



Agenda Report

April 15, 2024

TO: HONORABLE MAYOR AND CITY COUNCIL

FROM: William K. Huang, Director of Housing

SUBJECT: PUBLIC HEARING: SUBMITTAL OF PUBLIC HOUSING AGENCY ANNUAL PLAN (2024) TO THE U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

RECOMMENDATION:

It is recommended that the City of Pasadena (the "City"), as Successor Agency to the Pasadena Community Development Commission, after a public hearing:

- 1) Find that the recommended action is exempt from the California Environmental Quality Act ("CEQA"), pursuant to State CEQA Guidelines per 15061 (b)(3), the "common sense" provision that CEQA only applies to projects that may have a significant effect on the environment; and
- 2) Approve the City's Public Housing Agency Annual Plan (2024), as attached to this report, and authorize the City Manager to execute any and all documents regarding its submittal to the U.S. Department of Housing and Urban Development.

BACKGROUND:

It is an annual requirement for the City of Pasadena ("City") to submit the Public Housing Agency Annual Plan ("Annual Plan") to the U. S. Department of Housing and Urban Development ("HUD") in order to remain eligible for funding for the Housing Choice Voucher ("HCV") program, commonly known as Section 8. The Annual Plan, along with the Five-Year Plan, make up the Public Housing Agency Plan ("PHA Plan"). The PHA Plan consists of a HUD template and required attachments, the most significant of which is the Administrative Plan. The Administrative Plan lays out the policies and procedures of the rental assistance programs. The PHA Plan utilizes a required format and is not a broader plan to address housing issues.

The current Five-Year Plan covers the period of 2020-2025 and was adopted by City Council on October 5, 2020. The Annual Plan 2024 describes the City's progress on

goals that were set in the current Five-Year Plan, as well as any significant amendments or modifications to policies or procedures for the HCV program. The HCV program administered by the City of Pasadena Housing Department (“CoPHD”, the name used by HUD to identify the City’s public housing agency) provides housing assistance to approximately 1,400 very low and low-income households. This represents assistance for approximately two and a half percent (2.5%) of the households residing within the City of Pasadena. For the current fiscal year 2024, the total federal appropriation for the HCV Program is approximately \$20.5 million.

ANNUAL PLAN OVERVIEW:

The Annual Plan 2024 describes the progress made on the goals and objectives set in the current Five-Year Plan. The table below summarizes progress on goals and selected objectives include the following:

GOALS:	OBJECTIVES:	PROGRESS:
<p>Improve the availability of safe, decent, and affordable housing.</p>	<p>Strengthen outreach to the landlord community.</p> <p>Increase the availability of rental vouchers by applying for special needs vouchers when available.</p> <p>Increase housing choice by monitoring of the payment standards in relation to average rents within the city.</p>	<p>Landlord incentives secured 39 units for households experiencing homelessness, brought 10 new landlords to the program.</p> <p>Working with Department of Children & Family Services to implement rental vouchers for former foster youth.</p> <p>Increased payment standard for rental vouchers, lowering rent burden for participating families.</p>
<p>Promote fair housing and equal opportunity.</p>	<p>Provide training to employees, owners, and residents through workshops and mailers.</p>	<p>Two workshops are scheduled for March and April 2024 for Pasadena landlords in partnership with the Housing Rights Center. Housing Department staff participated in fair housing training.</p>
<p>Ensure effective operations and program management.</p>	<p>Utilize technology to improve program access.</p>	<p>Working with the DoIT to develop an electronic filing system to decrease the</p>

		time spent maintaining paper files
--	--	------------------------------------

A draft copy of the Annual Plan 2024 is included as Attachment A. Section D of the Annual Plan 2024 does not contain any data because it is not required yet. It is a new section as of the Annual Plan 2022 reporting format and will be used to document strategies and actions to meet the goals outlined in the PHAs' Assessment of Fair Housing (AFH). However, HUD has not yet provided guidance on the development of an AFH and has not required its submittal. Thus, the CoPHD is not required to complete this section.

ADMINISTRATIVE PLAN UPDATES:

The Administrative Plan was updated to incorporate changes required by the Final Rule implementing Sections 102 & 104 of the Housing Opportunities Through Modernization Act (HOTMA) of 2016. On February 14, 2023, HUD published a final rule implementing Sections 102 and 104 of the HOTMA Act of 2016. These sections make changes to federal regulations addressing income, participant eligibility reexaminations, maximum asset limits and asset exceptions. Many of the provisions of HOTMA are intended to streamline administrative processes and reduce burdens on PHAs, thereby also reducing burdens on participants. Information about specific updates to the Administrative Plan is included as Attachment B.

COUNCIL POLICY CONSIDERATION:

The PHA Plan 2024 advances Policy HE-3.6 in the City's Housing Element (2021-2029), which calls for the City to "support the provision of rental assistance for residents earning lower incomes, including persons with special needs consistent with City preference and priority categories and fair housing law."

The Annual Plan 2024 is also in agreement with the following City-approved program plans and documents:

- Five-Year Consolidated Plan (2020-2024)
- Rental Assistance Program Policies & Procedures

PUBLIC REVIEW AND COMMENTS:

The Annual Plan 2024 was reviewed by the Resident Advisory Board (RAB) at its meeting of February 6, 2024. The RAB, which is comprised of Section 8 HCV Program participants, recommended that the Annual Plan 2024 be approved by the City Council. It was then presented at a meeting on March 19, 2024 to which all rental assistance program participants were invited and encouraged to provide input and comments. The nineteen participants in attendance were supportive of the Annual Plan 2024 and had no recommendations.

Copies of the Annual Plan 2024 have been made available to the general public on the Housing Department website for a public review and comment period beginning February 7, 2024 through the present, as required by HUD. Public notices of the City public hearing were posted in English, Spanish, and Armenian on the Housing Department website on February 29, 2024, and published in the Pasadena Journal on February 29, 2024.

ENVIRONMENTAL ANALYSIS:

The action proposed herein is exempt from the California Environmental Quality Act (CEQA), pursuant to State CEQA Guidelines Section 15061 (b)(3), the “common sense” provision of CEQA which applies to activities which may have the potential for causing a significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA. The submittal of the Public Housing Agency Annual Plan to HUD will not have a significant effect on the environment and, hence, is not subject to CEQA.

FISCAL IMPACT:

Submission of the Annual Plan 2024 will have no direct fiscal impact on the General Fund. Its submission will ensure compliance with HUD-stipulated regulations for the City's receipt of federal funds in excess of \$20.5 million to administer and provide HCV rental subsidies.

Respectfully submitted,



WILLIAM K. HUANG
Director of Housing
Department of Housing

Prepared by:



Anne Lansing
Housing Assistance Officer

Approved by:



MIGUEL MÁRQUEZ
City Manager

ATTACHMENT A: PHA Annual Plan (2024)

ATTACHMENT B: Proposed changes to Administrative Plan