

2008-2014 Housing Element  
July 26, 2010

**Letter, April 23, 2010**  
**Department of Housing and Community Development**

**Attachment B**

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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April 23, 2010

Mr. Steve Mermell, Interim Director  
Planning and Community Development Department  
City of Pasadena  
175 North Garfield Avenue  
Pasadena, CA 91101-1704

Dear Mr. Mermell:

**RE: Review of the City of Pasadena's Revised Draft Housing Element**

Thank you for submitting Pasadena's revised draft housing element received on February 22, 2010 with additional revisions received on March 31, and April 13, 14, 15, and 19, 2010. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). The review was facilitated by communications with Messrs. John Poindexter, Planning Division Manager; Bill Trimble, Senior Planner; and Mark Hoffman, with The Planning Center.

The revised draft element addresses the statutory requirements described in the Department's February 19, 2009 review. For example, the element now identifies adequate sites to accommodate the City's regional housing need for lower-income households and includes innovative programs, such as Program 8D, "Consolidated Review for Affordable Housing," which streamlines approval of housing affordable to lower-income households. As a result, the revised draft element will comply with State housing element law (Article 10.6 of the Government Code) when adopted and submitted to the Department, pursuant to Government Code Section 65585(g).

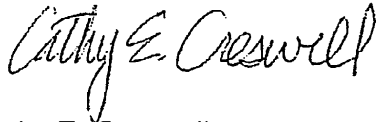
The determination of adequate sites to accommodate the regional housing need for lower-income households is based on sites in the inventory ranked 0, 1, or 2 with the capacity to develop at least 20 units per site. Given the majority of these sites are non-vacant, the City should monitor the effectiveness of these sites in accommodating housing for lower-income households.

In addition, Government Code Section 65863 specifies no local government action shall reduce, require or permit the reduction of, the residential density or allow development at a "lower residential density" for any parcel identified in the site inventory unless the local government makes written findings, the reduction is consistent with the adopted general plan, and the remaining sites identified in the element are adequate to accommodate the jurisdiction's share of the regional housing need. As defined by statute, "A lower residential density" refers to allowing fewer units on the site than were projected within the sites inventory of the housing element. The Department recommends Pasadena consider adopting a program to monitor approved development relative to capacity estimates in the housing element (see sample program enclosed).

Mr. Steve Mermell, Interim Director  
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The Department appreciates the effort and cooperation provided by Messrs. Trimble and Hoffman throughout the course of the review and looks forward to receiving Pasadena's adopted housing element. If you have any additional questions, please contact Robin Huntley, of our staff, at (916) 323-3175.

Sincerely,

A handwritten signature in cursive script that reads "Cathy E. Creswell". The signature is written in black ink and is positioned above the typed name.

Cathy E. Creswell  
Deputy Director

Enclosure

cc: Mark Hoffman, The Planning Center

**Sample Program: No net loss provisions, Government Code Section 65863**

**H-1 Action 1:** To ensure adequate sites are available throughout the planning period to meet the City's RHNA, the City will continue to annually update an inventory that details the amount, type, and size of vacant and underutilized parcels to assist developers in identifying land suitable for residential development and that also details the number of extremely low-, very low-, low-, and moderate-income units constructed annually. If the inventory indicates a shortage of available sites, the City shall rezone sufficient sites to accommodate the City's RHNA.

To ensure sufficient residential capacity is maintained to accommodate the RHNA need, the City will develop and implement a formal ongoing (project-by-project) evaluation procedure pursuant to Government Code Section 65863. Should an approval of development result in a reduction of capacity below the residential capacity needed to accommodate the remaining need for lower-income households, the City will identify and zone sufficient sites to accommodate the shortfall.

**Time Frame:** Development of evaluation procedure to implement Government Code section 65863 by July 1, 2010.

*Responsibility: Development Services*

*Funding Source: City Development Services Fund*

2008-2014 Housing Element  
July 26, 2010

## **Resolution to Approve 2008-2014 Housing Element**

**Attachment C**

RESOLUTION NO. \_\_\_\_\_

**A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF PASADENA  
ADOPTING THE 2008-2014 HOUSING ELEMENT OF THE  
COMPREHENSIVE GENERAL PLAN**

**WHEREAS**, the State of California Government Code at Article 10.6 (sections 65580 through 65589.8) states that the availability of housing is of vital statewide importance and directs the preparation, content, and adoption of housing elements; and,

**WHEREAS**, the City of Pasadena's 2008-2014 Housing Element is based on vision, priorities, and goals that were first identified in the Housing 2000 workshops, then incorporated in the 2000-2005 Housing Element, and later refined through numerous programs and meetings devoted to housing issues in the City, including the 2006 Housing Agenda for Action, and

**WHEREAS**, the Housing Element incorporates the comments of the public in a series of community meetings during 2008 and comments of the Planning Commission; and,

**WHEREAS**, the City of Pasadena submitted a draft Housing Element to the Department of Housing and Community Development of the State of California ("Department") and, after consultation between the City of Pasadena and the Department and after modifications to the Housing Element to address the Department's comments thereto, the Department informed the City of Pasadena that

the Housing Element as revised would substantially comply, when adopted, with the requirements of Article 10.6 (sections 65580 through 65589.8) of the Government Code; and,

**WHEREAS**, a Negative Declaration was prepared and circulated according to law, and the Planning Commission on June 23, 2010 recommended to the City Council that it adopt the Negative Declaration and the 2008-2014 Housing Element; and,

**WHEREAS**, the City Council adopted the environmental Negative Declaration on July 26, 2010; and

**WHEREAS**, the 2008-2014 Housing Element was the subject of a public hearing before the City Council on July 26, 2010.

**NOW, THEREFORE, BE IT RESOLVED** that the City Council of the City of Pasadena hereby adopts the 2008-2014 Housing Element of the Comprehensive General Plan, dated May 2010.

Adopted at the regular meeting of the City Council on the \_\_\_\_\_ day of \_\_\_\_\_, 2010, by the following vote:

AYES:

NOES:

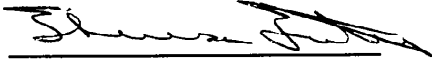
ABSENT:

ABSTAIN:

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MARK JOMSKY, CMC  
City Clerk

APPROVED AS TO FORM:



THERESA. E. FUENTES  
Assistant City Attorney

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