle and higher-density residential development in R1 zones.

Recommendations:

- **Upzone parcels located near transit, job centers, schools, and parks in order to expand the supply of housing in the City's highest-opportunity areas. This should include R1 zoned parcels where single-family detached homes are currently mandated by law.**
- **Ensure that housing opportunities for lower-income households are not concentrated in neighborhoods with high concentrations of low and moderate income households, or in neighborhoods with significant exposure to noise or air pollution.**
- **Identify new funding sources and public resources to encourage the production of affordable housing, such as reform of the City's real estate transfer tax, an introduction of congestion pricing.**
- **Exempt parcels containing rent-restricted and de facto affordable housing units from rezoning.**
- **Ensure that "no net loss" provisions apply to parcels in the site inventory and rezoning program with a monitoring and implementation program.**
- **Prioritize the production of affordable housing on publicly-owned land.**
- **Create a 100% affordable housing zoning overlay that encompasses high-opportunity neighborhoods, including R1 zoned parcels.**

2. The housing element must do more to fund preservation of existing affordable housing, and must use funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

Under state law, a housing element must affirmatively "[a]ssist in the development of adequate housing to meet the needs of extremely low, very low, low, and moderate-income households" (Gov't Code 65583(c)(2)). Additionally, HCD's AFFH Guidance Memo states that "The schedule of actions generally must (1) enhance the mobility of low-income and minority communities, (2) encourage the development of new affordable housing in high-opportunity areas, (3) protect existing residents from displacement, and (4) invest in disadvantaged places."⁹

Housing elements should use available public resources, including real estate transfer taxes and publicly owned land, in order to fund and encourage the preservation of existing affordable housing, potentially through a local Tenant Opportunity to Purchase Act, community land trusts, land banks, or assisting mission-driven nonprofits with acquisition of housing whose affordability covenants are close to expiration. This is important to ensure that lower-income households are able to maintain access to quality affordable housing options.

⁸ Draft Housing Element, p. 151 and 153

⁹ AFFH Guidance Memo, p. 54

While the draft housing element's Program 3 proposes to "Monitor the status of the 366 affordable housing units that are at risk of converting to market-rate during the 2021-2029 Housing Element" and to "Contact property owners of units at risk of converting to market-rate housing within one year of covenant expiration to discuss preservation alternatives"¹⁰, these are relatively weak actions that seem unlikely to be impactful. **We urge the City to increase its commitment to funding and supporting affordable housing preservation and production.**

Additionally, housing elements should incorporate a program that creates affordable units, such as a density bonus program or base-bonus incentive system, that would apply to rezoned parcels. This will ensure that new housing development will directly create affordable units within mixed-income properties.

The City of Los Angeles's Transit Oriented Communities program, which offers generous by-right density bonuses to developers who include affordable housing in new developments near mass transit, is worth emulating. Transit Oriented Communities has led to the proposal of over 35,000 homes (of which 20% are deed-restricted affordable units) in Los Angeles.

The housing element states that Alhambra's local density bonus program has not yet been updated to comply with State law.¹¹ This presents an opportunity for Alhambra to implement a best-in-class density bonus program, akin to LA's TOC program, which would encourage mixed-income housing production near transit. While Alhambra has implemented a local Inclusionary Housing Ordinance, a strong density bonus program is needed to create the economic incentives necessary for more mixed-income development to materialize.

Additionally, rezoning R1 parcels to legalize small apartment buildings, especially in high-resource, high-demand neighborhoods, would expand usage of a local density bonus program and lead to greater production of subsidized housing units for lower-income households. The housing element's Program 9, which proposes to expand the state's density bonus program for 100% affordable projects throughout the Downtown Revitalization District, offers a good starting point for a more expansive local density bonus program.¹²

Recommendations:

- **Introduce a density bonus program similar to Los Angeles' Transit Oriented Communities program (with 50-80% density bonuses) to permit additional affordable housing to be built near mass transit.**
- **Ensure that R1-zoned parcels are included in a local density bonus program.**
- **Identify additional funding sources to support the preservation of existing affordable housing.**

¹⁰ Draft Housing Element, p. 144

¹¹ Draft Housing Element, p. 80

¹² Draft Housing Element, p. 147

3. The housing element does not include programs with concrete action steps to facilitate housing production and pare back constraints on homebuilding. As a result, the housing element does not do enough to streamline housing production.

Housing element law requires cities to provide an analysis of governmental constraints on housing development, as well as a program to mitigate or remove these governmental constraints. This is important because local governmental constraints are a major reason why affordable housing production in most California cities is low.

Unfortunately, building housing in Alhambra is slow and difficult, due to the City's complex regulatory regime. The City's own recent zoning code audit found many constraints on housing development, including heavy on-site parking requirements, excessive discretionary review, and inconsistent review and approval procedures, and the code's overall complexity.¹³

All multifamily development in Alhambra, even a duplex, is subject to discretionary review, while single-family homes are generally approved by-right.¹⁴ Additionally, development timelines are long and unpredictable; as the housing element stated, "The city's zoning code audit found Alhambra's development review processes to be burdensome and over reliant on discretionary review."¹⁵ Most new apartments must provide two parking spaces per unit¹⁶, which raises construction costs and makes new housing production less feasible, and maximum building sizes and lot coverage are generally restrictive, even in the City's R-3 zones.¹⁷ As the housing element put it, "We found that collectively, the city's development standards make it difficult to reach maximum allowed densities and place additional financial burden on development. Height limits, open space and parking requirements are the greatest constraint."¹⁸

As a result of these many constraints, the city's housing stock only grew 6% between 2000 and 2020, while neighboring Pasadena experienced 16% growth in the housing supply during that time.¹⁹ Housing scarcity hurts Alhambra residents financially: the median rent for a two-bedroom apartment exceeds \$1,700/month²⁰, and median home sale prices now exceed \$800,000.²¹ Per Professor Chris Elmendorf of the University of California, Davis and his co-authors of Superintending Local Constraints on Housing Development, the above data suggest that restrictive land use rules are making homebuilding difficult in Alhambra, leading to continued shortage and high costs.

While the housing element candidly discusses governmental constraints in detail, and explains how these constraints deter housing production and raise housing costs, the housing element does not commit to a strong program to remove these constraints. For example, Program 26 (Development Streamlining) says that the City will "continue to find opportunities to streamline

¹³ Draft Housing Element, pg. 58

¹⁴ Draft Housing Element, pg. 98

¹⁵ Draft Housing Element, pg. 99

¹⁶ Draft Housing Element, pg. 74

¹⁷ Draft Housing Element, pg. 68

¹⁸ Draft Housing Element, pg. 77

¹⁹ Draft Housing Element, pg. 40

²⁰ Draft Housing Element, pg. 46

²¹ Zillow estimate, September 2021

the permitting process to remove unnecessary barriers” and “adopt new streamlining procedures to expedite the permitting and design review of certain housing projects”.²² However, no specific policies are proposed to achieve this outcome, nor is a plan for implementation included.

Government Code Section 65583(c) requires housing elements to include programs with concrete action steps to facilitate housing production.²³ This is hardly an impossible target; other cities in California have successfully implemented process reforms that streamline housing production. For example, the City of Los Angeles’ Transit Oriented Communities program approves qualifying mixed-income and 100% affordable projects by-right, leading to an average approval time of 6 months for these projects. The City of Santa Monica eliminated on-site parking requirements in its downtown in 2017. **We urge Alhambra to commit to a robust package of constraint removal policies in order to streamline housing growth.**

Recommendations:

- **Establish a fast by-right review process for all new multifamily and mixed-use buildings which meet the zoning law and the General Plan.** Sacramento’s Ministerial Housing Ordinance is an excellent model to follow.
- **Pre-approve standard ADU, small-scale “missing middle” multifamily and small lot subdivision housing plans, allowing developers to receive a permit quickly if they use a pre-approved design.**
- **Eliminate on-site parking requirements, instead allowing property owners to decide how much on-site parking is necessary.**
- **Reduce restrictions on maximum height, floor-area ratio, unit size, and lot coverage.**
- **Reduce burdensome fees on new housing production.**

4. The housing element does not apply a likelihood of development discount factor on redevelopment sites that were previously identified in the 5th Cycle.

Assembly Bill 1397 (2017) requires cities to provide an accurate assessment of realistic site capacity, including “the city’s or county’s past experience with converting existing uses to higher density residential development, the current demand for the existing use, and an analysis of existing leases or other contracts that would perpetuate the existing use or prevent redevelopment.”

Laudably, Alhambra’s housing element estimates the likelihood of development for sites that provide new nonvacant redevelopment capacity, and identifies 8,983 units of theoretical capacity in order to create 5,571 units of realistic capacity. This recognizes that *theoretical*

²² Draft Housing Element, pg. 155

²³ “The element shall contain all of the following: A program [or programs] that sets forth a schedule of actions during the planning period, each with a timeline for implementation, that may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land use and development controls, the provision of regulatory concessions and incentives...”

capacity and *realistic capacity* are two different things, and that redevelopment sites must be discounted by the likelihood of redevelopment.

However, this same analysis is not applied to the site inventory's **existing** nonvacant redevelopment capacity, which are 64 sites previously identified in the 5th Cycle site inventory, containing 412 units of theoretical capacity, that have once again been included in the 6th Cycle site inventory.²⁴ Instead, all 412 units are treated as *realistic capacity*, effectively suggesting that their redevelopment during the 6th Cycle is a certainty. However, only about 20% of 5th Cycle sites were subsequently redeveloped, and the fact that these 64 sites were not redeveloped during the 5th Cycle suggests that they have an especially low likelihood of redevelopment in the future.

The City must fairly estimate the likelihood of development for these 64 parcels. Barring that, the City should remove these sites from the site inventory, and instead rezone other parcels in order to create 412 units of *realistic capacity*.

Recommendations:

- **Incorporate the quantitative estimate of 5th Cycle parcels' development probabilities into the estimate of these sites' realistic capacity for the 6th Cycle.**
- **Alternatively, remove parcels from the site inventory where redevelopment is unlikely to occur during the 6th Cycle.**
- **If the City lacks enough suitable sites to achieve the RHNA target, rezone additional parcels where redevelopment is likely.**

5. A buffer of at least 15-30% extra capacity is not included in the housing element site inventory. This capacity buffer is especially necessary in order to accommodate the lower-income RHNA target.

The No Net Loss law established by SB 166 (2017) requires adequate sites to be maintained at all times throughout the planning period to accommodate the remaining RHNA target **by each income category**.²⁵ If a jurisdiction approves a development on a parcel listed in the site inventory that will have fewer units (either in total or at a given income level) than the number of units (either in total or at a given income level) anticipated in the site inventory, then the jurisdiction must identify and make available enough sites to accommodate the remaining unmet RHNA target for each income category.²⁶

If additional sites with adequate zoned capacity don't exist, then the jurisdiction must rezone enough sites to accommodate the remaining unmet RHNA target within 180 days. If the jurisdiction fails to accomplish this rezoning in the required period, then the consequences will include decertification of the housing element and potential state legal action. HCD recommends that "the jurisdiction create a buffer in the housing element inventory of at least 15-30% more capacity than required, especially for capacity to accommodate the lower income

²⁴ Draft Housing Element, p. 173

²⁵ HCD No Net Loss Law Memo, pg. 1

²⁶ HCD Site Inventory Guidebook, pg. 22

RHNA.²⁷ This is important because it ensures that adequate affordable housing capacity exists in the housing element through the 6th Cycle.

The City's draft housing element claims to provide capacity for 8,000 housing units, 17% higher than the City's RHNA goal of 6,825 homes.²⁸ But the City has not fulfilled HCD's recommendation to maintain a 15-30% capacity buffer at each income level, giving the City little margin if a site intended for affordable housing is developed with market-rate housing.

No Net Loss buffers

Income Category	RHNA Target	Claimed Realistic	
		Capacity in Draft HE	NNL Buffer
VLI	1,774	1,830	3%
LI	1,036	1,333	29%
MI	1,079	1,192	10%
AMI	2,936	3,645	24%
Total	6,825	8,000	17%

The City should ensure that enough housing capacity is created to provide 15-30% capacity buffers at each level of income, to avoid violating the No Net Loss requirement. Otherwise, the City risks falling afoul of the No Net Loss requirement, making it vulnerable to mid-cycle rezoning, a costly process in terms of time, money, and political will.

Recommendation:

- Identify sufficient sites to provide a 15-30% No Net Loss buffer, especially for the VLI, LI, and MI categories, and rezone if there aren't enough suitable sites to provide this buffer.

6. The housing element does not provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and does not adjust the number of in-pipeline units counted towards the 6th Cycle RHNA target accordingly.

HCD allows cities to count permitted or entitled units towards its 6th Cycle RHNA goals, on the grounds that some of these projects will be built during the 6th Cycle. However, the city must realistically estimate how many of these units will ultimately be built during the 6th Cycle, based on recent historical data. This is necessary because not every pending project gets approved, and not every approved project gets built. Assuming that all permitted or entitled projects will ultimately be built is a faulty assumption, and would make it likelier that the city does not achieve its 6th Cycle RHNA goals.

²⁷ HCD Site Inventory Guidebook, pg. 22

²⁸ Draft Housing Element, p. 181

Unfortunately, the City has made this assumption, counting towards the 6th Cycle RHNA target 1,163 units in projects that have been proposed, approved, or permitted, but not yet built.²⁹ The City has therefore assumed that all 1,163 units will ultimately be built, without adjusting for the likelihood that some will not. While the City states that the identified projects "have a very high likelihood of being developed over the planning period", among the projects counted here is The Villages, a major development whose approval process has been mired in controversy, and whose size has been repeatedly scaled down in the face of community opposition. It would be inappropriate to assume that the project's completion is a certainty.

Alhambra should instead emulate the approach taken by the City of Los Angeles. Their Initial Study counted active planning entitlements, approved planning entitlements with no building permit, and permitted projects that have not yet been completed towards its 6th Cycle RHNA goals, but discounted each category based on the share of proposed units expected to be built, using the City's historical data.

This approach would allow for a more realistic number of units from pending and entitled projects to be counted towards Alhambra's RHNA target. Planning could use local data from recent projects to estimate these percentages. **But the City should certainly not count 1,163 units towards its 6th Cycle RHNA goal.**

Recommendation:

- **Provide a quantitative estimate of the likelihood that in-pipeline projects will be completed, based on historical data, and adjust the number of in-pipeline units counted towards the 6th cycle RHNA target accordingly.**

7. The housing element makes overly optimistic forecasts of future ADU production which are unlikely to be achieved even with aggressive policies. The City did not use an HCD-recommended safe harbor methodology for forecasting future ADU production.

Local jurisdictions frequently use overly optimistic estimates of ADU capacity and future production to avoid necessary housing reform and rezoning. This is why HCD has established two safe harbors for forecasting ADU production during the 6th Cycle³⁰. One option ("Option #1") is to project forward the local trend in ADU construction since January 2018. The other, for use when no other data is available ("Option #2"), assumes ADU production at five times the local rate of production prior to 2018.

HCD's guidelines ensure that ADU development estimates reflect actual on-the-ground conditions so that they are realistic. This will maximize the likelihood that ADUs will be built to the level forecasted in the housing element update.

According to HCD, Alhambra issued permits for 7 ADUs in 2018 and 30 ADUs in 2019.³¹ The housing element states that the City received 67 ADU permit applications in 2020, and based on

²⁹ Draft Housing Element, p. 167

³⁰ HCD Site Inventory Guidebook, pg. 31

³¹ Housing Element Implementation and APR Data Dashboard, HCD, 2020

past trends, 90% would ultimately receive a permit (so roughly 60 ADU permits in 2020).³² Under a correct calculation of HCD's "Option #1", Alhambra would take the average of the ADU permitting trend between 2018 and 2020, and forecast that 32 ADUs will be permitted per year during the 6th Cycle. **This would allow for a total 6th cycle forecast of 256 ADUs.**

However, the City counts 600 ADUs, or 75 ADUs per year, towards the City's RHNA target, under the logic that the City contains almost 7,400 lots that are ideal for ADU development, and that just 1% would need to be developed annually in order to reach the projected goal.³³ But this estimate is purely speculative, and is not grounded in actual production trend data, as HCD requires. **The City must correct its calculation of the ADU safe harbor, and simply apply the average of annual ADU permits issued between 2018 and 2020, per HCD's guidelines.**

Recommendation:

- **The City must use HCD's Option 1 safe harbor, and project that 256 ADUs will be permitted during the 6th Cycle.** High-quality data is available on the local trend in ADU construction since January 2018, so this is the appropriate safe harbor to use. If the City believes that higher ADU production forecasts are warranted, it must provide well-grounded estimates, based on the pace of ADU production in neighboring jurisdictions, and must explain what programs or policy efforts it will adopt that would lead to higher ADU production than it currently observes.

8. The housing element does not provide for mid-cycle adjustments if inventory sites are developed at lower rates, or lesser densities, than the housing element anticipated and if ADU production falls short of projections. Mid-cycle adjustments should automatically implement a by-right density bonus on inventory sites, starting mid-cycle, and be large enough to make up for an ADU shortfall.

No city can perfectly forecast future redevelopment trends, and it is entirely possible that despite best efforts, a city's 6th Cycle housing production falls short of the RHNA target due to less redevelopment than expected.

Anticipating this issue for ADUs, HCD's Site Inventory Guidebook states that cities' housing elements "should also include a monitoring program that a) tracks ADU and JADU creation and affordability levels, and b) commits to a review at the planning cycle midpoint to evaluate if production estimates are being achieved."³⁴ "Depending on the finding of that review, amendments to the housing element may be necessary, including rezoning pursuant to Government Code 65583.2 (h) and (i)."³⁵ This wisely provides a fail-safe in the event that ADU development falls short of forecasted production by the midpoint of the planning cycle.

A housing element's provision for mid-cycle adjustment should be feasible to implement at the midpoint of the cycle. Rezoning is generally a multiyear process, often involving extensive

³² Draft Housing Element, pg. 174-175

³³ Draft Housing Element, pg. 174

³⁴ [HCD Site Inventory Guidebook, pg. 31](#)

³⁵ [HCD Site Inventory Guidebook, pg. 31](#)

CEQA review and litigation. Rezoning initiated at the midpoint may result in little (if any) new zoned capacity during the planning period. For this reason, we recommend that jurisdictions proactively plan for the possibility of an ADU shortfall by providing in the housing element for by-right density bonuses on inventory sites, which would become automatically available mid-cycle if the ADU target is not met.

While the draft housing element states that Program 30 “includes a mid-cycle evaluation of ADU production and an adjustment to its capacity estimates if ADU production falls well short of estimates”,³⁶ the City must commit to policy actions now that would automatically take effect in the event of a mid-cycle shortfall. We recommend that the final housing element be amended to include by-right density bonuses on inventory sites that become automatically available at mid-cycle in the event of an ADU shortfall; this is necessary in order to ensure that the City remains on track to achieve its RHNA target by the end of the 6th Cycle.

Recommendation:

- **Follow HCD’s recommendation to track ADU and JADU creation and affordability levels, and commit to a review at the planning cycle midpoint to evaluate if production and affordability estimates are being achieved.**³⁷ The housing element should commit to mid-cycle rezoning if ADU production is lower than forecasted, and its midpoint review should be linked with immediate and automatic programs to increase housing production in the second half of the RHNA cycle. Our recommended approach is to incorporate by-right density bonuses on inventory sites, which would automatically take effect mid-cycle if the ADU target is not met. The density bonus should be large enough, and apply to enough parcels, to fully make up for any ADU production shortfall.

The City of Alhambra has a legal obligation to sufficiently plan to meet current and future residents’ housing needs, in a way that guarantees access to opportunity for Californians of all racial and ethnic backgrounds. The issues that we’ve highlighted above suggest that additional reform is needed for Alhambra to fulfill this legal obligation. We urge you to actively embrace this opportunity to provide a variety of attainable housing options for the residents and workers of Alhambra.

Finally, state law imposes penalties on jurisdictions that fail to adopt a compliant 6th Cycle housing element update by October 15, 2021. On that date, noncompliant jurisdictions will forfeit the right to deny residential projects on the basis of local zoning, so long as projects include at least a 20% set-aside for below market-rate units or are 100% moderate-rate projects³⁸. Noncompliant jurisdictions may also lose the ability to issue building permits, including permits for kitchen and bath renovations. Jurisdictions that want to maintain local control over new development and maintain the ability to permit kitchen and bath renovations should therefore plan to adopt a compliant housing element update on time.

³⁶ Draft Housing Element, p. 175

³⁷ [HCD Site Inventory Guidebook, pg. 31](#)

³⁸ [California Government Code 65589.5\(d\)\(5\)](#)

We request the opportunity to meet with you and your colleagues to address the concerns raised in this letter. Thank you for your time and consideration.

Sincerely,

Leonora Camner
Executive Director
Abundant Housing LA

Sonja Trauss
Executive Director
YIMBY Law

CC: Jason Elliott, Senior Counselor to Governor Gavin Newsom
Megan Kirkeby, Deputy Director, Housing Policy Development, HCD
Melinda Coy, Land Use and Planning Manager, HCD
Tyrone Buckley, Assistant Deputy Director of Fair Housing, HCD
Paul McDougall, Housing Policy Development Manager, HCD

From: [Albert Alaan](#)
To: [Housing Element](#); [Myles, Lauren](#)
Subject: Alhambra"s Housing Element
Date: Friday, September 24, 2021 10:35:17 AM

CAUTION: This email originated from outside your organization.

I work in the City of Alhambra, and I'm asking that you include the following in the City's final Housing Element submitted to the State:

1. The commercial areas along East Main Street from Almansor to Chapel should be returned to the Central Business District (of which it was originally part) and the housing allowed there should match the CBD.
2. Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada.
3. We believe higher densities than currently recommended on Valley Blvd. would maximize the available property for housing production. The repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd. is a positive first step.

Thank you for your consideration. Denser housing in our commercial corridors will support a strong, local workforce as well as a larger, local customer base - a benefit to the city for decades to come.

Best regards,
Albert Alaan

From: [Angela Babcock](#)
To: [Housing Element](#)
Subject: Public Comment: Alhambra Housing Element
Date: Friday, September 24, 2021 12:50:12 PM

CAUTION: This email originated from outside your organization.

We're writing to raise key issues related to the draft Housing Element currently being circulated for review and comment. As we all are aware, the history of housing development in Alhambra has been chronically unaligned with actual needs. It has unfortunately limited growth and excluded people from living in the City.

Today, we have the opportunity to rectify mistakes of the past. Thus, the following are the corrections we request be made to the Draft Housing Element Report:

1. **Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada**
2. As the Draft Housing Element accurately recommends with regard to the Valley Blvd. Specific Plan, **the whole East Main Corridor designation should also be repealed.** The Housing Element, Zoning Code update, and other studies dictate its future.
3. **The commercial areas along East Main Street from Almansor to Chapel, which was formerly part of the CBD, should be returned to it. The housing allowed there should match the CBD, which is 48 units/acre.**
4. While we applaud the repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd., **we request higher densities than currently recommended on Valley Blvd. to optimize the available property for housing production to meet the local housing supply demand.**

We also ask that you include the following assertions in revising the draft Housing Element:

1. **Alhambra needs to build housing at all levels, especially Workforce Housing. We urge you to consider zoning to meet the needs of the market by allowing development that is in the densities and areas noted above.** Alhambra lacks sufficient housing for populations that are critical to the city's growth and future vision as a balanced, liveable community within the region. While Affordable Housing is a central element of this vision, too little attention is paid to those who work in Alhambra, who are not able to qualify for Affordable Housing as it is currently defined. Thus, it is Workforce Housing that we wish to call your attention to at this time. If this group is overlooked by the City these buyers will be attracted to other cities where

there is a market-priced residence that they can afford. There is a synergy that results from having these types of new communities since they are typically “walkable” to nearby businesses and community amenities, where the new money is spent. The outcome typically rewards nearby businesses and provides a lift in appreciation to existing homeowners.

2.

The City should include a recommended mechanism in the plan to support the assumptions of assembling parcels to allow for sufficient and actual housing production. Without a legal entity that can assist in the financing and assembly of the parcels, it will be difficult to realize the development goals set forth in the draft plan. We recommend that their created a City-controlled Housing Authority, or other legal housing production entity, which would provide the City with the legal and financial means to facilitate the timely and efficient acquisition and consolidation of property suitable for residential development, as well as the ability to facilitate both City-sponsored acquisition and development financing of this badly needed housing.

3.

The City must consider where fees-in-lieu would go. Is the intention to create a City Housing Production office? How can a mechanism be put into place that ensures these funds will be used to support true housing production? (see #2 as a possible solution)

4.

The City must avoid displacing families currently in residences. The recommendation to upzone existing multi-family units would displace families and eliminate existing affordable units.

We look forward to working with the City to ensure the draft Housing Element is reflective of Alhambra’s housing needs in the years to come.

Sincerely,

Angela Babcock
Alhambra Main Street Alliance

From: [CEO](#)
To: [Housing Element](#)
Subject: Comments on Housing Element
Date: Friday, September 24, 2021 12:21:58 PM
Attachments: [Alhambra Chamber Draft Housing Element Letter.pdf](#)

CAUTION: This email originated from outside your organization.

Please consider the attached letter as comments on the draft Housing Element. I'm happy to talk with you or answer any questions you might have so we can create more housing in the city.

JOHN

John Bwarie

CEO, Alhambra Chamber of Commerce
626-282-8481 (office)
ceo@alhambrachamber.org

104 South First Street
Alhambra Ca. 91801



September 17, 2021

Honorable Katherine Lee
Alhambra City Hall
111 S First Street
Alhambra, CA 91801

Re: Alhambra Draft Housing Element 2021-2029

Dear Mayor Lee,

We appreciate this opportunity to provide our input and insights to the draft Housing Element currently being circulated for review and comment. Our goal for housing is to meet the current needs, projected growth, and renewed commitment to be an inclusive, highly livable City where businesses and residents thrive now and into the future.

At our September 14, 2021 Board meeting, the Chamber Board voted to support greater housing development in Alhambra to allow more residents the opportunity to live here, which would provide greater opportunity for our businesses to prosper by virtue of not only customers, but with a greater workforce in proximity. The direct linkage between housing production and economic growth is clear, as most retailers use this to determine whether or not locate a store in a community. We support subsidized affordable housing for those few lucky enough to be selected for one of the units, though it is market-rate and workforce housing that drives the local economy: those living with disposable income to support proximate to businesses.

In our view, the Housing Element Draft begins to address this goal. We also hope the final Housing Element submitted to the state can include the following:

1. The commercial areas along East Main Street from Almansor to Chapel should be returned to the Central Business District (of which it was originally part) and the housing allowed there should match the CBD.
2. Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada.
3. We believe higher densities than currently recommended on Valley Blvd. would maximize the available property for housing production. The repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd. is a positive first step.

Again, we appreciate the opportunity to provide our comments to the City as it serves our mutual goal for the draft Housing Element to provide for our businesses and residents, current and future.

Sincerely,


John Bwarie

Alhambra Chamber of Commerce

From: [Johnson Lin](#)
To: [Housing Element](#)
Date: Friday, September 24, 2021 7:58:32 PM

CAUTION: This email originated from outside your organization.

I'm a business owner in the City of Alhambra, and I'm asking that you include the following in the City's final Housing Element submitted to the State:

- 1. The commercial areas along East Main Street from Almanson to Chapel should be returned to the Central Business District (of which it was originally part) and the housing allowed there should match the CBD.*
- 2. Extend housing allowance on East Main Street easterly to the city border, at a minimum of 30 units/acre, to align with areas west of Granada.*
- 3. We believe higher densities than currently recommended on Valley Blvd. would maximize the available property for housing production. The repeal of the Valley Blvd. Specific Plan to allow for housing density recommendations on Valley Blvd. is a positive first step.*

Thank you for your consideration. Denser housing in our commercial corridors will support a strong, local workforce as well as a larger, local customer base - a benefit to the city for decades to come.

Johnson S. Lin

Managing Partner,

Lin & Associates

CalBRE #02022997

**KW Executive
388 E. Valley Blvd #106
Alhambra, CA 91801**

**310-753-1719
626-792-2743**

tppgroup.kwrealty.com

From: [Alhambra Tenants Union](#)
To: [Housing Element](#)
Subject: Draft Housing Element Comments
Date: Sunday, September 26, 2021 7:25:53 PM

CAUTION: This email originated from outside your organization.

To the ECONorthwest Team and the City of Alhambra,

We are writing to comment on the current Draft of the Housing Element for the City of Alhambra.

The stated purpose of the Housing Element is to “ensure that the city establishes policies, procedures, and incentives in its land use planning and development activities that result in the maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in Alhambra”. However, as currently written, the Draft focuses primarily on the issue of expansion of housing supply through private means, and insufficiently on the protection of renters who make up the majority of those households that the Housing Element is intended to serve.

The Draft Housing Element finds that 60% of renter households experience some form of “housing problem” (i.e. physical defects, overcrowding, housing cost burdens). As such, the Housing Element can and must address strategies to protect renters from displacement caused by exorbitant or illegal rent increases, illegal evictions, landlord harassment, habitability issues, and loopholes in statewide Just Cause and Rent Stabilization protections.

First, Rent Stabilization and Just Cause Protection Ordinances are currently included in the City’s strategic plan and ought to be considered in the suite of recommended programs. The authors should look towards the tenant protection policies of cities like Baldwin Park and Culver City as examples for increasing both the types of units and tenants covered, and strengthening existing statewide tenant protections locally.

Second, while “Program 1: Housing Rehabilitation Program” and “Program 2: Code Enforcement” represent a first step towards addressing habitability issues, the Housing Element should explore protections that prevent landlords from using repairs as a reason to pass on costs to or displace tenants. Furthermore, the report should recommend enforcement options for non-compliant landlords by drawing from programs such as the LA Rent Escrow Account Program (REAP), which allows for the municipality to withhold landlord rents until landlords address habitability violations.

Regarding policies concerning the production of housing, Alhambra’s Inclusionary Housing Ordinance’s (IHO) in-lieu fees per square foot are low a) in comparison to the cost of constructing income-restricted housing and b) in comparison with the policies of neighboring cities like South Pasadena. The Housing Element should provide an analysis

of and recommendations for addressing the impact of these gaps on the construction of income-restricted housing through the IHO.

Finally, the Housing Element focuses primarily on the production of private housing—both income-restricted and market rate—by incentivizing or reducing costs borne by for-profit and nonprofit developers. However, thus far, the private sector has proven inadequate in meeting the substantial needs outlined by the RHNA recommendations. The City should explore public sector development strategies to enable municipal or County production of housing that would be open to residents of all incomes and allow the City to retain control of and realize returns from its investments. While there are undoubtedly barriers on both the state and federal level to such a strategy, the Housing Element is a long term planning document and should anticipate shifts in funding and priorities. With the federal move towards investment in hard infrastructure, and the introduction of CA Assembly Bill 387 and the H.R. 5244 Homes for All Act in Congress, the City of Alhambra should identify both the opportunities and constraints of financing and utilizing public lands for public sector production of housing.

Please confirm receipt of this letter. We look forward to hearing your responses to our concerns and thank you for your efforts thus far.

Sincerely,

The Alhambra Tenants Union

From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:11:12 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): General: If the sole purpose of this Housing Element proposal is to demonstrate to the State that Alhambra can meet its RHNA requirements, then it serves its purpose. If, however, the City Leaders were to use this document as a guide to future housing development in the City, Alhambra will cease to be a suburban residential community and become an urban housing center. Whether this type of gentrification over time is viewed as beneficial or harmful to current and future populations is a matter of personal opinion, but regardless of opinion, some of the byproducts of this plan???'s implementation will be displacement of many local residents and small businesses, and increased community division, often pitting neighbor against neighbor. The document may show that the city can meet its RHNA requirements, but it leaves much to be desired in providing guidance for reasonable, responsible, and supportive community development.

From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:12:08 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 78, ???What Can the City of Alhambra Do;??? Reducing parking restrictions and expanded use of waivers will harm small business if they are forced to share limited parking space with larger tenants within their new development. Less parking availability will also create safety problems for residents who will be forced to compete for limited parking on the streets. Reduced parking will only become practicable when safe, clean, efficient and more expansive public transit becomes a viable option to driving.

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:12:37 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 94, Constraints Summary; Fees should adequately cover costs, but not generate profits.

If you think this submission is spam, [report it as spam](#).

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:13:36 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 150, Program 16: Rezone and Upzone Strategies to Meet RHNA Targets and Buffers; Rezoning/Upzoning of East Main Street, and Valley Blvd. in particular, would displace dozens of small business currently operating in those areas. As lots are assembled and/or developed, rents would be raised by new property owners or buildings demolished to make way for new projects. Few, if any of these small businesses would be able to return, also impacting housing for owners and employees.

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:14:45 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 154, Program 25: Housing Production Education Program; ???The city will work with the community to achieve support for housing across income levels.??? How would you propose that the City do this? The community is already aware of the need for housing, but much of the community (the majority?) is simply opposed to sacrificing current residents??? quality of life when they feel that other, less invasive options are available.

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:14:52 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 154, Program 24: Reduce Development Constraints for Affordable Housing; I doubt that anyone would disagree with the stated objective to, ???Reduce development constraints for market-rate and affordable housing projects by increasing achievable maximum densities within the zoning code, reducing the total cost of development, or speeding up the development review process,??? however, a thorough and comprehensive review must not be sacrificed.

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:15:35 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Re: Report pg. 161, Lot Assemblage; ???The City of Alhambra will promote aggressive policies and programs that directly and indirectly facilitate lot assemblage. Program 22 directs the city to play an active role in lot assemblage.??? Is this eminent domain?

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:17:09 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Transit: Currently, an ADU located within one-half mile of a public transit stop or station is not required to have a dedicated off-street parking space. In my neighborhood, the Midwick Tract, a number of ADUs have been built over the past few years, with presumably many more to come. Recently, Metro discontinued bus service along Fremont Ave. south of Hellman, leaving the whole western portion of our tract farther than a half-mile to the nearest public transit. Do these units no longer qualify for the parking exemption?

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From: [Cliff Bender](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 6:17:43 PM

CAUTION: This email originated from outside your organization.

Cliff Bender just submitted your form: Draft Housing Element Comments
on [Alhambra HE](#)

Message Details:

First Name: Cliff

Last Name: Bender

Email: cbender99@sbcglobal.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Transit: Developments permitted under AB 1763 offer a significant challenge as they have been given a substantial density bonus because of their proximity to a major transit stop. Once the permit has been granted, or after the building is occupied, what happens if Metro decides to relocate the bus line or major transit stop? This case may be more unlikely than with ADUs and their parking qualifications, but nevertheless quite possible. How can the City be expected to provide density bonuses when the ongoing qualification for such a bonus is at the discretion of an outside agency?

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From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 12:22:08 AM

CAUTION: This email originated from outside your organization.

Lewis McCammon just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: Lewis

Last Name: McCammon

Email: leweldizamccammon@earthlink.net

Enter your comments on the Draft Housing Element here. (1,000 characters): One typo to remember to correct: In Chapter 7 on p.158 about 25-30% of the way down the page, in section on "Summary of Alhambra's Regional Housing Need" the second sentence should be corrected to read "Among these, approximately 41% [NOT 31%] must be appropriate for lower-income (very low, low) households." [26% very low + 15% low = 41%]. Overall, you have done a great job of assembling a tremendous amount of data in one place and have invested a lot of time especially in the lot-by-lot analysis. The task the state (thru regional entities like SCAG) has placed on us completely disregards (a) the amount of vacant and easily developable space available and (b) other competing possible needs/good uses (such as the Chinatown Service Center's interest in the empty East Main St. Wondries Nissan dealership building for a major state funded comprehensive senior day care program mostly serving low income seniors), etc.

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 11:55:04 PM

CAUTION: This email originated from outside your organization.

Lewis McCammon just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: Lewis

Last Name: McCammon

Email: leweldizamccammon@earthlink.net

Enter your comments on the Draft Housing Element here. (1,000 characters): Two final suggestions: (1) Build in a plan for a FULL MID TERM (4 year) REVIEW of progress on this Housing Element, especially in regard to (a) meeting the goals on the very low (26%) and low (15%) income categories and moderate income category -- all of which fell far short of the goals for RHNA cycle 5. This review should also look at the interim results on (a) ADUs, (b) the IHO, (c) SB9 and (d) the actual outcome vs.the assumptions on the affordability levels of housing built on the various individual parcels specified in the Draft's Sites Inventory. Then amend the Housing Element if a need is found. (2) Have the City Council assign an existing committee (HCDA?) or create a new committee to focus on housing issues (especially affordable housing) on an ongoing basis and report annually or semi annually to the City Council.

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Lam, Paul

From: Shirley Tatsuno <reply-to+5b5913364343@crm.wix.com>
Sent: Sunday, September 26, 2021 11:00 PM
To: Housing Element
Subject: [Alhambra HE] Draft Housing Element Comments - new submission

CAUTION: This email originated from outside your organization.

Shirley Tatsuno just submitted your form: Draft Housing Element Comments on Alhambra HE

Message Details:

First Name: Shirley

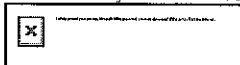
Last Name: Tatsuno

Email: surely994@gmail.com

Enter your comments on the Draft Housing Element here. (1,000 characters): The requirement of 2 parking spaces per unit should not be required especially if the property is near mass transit or if it is an older building and has 1 parking space per unit. I am an owner of an 8 unit older building near Valley Blvd and I have 1 parking space per unit. If God forbid my building was destroyed, for instance, in an earthquake and I had to rebuild right now, I would only be able to build 4 units with at least 8 parking spaces. There are many older apartments in Alhambra. This is unfair and will lead to less housing which is so desperately needed. Please revise this.

If you think this submission is spam, [report it as spam](#).

To edit your email settings, go to your Inbox on desktop.



From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Draft Housing Element Comments - new submission
Date: Sunday, September 26, 2021 11:55:59 PM

CAUTION: This email originated from outside your organization.

Lewis McCammon just submitted your form: Draft Housing Element Comments on [Alhambra HE](#)

Message Details:

First Name: Lewis

Last Name: McCammon

Email: leweldizamccammon@earthlink.net

Enter your comments on the Draft Housing Element here. (1,000 characters): (I hope this is going thru.) Two final suggestions: (1) Build in a plan for a FULL MID TERM (4 year) REVIEW of progress on this Housing Element, especially in regard to (a) meeting the goals on the very low (26%) and low (15%) income categories and moderate income category -- all of which fell far short of the goals for RHNA cycle 5. This review should also look at the interim results on (a) ADUs, (b) the IHO, (c) SB9 and (d) the actual outcome vs.the assumptions on the affordability levels of housing built on the various individual parcels specified in the Draft's Sites Inventory. Then amend the Housing Element if a need is found. (2) Have the City Council assign an existing committee (HCDA?) or create a new committee to focus on housing issues (especially affordable housing) on an ongoing basis and report annually or semi annually to the City Council.

If you think this submission is spam, [report it as spam](#).

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ATTACHMENT 5

Reynoso, Vanessa

From: Josh Albrektson <joshraymd@gmail.com>
Sent: Wednesday, March 8, 2023 11:51 AM
To: Housing Element; Housing Elements@HCD
Subject: Alhambra Housing Element public comment

CAUTION: This email originated from outside your organization.

Program 32 is a useless program that claims to support missing middle housing while doing nothing. This is an intentional act to write down words pretending like they are doing something but actually not doing anything.

There are almost no lots in Alhambra that are over 10,000 square feet. Even in the richest part of Alhambra, right next to San Marino, all of the lots are under 10k sq feet.

Here is a representative example:

<https://www.redfin.com/CA/Alhambra/620-N-Cordova-St-91801/home/7009946>

Alhambra is submitting this fake program so that they actually don't have to build missing middle housing to help affirmatively further fair housing and their housing element should be rejected for this.

--

Josh Albrektson MD
Neuroradiologist by night
Crime fighter by day

Reynoso, Vanessa

From: Paul Talbot <paultalbot24@gmail.com>
Sent: Tuesday, March 14, 2023 1:58 PM
To: Housing Element
Subject: Housing Element Comments

CAUTION: This email originated from outside your organization.

Honorable City Council,

Thank you for your continued efforts to get a Housing Element approved by the State. Just looking at the website and the numerous hearings and iterations the City has been through is exhausting. It speaks highly of all of you for your continued effort and diligence.

I encourage you to continue to do the right thing for Alhambra, both present and future. I encourage you to continue your vision of spreading out housing throughout the entire community, including the East Main Corridor. If the EMC is going to be successful, having new development and investment is essential for the vitality of that area of Main Street. Likewise, recognizing that The Villages at the Alhambra is a key place for future housing, is again a prudent and thoughtful approach.

Hopefully this will be your last round of revisions, so you can deal with other fun matters like the Zoning Code update!

Sincerely,

Paul Talbot

Reynoso, Vanessa

From: David Bond <djb85511@gmail.com>
Sent: Tuesday, March 14, 2023 6:05 PM
To: Housing Element
Subject: Comment on Alhambra Housing Element 2029

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside your organization.
Hi I'm a resident of Alhambra, and have participated in the housing element process this past year. I'm also a member of Alhambra Tenants Union. As per the findings from page 238

" To meet its RHNA for the 2021-2029 planning period, the city of Alhambra must show capacity for a minimum of 6,825 units. Among these, approximately 41 percent must be appropriate for lower-income (very low, low) households. "

Then all of these units are then suggested to be filled by for-profit developers to gain profits off of the building and maintenance of these units, at the expense of our neighbors. No where in the proposal does the most effective affordable income option present itself. With incredible examples of beautiful and successful very affordable housing from, Austria, Spain, Portugal, Singapore, China, and even in South America, public or socialized housing, beautifully designed, and well invested in, create the best option for people to find affordable housing. Mixed income, mixed age, and mixed single/family structures with open spaces, services such as child care, urgent-medical care, food-nutrition services, all lend themselves to incredible places to live, where lower income folks can thrive.

This isn't an advocacy for the public housing "projects" of the past that were purposefully left to fail with lack of funding and long term maintenance, this is a thoughtful counterpoint to the for-profit model of housing this Country and City have coalesced behind. Why does this Housing Element who's job it is to convey current housing analysis, and strategic options for improvement completely fail to mention public housing, the best option for affordable housing, lends to the thought that this document, and the process by which Alhambra has gone to reviewing its housing situation as just another means to the end of for-profit businessmen to exploit the people of our city.

David Bond

Reynoso, Vanessa

From: Henry Fung <calwatch@gmail.com>
Sent: Wednesday, March 15, 2023 4:43 AM
To: Housing Element
Cc: housingelements@hcd.ca.gov
Subject: Comment on Alhambra Housing Element March 2023 draft

CAUTION: This email originated from outside your organization.

Good morning, I have the following comments on the Alhambra Housing Element:

- I believe that the concerns of City Council and Planning Commission related to environmental contamination in the industrial zone (IPD) surrounding the Alhambra and the Palm Mission corridor continue to discount the likelihood of residential development occurring there. The amount of units projected need to be reduced 50% from existing. The same goes for the Alhambra Villages project, while the reduction in units from the past draft is appropriate, the amount of units allowed by right on the property with no ordinance changes or parking reductions needs to be calculated and that is the most units which should be included on the Housing Element. Any discretionary entitlement on the Alhambra property (1000 S Fremont) is likely to run into approval issues, whereas staff can control the by right process. So rather than realistic capacity of 43 units/ac it should be half that, unless the city is willing to commit to allowing 43 units/acre on IPD zoned land by right.

- There is a need to rationalize and harmonize comments made by Planning Commission during the zoning code review and the housing element. As HCD is copied on this email I urge them to review the comments made by the Planning Commission and the staff responses to ensure that both conform. These items are posted on the code revision web site, <https://www.alhambrcodeupdate.com/>

And Planning staff need to make sure that if Planning Commissioners or City Council are making comments that do not conform with the commitments in the Housing Element, that those comments are rejected with reasoning. The Zoning Code should be compliant with the Housing Element, not the other way around since doing so would cause the city to violate state law.

- Regarding Local Hire Program (Program 10) this is a good program but it should be an encouragement, not an impediment to housing.

- I would encourage the city to consider a SB 330 overlay zone to quickly permit new housing before the zoning code update is completed. This has been used in the City of Pomona to great results. Pomona presented on it at a recent Joint Senate - Assembly Committee meeting on housing.

- Regarding East Main Corridor and Valley Boulevard Specific Plan, is the intent of the Housing Element to complete these prior to mid cycle review? What will occur if they aren't completed by then?

- Single Room Occupancy housing has historically been an issue in the conceit of "maternity houses" as well as exploitative rooms rented to mainly older Asian immigrants, who may be here illegally or without proper work authorization. It is important when developing Program 21 to be sensitive to residential concerns, while allowing boarding houses similar to any hotel in a commercial district.

- Page 68, Community influence on new housing development - One area for improvement is continued education of council members and planning commissioners that their hands are tied due to State law. While Alhambra has not seen the outright defiance of state law like Huntington Beach and some other cities, there could be more education to electeds and the general public of the state mandates and how Alhambra is doing this thoughtfully. Also, failure to

housing someone who qualified for affordable housing. LA County Regional Planning recently had a pilot program for this and is a reference.

- Program 32 - SB 9 ordinance - Alhambra implemented an interim SB 9 ordinance with extremely strict standards to preclude development, i.e. LEED Platinum standards, one story unit maximum, enclosed garage requirement, annual interior inspection. <https://www.cityofalhambra.org/AgendaCenter/ViewFile/ArchivedAgenda/01032022-352> Alhambra must commit to repealing this ordinance by the October 2023 time frame promised. HCD should decertify the housing element if the ordinance is not repealed by then.

Program 37, 38 - incorporate Fremont/Valley Mobility Hub improvements in this section.

Program 40 - HCD should commit to monitoring the mid cycle review and decertify the housing element if it does not occur as committed to.

Overall I recognize and acknowledge the job staff and the consultant had to accommodate conflicting comments and the anti-growth sentiment of some planning commissioners and council members. But that is not a reason to not deliver a compliant housing element. HCD and the city staff will need to work together to ensure these commitments in the housing element are adhered to and not derailed by future politicians. There needs to be a stick (penalties) if the commitments to ordinance changes and new programs are not done.

Thank you for considering my comments.

Sincerely,
Henry Fung

Andrew Ho, Director of Community Development
Paul Lam, Principal Planner
Members of the Planning Commission

The City has asked for public input on the draft Housing Element, but the website gives little information regarding exactly what type of input they expect from the public. With the information given on the website, I can only assume that the downloadable Housing Element (March 2023) is a culmination of responses by the City to the shortcomings and deficiencies detailed in the three previous letters from HDC. But with HDC letters dating back well over a year, why are we only *now* being asked for input or comment? All this to say that I'm not really sure how approach this or how to formulate my feedback. Since I don't really have the expertise to comment on specifics such as density, building heights, etc., I will limit my comments to generalities.

The first of my primary concerns goes straight to the overreaching state legislation that led to the unrealistic and deeply flawed RHNA process that is the foundation of the city's Housing Element. (At some point, I think the city needs to challenge these laws and SCAG's interpretation of the laws in determining the RHNA numbers.)

- The population in Alhambra is expected to increase by 4,600 by 2045 (based on 2021 data and estimates). That's a growth of about 5.7% over 24 years. RHNA requires an increase in housing of 22% by 2029- a rate nearly four times the growth in population, but in one third of the time. Yes, we currently have un-housed and under-housed people and families that we need to accommodate and there will be more by 2029, but nowhere close to the housing numbers RHNA is requiring for our projected population.
- Increasing our RNHA allotment by claiming that most of the city is within a half mile of a major transit line is misleading and inaccurate, when properly based on actual walking distance rather than 'as the crow flies.' Transit ridership studies have consistently shown that ridership is more dependent on time and ease in reaching the transit stop, not distance.
- The SCAG map showing access to public transit within 1/2 mile is supposedly the current condition, not a projection. If high quality public transit is already as easy and accessible as shown on the map, why do so few of our residents make use of it?

Another of my primary concern is displacement, both residential and commercial. Goal 1 of the draft Housing Element is the "Preservation and improvement of the existing supply of housing and prevention of displacement among existing tenants." But in a built-out city, it's nearly impossible to build new housing without displacing current tenants- physically or financially- from older buildings. Goal 4 is to "Mitigate gentrification and displacement," however several statements in the proposed plan seem to recognize, or even encourage gentrification and displacement, such as on pg. 71, "*The Garfield corridor currently has a mix of older multifamily housing and newer office developments. The new vision could phase out the older stock of multifamily residential units in this area of the city.*" This "older stock of multifamily residential units" is typically home to lower income residents. Once these residents are displaced by new development, whether during construction or after occupancy, where are they expected to go? Vacancies in lower priced rentals are rare. And as more new developments are built, the problem becomes worse. Factor 1.1, on page 187 already recognizes that, "*Alhambra has a high incidence of census tracts with high risk of gentrification and displacement.*" Wherever new housing is built, affordable or market rate, in order to be financially feasible it must be priced higher than the housing it replaces, inevitably leading to displacement and gentrification.

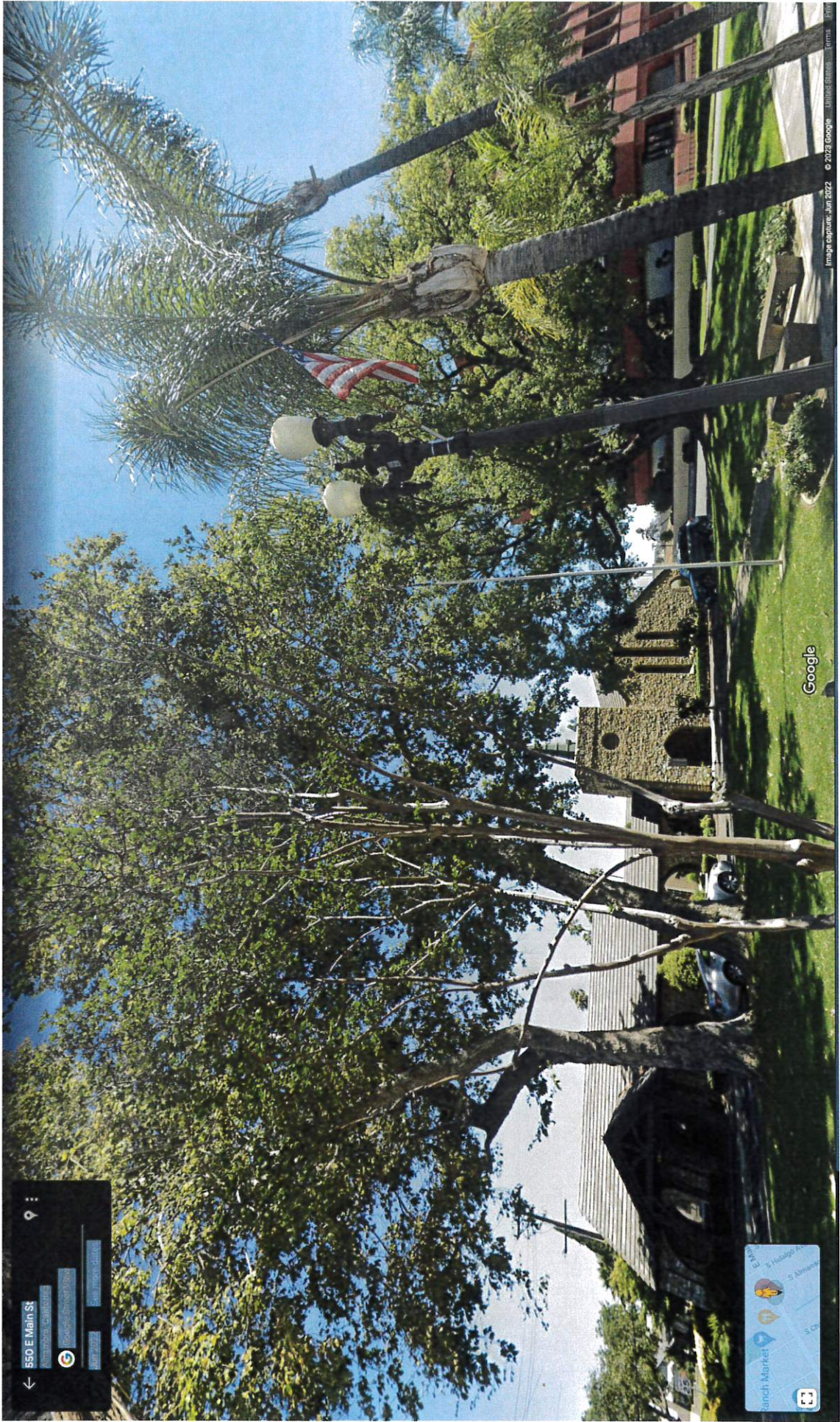
Commercial displacement is also a concern (although not necessarily as part of the Housing Element). As with housing, most new commercial or mixed-use development will likewise displace the current business, in many cases a small business owner struggling to make ends meet. Think of the many small businesses along Valley Blvd. As housing or mixed-use developments replace the current commercial properties, these small businesses will be forced out, most likely never to return because of the unavoidable increase in rent.

Another major concern is the degradation of the 'character' of the city. Our historical reputation as a quiet residential suburb of mostly single-family homes, each with its own yard, is changing into an urban center of large multifamily apartments or condos with minimal open space where children can play and residents can relax while maintaining some level of privacy. The chart on pg. 9, in response to previous public comments, claims that there are no proposed changes to the R-1 zone. This claim is made in several other parts of the proposed plan, as well. However, the remainder of the plan goes on to encourage residents to build more ADUs, anticipating 20 per year, and incentivizing SB 9 development in R-1 zones, up to six homes per lot. The city may not have much or any discretion in these policies, in large part because of recent legislation, but how is that not a change to the R-1 zone? Very misleading to readers of this Housing Element. Over time, our neighborhoods of single-family homes will slowly evolve into what will essentially be wide areas of duplexes and townhomes with minimal open space, insufficient parking and overburdened infrastructure.

Other miscellaneous concerns-

- Basic assumptions; *"The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval."* Any community opposition to a project must be considered reasonable and valid, as the review process is the ONLY opportunity for citizen oversight and resident input regarding development. This limited opportunity for citizen review is not abnormal nor out-measured.
- Factor 3.3, pg. 188; *"A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production."* First, I feel that this statement is not accurate. I have followed the development approval process in our city for quite a few years and can't recall hearing ANY opposition to affordable housing. Obviously, there may be concerns about the location, size and density of certain residential developments, but that could apply to any project.
- There is much talk of residential or mixed-use development along Valley Blvd. If building height is an aesthetic concern for residents near East Main Street, why would it be OK to disturb the aesthetics or block the mountain views of residents adjacent to Valley Blvd?
- Nothing to do directly with housing, but on page 211, *"...the city could include advertisements or notices in the city's newsletter, Around Alhambra, to provide information on the available Housing Rehabilitation Programs."* I don't mind the advertisements or notices, but *Around Alhambra* is NOT the city's newsletter! ...and city staff should be aware that!

Cliff Bender
Midwickhill Drive



550 E Main St
 550 E Main St, San Diego, CA 92101
 Street View icon
 Street View icon

San Diego Market
 Heritage Ave
 Alameda
 Co

Image captured Jun 2022 © 2023 Google - United States - Terms - Privacy

Google

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 3rd comment: More on site Nv.509
Date: Wednesday, March 15, 2023 7:57:22 AM
Attachments: [300 E. Main St-boarded up front door 3-13-2023.jpg](#)
[300 E. Main St. - Close up of boarded up front door.jpg](#)

CAUTION: This email originated from outside your organization.
Now more info/considerations on the Nv.509 site:

Nv.509: 6 parcels. 5 of these 6 parcels seem ripe for redevelopment for housing or mixed use. The Planning Commission itself has expressed a desire to keep commercial on the bottom level along Main St. and would prefer mixed use.

The first of these 6 parcels (AIN 5345015016 - the 0.21 acre "Restaurant/Cocktail Lounge" parcel shown with an address of 360 E. Main St.), however, shows on the LA County Tax Assessor's website as having been **improved in 1999**. This parcel since 2012 actually contains the relatively new **Dog Haus restaurant** (which refers to its location as 410 E. Main St.) which is part of a highly rated restaurant chain featuring gourmet hot dogs, sausages, burgers, chicken, plant based protein and craft beers in a "biergarten" setting and seems to be doing well.

The other 5 parcels (a total of 2.22 acres) are ripe for redevelopment -- containing only surface parking lots and the one boarded up one-story structure on the SE corner of Chapel Av. and Main St. which was once in use as a bank and was apparently last in use as a lasik eye surgery center. **Attached are two photos of the newly crudely boarded up front doors of this building (shown as 300 E. Main St.).** The second close-up photo shows my shadow from the streetlight as I took the photo. These photos were taken by me on the evening of Monday, March 13 on my way home from speaking at the City Council meeting about the EMC to CBD issue raised in my 1st email to you sent a few minutes ago. Just before I spoke I also distributed copies of the two documents (those attached to my 1st comment email to you today) to members of the City Council and to the behind-the-rail staff. Community Development Department Director Andrew Ho also has a copy. Just after taking the photos, I had a conversation with a man in a car parked behind the site who was doing security surveillance for the doctor who he said owns the site. The man said that the doctor plans to reopen the lasik center, but that the site had suffered recent burglaries intending to steal lasik equipment and other items. On one occasion, the burglars had used a ladder to go on the top of the building and entered thru the roof and broke out the front door on the way out. On one occasion, the man said that Alhambra Police Department had actually been able to arrest two burglars inside the building. I gave the man copies of the two documents I had just given to the City Council and discussed with him the possible use of the site for housing and wrote my name and phone number on one of the documents in case the doctor wanted more information.

Lewis McCammon

105 N. Cordova St.

Alhambra, CA 91801-2708

(626) 363-3516

leweldizamccammon@earthlink.net





From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 7th comment: More on Site Nv.503
Date: Wednesday, March 15, 2023 11:12:56 PM

CAUTION: This email originated from outside your organization.

More considerations on Nv.503:

This site has been in previous use as a gas station and later for many years automotive sales and service (Bewley Allen Cadillac) and **would need to be checked carefully for possible contamination issues before housing is situated there.** I believe that the Olson Company, which was exploring a possible 38 unit housing project there and had a series of meetings with the community, had undertaken some initial investigations on this. I would not expect possible toxic issues here to be as serious as those at for former C.F. Braun Co. site which was proposed for The Villages housing project, but possible contamination still needs to be checked out.

In 2019, the Planning Commission refused to approve a very tall (over 60 foot) very modern, mostly glass style proposed commercial condominium for this site after considering its impact on the community. The massive community protests over that project had nothing to do with housing (it contained no housing) but focused on its scale (massive in an area of 1-2 story buildings and adjacent 1 story home), its style, its impact on traffic (especially in adding a several hundred car parking structure with much in-and-out traffic being forced onto the Cordova St side which still has no stoplight on Main St. and was already rated a level F intersection) and the its lack of public notice and chance to have input with the developer in the design of the project, etc.

Sites such as this definitely need to be open to public input on aspects of any project which might compromise public health and community character. We remain very open to reasonable, safe projects and welcome the opportunity to meet and engage with developers to provide input beginning at the earliest stages of project conception to help facilitate such projects.

Lewis McCammon

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leweldizamccammon@earthlink.net

From: Lewis McCammon
To: Housing Element
Subject: 4th comment: Re: Site Nv.506
Date: Wednesday, March 15, 2023 5:03:18 PM

CAUTION: This email originated from outside your organization.
This is comment on **Site Nv.506**:

The two parcels that remain on the current Nv.506 were formerly included with a third parcel that housed the old Wondries Nissan Dealership building now owned by CSC (the Chinatown Service Center). Since the Planning Commission had already had already approved the CSC's project for adaptive reuse of this site as its Regional Health Center that third parcel has now been appropriately removed from Site Nv.506 in this draft.

About a week ago Marisol Grier communicated with a top CSC person with whom she had been working to inquire if the new blue fence surrounding the front of the site meant the CSC Regional Health Center was now moving forward. She received an affirmative response, though CSC is still working on some aspect of the project before construction can begin.

It is my understanding (1) that the two parcels remaining on Site Nv.506 were also purchased by the CSC from Wondries and that these two parcels are intended for use as employee parking for the new CSC Regional Health Center as they had been with Wondries Nissan and (2) that the CSC project as approved by the Planning Commission had probably included the continued use of these parcels as employee parking. Number (2) should be checked to see if these two lots were indeed included as part of the Planning Commission's approved CSC project. If so, they should probably be removed from the Site Inventory also.

A bit more info:

(a) The northernmost of the Nv.506 parcels (AIN 5435023012 - "17 S. Cordova St.") is still formatted as the northern part of a parking lot. It is specified as general commercial in the General Plan and is in the EMC.

(b) The southernmost of the Nv.506 parcels (AIN 5435023013 - "21 S. Cordova St.") is still formatted at the southern part of this same parking lot, although it is designated in the General Plan as R1/Low Density Residential. The Los Angeles County Tax Assessor shows this parcel as having land value only with no improvements -- recognizing that no house is there.

(c) The remaining 2 parcels in Nv.506 are so small (totaling 0.34 acres) that this site no longer is able to contribute any expected "lower" income units to the total inventory.

A few more comments will follow later today on other aspects of the Draft Housing Element.

Lewis McCammon

105 N. Cordova St.

Alhambra, CA 91801-2708

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leweldizamccammon@earthlink.net

From: casadelaspalmaslh@gmail.com
To: Housing Element
Subject: Impact Comment
Date: Wednesday, March 15, 2023 5:05:32 PM

CAUTION: This email originated from outside your organization.

It appears in the rush to put something down towards affordable housing we are not thinking of long-term ramifications of decisions made in haste. These decisions will impact the residence of Alhambra for years to come. For example I live in an area that is predominantly single-family resident homes in the east main corridor. The plan is to build high density in an empty lot with the address of 801. This empty lot is known for the contaminants in the soil which we will soon have to hire a private soil expert. Housing is planned for this area. Not only is it dangerous for future residence but also residence around the area. Furthermore it appears that neighbors were very much concerned about the destruction of our ones quiet streets and pollutants in the soil. We are gaslighted as it appears the developers take front row seat to determine whatever projects they want to be approved. Premier Development who is making and part of the ginormous plan on Bay Street has been Alhambra's darling developer and has basically given free rein to do what they want to build in Alhambra. We live here they don't. We will have to deal with the ramifications of poor development that aesthetically do not conform to the surrounding neighborhood. Possibly people being poisoned as future residential living in this area. We ask that we place a pause and for once please listen to the neighbors that make up the city of Alhambra.

For example, on site Nv.503 (the "801 E. Main St." site),

- (a) this site at various times in the past had a gas station and later for many years an auto dealership which also did auto repairs and service and was engaged in missile work for the armed forces during WWII and would thus be subject to contamination concerns, and
- (b) this site is located in a more than half mile long stretch of East Main Street (from before Hidalgo Av. to Hampton Ct.) having buildings which front directly on Main Street of only one or two stories in height and is a stretch where the only two projects already approved by the Planning Commission (both the replacement for the old burned down music academy building and the CSC's planned adaptive reuse of the old Wondries Nissan site for a Regional Health Center) are also only two stories in height, and
- (c) this site has a further community character which caused the Planning Commission on July 1, 2019, after massive community protests, to reject a proposal for a huge 64 foot high commercial condominium building featuring a largely glass front modern style with a parking structure where the adjacent lot to the north still contains a one story family residence, etc

From: Constant
To: Housing Element
Cc: Jennifer Hedge; Constant Ng
Subject: Housing Element Comments
Date: Wednesday, March 15, 2023 6:41:21 PM

CAUTION: This email originated from outside your organization.
Housing Element Comments
March 15, 2023

To whom it may concern,

My name is Bert Ng, a resident of Alhambra for over 40 years.

My wife Jennifer and I own a modest Craftsman bungalow built in 1912 located on the Alhambra Tract, which is a stone throws away from the East Main Commercial Zone.

We both love Alhambra and were fortunate to find our forever home, which we've been slowly, but lovingly restoring. We are all for development and housing that makes sense, that doesn't take away, doesn't degrade the very things that draw so many folks to move to Alhambra, to raise families in Alhambra and to grow old in Alhambra; the charming homes, the small town feel, and the sense of community.

Our comment is regarding the Housing Element is focused around East Main.

To give you some context, we and many in the community had deep concerns regarding multiple developments on East Main, the most contentious being the development being a proposed 65 feet medical condo on 801 East Main. While there were a multitude of issues with the development, ranging from questionable traffic studies to questionable notifications to the community, the primary issues revolved around the height and incompatibility of design to the adjacent neighborhoods. Many in the community packed the room at Planning Commission and City Council meetings to express our concerns, the most importing being the ones I listed above of building height and design incompatibility to the neighborhood. The voices in the community were heard and the development was stopped.

Since then, there have been more proposed developments in the area with varying heights up to 3-4 stories, but time and time again the community has pushed back and won.

Now in the Housing Element, we see a proposal for East Main that is contrary to what the community has fought for. It proposes rezoning a segment of East Main, between Chapel and Granada, with the end result in the Zone Code update of allowing heights up to 5 stories / 75 feet (including at 801 E Main St, the very property the community pushed back on because of height). 5 feet / 75 stories is horrifying and goes against everything the community has voiced as an acceptable height. The community was outraged and came out in full force over developments of 3 to 4 stories, yet now with the creation of Segment 1 on East Main it is allowing even greater heights, specifically on the very property the community came together to voice their concerns about.

We propose the following:

<!--[if !supportLists]-->1. <!--[endif]-->Eliminate Segment 1 of East Main and consider East Main a single zone that allows development up to 3 stories / 40 feet. This is consistent with the information staff recommended at a recent Planning Commission meeting on the Zoning Update where staff presented on height options for East Main, including an option of 3 stories / 40 feet. This would be a compromise of the community request of 2 stories / 25 feet.

<!--[if !supportLists]-->2. <!--[endif]-->We agree with the General Plan Land Use map showing the dividing street between Central Business District and East Main Commercial as Almansor as this is a natural break in height.

If you would like additional input, please don't hesitate to contact us at this e-mail.

Sincerely,

Bert & Jennifer Ng

Reynoso, Vanessa

From: Lewis McCammon <leweldizamccammon@earthlink.net>
Sent: Wednesday, March 15, 2023 7:46 AM
To: Housing Element
Subject: 1st comment - Sites Nv.508 and Nv.509 + bullet 5 on p.220
Attachments: Alh Draft Site Inventory-last page.jpg; Alh Gen Plan-p.19-CBD map.jpg

CAUTION: This email originated from outside your organization.

Good morning.

This is the first of a number of comments I will be submitting today, some quite specific, some more general.

Comment #1: Re. Sites Nv.508 and Nv.509 (These are the very last two sites listed in the draft inventory).

The site inventory in this new Draft of the Housing Element has been amended to respond to state HCD's request to show each site's **General Plan** designation.

Please see the two attached screen-shots which show:

- Detail from the last page of the site inventory showing Nv.508 and Nv. 509
- **Detail from the new Aug. 2019 General Plan map** (from p.19 of that document) **showing that the former area of the EMC (East Main Commercial Zone) along Main St. between Chapel Av. and Almanson St. is intended to be reassigned to the Central Business District (CBD).**

The Zoning Code is required to be updated within 2 years after the adoption of a new General Plan to bring the Zoning Code **into conformity with the new General Plan**. The state is generally OK with a city taking additional time to complete that process as long as that update is making progress.

Nv.508 and Nv.509 are the ONLY two sites in the inventory which the newly adopted Aug. 2019 General Plan reassigns the the Central Business District (also the name of a zone) from the old Zoning Code's EMC (East Main Commercial zone).

Given this, there are two IMPORTANT QUESTIONS:

(1) Should the applicable DUA (number of allowable Dwelling Units per Acre) shown in this Draft Housing Element for the new part of the Central Business District in the General Plan between Chapel Av. and Almanson St. (and thus for sites Nv.508 and Nv.509) be the same (64) as it is for all other parts of the Central Business District? Or should it be some other number above 30 but below 64?

(2) If the answer is yes to the first part of question 1, then bullet 5 on page 220 of the draft will need to be amended to make this limited addition to the 64 DUA area. If the answer is yes to the second part of question 1, a new bullet will need to be added on page 220 of the draft to specifically cover this area on Main St. between Chapel Av. and Almanson St.

Any increase on the number of allowable DUA on Nv.508 and Nv.509 (presently 30 as if they were intended to remain a part of the EMC zone) could yield substantially more units for the total inventory. A note could be added to the site inventory, if needed, to justify this change in DUA based on the new General Plan specific intention for the area containing these two sites. Also, the new Zoning Code Update will need to change the designation for the area on Main St. between Chapel Av. and Almanson St. to Central Business District (CBD) from EMC.

Some specific information/comments on each of these two sites will follow in my next emails. This email, however, makes very important points to be considered in regard to the General Plan's change to the CBD's eastern boundary.

Lewis McCammon

105 N. Cordova St.

Alhambra, CA 91801-2708

(626) 363-3516

leweldizamccammon@earthlink.net

from the last page of the latest draft of the Housing Element

Site ID	AIN	Parcel Size	Address	General Plan GP	Zone	Existing Use	Site Area	C
Nv. 502	5347026011	0.22	820 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.22	Nonva
Nv. 503	5336021041	0.22	25 N GRANADA AVE	Medium Density Residential	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021040	0.22	21 N GRANADA AVE	Medium Density Residential	EMC	Commercial - Parking Lot (Commercial Use Property)	2.43	Nonva
Nv. 503	5336021023	0.06	801 E MAIN ST, REAR	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021089	0.35	17 N GRANADA AVE	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021038	0.43	807 E MAIN ST	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021027	0.17	817 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021028	0.65	801 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 503	5336021026	0.34	835 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 504	5336023053	0.13	645 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonva
Nv. 504	5336023007	0.28	625 E MAIN ST	General Commercial	EMC	Commercial - Restaurant, Cocktail Lounge	0.43	Nonva
Nv. 504	5336023009	0.02	N/A	Parking	EMC	Commercial - Office Building	0.43	Nonva
Nv. 505	5336023095	0.47	18 N ALMANSOR ST	General Commercial	EMC	Commercial - Parking Lot (Commercial Use Property)	0.43	Nonva
Nv. 506	5345023012	0.17	17 S CORDOVA ST	General Commercial	EMC	Commercial - Parking Lot (Commercial Use Property)	0.47	Nonva
Nv. 506	5345023013	0.17	21 S CORDOVA ST	Low Density Residential	EMC	Commercial - Parking Lot (Commercial Use Property)	0.34	Nonva
Nv. 507	5345022021	0.54	7 S HIDALGO AVE	General Commercial	EMC	Residential - Single Family Residence	0.34	Nonva
Nv. 508	5345016014	0.34	21 S ALMANSOR ST	Central Business District	EMC	Commercial - Store Combination	0.54	Nonva
Nv. 508	5345016004	0.96	512 E MAIN ST	Central Business District	EMC	Commercial - Parking Lot (Commercial Use Property)	1.30	Nonva
Nv. 509	5345015016	0.21	360 E MAIN ST	Central Business District	EMC	Institutional - Cemetery, Mausoleum, Mortuary	1.30	Nonva
Nv. 509	5345015071	0.71	300 E MAIN ST	Central Business District	EMC	Commercial - Restaurant, Cocktail Lounge	2.43	Nonva
Nv. 509	5345015008	0.22	22 S CHAPEL AVE	Central Business District	EMC	Commercial - Bank, Savings and Loan	2.43	Nonva
Nv. 509	5345015009	0.23	16 S CHAPEL AVE	Central Business District	EMC	Commercial - Office Building	2.43	Nonva
Nv. 509	5345015010	0.88	14 S CHAPEL AVE	Central Business District	EMC	Commercial - Parking Lot (Commercial Use Property)	2.43	Nonva
Nv. 509	5345015901	0.18	N/A	Central Business District	EMC	Commercial - Parking Lot (Commercial Use Property)	2.43	Nonva

Purple = CBD

Open in desktop app



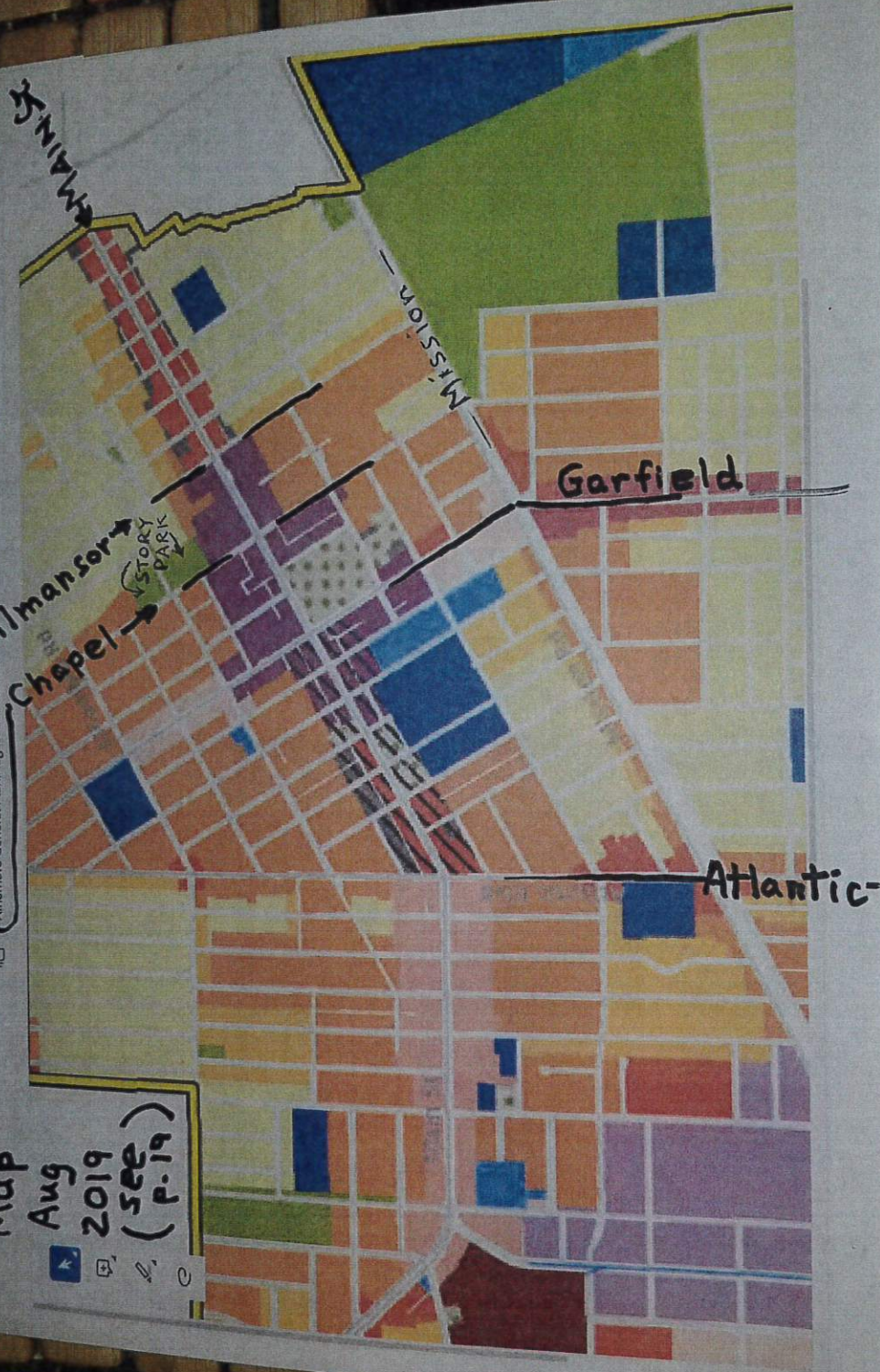
Alhambra General Plan, August 2019, low re...

Detail from the General Plan

Map

Aug 2019

(see p. 19)



MANLY

MISSION

Garfield

Atlantic

Hello,

These are some other comments I have.

While most residents expressed that they were at least somewhat satisfied with their housing situation, most also reported affordability as a top concern. Residents are concerned about increases in home prices and rents. They expressed a desire to located more affordable housing near reliable transit.

I believe only a few renters participated in the Housing Element discussion. Renters are very reluctant. Most of the participants were homeowners. I believe I am one of the few apartment owners who has participated. I think renters are very concerned about the prices of rent. A one bedroom can be \$1,700 plus. Not many residents can even buy condos in Alhambra with prices of ranging from \$600,000-\$800,000. Instead they will buy condos for instance in Duarte or Rancho Cucamonga.

More affordable housing near reliable transportation is needed. However, I am still waiting to see changes with our ACT bus system. I am even concerned about the Metro system. Prior to Covid I often used the Monterey Park Gold Line to go to Little Tokyo. Recently on a Sunday, I did this. I didn't realize till I arrived at the MP Gold Line that you have to take a shuttle from Pico-Aliso to Little Tokyo because of the construction going on. I will not do that again. I was by myself and I felt nervous at the shuttle stop. I will wait for the Gold Line work in J-Town to be completed. There were very few people on the Metro Rail. Reading the LA Times that large swaths of the line have drug overdoses, crime and very few business people is something to be very concerned about. Homeless people and the mentally ill are a concern too. If we have any hope of making this housing plan work the transportation system needs to work very well. Also people have to feel safe and want to use it.

The city has had a parallel project to explore the future of the East Main Corridor. This topic dominated many of the conversations throughout the update process. Alhambra contrasting community perspectives about East Main. One contingent does not want to allow housing at all on East Main. This was driven by preference for an "Old Town Alhambra" commercial district on East Main Corridor. Another contingent discussed that the East Main area is among the highest resource areas of Alhambra and not allowing housing would be exclusionary.

I definitely think some affordable housing should be included in this area. It should be in all districts.

Residents expressed a desire to locate new capacity broadly across the city. Valley Boulevard was often referenced as an underutilized asset for potential housing. Other areas identified for upzoning/rezoning included Garfield Avenue, East Main Street, and the Industrial Zones in west Alhambra.

Valley Blvd. can be an area for housing. However, some of the lots are very narrow. For instance, my apartment is next to the commercial businesses on 5th and Valley. From North to South to give you an idea how narrow it is maybe 4-1/2 medium size cars can fit. I feel just as the E Main residents feel that there should be space between the buildings. I do not see how this is possible if housing is built here. I am sure the R1 owners North of me next to the commercial properties feel the same way.

Questions of the appropriateness to consider broad rent stabilization and just cause eviction protections as a program.

Reynoso, Vanessa

From: Lewis McCammon <leweldizamccammon@earthlink.net>
Sent: Wednesday, March 15, 2023 10:29 PM
To: Housing Element
Subject: 6th comment: FLASH - Bod Wondries Ford VACANT - a new site?
Attachments: Bob Wondries Ford VACATED 440 S. Atlantic.jpg

CAUTION: This email originated from outside your organization.

HOT NEWS

Re: Bob Wondries Ford site -- NOW VACANT -- a possible new site?

Since my last email tonight, as I was driving west on Mission and nearing Atlantic, I noticed that the usual bright lights on the corner were out. Looking closely, **I noticed that Bob Wondries Ford has CLOSED within the past 2 weeks -- all locked up and no more cars there!!** See attached photo--especially the left end where the brightest lights used to be.

This is a huge lot: AINs 5344002044, 5344-001-046, 5344-001-047 and maybe others - appears to be 4+ acres.

Paul Wondries was one of the 9 "code users" selected by staff to have a special hour long one-on-one interview with the Zoning Code Update consultants to shape the very beginnings of the Zoning Code Update process. Staff undoubtedly has his number and maybe with a call to him you could find out what's up with this site.

This site is huge compared to many other sites in the Site Inventory. Should it be added to the list?

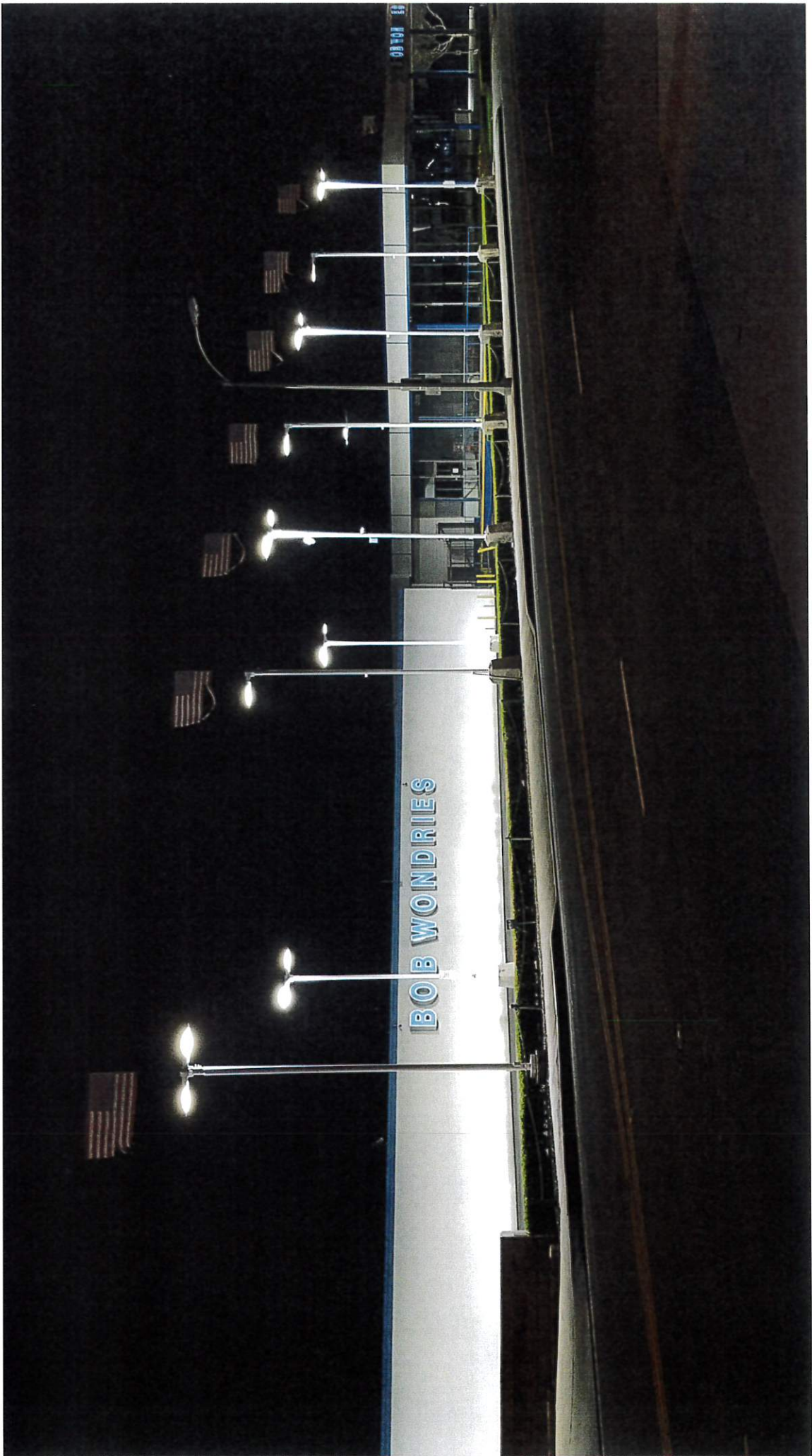
Lewis McCammon

105 N. Cordova St.

Alhambra, CA 91801-2708

(626) 363-3516

leweldizamccammon@earthlink.n



From: [Henry Fung](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Housing Element Message - new submission
Date: Tuesday, September 26, 2023 4:17:43 PM

Henry Fung just submitted your form: Housing Element Message
on [Alhambra HE](#)

Message Details:

First Name: Henry

Last Name: Fung

Email: calwatch@gmail.com

Message: To whom it may concern, As I mentioned to the Planning Commission at the public hearing, the State has already conditionally certified the April 2023 draft of the housing element, and further changes would put it into jeopardy. The letters refer to the Planning Commissions comments of September 18, 2023. I respond to the Planning Commission's recommendations as follows: A. Reintroducing the Residential Planned Development process: I shared staff's and the consultant's concern that retaining a discretionary process introduces uncertainty, creates issues in allowing for subjective standards to be used in approval, and does not reduce barriers to affirmatively furthering fair housing. Planning commissioners seemed to insist that HCD put this guidance down in writing, it is stated numerous times that a housing element has to review the barriers to housing development and address them. While HCD may not explicitly reject the process, it is clear that a much more substantive discussion of how the RPD process does not delay housing or reduce the number of units built must be included in a Housing Element before it can be added. Timelines for action and rewriting the standards so that they can be applied

objectively will need to be included in the Zoning Code update, which is not currently present. Barring including replacement language, which will trigger another round of back and forth with HCD, as well as a necessary increase in the consultant's budget to engage in this discussion, I urge the City Council to not include this language in the draft Housing Element. B, C, D, F, G, I - Although I do not support any changes in language, I also believe these are essentially nonsubstantive changes and this should not be a reason HCD rejects or asks for revision for the housing element. E, H - Development Standards and 100% residential in commercial zones - This is a substantive change in the Housing Element and the city will need to determine how much this will impact housing production. It should be noted that often the ground floor businesses in "mixed use development" in other jurisdictions remain empty. Many residential landlords and housing developers do not have the same expertise in marketing commercial ground floor properties. Some of the potential types of commercial development, like certain types of restaurants and bars, are incompatible with residential living. There is an opportunity to activate the ground floor space similarly, for example there is not much difference between a health club/exercise room as an amenity for building residents compared to one open to the public. Or the ground floor space could be used for parking for the residents instead of forcing them to build an additional level and added cost. The developers should determine whether mixed use or 100% commercial is appropriate for their project, regardless of whether the project is in a general commercial zone or the CBD or EMC zones. I would urge HCD to request backup for the changes and a recalculation of capacity to show that this change does not affect the units projected in the Housing Element. Sincerely, Henry Fung

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From: [Marisol Grier](#)
To: [Housing Element](#)
Subject: Comments for Public Review
Date: Wednesday, September 27, 2023 10:21:41 AM
Attachments: [attachment-2.png](#)
[attachment-3.png](#)
[Sept housing element - marisol public comments .pdf](#)



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Good Morning,
Please see attached my comments to be included for public review and to be on the record.
Thank You
Marisol Grier
815 Lindaraxa Park N
(626)487-6849

September 26, 2023

To: Mayor, Council Members, Planning Commissioners and City Manager

Fr: Marisor Grier, Alhambra Resident

Re: Public Review on the Housing Element - Edit Request for Page 9

Thank you for the opportunity to address concerns regarding the public draft of the Housing Element and its purpose to serve as an envisioning policy tool for what residents would like to see in our City of Alhambra.

Still Missing: Vision & Plan for Gateway Mixed-Use Redevelopment on East Main Corridor (EMC)

Residents along the East Main Street Corridor, through extensive public engagement and comments in formal and informal platforms, have requested the Housing Element reflect the General Plan and include the vision of an “Old Town Alhambra” in the East Main Corridor as part of a vibrant economic, transportation and housing redevelopment on the eastern gateway to the city.

Stating so in the Housing Element would inform the zoning update for the commercial corridor between the Central Business District (CBD) and the eastern border to the City of San Gabriel. It would also create opportunities for redevelopment grants, multi-modal transportation development, and the commercial infrastructure needed to support an influx in population due to increased affordable housing along the east main corridor (EMC) and the central business district (CBD).

To be clear, the vision for an “Old Town Alhambra” type of themed commercial development is not mutually exclusive with the addition of affordable housing. In fact, increasing housing and population will require a complementary build-up of commercial infrastructure.

REQUESTED EDIT to Housing Element bullet item on page 9:

REMOVE:

- A compromise between contrasting positions on East Main. The Housing Element includes rezoning a portion of East Main from Chapel to Granada at densities suitable for lower-income housing. Housing was not allowed on properties east of Granada. Based on the parcellation of this segment and the character of existing buildings, this was determined as the most appropriate segment for an “Old Town Alhambra” district.

REPLACE with:

- The Housing Element includes rezoning a portion of East Main, from Chapel to Almansor, at densities suitable for low-income housing, by rejoining it to the Central Business District. Through recent state law changes, mixed-use housing is now allowed on the East Main Street Corridor. Based on the parcellation of this segment, the character of existing buildings, historic references of the area, its close proximity to low-density housing, and as a gateway entrance/exit to the city, the East Main Street Corridor was determined an appropriate segment for an “Old Town Alhambra”

district with opportunities for multi-modal transportation improvements to ease traffic and increase pedestrian safety.

Here's why:

Align with General Plan Land Use Goals

As active participants in the update of the General Plan, we were pleased to support the General Plan's **Land Use Goals including LU 5, as an intention to increase investment in the East Main Street Corridor (EMC)**. Especially because formal recognition of this eastern entry into the city as a "**Gateway**", qualifies it for special development considerations. A definition of "Gateway" is an entrance that heralds the approach of a new landscape and defines the arrival point as a destination. The goal of gateway planning is to arrange this landscape so that it rewards the viewer with a sense of arrival and a positive image of the place. When one approaches a city or a town by bus or car, the sequence of views from the road determines one's first impressions of a place. If we think of a gateway as an entrance corridor, then gateway planning means linking this sequence of views together with common elements that give the corridor its own identity.

Alhambra's History as Inspiration for Americana is based in the East Main Street Corridor

It is time Alhambra gets to keep its well-deserved identity via the East Main Street Corridor by leveraging and preserving its significant contribution to the San Gabriel Valley as it is adjacent to the Alhambra Wash, vital to the indigenous people and critical to the site location of the San Gabriel Mission, as a life-sustaining water source for them to drink and grow crops.

The entire Alhambra Tract includes some of the historic neighborhoods built in the city of Alhambra with the homes boasting the original character of the era as the new homes were constructed. As well as noted artists gathering to capture life in the Americana era. During the 50s to 60s the East Main Street Corridor was the inspiration for many artists at the time, most famously **Norman Rockwell**, who would work at Mr. Clyde Forsythe's home and was one of the eight artists that comprised an artist's enclave that became known as "Artists' Alley" and "Little Bohemia" over on Champion St. in the early 1900's.

Mr. Clyde Forsythe, owned the home at 520 N Almanson St. in Lindaraxa Park, where Mr. Rockwell would gather inspiration and working from his studio above the garage. Many of Rockwell's works were created in and inspired by Alhambra as he captured American scenes that celebrated life in the United States. Alhambra was a fundamental inspiration for those images of middle-American families enjoying strolls together on sidewalks, parades, and barber shops and most famously described as portraying Americans as humble, God-fearing people who enjoy a strong prosperous family life.

That is how Alhambra was foundationally portrayed and today is a diverse community that displays a beautiful place that attracts families and, through community gathering spaces, create strong family bonds.

That is who Alhambra was at it's core and that is who we are now. We are a wonderfully diverse community that still longs to create a strong community through our welcoming city, our families, neighbors, civic leaders, and the police & fire services that protect us. We want to re-instill that sentiment

into our community infrastructure and leave visitors with that same feeling of a taste of what Alhambra life is all about.

With a nostalgic corridor that highlights our beginnings as a nod to humble Americans who come here to build community, we can preserve our history and our adjacent historic neighborhoods that reflect the beautiful architecture and character of what was originally established. We find that in a purposeful way, the neighborhoods created adjacent to East Main St. for accessibility of goods, and services, meeting together with neighbors for parades and other gathering events. With vision, and leadership, we can recreate this community connection space through gateway planning on the East Main Corridor, again.

Low-density residential housing requires a buffer from high-density high-rise buildings

As per the current zoning code, the East Main Street Corridor is commercial only. Well, we know that once a commercial is taken away it does not come back. The East Main Corridor is a “Gateway” as noted above. We as residents are concerned about the empty lots and want to be notified regarding the developments/ projects being proposed on East Main since they are adjacent to our homes.

Residents are concerned about proposals for outsized development in the area. More recently, in April 2019 residents came to this very chamber to passionately protest the outsized development on the Bewley Cadillac dealer lot, at 801/807 E. Main St., which was denied authorization.

The combination of these experiences prompted residents to question what it is **WE DO WANT** in developing the East Main Street Corridor there had been no vision.

As a matter of fact, in the General Plan pg 44-45, we notice there are plans for other parts of the city. However, it was clear that East Main had been neglected in planning documents until residents requested a specific plan as an overlay with the vision of an Old Town Alhambra.

This is reflected in the resident's comments and supports the LU1-LU8 Implementations. It upholds as an integral transportation artery for neighbors in adjacent cities to drive through or drive to our Alhambra stores, and entertainment areas and it receives what feels like minimal attention from city leaders. Businesses struggle and there are empty storefronts that have been so for decades! At a time of emergency, such as the recent hurricane and earthquake on the same day/weekend, it becomes clear current and future residents need more, not less, commercial infrastructure.

What Residents Do Want on East Main Street

Instead of outsized development, residents suggest the city leverage the history of the city to reconnect to our neighbors and increase the vibrancy and economic viability of the area through an “Old Town Alhambra” district.

We acknowledge and thank the Planning Commission for the current effort to allow the development of an Old Town Alhambra “east of Granada Avenue.” That is, unfortunately, not sufficient for the same reason housing in that area is not feasible — the small lot sizes, limited parking, and lack of development investment by the city. Now, thanks to new state laws, the compartmentalization of the East Main Street Corridor as represented in the draft Housing Element is no longer needed to accommodate mixed-use housing.

With recent state laws designed to increase housing development like SB6, the East Main Street Corridor is no longer limited to commercial-only development. This represents opportunities for the development of housing that is affordable to people who work in Alhambra. It also means that mixed-use development of housing and commercial can infuse the development of an Old Town Alhambra district.

As such, **there is no reason to extend the “Central” Business District (CBD) east to Granada Ave.**

Additionally, it can **leverage AB 2097 and develop a multimodal transportation hub on this portion of the heavily utilized Main Street.**

In light of AB2097 and SB6, allowing mixed use development on all commercial corridors in the city, the proximity to low-density residential neighborhoods on both the north and south sides of East Main Street, and the goal of developing the area for an Old Town Alhambra district, it would be appropriate to **limit heights in this area to 30’ mixed-use housing and for retail as other cities have done.**

Residents, not just Developers, are Vested in the Future of Alhambra Too

I am committed to Alhambra. Like my neighbors, I too am vested in Alhambra through property ownership and by raising my children and grandchildren here. Personally, we chose Alhambra because my mother lives with us and she loved the proximity to Main St. and wanted to be able to walk to the bank, drug and grocery stores, and also with her grandchildren to the school and the park. But now, it’s too dangerous for her to walk near Main Street on her own because traffic is too fast and too often results in pedestrian accidents or fatalities.

As a real estate agent, our home values are important to me and all of our Alhambra residents. However, it is equally important to us that use of our tax dollars reflects the quality of life standards we expect within our city.

It is vital communities have accessible places to gather where we can all enjoy the city in which we call home. Friendly, inviting spaces that differ from larger developments will give a respite for residents as well as visitors. We know this equation works because we can compare it to other cities that have adopted this same format. Many others that have adopted this plan include bike paths, perpendicular parking, and shared open lots to not congest residential streets known as “compact development”.

It is easy to see how a community thrives when it lives, works, and shops within its city as do property values. We are not asking to reinvent the wheel — we are just asking to enhance and add to our community too. I believe together we can truly make Alhambra a premier city that includes amenities, upgrade our schools, and create guidelines for safety from which we all can benefit.

Vision Plan Articulated in the Housing Element is the Seed for an Old Town Alhambra

It's time for Alhambra to invest in its own community experience. An Old Town Alhambra and creating pedestrian-friendly, “complete streets” and providing the retail infrastructure new housing will require.

The future of Alhambra starts here ... with the Housing Element as a policy tool for city staff to use as guidance. I have attended plenty of city public hearing, council and commission meetings to know that

you care about Alhambra's future and its residents. ***Now is the time to make the commitment the residents have asked for time and time again.***

Please help make East Main Street a great "new" part of Alhambra's economic future with a full commitment to converting the East Main Street Corridor to an Old Town development district, limiting mixed-use building heights, adding multimodal and pedestrian-friendly streetscapes and design elements that create a collaborative and cohesive business and housing district.

#

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 1st Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 5:03:43 PM
Attachments: [attachment-1.png](#)
[attachment-2.png](#)



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(1st comment)

I support all of the Planning Commission's recommendations on the 4th Draft of the Housing element and request that they be incorporated into the document.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 2nd Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 5:22:38 PM
Attachments: [attachment-1.png](#)
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(2nd comment)

I recommend that the two identical charts in the Draft 4 Housing Element titled "**Site Capacity by Source and Income Level. RHNA Surplus/Shortfall**" have the numbers adjusted to reflect the Planning Commission's recommended addition of the 400 S. Atlantic Bl. 2.51 acre parcel (APN 5344-002-044 - part of the closed Bob Wondries Ford site). This chart can be found at two places in Draft 4 Housing Element, namely
(a) as Table 2 on page number 12
(b) as Figure 147 on page number 265.

Thanks.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 3rd Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 6:03:19 PM
Attachments: [attachment-1.png](#)
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(3rd comment)

I strongly recommend that the last sentence be deleted from Program 21 Adopt the comprehensive Zoning Code Update (Draft 4 page 219). This sentence reads:

"This program will also include amendments to previous errors in the General Plan Land Use Map that mis-classified a section of East Main Street from Chapel to Almansor as Central Business District instead of General Commercial."

Two reasons for this suggested deletion:

(a) This sentence as currently included actually serves to ***restrict*** the number of housing units that could be produced on sites in this area like Site NV509 (density 30DU/acre vs. 64 DU/acre) in this area. As such, the deletion of this sentence would have no negative impact on the total number of housing units that can be produced and could possibly [pending the results of discussion in (b) below] increase the number of such housing units that can be produced.

(b) This change has not yet been the subject of substantive discussion by the Planning Commission and more properly needs to be left flexible for such discussion in the ongoing Zoning Code Update process. Such further Zoning Code Update discussion could also consider other alternatives such as having the area here south of Main St. between the San Pascual Wash and Chapel Av. be treated separately and by having that area be either (1) confirmed as part of the CBD or, alternatively, (2) confirmed as general commercial (EMC) but with different height and/or stories and/or density. I feel that this is an important substantive discussion to have.

Thanks for considering this.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

From: [Shirley Tatsuno](#)
To: [Housing Element](#)
Subject: Affordable Housing
Date: Thursday, September 28, 2023 7:32:39 PM
Attachments: [attachment-2.png](#)
[attachment-3.png](#)
[9.28.2023 Housing Element.pdf](#)



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Hello,

Attached are my comments.

Thank you,
Shirley Tatsuno

Dear ECONorthwest,

My name is Shirley Tatsuno. I would like to discuss affordable housing which is an important part of the Housing Element. As several residents have mentioned, I think it was a mistake not to consult affordable housing developers. I was thinking about this. Would there be affordable housing developers interested? For example, on my street, 5th Street, where 4 are proposed developers would have to pay \$1 Million dollar plus for a property and then pay for demolishment. What about property tax? Will all the affordable housing developments have reductions? The proposed developments also includes moderate and above moderate units. In the Alhambra Inclusionary Housing, "(A) All inclusionary units shall be reasonably dispersed throughout the residential development; shall be proportional, in number, bedroom size and location, to the market rate units; and shall be comparable with the market rate units in terms of the base design, appearance, materials and finished quality." Does this apply to these projects? If it does, with 9 out of the 26 units for the moderate or above moderate income units appealing to them, will the 17 low income units be built in a similar fashion? Does this make financial sense?

For some background I am an affordable housing advocate in Alhambra and I also have volunteered for 10 years and continue doing this as a core member of Family Promise at my church, Evergreen Baptist Church of LA. Family Promise is a church shelter program for homeless families. Especially because of my experience with these families who are often low income single moms with children, I know how hard it is to find housing for these families. I especially would like to see low income families with children have safe and good housing in Alhambra.

However, it is the city's desire to cut out the Planning Commission and public discussion to speed the process to build housing more quickly that concerns me. I do not agree with this. As I have said, there are 4 majority affordable housing developments possibilities on my street. Ramona Elementary School is across the street. All Alhambra schools with affordable housing across the street should have the same agreement for the types of people who will not be allowed to live there as Mariposa Affordable Housing Development has because Alhambra High School is across the street. So many low income people need supportive services. Will it be provided? Across the street and nearby from the proposed housing is a preschool with lots of "No Smoking" signs which honestly now are for the smoking restaurant workers. But Ramona has put black netting on the north side fence of the playground to prevent homeless people from watching or taking photos of the children. Safety must be maintained.

My deceased husband Brian and I worked hard for 35 years and I continue to provide a safe, clean environment at my apartment. As a matter of fact, 2 of my tenants moved to our apartment from Monterey Park because their cars parked in their carports had been broken into several times. I often pick up trash around my property and I do not want to be picking up or seeing human feces or syringes. I want to continue to have a clean, safe environment in our area for my tenants, neighbors, the Ramona School children, teachers, workers and myself.

Sincerely,
Shirley Tatsuno

I am a Habitat for Humanity donor. Their mission to build homes for low income families which they become homeowners of, is important to me. Habitat for Humanity is one of the beneficiaries of my Trust. Last week I went to my second home opening. It is heartwarming to know a Latino family of parents with 3 children who lived in a one bedroom apartment rental, will now live in a very nice 3 bedroom home in Altadena. In Alhambra, I am hoping Habitat for Humanity will be able to build homes perhaps on a church property. If this were to happen, I hope Alhambra will welcome and work with them. God willing, I live for 10 plus years but I have requested they build or remodel a home in Alhambra with seed money from my Trust. If it does not work out they will go to another neighboring city. We will see what happens.

From: [Rossana Javier](#)
To: [Housing Element](#)
Subject: Public Review Draft Release - My Comments
Date: Thursday, September 28, 2023 9:15:18 PM

Re. 2019-2029 Alhambra Housing Element

Dear City of Alhambra,

One week to review a document over 200 pages was grossly insufficient; I would have greatly appreciated having more time to review this important, far-reaching document.

I have a few comments based on the extremely limited amount of time I had to review key points of the aforementioned document:

- I DO like the 4 stated goals under Priority 4,"1. Expand Fair Housing Choice and Access 2. Expand Affordable Housing Opportunities 3. Maintain Safe and Green Neighborhoods 4. Mitigate Gentrification and Displacement " 2 thumbs up!
- I DO like the table on Pages 186-7 "Figure 123: Meaningful action the City will pursue to overcome identified patterns and trends from the AFFH assessment of contributing factors to fair housing issues." Thank you so much for listening to us and incorporating our feedback! I especially appreciate the acknowledgement of the need for more affordable housing for the disabled and for the education of the community. I am living with my mother and am currently on disability. If I had to pay rent on my own, I would likely be homeless. Why? Social Security Disability pays me only a mere fraction of what I used to earn in architecture or construction management; I receive under \$1400/month. That is basically the cheapest cost to rent a studio somewhere, usually in a high crime area. E.g. a studio in Boyle Heights in a project with many gang member residents is over \$1200/month. SROs on Skid Row are over \$1000/month. Our Alhambra neighbors are renting a 2 bedroom house for over \$2500/month.
- There were repeated mentions to future developments based off the main corridors of Main Street and Valley Blvd. My concern: There are many single family dwellings along both these thoroughfares. New developments should preferably be on the south side of the street, where they will not infringe upon residents solar rights. Existing residents must have their sunlight and access to views preserved. They should NOT be blocked by monolithic developments.
- As much as we designers would like to encourage the use of public transportation via limiting the number of parking spaces provided in new multi-family developments and infill developments, this just is NOT REALISTIC, and to me as an intern architect and former construction management professional, represents EXTREMELY POOR PLANNING AND DESIGN.
 - It is an imposition on existing neighborhoods and residents, further worsening some parking situations which are already very difficult. I grew up in Echo Park, in a neighborhood of mostly single family residences. As more apartments and condos were built, parking became more limited. The property next to my childhood home was sold to a developer who created 4-story condos, which include 3 stories plus roof decks. Not only is it completely out of scale for the neighborhood, it completely obstructs the sunlight and existing views to downtown L.A. It is an absolutely hideous monstrosity, and dominates the entire neighborhood. The parking there is now an absolute nightmare. I'm disabled and mobility challenged. Where am I supposed to park when visiting family? PLEASE DO NOT DO THIS TO ALHAMBRA.
 - Public transportation in L.A. and L.A. County are still lousy. For example, a 15-30 drive to Glendale takes 2-3 hours by bus. Therefore, it is highly naive and unrealistic to expect persons to give up their vehicles just because the development does not include parking or sufficient parking spaces. Most persons rely on their vehicle to live: going to work, going to appointments, visiting loved ones, running errands. What will happen if parking is excluded

or diminished is exactly what happened in my old neighborhood: create nightmares for all residents, old and new alike. Disabled and mobility challenged persons like me especially need our parking spaces. PROVIDE AMPLE AND SUFFICIENT PARKING SPACES FOR RESIDENTS. DO NOT SHORTCHANGE RESIDENTS ON PARKING SPACES. Not enough room in the budget? Then cut the number of units and refuse to pander to deep-pocketed developers; it's that simple.

- On Page 12, the AHE states "significant changes in response to public comment include: A rezoning and upzoning strategy that increases allowed densities in all zones that currently allow housing and allows housing in most areas that do not currently allow housing."
 - I disagree. I do not like nor do I condone increasing densities in R1 areas with single family dwellings, with the exception of an ADU, limited to 2 stories or split-level, including any balcony/porch/terrace, or conversion to a duplex.
 - I DO, however, generally agree with the overall strategies listed under Program 19, pages 217-8. any increase in densities along Valley Blvd. should be per my comments above.
- Also on Page 12, another change made to the AHE includes the "Reduction in the reliance on ADUs to meet RHNA targets. "
 - I disagree. This is an extremely bad idea. ADU's are a great way to increase housing availability while maintaining the character of the neighborhoods. As they would be spread out over the city, the problem of oversized, megalithic developments overpowering and encroaching on existing residents and neighborhoods can thus be avoided or minimized.
- More moderate income housing should be built and less "above moderate" income housing. Persons' incomes have not kept up with inflation, and many businesses failed during the Covid shutdowns, leading to layoffs and unemployment. People are spending 50% or more of their incomes on rent, and homelessness has increased. Please help provide a solution to our housing problem instead of creating more unaffordable housing that only the well-off can afford.

Thank you for your time and consideration; it is very much appreciated.

Best regards,
Rossana Javier, Associate AIA

From: [Kaly](#)
To: housingelement@cityofalhambra.org
Subject: Review of the draft
Date: Thursday, September 28, 2023 9:30:40 PM

Good evening,

There was not enough time to read through the entire document to meet today's deadline for comment.

Two items, nevertheless:

1. I do not understand if this document adequately summarizes the proposed zoning requirements or not.
2. I am concerned that privately held development will not accomplish the goal of increasing low income housing stock.

Kaly Trezos

From: [Olga Alarid](#)
To: HousingElement@cityofalhambra.org
Subject: EMC and CBD boundary
Date: Thursday, September 28, 2023 10:07:27 PM

Dear Housing Element,

Many neighbors have attended many meetings so we hope we are finally heard since these decisions impact where we live. Where we have families and raise the next generation of Alhambra neighbors. So these decisions are critical to what we value the most, our homes.

We ask the the commercial business district boundary please be changed to Almamsor westward where the area is dense with larger businesses and large apartments. It make sense. Please consider East Main Corridor from Almamsor east to the San Gabriel Border. The area is less dense and surrounded by mainly single family homes.

From Almamsor westward, there are large lots that can absorb the majority of affordable housing such as the huge mainly empty lot where the Ranch 99 Market is located next to Almamsor and the huge empty lot on Chapel and Main. Those areas make sense since the area is mainly marked by apartments and other businesses.

Thank you
Olga