

Exhibit A

Pasadena 2021-2029 (6th Cycle) Housing Element HCD Comments Matrix Responses to Comments on Second Draft Housing Element July, 2022

HCD Review Comments on the Draft Housing Element Revised No. 2 in Letter Dated February 25, 2022	How HCD Comments Have Been Addressed in the proposed Housing Element
<p>A: Review and Revision</p> <p>The revised element provided an adequate 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). However, the element generally lacks an evaluation of the effectiveness of prior programs and an appropriate adjustment to goals, objectives, policies, and programs. Further, the element must still address 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>The Past Accomplishments Analysis in Appendix D has been substantially revised to include language describing program efficacy and reasons why a program has been continued, modified, or eliminated based on each program’s effectiveness during the fifth Housing Element cycle. This information was used to adjust goals, policies, and programs in the Housing Plan. As an example, the analysis of Program #3 beginning on page D-4 identifies that the Quadrennial Inspection and CRASH programs are highly effective for improving housing conditions, particularly for lower-income and senior households. In response, Program #3 in the sixth cycle element (beginning on page 30 of the Housing Plan) continues the program and establishes numeric goals for the number of units to be assisted. For Program #12 (see page D-13), the analysis concludes that updates to the City’s regulatory incentive programs are needed. In response, parallel Program #10 (see page 43 in the Housing Plan) calls for the City to update its density bonus ordinance and adjust parking requirements in the updated Specific Plans.</p> <p>The City very purposefully adjusted goals, policies, and programs to address prior efficacy. The City also relied upon input from the Housing Task Force. The Task Force reviewed and prioritized programs and considered public comments as part of the prioritization process; this direction was incorporated into the revised element.</p> <p>Regarding public comments, as part of the extensive public engagement process conducted for the draft Housing Element, the City considered all comments, including those contained in letters submitted to HCD. Those comments and suggestions that align with City program priorities, as reviewed by the Task Force, are reflected</p>

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	<p>in the programs. Those which do not align with City policy have not been included.</p> <p>Example comments from the many received from the public that are reflected in the element include:</p> <ul style="list-style-type: none"> ▪ “We need affordable housing dispersed throughout out city, which is a good reason to allow churches to have affordable housing built on their underutilized property. “ In response, see Program #11: Alternative Housing Opportunities. ▪ “Revise City zoning and parking regulations to encourage more affordable housing development.” In response, see Program #10 – Regulatory Incentives. ▪ “Need to make ADUs as affordable and simple to build as possible, including having the City provide preapproved plans.” In response, see Program #11: Alternative Housing Opportunities. ▪ “Need permanent supportive housing for families, who are underserved. Supportive housing tends to focus on single individuals.” In response, see Program #11: Alternative Housing Opportunities. <p>Example comments received from the public not reflected in the element include:</p> <ul style="list-style-type: none"> ▪ “Eliminate single-family zoning.” The City’s land use policy provides for zones that support a variety of housing types within a broad density range. Single-family zoning provides opportunities for residents to purchase and rent such housing if that is their preference. Changes in State law made by SB9 in 2021 provided flexibility to create additional units in single-family zones.

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	<ul style="list-style-type: none"> ▪ “Build housing over I-210.” The prospect of covering a freeway to create additional land for housing is intriguing but extraordinarily costly. During this housing cycle, the City has focused on near-term and the most practical means of encouraging and facilitating housing production. <p>The above information regarding the Task Force and public comment has now been included in the Housing Plan chapter under Public Engagement.</p>
<p>B: Housing Needs, Resources, and Constraints</p>	
<p>1. Affirmatively further[ing] fair housing (AFFH)</p> <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. While the City does incorporate comments regarding AFFH from Our Future LA Coalition, Abundant Housing LA, and Pasadena Affordable Housing Coalition, it must still provide more evidence of outreach conducted for AFFH and show how that local data is integrated into the overall AFFH analysis.</p>	<p>Appendix F, the AFFH analysis, has been augmented to provide the discussion and analysis requested. In particular, the text describes efforts undertaken for preparation of the recent <i>Analysis of Impediments to Fair Housing Choice</i>.</p>
<p><u>Other Relevant Factors:</u> The element was revised to include further 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 was also revised to include additional analysis of the effectiveness of efforts in Northwest Pasadena and programs were modified as needed. However, the element must still provide more information on City’s local</p>	<p>Additional research and analysis based on publicly available resources have been included. The analysis of the local preference begins on page F-59 and the monitoring meaningful action can be found on page F-85.</p>

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<p>preference policy and should also discuss the impacts of this policy on housing mobility on a regional level. The analysis should also further assess and address concerns that the policy perpetuates existing patterns of segregation within the City.</p>	
<p><u>Goals, Actions, Metrics, and Milestones:</u> While the element has been revised to include some actions in Appendix F (pp. 68-75), based on the outcomes of a complete analysis, these actions must be significant and meaningful to overcome patterns of segregation and foster more inclusive communities, including 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. Please see HCD’s prior review.</p> <p>Previous Comment:</p> <p>Goals, Actions, Metrics, and Milestones: 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 added a number of additional actions it will pursue to achieve the AFFH goals cited by HCD. See the new text in Appendix F and the targeted programs for the Northwest neighborhood that begin on page 28 of the Housing Plan chapter. The information has been converted into table form to show clear relationships between issues identified and actions the City will take. In particular, the City commits to the following:</p> <ul style="list-style-type: none"> • Conducting AFFH outreach annually via all media • Creating a fair housing informational video to run on the local access station KPAS • Conducting one workshop annually for community-based organizations serving the Northwest neighborhood • Creating metrics to measure progress toward fair housing goals, and reporting those in the Housing Element APR • Strengthening the City’s Tenant Protection Ordinance to guard against "renoviction" • Removing building caps in the Specific Plans to increase housing supply in high opportunity areas and TODs • Targeting at least 20 percent of CDBG public improvement funds to Northwest Pasadena • Modifying the Local Preference Ordinance to capture persons priced out within the past 10 years • Promoting acquisition/rehabilitation as an option in the IHO

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<p>2. Household Characteristics</p> <p><u>Extremely Low-Income (ELI) Households:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p> <p>Previous comment: <i>Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)</i></p> <p>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. Additional information has been added to the element beginning on page A-5 to analyze the needs of ELI households.</p>
<p><u>Housing Conditions:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p> <p>Previous comment: <i>Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)</i></p>	<p>Please see the information included on page A-8 that indicates the City has identified an average of 359 units annually in need of rehabilitation and/or replacement due to code violations. Through its proactive MASH and Quadrennial Rental Inspection programs, the City is able to identify and address substandard unit conditions continuously.</p>

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<p>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, 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>3. Sites Inventory.</p> <p><u>RHNA Progress:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p> <p>Previous comment:</p> <p>RHNA Progress: 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>The following information was provided in the December 29, 2021 response matrix and has now been integrated into the element to document the actual affordability of pipeline projects. As noted in the prior response, the sites table was updated in the second draft per HCD’s comment and has again been updated to reflect the most current information regarding affordability components of proposed and approved projects.</p> <p>Since submittal of the second draft Housing Element to HCD in December 2021, the City has continued to receive applications for housing development. As of March 2022, active applications were being processed or had recently been approved for 4,062 housing units. Of those, the number of affordable units verified are as follows: 1) very low income = 350 (8.6%), 2) low = 219 (5.4%), and 3) moderate = 427 (10.5%). Overall, affordable units represent 25 percent of currently active applications.</p> <p>The sites inventory database has been updated to include the additional information requested.</p>
<p>Realistic Capacity: While the element now supports capacity assumptions relative to maximum allowable densities, it still must</p>	<p>See the discussion beginning on page C-18 that documents residential projects replacing commercial uses on sites that allow 100 percent</p>

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<p>account for the likelihood of 100 percent nonresidential uses. For example, the element includes some reasons why residential might occur in these zones and selects a few projects from the past, it still must address the likelihood of 100 percent nonresidential uses. For example, the element should examine all development activity in the pertinent zones, examine how often 100 percent nonresidential uses occur and account for that likelihood in the calculation of residential capacity.</p>	<p>nonresidential uses. This trend 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.</p>
<p><u>Suitability of Nonvacant Sites:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p> <p>In addition, as noted in the prior review, 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>As of the end of November 2021, the City had eight active applications to replace existing single-unit residences in the RM-12 with multiple units. As of June, 2022, over 40 applications were on file to redevelop properties in the R-16, RM-32, and RM-48 zones with additional units. These are documented in new Table C-3.</p> <p>Regarding nonvacant sites as a whole, of the 3,905 new units either in the pipeline or approved as of the end of early 2022, virtually all sites are currently occupied by commercial or single-unit residential uses. See the discussion beginning on page C-15.</p>
<p><u>Replacement Housing Requirements:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p>	<p>Please see the discussion beginning on page C-22.</p> <p>Also, language has been added to Program 6 (Housing Sites) 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,</p>	<p>The requested information has been added to the sites inventory discussion beginning on page C-23.</p>

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<p>meeting statutory requirements, requires rezoning within three years. The element now clarifies which sites were identified in prior planning periods, but it must also, as noted in the prior review, 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><u>Small Sites:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p>	<p>Refer to the discussion on page C-13. 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 unless two or more adjacent small sites are in common ownership.</p>
<p><u>Environmental Constraints:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p>	<p>HCD may have overlooked that as noted in the City’s December 29, 2021, submittal to HCD, a thorough discussion of environmental constraints was added to the end of Appendix B and was part of the second draft element provided to HCD.</p>
<p><u>Infrastructure:</u> While the element now explains that procedures are available to grant priority water and sewer service to developments with units affordable to lower-income households, it must still clarify sufficient capacity to accommodate the RHNA as noted in the prior review.</p> <p>Infrastructure: 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-</p>	<p>Please refer to the discussion on page B-36 in Appendix B, Constraints.</p>

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<p>blocks/site-inventoryanalysis/analysis-of-sites-and-zoning.shtml#environmental.</p>	
<p><u>Accessory Dwelling Units (ADUs)</u>: As noted in HCD’s prior review, while the number of applications can 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. In response, the element continues to utilize applications in estimating the number of ADUs in the planning period. Please see HCD’s prior review for additional information.</p>	<p>The City has revised the sites inventory to only include approved ADU permits. Where the data are at odds with the APRs submitted previously, the City will submit updated APRs.</p>
<p><u>Electronic Site Inventory</u>: As noted in the prior review, 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 and submit an electronic version of the sites inventory. While the City has submitted an electronic version of the sites inventory, any future adopted versions of the element must also submit the electronic version of the sites inventory.</p>	<p>The City will continue to submit the standard form as noted.</p>
<p><u>Zoning for a Variety of Housing Types</u></p> <ul style="list-style-type: none"> • <i>Emergency Shelters</i>: The element generally was not revised to address this requirement. Please see HCD’s prior review. • <i>Emergency Shelters</i>: 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 	<p>Additional information regarding services available to homeless persons has been added to page A-12 in Appendix A (Needs Assessment).</p> <p>Regarding emergency shelters: Additional information has been included beginning on page C-22 of Appendix C: Housing Resources to report availability of sites for additional emergency shelters.</p> <p>An analysis of parking requirements for emergency shelters is included on page B-16 of Appendix B: Constraints. The requirements are not considered a constraint. Program 23 has been augmented to include updating emergency shelter regulations to reflect current laws, including the parking requirements.</p>

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<p>analyze development standards, including parking requirements which appear inconsistent with recent changes to law (AB 139).</p> <ul style="list-style-type: none"> • <i>Transitional Housing</i>: The element now includes a program that appears intended to amend zoning to comply with state law regarding transitional housing, but it does not address HCD’s prior finding. This Program (Program 9 – Removal of Constraints) should specifically amend zoning and comply with law, including addressing exclusion of these uses in lower density residential zoning districts as noted in the prior review. • <i>Transitional Housing</i>: 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. • <i>Employee Housing</i>: The element generally was not revised to address this requirement. Please see HCD’s prior review. • <i>Employee Housing Act</i>: 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 City of Pasadena’s 6th Cycle Draft Housing Element Page 7 October 11, 2021 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 	<p>The City had previously amended the Zoning Code to address transitional housing consistent with State law. That amendment, however, was inadvertently changed in a subsequent code amendment. Program 23 has been augmented to ensure that the proper use regulations for transitional housing are included.</p> <p>Program 23 has been revised to address employee housing with six or fewer residents and housing of 12 units or 36 beds.</p>

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<p>requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.</p>	
<p>4. Government Constraints</p> <p>Land Use Controls: The element generally was not revised to address this requirement. Please see HCD’s prior review. In addition, from the prior review, the element must address the following:</p> <ul style="list-style-type: none"> • <i>Specific Plans</i>: The element was not revised to analyze development caps in specific plans. Further, Program 9 (Removal of Constraints) does not appear to specifically commit to remove development caps. The element should include analysis and add or modify program as appropriate. • <i>Inclusionary Requirements</i>: The element generally was not revised to address this requirement. Please see HCD’s prior review. • <i>Inclusionary Requirements</i>: 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. • <i>State Density Bonus Law</i>: While the element includes Program 10 (Regulatory Incentives) to revise the City’s density bonus ordinance, the Program should include specific commitment to not subject requests under State Density Bonus Law to discretionary actions. 	<p>The Housing Element now includes action in Program 9 (Removal of Constraints) that commits the City to removing the development caps in the General Plan and Specific Plans (see page 43 in the Housing Plan chapter).</p> <p>The December 29, 2021, response matrix addressed at length the comments raised in the prior letter, particularly regarding parking, building heights, specific plans, the inclusionary ordinance, density bonus regulations, and density bonus. That information which was not directly reflected in the revised Housing Element is now included in the Housing Element. The prior information is included below for reference, and additional comments are provided as underlined text.</p> <p>Parking: The analysis of parking requirements begins on page B-15 (<u>now page B-17</u>) 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 unit. For ADUs, consistent with State law, no on-site parking is required for sites near public transit. 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>

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	<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 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><u>The City is in the process of updating all Specific Plans. The generous and flexible height regulations will remain and development caps will be removed.</u></p> <p>In summary, the building height regulations are flexible and do not constrain development, as evidenced by the many development applications currently underway and recently approved—and the fact that developers build at or close to the maximum allowable densities.</p> <p>Specific Plans: 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</p>

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	<p>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><u>However, the City notes that the Specific Plan caps may be considered as a constraint on housing development. Program 9 has been amended to direct revisions to these requirements (which the City has already accomplished).</u></p> <p>Inclusionary Ordinance: As described in the Constraints analysis, Pasadena has an inclusionary housing ordinance (IHO) that 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. Affordable units proposed under the IHO may qualify projects for a density bonus if they meet the requirements of both the IHO and state law. <u>New text has been included beginning on page B-18 to provide additional detail about the IHO and its impacts on the cost of housing.</u></p> <p>Density Bonus: 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. <u>The City is no longer requiring Affordable Housing Concession Permits to be a discretionary hearing/action.</u></p>

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<p><u>Local Processing and Permit Procedures:</u> The element generally was not revised to address this requirement. Please see HCD’s prior review.</p> <ul style="list-style-type: none"> Local Processing and Permit Procedures: The element provides a general overview of the City’s processing and permit procedures. However, the element must describe City of Pasadena’s 6th Cycle Draft Housing Element Page 8 October 11, 2021, 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>HCD appears to have overlooked narrative in the City’s December 29, 2021 submittal to HCD stating that extensive information was added to Appendix B: Constraints of the Housing Element to describe in detail processing and permit procedures. See discussion beginning on page B-29 of Appendix B. Text was also added to address design review triggers and the impacts of conducting design review.</p>
<p><u>Housing for Persons with Disabilities:</u> While the element now includes actions under Program 9 (Removal of Constraints) to remove constraints that inhibit residential care facilities for seven or more persons when the use operates as transitional and supportive, this Program does not address that these uses are excluded from residential zones and subject to a conditional use permit, unlike other residential uses. Please see HCD’s prior review for additional information.</p>	<p>Please refer to Program 9, the fourth bullet, on page 43 of the Housing Plan. The program commits the City to addressing this issue as part of the planned comprehensive Zoning Code update now underway.</p>

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<p>5. Special Needs Housing</p> <p>The element generally was not revised to address this requirement. Please see HCD’s prior review.</p>	<p>HCD appears to have overlooked the following information provided in the December 29, 2021, submittal documents for the second draft element:</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> <p>Text has been added to Appendix B: Constraints on Housing Production to explain seasonal farmworker needs at a regional level.” (See page B-21.)</p>
<p>C. Housing Programs</p>	
<p><u>1. Timelines and Commitment.</u> While the element revised several programs with specific commitment and timing, Programs 3 (Housing Rehabilitation), 16 (Housing for People with Disabilities) and 18 (Family, Youth and Student Housing) should still be revised with specific timelines. In addition, from the prior review:</p> <ul style="list-style-type: none"> • <i>Program 7 (Mixed Use/TOD Strategy):</i> The prior review noted the Program should include actions toward actual housing outcomes. In response, the Program now commits to “explore” adjustments to zoning. The Program should make a specific and clear commitment to 	<p>Specific Timelines</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>16 (Housing for People with Disabilities): Language has been added to show commitment to simplifying the reasonable accommodation</p>

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<p>adjust zoning and other mechanisms as appropriate to promote mixed use and transit-oriented development.</p> <ul style="list-style-type: none"> • <i>Program 12 (Financial Assistance)</i>: While the Program now commits to identify opportunities, it should also add discrete timing (e.g., annually) for pursuing state and federal funding. 	<p>process by 2023. All other program components are shown as ongoing since they involve grant applications.</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>Program Commitments</p> <p>Program 7 (Mixed Use/TOD Strategy): As written in the draft Housing Element, the program calls 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 evaluate the incentives in the Specific Plans as they are being updated.</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><u>2. Sites Inventory.</u> As noted in Finding B3, 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</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</p>

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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.	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><u>3. Removal of Constraints.</u> As noted in Finding B4, 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>Additional program language has been added to address:</p> <ul style="list-style-type: none"> ▪ Removal of Specific Plan caps (Programs 6 and 9) ▪ Removal of Waiver of Development Standards Permit (Program 9) ▪ Addressing transitional housing in lower density residential zones (Program 23)
<p><u>4. Affirmatively Further Fair Housing.</u> As noted in Finding B1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions accompanied by specific commitment, goals, and milestones to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs.</p>	<p>Several new implementation programs/meaningful actions have been added throughout the Housing Plan. Many of these actions pertain specifically to Northwest Pasadena (Program 2).</p>
<p>D. Public Participation</p>	

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<p>As noted in the prior review, the element should summarize public comments and describe how they were considered and incorporated into the element. Further, the prior review called for the application of additional methods for public outreach, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. Finally, in the prior review, HCD received comments with many meaningful and valuable suggestions related to the housing element and HCD strongly encouraged the City to consider and address these comments, including revising the document as appropriate. The City appears to not have taken any actions to address HCD’s prior finding. Please see HCD’s prior review.</p>	<p>Text has been added to the Housing Plan public engagement summary to describe ongoing efforts and additional outreach moving forward.</p> <p>Also, additional text has been included in Appendix E, beginning on page E-14, to indicate how public comments have been incorporated into the revised Housing Element. This includes responses to letters from OFLA dated 8/31//21 and YIMBY Law dated 7/27/21.</p> <p>The discussion also addressed the extensive work with the Housing Task Force to review public comments and prioritize programs.</p>