

Pasadena 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix
December 29, 2021

<p>HCD Review Comments on the Draft Housing Element from October 8, 2021 Call</p>	<p>How HCD Comments Have Been Addressed in the Revised Housing Element</p>
<p>A: Review and Revision</p> <p>The element must evaluate the effectiveness of prior programs and appropriately adjust goals, objectives, policies, and programs. For example, many programs are continued without adjustment. Further, HCD received substantial public comments regarding past programs and these comments should be considered as part of this evaluation and adjustment of program in the 6th cycle.</p> <p>In addition, as part of the review of programs in the past cycle, the element must provide an evaluation of the cumulative effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness).</p>	<p>The Housing Element Task Force, in addition to its four meetings to inform Housing Element preparation, met five times following submittal of the draft Housing Element to HCD in August 2021 to prioritize housing programs for implementation and to consider HCD comments on the draft Housing Element. Initially, the Task Force did not identify any new programs or policy direction to pursue beyond those currently in place and/or described in the draft Housing Element. To further assist the Task Force in its review and consideration of the HCD comment letter, City staff assigned a rating system for each program in terms of High Impact and Ease of Implementation: green (high/easy), yellow (moderate), and red (low/hard). This assessment has been used to look again at the assessment of program effectiveness. The outcome is that the assessment contained in the draft Element reviewed by HCD aligns well with the priorities expressed by the Task Force and community needs. The City’s many housing programs work well to address those needs. For this reason, many of the programs are indeed carried forward without adjustment.</p> <p>As part of the extensive public engagement process conducted for the draft Housing Element, the City considered all comments, including those contained in letters HCD has referenced. Those comments and suggestions that align with the priorities are reflected in the programs. Those which do not align with current City land use policy have not been included.</p> <p>In the revised draft Housing Element provided to HCD with this matrix, language has been added as needed to describe program efficacy and reasons why a program has been continued, modified, or eliminated. An assessment has also been provided at the beginning</p>

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	of the section describing the cumulative effectiveness of programs for special needs populations.
B: Housing Needs, Resources, and Constraints	
<p>1. Affirmatively further[ing] fair housing (AFFH)</p> <p><u>Concentrated Areas of Poverty and Affluence:</u> The element notes there are not Racially and Ethnically Concentrated Areas of Poverty (R/E CAP) in the City. However, the element also identifies an area of High Segregation and Poverty utilizing HCD and TCAC Opportunity Areas maps and as a result, it should include a specific analysis of these areas including trends, investment, past policies, local data and knowledge and other relevant factors. In addition, the element states there are no block groups with racial/ethnic minority populations below 20 percent; therefore, Pasadena is not an area of concentrated area of affluence. However, the element should include discussion and analysis of household incomes relative to the rest of the region and whether any trends present potential barriers to AFFH.</p>	<p>Appendix F, the AFFH analysis, has been augmented to provide the discussion and analysis requested. New text is shown in track-changes format.</p>
<p><u>Sites Inventory:</u> The element reports percentages of the regional housing need allocation (RHNA) by income group based on different concentrations of socio-economic characteristics but should also include analysis of the magnitude of the impact of identified sites relative to the number of households and whether the identification of sites exacerbates or improves existing conditions. This analysis should also discuss impacts at a neighborhood level and the element should include policies and program as appropriate.</p>	<p>Appendix F, the AFFH analysis, has been augmented to provide the discussion and analysis requested regarding the relationship of the sites inventory and concentrations of minority and low-income households. The analysis describes a known history of redlining and other exclusionary housing practices and how such practices led to an overconcentration of such households in Northwest Pasadena and to a lesser extent, within the civic core (Old Pasadena), as well as the impact that construction of I-210 had on dividing the community. New text is shown in track-changes format.</p> <p>Also discussed in Appendix F is the City’s overarching land use principle to place denser housing near transit stops (light rail stations in particular) and within high service areas. The sites inventory</p>

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	<p>reflects this policy direction and indicates how the RHNA can be satisfied without any zone changes.</p> <p>Since adoption of the General Plan in 2015, the City has been working to update eight Specific Plans that implement General Plan land use policy, which calls for substantially more housing in areas where the plans do not currently allow housing, such as within the South Fair Oaks and East Colorado Specific Plan areas. However, since those amended specific plans have not yet been adopted—but will be by early 2023—the sites inventory was not able to take advantage of many potential sites for new high-density residential development located citywide. However, as shown in the Housing Resources section of the element, the RHNA can be achieved using current zoning/specific plan designations. The City’s ability to accommodate even more units in areas in high-resource areas will expand with Specific Plan adoption, resulting in a more extensive distribution of affordable housing—and particularly outside of areas where it has been concentrated historically.</p> <p>As demonstrated throughout the sites assessment in Appendix F, the City made its best effort to distribute RHNA units in vacant and underutilized areas outside of Specific Plan areas as well as within Specific Plan Areas. For areas outside specific plan zones, most units were classified as moderate or above-moderate income. For example, virtually all these sites in the Northwest Pasadena (about 282 units) have been included in the above moderate-income RHNA category since densities fall below the default density of 30 units per acre. Given that this area been identified as having a high concentration of lower-income households, locating above-moderate income housing in this area is expected to ameliorate conditions by attracting investment and the services that follow. Also, the City’s Northwest</p>

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	Commission promulgates economic development activity in this area to reverse historic conditions of disinvestment.
<p><u>Local Data and Knowledge:</u> The element should incorporate local data and knowledge of the jurisdiction into the Affirmatively Furthering Fair Housing (AFFH) section. To assist in meeting this requirement, the element should provide local data not captured in regional, state, or federal data analysis. In addition, HCD received many useful comments regarding AFFH, particularly from Our Future LA Coalition, Affordable Housing Services, Abundant Housing LA, and Pasadena Affordable Housing Coalition. The City should consider these valuable and important comments across all components of the AFFH analysis and programs.</p>	<p>Appendix F, the AFFH analysis, has been augmented to summarize public comments regarding AFFH issues and to provide the discussion and analysis requested. New text is shown in track-changes format.</p>
<p><u>Other Relevant Factors:</u> The element includes some discussion of other relevant factors such as past restrictive covenants and redlining as well as freeway construction and efforts related to Northwest Pasadena. The element should include additional analysis of the effectiveness of efforts in Northwest Pasadena and add or modify programs as appropriate. In addition, the element describes the City’s local preference policy but should also discuss the impacts of this policy on housing mobility on a regional level.</p>	<p>See discussion above regarding the sites inventory. Appendix F, the AFFH analysis, has been augmented to provide the discussion and analysis requested. New text is shown in track-changes format.</p> <p>Regarding the local preference policy, discussion has been augmented regarding regional housing mobility.</p>
<p><u>Contributing Factors to Fair Housing Issues:</u> The element must identify and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing</p>	<p>As described above, the AFFH analysis have been expanded to describe factors contributing to severity of fair housing issues and to present actions the City has taken and continues to take to address the adverse consequence of past practices and guard against any continued violations of fair housing laws.</p>

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and lack of public or private investment in areas of opportunity or affordable housing choices.	
<p><u>Goals, Actions, Metrics, and Milestones:</u> The element must be revised to add or modify goals and actions based on the outcomes of a complete analysis. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have specific commitment, metrics and milestones as appropriate and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection.</p>	<p>The City has augmented the discussion of existing programs and actions in the draft Housing Element and has added new actions (implementation measures) to directly address housing mobility enhancement, new housing choices for lower-income households in high opportunity areas, place-based strategies for community preservation (anti-gentrification measures), and displacement protection. Many of the actions described are focused in the Northwest neighborhoods.</p>
<p>2. Extremely Low-Income (ELI) Households: While the element includes a general description and identifies the projected number of ELI households, it must still analyze their existing housing needs. This is particularly important given the unique and disproportionate needs of ELI households. For example, the element should analyze tenure, cost burden, overcrowding and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml.</p>	<p>The needs of ELI households mirror those of VLI households, with the added burden of even more limited means and the paucity of affordable housing available. As noted in Table A-14, ELI households have been assumed to represent 50 percent of the VLI households, as allowed by statute. Thus, the analysis provided for VLI applies to ELI as well. Programs targeted to meet the needs of VLI households apply to ELI.</p>
<p>3. Housing Conditions: The element identifies the age of the housing stock. However, the element should also estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from the City’s inspection programs,</p>	<p>Information has been added to the analysis based on additional input from City Code Compliance staff. Given that the City’s robust multi-family inspection program and Pre-sale Self Certification Program for single-unit homes effectively identify code violations and that the City</p>

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<p>a recent windshield survey or sampling or information from knowledgeable builders/developers and neighborhood advocacy groups. Programs should be added or modified based on the outcomes of a complete analysis.</p>	<p>has resources to assist lower-income households with repairs, no new program is warranted.</p>
<p>4. Sites Inventory. <u>RHNA Progress:</u> The City’s RHNA may be reduced by the number of new units pending, approved, permitted or built since July 1, 2021 by demonstrating availability and affordability based on rents, sale prices or other mechanisms ensuring affordability (e.g., deed restrictions). The element notes 1,277 units affordable to various income groups. However, the element should account for whether the units will likely be built during the planning period and specifically demonstrate affordability on a project basis utilizing rents, sale prices or other mechanisms ensuring affordability (e.g., deed restrictions). Since these are actual projects, this analysis may not utilize density as a factor to demonstrate affordability.</p>	<p>Since submittal of the draft Housing Element to HCD in August 2021, the City has continued to receive applications for housing development. As of mid-November 2021, active applications were being processed for 2,657 housing units. Of those, the number of affordable units verified are as follows: 1) very low income = 261 (9.8%), 2) low = 171 (6.4%), and 3) moderate = 193 (7.3%). Overall, affordable units represent 24 percent of currently active applications. The 1,277 affordable units in the sites inventory represents 14 percent of the 9,459 RHNA allocation. Thus, based on current trends, the sites inventory may underrepresent the percentage of affordable units. Nonetheless, the sites table has been updated to reflect actual affordability levels, where known. Inclusionary and density bonus units, which these are, have their affordability maintained via covenants.</p>
<p><u>Sites Inventory:</u> The sites inventory lists sites by address, assessor parcel number, parcel size, general plan, zoning, specific plan, and number of units but should also clearly distinguish between vacant and nonvacant sites. For nonvacant sites, parcels should be listing by existing uses and the description should be sufficiently detailed to facilitate an analysis of the potential for additional development in the planning period.</p>	<p>The sites inventory database has been updated to include the additional information requested. This information was known at the time of Housing Element preparation and was used in the sites analysis.</p>
<p><u>Realistic Capacity:</u> The element mentions an assumption of 90 percent of maximum allowable densities to calculate residential capacity on identified sites. However, the element should include</p>	<p>Additional documentation has been added to the sites inventory demonstrating that projects subject to the Inclusionary Housing Ordinance (10+ units) achieve or exceed the maximum permitted</p>

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<p>additional and clear supporting information on typical densities of existing or approved residential developments at a similar affordability level. For example, the element could clearly list other recent projects, the zone, acreage, built density, allowable density, level of affordability and presence of exceptions such as a density bonus.</p> <p>In addition, the element appears to assume residential development on sites with zoning that allows 100 percent nonresidential uses, but to support this assumption, the element must analyze the likelihood of residential development in zoning where 100 percent nonresidential uses are allowed. The analysis should be based on factors such as development trends including nonresidential, performance standards requiring residential uses or other relevant factors such as enhanced policies and programs. For example, the element could analyze all development activity in these nonresidential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly. For addition information, see HCD’s Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.</p>	<p>densities. For example, the project at 177 E. Del Mar is zoned at a maximum density of 87 units per acre and achieved 100 units per acre (in the CD-1 zone). The project at 125 Hurlbut is zoned RM-32 (32 units per acre) and yielded 36 units per acre. The Avila Apartments to be built at 75 W. Walnut (201 total units) yielded 106 units per acre in the CD-1 zone (87 units per acre maximum). Thus, the sites inventory is actually conservative with a 90 percent estimate.</p> <p>For projects in the RM-12 and RM-32 zones, where development generally consists of replacing a single unit or units with multifamily housing and the IHO may not apply, resulting densities range from 86 to 90 percent of the permitted density.</p> <p>With regard to zones allowing 100 percent nonresidential uses, such as most zones within the Central District, residential uses represent the overwhelming type of applications. This can be attributed to the decline in demand for brick-and-mortar retail space, lower demand for new office space associated with COVID-19, and a high demand for housing. In fact, in commercial zones where residential uses are specifically prohibited, the City has received numerous inquiries to convert office and commercial space to residential. Additional discussion has been included to analyze and document the trends.</p>
<p><u>Suitability of Nonvacant Sites:</u> The element offers a high-level analysis of sites and their suitability for residential development. However, the element must include an analysis to demonstrate the potential for redevelopment. The analysis shall consider factors including, but not limited to, the extent existing uses constitute an impediment, recent developments, development trends and market conditions. For example, the element identifies over 30 acres of nonvacant sites in the RM-12 zone based on inquiries from property owners but must</p>	<p>As of the end of November 2021, the City had eight active applications to replace existing single-unit residences in the RM-12 and RM-32 zones with multiple units. These are documented in the sites inventory.</p> <p>Regarding nonvacant sites as a whole, of the 2,657 new units either in the pipeline or approved as of November 2021, virtually all sites are currently occupied by commercial or single-unit residential uses.</p>

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<p>also include analysis of trends relative to identified sites and characteristics of sites that demonstrate the potential for additional development.</p> <p>In addition, the element appears to rely on nonvacant sites to accommodate 50 percent or more of the RHNA for lower-income households. For your information, the housing element must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p>	<p>Here are a few examples that clearly demonstrate that existing uses are not an impediment to additional residential development.</p> <p>740 E. Green: Demolish an office building and replace with 250 residential units</p> <p>141 S. Lake: Demolish 27,220 sf of restaurant and office uses and replace with 91 units and 12,794 sf of commercial space</p> <p>139 S. Oak Knoll: Demolish a three-story office building and parking lot and replace with 17 units</p> <p>150 E. Colorado: Demolish a 62,268 sf office building and replace with a mixed-use project with 98 units</p>
<p><u>Replacement Housing Requirements:</u> If the sites inventory identifies sites with existing residential uses, it must identify whether the current residential uses are affordable to lower-income households or describe whether the additional residential development on the site requires the demolition of the existing residential use. For nonvacant sites with existing, vacated, or demolished residential uses and occupied by, or subject to an affordability requirement for, lower-income households within the last five years there must be a replacement housing program for units affordable to lower-income households. (Gov. Code, § 65583.2, subd. (g)(3).) Absent a replacement housing program, these sites should not be utilized toward the regional housing need allocation. The replacement housing program has the same requirements as set forth in Government Code section 65915, subdivision (c)(3). The housing element must be revised to include an analysis and a program, if necessary.</p>	<p>Other than tracking affordable units created via the City’s IHO or density bonus ordinance or units with Section 8 vouchers, the City does not have data regarding unit affordability. The City does have a mechanism, however, to ensure residents in affordable housing are not displaced as a result of new construction: the Tenant Protection ordinance (Chapter 9.75 of the Pasadena Municipal Code). Generally, the ordinance provides that: “For all tenants in good standing living in households at or below 140% of the median income, by household size, landlord shall pay a relocation allowance equal to two and one-half (2½) months fair market rents as established by the U.S. Department of Housing and Urban Development ("HUD") for a rental unit of a similar size. In addition to the relocation allowance, landlord shall also pay a moving expense allowance in the amount of \$1,306.00 for adult households or \$3,935.00 for households with dependents, disabled, or senior members. The amounts listed are</p>

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	<p>adjusted for FY 2019 and will continue to be adjusted as provided in paragraph C below.”</p> <p>A program has been added to address the specific requirement regarding a replacement housing program.</p>
<p><u>Sites Identified in Prior Planning Periods:</u> Sites identified in prior planning periods shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period. For more information on program requirements, please see HCD’s Housing Element Sites Inventory Guidebook at https://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml.</p>	<p>The requested information has been added to the sites inventory.</p>
<p><u>Small Sites:</u> Sites less than 0.5 acres in size are deemed inadequate to accommodate housing for lower-income housing unless it is demonstrated that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless the housing element describes other evidence to HCD that the site is adequate to accommodate housing for lower-income households. (Gov. Code, § 65583.2, subd. (c)(2)(A)&(B).) For example, the analysis could describe trends in facilitating affordability on small sites, potential for lot consolidation or zoning, policies or programs that will facilitate consolidation or development comparable to sizes of typical affordable developments (e.g., 50 to 150 units).</p> <p>Zoning for a Variety of Housing Types:</p>	<p>As required by statute, the City has not included sites less than 0.5 acres or larger than 10 acres in size as sites to fulfill the lower-income RHNA categories.</p> <p>A program action has been added to amend the zoning code to accommodate transitional and supportive housing in residential zones as required by law (by 2026).</p>

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<ul style="list-style-type: none"> • Emergency Shelters: The element must identify a zone(s) to permit emergency shelters without discretionary action and sufficient to accommodate the need for emergency shelters. Currently, the element appears to identify insufficient capacity to accommodate the need for emergency shelters and should include programs as appropriate to zone additional capacity. In addition, the element should discuss available acreage, including typical parcel sizes and the presence of reuse opportunities proximity to transportation and services and any conditions inappropriate for human habitability. Finally, the element should analyze development standards, including parking requirements which appear inconsistent with recent changes to law (AB 139). • Transitional Housing: Transitional and supportive housing must be permitted as a residential use in all zones and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. These uses appear to be excluded from low density residential zones (Table B-3). The element must demonstrate compliance with these statutory requirements and include a program, as appropriate. • Employee Housing Act: The element states the City does not have agricultural land and as a result does not have zoning responsive to the needs of farmworkers. However, regardless of need or presence of agricultural land. The City must demonstrate zoning in compliance with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or include programs as appropriate to establish zoning by a specified date. Specifically, Health and Safety Code section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 	

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beds to be permitted in the same manner as other agricultural uses in the same zone.	
<u>Environmental Constraints:</u> The element must include analysis of potential environmental constraints and any known conditions that preclude development on sites listed in the inventory. This analysis may describe any mitigation or other measures that impact the availability of sites.	A discussion of environmental constraints has been added to the end of Appendix B.
<p><u>Infrastructure:</u> The element must demonstrate sufficient existing or planned water, sewer and dry utilities capacity to accommodate the regional housing need allocation in the planning period. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/analysis-of-sites-and-zoning.shtml#environmental.</p> <p>In addition, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element must demonstrate compliance with these requirements or include a program as appropriate.</p>	The City of Pasadena Power and Water Department (PWP) is responsible for providing water service to all customers in the city. City Council Resolution No. 8621, dated July 17, 2006, fulfills the requirements of Government Code § 65589.7 for granting priority water service to lower-income housing. A paragraph has been added to the site inventory discussion in this regard.
<u>Accessory Dwelling Units (ADUs):</u> The element relies on 1,245 Accessory Dwelling Unit to accommodate a portion of the City’s RHNA, including for lower-income households. The element appears to rely on the number of applications in 2019 and 2020. While this information may be utilized to inform the potential for ADUs in the planning period, the analysis should be based on permitted ADUs and the approval information should be ancillary to permitted ADUs. For	Please see the revised discussion.

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<p>your information, HCD records indicate permitted ADUs of 13 in 2018, 16 in 2019 and 79 in 2020. The element should reconcile these numbers and adjust assumptions as appropriate.</p>	
<p><u>Electronic Site Inventory:</u> For your information, pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD’s housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.</p>	<p>The City has included its more detailed sites inventory in this second submittal. The City will submit the standard form once HCD has concurred that the inventory fulfills the requirements of the law.</p>
<p>5. Government Constraints</p> <p><u>Land Use Controls:</u> The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other land use controls. The analysis should specifically address requirements related to parking and heights. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints. In addition, this analysis should address the following:</p> <ul style="list-style-type: none"> • Specific Plans: The element mentions caps general plan development caps on specific plans and exemptions for affordable housing; however, it must specifically analyze the impacts of caps on 	<p>As an overarching response, the City notes that development standards in the Zoning Code are easy to find and clearly stated. As described for the sites inventory, most development projects approach the maximum permitted densities inclusive of required parking and reflective of the required development standards. Thus, land use controls, including the Inclusionary Housing Ordinance (IHO), are not a constraint on development, as further evidenced by the 1,277 developments currently underway and in the entitlement process (as cited in the Resources appendix).</p> <p>Parking: The analysis of parking requirements begins on page B-15 of the draft element submitted for HCD review. Table B-7 outlines required parking for all residential and mixed-use zones. The discussion indicates that in multi-family zones, the parking may be provided as tandem spaces; this provision can save space and development costs. Senior developments only require 0.5 spaces per</p>

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<p>residential capacity on identified sites and overall impacts on housing supply and cost.</p> <ul style="list-style-type: none"> • Inclusionary Requirements: The element must identify the components and all pertinent procedures related to inclusionary housing requirements and analyze impacts on the cost, supply and timing of housing. The analysis must evaluate the implementation framework, including levels of mandated affordability and the types of options and incentives offered to encourage and facilitate compliance with the inclusionary requirements. This analysis should also address the relationship to State Density Bonus Law pursuant to Government Code section 65915. • State Density Bonus Law: The element must describe and analyze the City’s density bonus ordinance, including any discretionary actions or other related procedures for compliance with Government Code section 65915. 	<p>unit. For ADUs, consistent with State law, no on-site parking is required for sites near high-quality transit stations and car-share locations. Also as described, zoning regulations mandate parking reductions for projects within all transit-oriented districts; Pasadena has seven TOD areas for the Gold Line light-rail stations that extend across the city. In the Central District, where much of the new housing development is concentrated, options exist for mixed-use developments to take advantage of off-site parking structures.</p> <p>In sum, the City’s parking regulations are typical for those in a suburban community and responsive to reduced parking demands in TODs and more urbanized areas.</p> <p>Building Heights: Table B-5 in the draft Housing Element submitted for HCD review summarizes development standards for all multi-family and mixed-use zones outside of the Specific Plan areas. For multi-family housing, height limits are indicated in terms of feet rather than stories, thus providing developers with flexibility regarding how many stories to incorporate within the limits (e.g., placing a first story partially below grade, variable floor plate heights). Mixed-use building may extend four to five stories in height.</p> <p>Within the Specific Plans, maximum allowed heights vary (see Table B-6 beginning on page B-11). Except within the Central District, building height limits generally are 45 feet to 60 feet within ¼ mile of a rail station; this provides the flexibility described above. Within the Central District, the height map shown on page B-14 illustrates generous height allowances and the ability to use height averaging to attain additional building height.</p> <p>In summary, the building height regulations are flexible and do not constrain development, as evidenced by the many development</p>

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	<p>applications currently underway and recently approved—and the fact that developers build at or close to the maximum allowable densities.</p> <p>Specific Plans: Regarding the Specific Plan caps, please note the discussion included on page B-5 of the August 2021 draft Housing Element that all Specific Plans allow density caps to be exceeded through the conversion of nonresidential development allocations to residential units. These provisions allow for additional units beyond the caps and thus are not a constraint to housing development within the Specific Plan areas. Also, affordable units do not count toward the caps (except in the Fair Oaks/Orange Grove Specific Plan, which already has a high percentage of affordable units). Additional language has been added to emphasize this point.</p> <p>Inclusionary Requirements</p> <p>As described throughout the Constraints analysis, Pasadena has an inclusionary housing ordinance (IHO) that contributes significantly toward affordable housing production. The IHO has been in place since 2001 and was most recently amended in 2019 to increase the percentage of affordable housing from 15 to 20 percent. All projects proposing 10 more units are required to provide affordable housing on or off site, pay in-lieu fees, or contribute land for affordable housing. The relationship of the IHO program to density bonus regulations is described in detail on page B-17 of the Housing Element.</p> <p>Application and building permit date demonstrate that the IHO does not constrain development. As indicated in Table C-1 beginning on page C-5 of the Housing Element, current and recently approved applications will result in 1,277 new housing units, with almost all applications required by the IHO to provide affordable units. Table B in the City’s 2020 Annual Progress Report to HCD indicates that</p>

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	<p>building permits for 3,004 units were issued 2014-2020. The IHO does not constrain housing production.</p> <p>In January, 2021, City staff presented an analysis of the 2019 IHO amendments to the Planning Commission which concluded: “Based on this review, it appears that the amendments have been working relatively well and as intended. They have not slowed or stopped production of housing in the city, have not caused a sudden influx of more affordable housing concession permit projects with increased height, and in some cases, have been enough of an incentive for projects to choose concessions on the menu rather than seeking additional relief through SDBL [state’s density bonus law.]” See https://www.pasadenanow.com/main/developers-not-discouraged-by-inclusionary-housing-ordinance-amendment.</p> <p>Density Bonus</p> <p>The City’s density bonus ordinance is discussed throughout the Appendix B – Constraints and most specifically on page B-17. The text specifically notes that affordable units provided via density bonus regulations (and the IHO) do not count toward the Specific Plan unit caps, except with the North Fair Oaks/Orange Grove Specific Plan, which historically has had an overconcentration of affordable units.</p> <p>Also as described in the Housing Element, the City last updated its density bonus ordinance in 2006. Program 10 in the Housing Element calls for the City to update the density bonus ordinance to reflect current State law, which applies in the absence of current local regulations. While the City in the past required a public review process for density bonus concessions requests; that process has been discontinued to expedite density bonus requests.</p>

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<p><u>Fees and Exaction:</u> The element must describe all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. While the element summarizes impact fees, it should also list and analyze all relevant impact fees.</p>	<p>All City processing and impact fees are presented comprehensively in Tables B-8 and B-9 in Appendix B – Constraints. As described above regarding housing production, Pasadena approved permits for 3,004 new housing units from 2014-2020 (average of 429 units annually) with fees in place. As noted on page B-24, for affordable housing projects, building-associated fees are waived up to a maximum of \$125,000. Fees do not constrain housing production. Text has been added to the Housing Element that compares charges and fees in Pasadena to the nearby cities of Burbank and Glendale.</p>
<p><u>Local Processing and Permit Procedures:</u> The element provides a general overview of the City’s processing and permit procedures. However, the element must describe and analyze the development application process and all related procedures including design review and decision-making criteria for their impact on housing cost, supply, timing, and approval certainty. For example, the element should describe the procedures for a typical single family and multifamily development. The analysis should address the approval body, the number of public hearing if any, approval findings and any other relevant information. Finally, the element notes a development may trigger a Planning Commission or Design Commission review. The analysis should address what triggers this type of review and all components of the review that may impact housing supply, cost and approval findings.</p>	<p>Charts have been added to Appendix B: Constraints of the Housing Element to illustrate processing and permit procedures. Text has been added to address design review triggers and the impacts of conducting design review.</p>
<p><u>Zoning and Fee Transparency:</u> The City must address whether it has complied with new transparency laws requiring all zoning and development standards for each parcel to be provided on the jurisdiction’s website (Gov. Code, § 65940.1 (a)(1)(B)).</p>	<p>The City has a GIS system online that provides all zoning and development standards information for every parcel. The GIS site is easily accessed through the Planning Division’s home page: https://www.cityofpasadena.net/planning/planning-division/current-planning-and-zoning/. Also, Title 17, the Zoning Code, is available</p>

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	online via the same path. This information has been added to the Constraints appendix.
<p><u>Housing for Persons with Disabilities</u>: While the element briefly describes its reasonable accommodation procedures, it should further evaluate its reasonable accommodation criteria and process, including approval findings. For example, the element notes a process similar to a minor variance which involves findings related to hardship provisions that are not appropriate for providing reasonable accommodation and act as a barrier to housing for persons with disabilities. In addition, group homes for seven or more persons appears to be excluded from several zones allowing residential uses and subject to a conditional use permit. The element should evaluate these requirements as constraints and include programs as appropriate.</p>	<p>The text has been revised to indicate the current reasonable accommodation process may be considered time consuming and costly and that Program 16 calls for the program to be revised to comply with State law.</p> <p>Under the Transitional and Supportive Housing subheading, additional discussion has been included regarding group homes for seven or more persons. Also, Program 9 has been expanded to include residential care facilities.</p>
<p>6. Special Needs Housing</p> <p>The element includes some general quantification; however, the element should include analysis of households with special housing needs. The analysis should include, but is not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources. In addition, the element should address persons with disabilities by type, elderly households by tenure, permanent, seasonal farmworkers (e.g., USDA county level data) and the characteristics and trends of persons experiencing homelessness. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/large-families-female-head-household.shtml.</p>	<p>As required by statute, Appendix A: Community Profile/Housing Needs Assessment of the first draft, beginning on page A-9, included discussion of persons with disabilities, the elderly, large households, farmworkers, female-headed households, and persons experiencing homelessness. Table A-9 identifies the number of persons in each category and the percentage they represent of the overall population. The discussion also indicates poverty status and tenure, where such information is available. With regard to persons experiencing homelessness, the text identifies the number of individuals from the 2020 point-in-time count (and compares it to the 2019 count) and documents resources available to homeless persons.</p>

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	Text has been added to Appendix B: Constraints on Housing Production to explain seasonal farmworker needs at a regional level.
C. Housing Programs	
<p><u>1. Timelines and Commitment.</u> To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, specific commitment, and descriptions on how the program will be implemented. For example, programs to be revised with specific timelines include, but are not limited to Programs 2 (Northwest Pasadena), 3 (Housing Rehabilitation), 5 (Housing Design), 6 (Housing Sites), 14 (Rental Housing Assistance), 16 (Housing for People with Disabilities), 17 (Housing for Seniors), 18 (Family, Youth and Student Housing) and 19 (Homeless Services). Programs to be revised with specific commitment include but are not limited to:</p> <ul style="list-style-type: none"> • Program 7 (Mixed Use/TOD Strategy): The program must go beyond “assess” and include actions toward actual housing outcomes. • Program 10 (Regulatory Incentives): Program timing should be moved earlier in the planning period and revised as appropriate based on a complete analysis as described in Finding B5. • Program 11 (Alternative Housing Opportunities): Program timing should be moved earlier in the planning period (Consistent with Program 23) and actions should go beyond “review” and “evaluate” toward actual housing outcomes in the planning period. • Program 12 (Financial Assistance): Program actions should be added beyond “Look for additional opportunities...). • Program 15 (Affordable Housing Preservation): The program currently “plans” to monitor properties at-risk of converting to 	<p>Specific Timelines</p> <p>2 (Northwest Pasadena): The Northwest Program Office is dedicated to implementing both housing and economic development programs in Northwest Pasadena. The programs are indicated as ongoing because the programs noted are in place and will continue to be implemented throughout the housing element cycle. “Ongoing” reflects the timeline.</p> <p>3 (Housing Rehabilitation): The MASH program described exists today and is planned to continue throughout the housing element cycle; thus, the time frame is indicated as ongoing and no change is needed.</p> <p>5 (Housing Design): A timeline for objective design standards has been added (by early 2023).</p> <p>6 (Housing Sites): Timelines have been included for each program component.</p> <p>14 (Rental Housing Assistance): Timelines have been included for each program component where applicable. Long-time ongoing programs that will continue are indicated as “ongoing” since no specific timeline applies.</p> <p>16 (Housing for People with Disabilities): Language has been added to show commitment to simplifying the reasonable accommodation process by 2023. All other program components are shown as ongoing since they involve grant applications.</p>

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<p>market rate uses but should include specific commitment to carry out actions. In addition, the program should commit to comply with noticing requirements, assist with funding and support funding opportunities and coordinate with qualified entities to preserve at-risk properties.</p>	<p>17 (Housing for Seniors): Language has been added to apply a timeline for a possible shared housing program. All other program components are shown as ongoing since they involve funding housing construction and provision of services annually based on available funding.</p> <p>18 (Family, Youth and Student Housing): Most of the program components involve ongoing coordination with the local post-secondary education institutions and organizations providing support to foster youth; the “ongoing” time frame is appropriate. Language has been added to address the more specific program to identify incentives for 3+ bedroom units.</p> <p>19 (Homeless Services): Most of the program components involve ongoing annual efforts to secure funding for homeless service and re-housing programs; the “ongoing” time frame is appropriate since these efforts occur continuously. Language has been added to address the more specific programs to update the Ten-Year Strategy to End Homelessness and investigate a “Moving On” program.</p> <p>Program Commitments</p> <p>Program 7 (Mixed Use/TOD Strategy): As written in the draft Housing Element, the program call for the City to continue implementing existing incentives and strategies (such as reduced parking and increase height allowances) in mixed use and TOD areas—strategies that have resulted in substantial new housing development. The program calls for the City to “assess the effectiveness of the incentives on a bi-annual basis.” Current programs are producing actual program outcomes. The program establishes the City’s commitment to ensuring the programs are effective. Language has been added that the City will consider adjusting the incentives if future, ongoing assessment warrants such adjustment.</p>

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	<p>Program 10 (Regulatory Incentives): The target date for completing the Zoning Code and Specific Plan amendments has been moved from 2025 to 2024. Given the magnitude of the effort to complete updates for eight Specific Plans and the Zoning Code—and the staff time required—this target reflects a realistic target date (rather than sooner).</p> <p>Program 11 (Alternative Housing Opportunities): The time frame for completing targeted Zoning Code amendments to establish a Religious Institutions Ordinance and update the ADU ordinance has been moved from 2025 to 2023.</p> <p>Program 12 (Financial Assistance): The target for identifying a property or properties to be converted to market-rate to affordable housing has identified for 2023 (as well as ongoing, since the City will continuously look for opportunities and partners).</p> <p>Program 15 (Affordable Housing Preservation): The key objective has been revised to read:</p> <p style="padding-left: 40px;">Preserve all possible deed-restricted housing at risk of conversion during the planning period by: 1) conducting early outreach to property owners, 2) identifying partners to preserve the units, 3) complying with notification requirements, and 4) discussing with the City Council possible allocation of funds for preservation (balanced with other housing program priorities).</p>
<p><u>2. Sites Inventory.</u> As noted in Finding B4, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p>	<p>The sites analysis has been revised to address HCD comments regarding ADU contributions, the size of sites for the lower-income RHNA, the assumed yields based on actual projects, and documentation for reuse of nonvacant sites. The revised analysis continues to show that existing zoning can accommodate the RHNA for all income categories, with a buffer.</p>

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<p><u>3. Removal of Constraints.</u> As noted in Finding B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<p>The first draft of the element contained several programs to address removal of regulatory constraints:</p> <p>Program 5: Adoption of objective design standards</p> <p>Program 6: Allow residential uses on commercial zones</p> <p>Program 9: Streamline CEQA review, adjust standards for live/work, streamline the design review process, facilitate manufactured housing</p> <p>Program 10: Reduce parking regulations</p> <p>Program 16: Amend the reasonable accommodation procedure</p> <p>Program 23: Zoning Code updates</p>
<p><u>4. Affirmatively Further Fair Housing.</u> As noted in Finding B1, the element must include a complete analysis of AFFH. Based on the outcome of that analysis, the element must add or modify programs. Additionally, programs and actions need to be significant, meaningful, and sufficient to overcome identified patterns of segregation and AFFH.</p>	<p>Several new implementation programs/meaningful actions have been added throughout the Housing Plan; see track changes. Many of these actions pertain specifically to Northwest Pasadena.</p>
<p><u>5. ADUs.</u> Programs must be added or modified to include incentives to promote the creation and affordability of ADUs. Examples include exploring and pursuing funding, modifying development standards and reducing fees beyond state law, increasing awareness, pre-approved plans and homeowner/applicant assistance tools. In addition, Program 11 (Alternative Housing Opportunities) should be revised with a date earlier in the planning period and must monitor permitted ADUs and affordability every other year and take appropriate action such as adjusting assumptions or rezoning within a specified time (e.g., 6 months).</p>	<p>In Program 11, discussion has been added to highlight the pilot program that provides grants for the construction of ADUs covenanted as affordable housing. Implementation also calls for amending the ADU regulations to facilitate production. The time frame has been reduced from 2025 to 2023.</p>

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D. Quantified Objectives	
<p>While the element includes quantified objectives for the preservation of units at-risk of conversion to market rate uses, the objectives are far less than the number of units at-risk of conversion. Given the importance of preserving the existing affordable housing stock, the City should consider a higher objective for the planning period.</p>	<p>Approximately half of the 243 units at risk of converting to market rate by 2031 are owned by for-profit entities and are covenanted as affordable units within existing market-rate developments. The City has actively worked with non-profit owners to preserve those units, such as preserving the 114 units at 1070 N. Lake Avenue. However, the properties owned by for-profit entities will continue to be more difficult to preserve. One strategy would involve partnering with a non-profit housing provider to purchase long-term leases for the units and then rent them to qualifying households. The programs regarding at-risk housing have been strengthened as follows:</p> <ul style="list-style-type: none"> • Preserve all possible deed-restricted housing at risk of conversion during the planning period by: 1) conducting early outreach to property owners, 2) identifying partners to preserve the units, 3) complying with notification requirements, and 4) discussing with the City Council possible allocation of funds for preservation (balanced with other housing program priorities). • Continue activities to preserve market rate affordable housing through rehabilitation loans. Inform builders of the option to satisfy inclusionary housing ordinance requirements through acquisition/rehabilitation of rental properties.

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F. Public Participation	
<p>While the element includes a general summary of the public participation process, it should also summarize public comments and describe how they were considered and incorporated into the element. Further, the element should describe additional methods for public outreach efforts in the future, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. For additional information, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/getting-started/public-participation.shtml.</p> <p>In addition, HCD understands the City did not make the full element available with sufficient time to comment prior to HCD submittal. If so, by not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including revising the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The</p>	<p>The City notes that public engagement and input were extensive via four workshops, an online survey that had approximately 1,100 participants, four Task Force meetings, and study sessions (open to the public) with the Planning Commission and City Council. This participation and public comments are documented extensively in Appendix E and summarized in the Housing Plan.</p> <p>Public comments were considered by City staff, the Task Force, the Planning Commission, and City Council in the drafting of the Housing Element. The Task Force, Commission, and Council were all provided with public workshop summaries and all comments received via the survey, as well as any letters submitted outside of these processes. The Task Force in particular considered public comments in their discussions that directed crafting of the housing programs and implementing actions. For example, the suggestion to create a congregational housing overlay arose from public comment. City staff—Planning and Housing—reviewed both public comments and Task Force recommendation to prepare the draft Housing Element shared with the Commission and Council before sending the document to HCD in August 2021.</p> <p>To inform the public of housing programs, the Housing Department currently conducts targeted workshops for lower-income households on such topics as tenant protections, the MASH program, and ADUs. For example, the Housing Department convened workshops for the Pasadena Second Unit ADU Program on September 16-17, 2019 to provide potential applicants program information. Specifically, the program provides homeowners financial assistance to build an ADU through new construction or garage conversion. Assistance is also</p>

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<p>City’s consideration of public comments must not be limited by HCD’s findings in this review letter.</p> <p>Finally, HCD received comments with many meaningful and valuable suggestions related to the housing element. Comments ranged a variety of topics such as protection and preservation of affordable housing, prioritization of affordable housing, site capacity, AFFH, ADU estimates, lack of past progress in implementation such as place based strategies for community revitalization in northwest Pasadena, not enough sites for moderate income households, density caps in specific plans, lack of rezoning for housing on religious institutions sites, dedicated affordable housing money and lack of analysis and zoning to address the needs of people experiencing homelessness. Yet, the element includes no discussion of how these comments were considered or incorporated in the element. In future versions of the element, HCD strongly encourages the City to consider and address these comments, including revising the document as appropriate.</p>	<p>available to rehabilitate and bring up to code an existing unpermitted “granny flat” or illegal garage conversion.</p> <p>In 2019, the City initiated community outreach events for the program to update all Specific Plans. These outreach events include presentations and discussions on housing issues in the City. In 2020, the City held virtual community workshops and open houses from July 2020-December 2020. In 2021, public hearings began.</p> <p>While HCD was conducting its 60-day review for the draft Housing Element, the element remained available for public review and comment on the City’s website. Also, the Task Force used this time to meet five more times to strengthen and prioritize housing programs based in part on public comments. The Task Force had the benefit of reviewing HCD’s comment letter prior to providing its feedback.</p> <p>Text has been added to the Housing Plan public engagement summary to describe ongoing efforts and additional outreach moving forward.</p>