

Housing Pasadena 2021-2029

Introduction

The City of Pasadena is a thriving community of 141,000 residents, many of whom have lived here for generations and others who continue to move to the City attracted by its diverse neighborhoods, broad jobs base, quality public services, ready transit access, and beautiful backdrop of the San Gabriel Mountains. Pasadena has been referred to as a city on the world stage—sharing its qualities with an international television audience every January 1—but with smaller-scale community experiences that residents find in its many distinctive neighborhoods.



These qualities continue to distinguish Pasadena as one of the most livable communities in California.

In Pasadena's neighborhoods, you can find homes of almost any configuration, size, and architectural style. And in an increasingly difficult housing market, the City has been a leader in facilitating production of affordable housing—with affordability extending to middle-income households that previously had few housing assistance programs available to them. However, conditions throughout California have created a housing market increasingly unaffordable to people of modest means, with lower-income households unable to find decent housing near their jobs or in the communities where their families have lived for generations. This housing crisis threatens to dilute the richness of communities like Pasadena that benefit from diversity.

For many decades, federal, and State housing legislation has been based on the goal of a decent home and suitable living environment for every American. Homes provide more than just shelter; decent housing contributes to our well-being by providing a stable and safe environment for children to grow up, parents to raise families, and seniors to retire in safety and security. The environment or neighborhood in which housing is placed also provides the context where interactions important to a community can take place.

City leaders, staff, and community members have long been at the forefront of housing policies and programs, not only in the San Gabriel Valley but in Southern California as a whole. In 2000, Pasadena was one of the first communities to develop a housing vision that expressed its commitment to housing its residents.

All Pasadena residents have an equal right to live in decent, safe, and affordable housing in a suitable living environment for the long-term well-being and stability of themselves, their families, their neighborhoods, and their community. The

housing vision for Pasadena is to maintain a socially and economically diverse community of homeowners and renters who are afforded this right.

The 2021–2029 Pasadena Housing Element continues the work to achieve this vision and to move beyond statutory requirements. The City is committed to opening doors for people of all income levels, at all stages in their lives, and to creating programs that demonstrate innovation and leadership.

Required Scope of the Housing Element

California law requires that every city and county develop housing programs to address existing and future housing needs of their residents. To comply with State law and achieve its vision of providing suitable living environments for all residents, the City of Pasadena has prepared housing elements since the requirement was adopted in 1969. The housing element is a mandated chapter of the Pasadena General Plan and addresses the production, maintenance, and improvement of housing, as well as ensuring equal access to housing for all persons. This housing element covers an eight-year planning period from 2021 to 2029.

The detailed statutory requirements for preparing a housing element are contained in the California Government Code (sections 65580–65589.8). In accordance with State law, the housing element must include: 1) an identification and analysis of its existing and projected housing needs; 2) an analysis of the various governmental and non-governmental constraints to meeting that need; and 3) a series of goals, policies, and scheduled programs to further the development, improvement, and preservation of housing.

This housing element consists of two sections: Housing Framework and Appendices. The Housing Framework sets forth the housing concerns and issues in Pasadena, followed by the goals, policies, programs, and resources to address those issues. The Appendices support the Housing Framework and address specific statutory requirements as follows:

- **Appendix A: Housing Needs.** This includes an analysis of demographic, economic, social, and housing characteristics of Pasadena residents and an assessment of current and future housing needs in the community associated with population and employment growth and change.
- **Appendix B: Constraints Analysis.** This includes an analysis of potential governmental constraints that affect the development, maintenance, and improvement of housing for all income groups and people with disabilities, commensurate with the City’s identified housing needs.
- **Appendix C: Housing Resources.** This includes an inventory of resources available to address the City’s housing needs, including available land to accommodate new housing, financial resources to support program efforts, and administrative capacity to manage housing programs.

- **Appendix D: Program Evaluation.** This includes an evaluation of current housing programs and accomplishments in addressing the housing needs identified in the 2014–2021 Housing Element.
- **Appendix E: Community Inputs.** This includes the input from community engagement initiatives conducted for this Housing Element update. Although the City lacks resources to implement all initiatives in the Housing Element, this appendix is a resource to draw upon for creative housing solutions over a longer planning horizon.
- **Appendix F: Affirmatively Furthering Fair Housing.** State Housing Element law requires a thorough analysis of any patterns of discrimination in the provision of housing. The analysis in this section is coupled with programs in the Housing Plan to forward meaningful actions to address fair housing issues identified in the analysis.



Related Plans

Pasadena's 2021–2029 Housing Element is related to local planning efforts and others mandated by the State of California and the federal government. The following describes these documents and how the City will maintain consistency with each of them.

- **General Plan Housing Vision.** Pasadena's General Plan establishes eight guiding principles: 1) growth targeted to the Central District, Transit Villages, and Neighborhood Villages; 2) historic preservation; 3) economic vitality; 4) social, economic, and environmental sustainability; 5) circulation without cars; 6) regional prominence and leadership; 7) robust community participation; and 8) educational commitment. The City's Housing Vision to maintain a socially and economically diverse community of homeowners and renters is consistent with the General Plan guiding principles.
- **General Plan Consistency.** In 2015, the City comprehensively updated the Land Use Element. The land use plan includes extensive accommodation of mixed-use development within the Central District, areas surrounding Metro light rail stations, and neighborhood villages. This approach creates greater capacity for new residential uses. To implement land use policy, the City is updating seven existing specific plans, creating a new specific plan for the Lamanda Park area, and undertaking targeted zoning code amendments. This Housing Element reflects and responds to the updated Land Use Element regarding targeted areas for housing growth and allowed densities; the specific plans and zoning code will facilitate housing production. The City will maintain consistency between this element and other General Plan elements by reviewing those elements and determining whether any focused amendments are required.
- **City of Pasadena Housing Plans.** To maintain eligibility for receiving federal Community Development Block Grant (CDBG) funds, HOME Investment Partnerships program grant, Emergency Solutions Grant, and associated monies, Pasadena prepares a consolidated plan on a five-year cycle. Pasadena's Consolidated Plan was last revised for the 2015–2019 planning period. The City also prepared its 2020 Analysis of Impediments to Fair Housing Choice and Ten Year Plan to End Homelessness. The housing, community development, and economic needs identified during those efforts and the program commitments made are consistent with those in the 2021–2029 Housing Element.
- **Water and Sewer Services.** The Pasadena Water and Power Department provides water service to the Pasadena community. Sewer services are provided by the Sanitation District of Los Angeles County and the Pasadena Public Works Department. The City transmitted this housing element to these agencies to allow for population projections to be incorporated into their plans. This allows purveyors to plan for

infrastructure and set priorities to serve affordable housing—as required under Government Code section 65589.7—should a shortfall in water or sewer service occur.

- **Disadvantaged Unincorporated Communities.** As required by SB244, cities are required to amend their land use element to address provision of services to disadvantaged communities within their sphere of influence. According to the Los Angeles County Local Agency Formation Commission, Pasadena does not have disadvantaged communities under the definition specified in SB244 within its sphere of influence. Therefore, the City is not required to amend the General Plan to address this legislation.



Terms and Acronyms

This Housing Element uses many terms and acronyms specific to Housing Element law. While the City has looked to minimize use of acronyms to make the document more accessible, the following definitions are provided for terms and acronyms used for purposes of expediency.

AFFH – Affirmatively Furthering Fair Housing

Refers to the 1968 Fair Housing Act’s obligation for State and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability, or familial status.

AI – Analysis of Impediments to Fair Housing Choice

A document required by the federal government for the review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. The AI serves as the basis for fair housing planning, provides essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

AMI – Area Median Income

The Area Median Income (AMI) is the midpoint of a region’s income distribution; half of families in a region earn more than the median and half earn less. Related to housing policy, the U.S. Department of Housing and Urban Development (HUD) and California Housing and Community Development Department (HCD) both define and release income thresholds every year, by household size, that determines eligibility for affordable housing.

CDBG – Community Development Block Grant

A grant program administered by the U.S. Department of Housing and Urban Development that provides federal grants directly to larger urban cities and counties for activities that benefit low- and moderate-income individuals, eliminate blight, or address a serious and immediate threat to public health and welfare. States distribute CDBG funds to smaller cities and towns. Grant amounts are determined by a formula based upon need.

CEQA – California Environmental Quality Act

A State law requiring state and local agencies to assess the environmental impacts of public or private projects they undertake or permit. Agencies must mitigate adverse impacts of the project to the extent feasible. If a proposed activity has the potential for a significant adverse environmental impact, an Environmental Impact Report (EIR) must be prepared and certified as legally adequate by the public agency before action on the proposed project.

CHAS – Comprehensive Housing Affordability Strategy

A plan prepared by State or local agencies as a prerequisite for receiving assistance under certain U.S. Department of Housing and Urban Development programs.

CHDO – Community Housing Development Organization

A private nonprofit organization certified by the State that meets federal criteria to receive HOME Investment Partnership Program (HOME) funds. A minimum of 15 percent of total HOME funds provided to each state are reserved for CHDOs.

HCD – California Department of Housing and Community Development

A State agency that administers State housing programs and is responsible for review of the Housing Element for compliance with law. HCD also administers the federal HOME and CDBG programs on behalf of jurisdictions that are not directly assisted by HUD.

HOME – HOME Investment Partnership Program

A federal housing program that provides formula grants to States and localities. Communities use the grants (often in partnership with local nonprofit groups) to fund a wide range of activities. These include building, buying, or rehabilitating affordable housing for renters and homeowners, and providing direct rental assistance to low-income people.

HUD – U.S. Department of Housing and Urban Development

A federal, cabinet-level department responsible for overseeing, implementing, and administering U.S. government housing and urban development programs.

LIHTC – Low Income Housing Tax Credit Program

A federal housing subsidy program that gives tax credits or reductions in federal income tax liability as incentives for investment in affordable housing projects. The owners of LIHTC projects receive tax credits each year for 10 years. The program is often used by limited partnerships made up of nonprofit developers that build and manage the projects (general partners) and for-profit passive investors (limited partners) who receive shares of the project's tax credits. The federal government allocates tax credit amounts to states based on population. In California, tax credits are awarded by the California Tax Credit Allocation Committee (CTCAC) in the State Treasurer's Office.

MRB – Mortgage Revenue Bonds

A mortgage revenue bond is a type of municipal tax-exempt bond issued by state and local governments through housing finance agencies to help finance low- and moderate-income housing for first-time qualifying homebuyers. MRB mortgages are generally restricted to first-time homebuyers who earn no more than the area median income (AMI).

RHNA – Regional Housing Needs Assessment

A determination by a council of governments (or by the California Department of Housing and Community Development) of the existing and projected need for housing within a region. The RHNA process numerically allocates the future housing need by household income group for each locality within the region. This housing allocation must be reflected in the locality's Housing Element of the general plan.

SCAG – Southern California Association of Governments

SCAG is a Joint Powers Authority under California law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization and under State law, as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles.

TOD – Transit-Oriented Development

Moderate to higher-density development, located within easy walk of a major transit stop. TOD generally has a mix of residential, employment, and shopping opportunities designed for pedestrians. TOD can be new construction or redevelopment of one or more buildings whose design and orientation facilitate transit use.

Public Engagement

California law requires local governments to engage the public in the development of the Housing Element. Specifically, Government Code section 65583(7) states “that the local government shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” State law does not specify the means and methods for participation; however, it is generally recognized that the participation must be inclusive.

Pursuant to one the General Plan guiding principles, the City is committed to engaging the community in defining local housing needs and discussing creative ways to address them. Public engagement and input were extensive via four workshops, an online survey that had approximately 1,100 participants, 12 Task Force meetings, and study sessions (open to the public) with the Planning Commission and City Council. This participation and public comments are documented thoroughly in Appendix E.

Preparation of this Housing Element included the following public engagement opportunities:

Website. The City hosted a Housing Element webpage on the Planning & Community Development Department’s landing page (on the City of Pasadena website). Information available included Housing Element background materials, presentations and summaries from community workshops and Task Force meetings, and the draft housing element for public review.

Housing Task Force. In March 2021, Mayor Victor M. Gordo announced the formation of a Housing Task Force, with its first charge being to advise on development of Housing Element programs. The Task Force met three times during initial Housing Element preparation (via videoconference due to COVID-19 restrictions on public gatherings) and 12 times in total through April, 2022. All Task Force presentation materials and summaries were posted on the City’s Housing Element webpage.

The Task Force 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.

While HCD was conducting its 60-day review for the draft Housing Element, the Task Force used this time to meet four more times to strengthen and prioritize housing programs based on public comments. The Task Force reviewed all comment letters submitted throughout the process and used the content of those letters to create a priority matrix of programs. Also, the Task Force had the benefit of reviewing HCD’s comment letter on the first draft element.



Additional Task Force meetings, open to the public, were held on March 16, March 30, and April 6, 2022 to review additional comments from HCD and the public. Task Force members considered not just the materials presented regarding HCD comments but also letters from the Pasadena Housing Coalition and other housing interest groups. Through a deliberative process, the Task Force identified additional programs to include in the third draft of the Housing Element. Those discussions were addressed through further revisions to the draft Housing Element.

Community Survey: To reach a broad constituency, the City prepared an on-line Housing Element survey, available in both English and Spanish that was accessible from mid-May to mid-July 2021. City staff also provided paper versions at key City facilities. Over 600 persons participated, responding to multiple-choice questions and providing detailed, thoughtful responses to open-ended questions. The City advertised survey availability via social media platforms, email blasts, newspaper advertisements, and direct contact with numerous community groups.

Community Workshops. Two community-wide workshop series were conducted, with each series offering an English version and a Spanish version. The first series occurred April 15 and 22, 2021, and the second on June 2, 2021. These workshops were extensively advertised via Council district contact lists, social media, email blasts, and direct outreach to over 35 community-based organizations, including churches and similar institutions that have deep reach into the community. Because of restrictions on public gatherings imposed by COVID-19, all events were held online. However, this platform allowed many more people to participate than the City typically experienced for in-person events, with over 100 participants at the first workshop series and approximately 50 participants at the second workshop. Participants' input was recorded on a digital whiteboard as shown in the exhibit on page 12.

Planning Commission and City Council Study Sessions. In May through August 2021, Planning staff conducted three study sessions with the Planning Commission and one with the City Council to review ideas and programs for the Housing Element prior to submitting the draft to HCD for review. The Commission and Council reviewed and considered inputs from the Task Force meetings, community survey, and community workshops. Following additional Task Force meetings in March and April of 2022, the Planning Commission conducted a study session on April 27, 2022 to hear from the Task Force regarding its further recommendations. Members of the public attended the session and provided comments.

Public Hearings. The City conducted public hearings on the Housing Element in June and July of 2022.

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. Task Force members 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 that was shared with the Commission and Council before sending the document to HCD in August 2021 and as part of subsequent submittals. Other examples of public recommendations and the City’s responses in the Housing Element include:

- *Making it less costly and time intensive to develop ADUs:* This element commits the City to continuing the pilot program to fund ADU construction for properties owners covenanting the units as affordable housing.
- *Using Caltrans’ houses for affordable housing:* This element includes a program to explore the purchase of Caltrans I-710 properties for creative housing types for lower-income and special needs households.
- *Allowing housing in commercially zoned areas:* Program 6 directs amendments to the Zoning Code to allow housing in commercial zones, where consistent with General Plan objectives.
- *Adaptive reuse of nonresidential buildings:* Program 6 also calls for the City to incentivize the adaptive reuse of nonresidential buildings for residential uses.
- *City actions to preserve naturally occurring affordable housing:* The City has partnered with The California Statewide Communities Development Authority (a joint powers authority) to set aside 513 units in the Hudson and Westgate apartment developments for low- and moderate-income households. Program 12 calls for similar efforts to continue as funds are available.

Actions to address fair housing issues: Appendix F provides a comprehensive list of meaningful actions the City will take to ensure all residents have access to affordable, clean, and safe housing. Program 2 specifically addresses the needs of Northwest Pasadena, an area historically underserved. Throughout development of the Housing Element and on an ongoing basis, the Housing Department conducted 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 available to rehabilitate and bring up to code an existing unpermitted “granny flat” or illegal garage conversion.

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

Housing Plan

and open houses from July 2020-December 2020. Public hearings for the Specific Plans began in 2021 and continued through 2022/23.

PASADENA

Agenda
- Introductions
- About the Housing Element
- Pasadena's Housing Needs
- Discussion

Housing Element: Workshop #1
Thursday, April 15, 2021
6:00 - 8:00 PM

Key Themes

What are the major housing issues and challenges in Pasadena today and in the future?

What types of housing are needed in the community?

Where should new housing be located in Pasadena?

Additional Questions and Comments

Comments from participants the first workshop were captured on a digital white board. Appendix E contains summaries of all comments from all community engagement activities.

Framing the Challenge

Pasadena’s 2021–2029 Housing Element has been prepared during a unique and challenging period. Foremost, the COVID-19 pandemic and resulting economic shutdown caused many people to lose their jobs, thus significantly affecting their ability to pay rents and mortgages. Supply chain disruptions drove up the cost of building materials, making it more expensive to build housing and deliver new units to the market. Housing prices continued to rise. Interestingly, however, Pasadena experienced substantial housing construction, much of it likely pent up from long-existing building demand and tied to construction loans made before COVID-19 erupted. The impacts of COVID-19 piled onto the housing challenges many people faced before 2020 began, which they identified during community workshops and through the Housing Element: a lack of affordable housing, too few units for large families, rising rents, a shortage of housing for special needs individuals, and City permits and processes that add to the cost of building new homes.

Housing and Neighborhood Change

A most-unusual housing market continued to affect Pasadena and all of California into the 2010s and 2020s. The housing crisis and Great Recession that began in 2007/2008 became a distant memory as housing prices rebounded quickly, and housing costs showed continued escalation through the pandemic. The underlying housing issues from 10 years ago—and primarily underproduction to meet pent-up demand—remain. Pasadena’s ability to further its housing vision depends upon its success in addressing the following:

- **High Housing Costs.** During the 2000s, Pasadena’s housing prices have soared. As of May 2021, the median price of a home was \$1.1 million, up almost 19 percent from 2020.¹ According to RENTCafe, the average rent payment for a two-bedroom apartment was \$2,463 per month, one percent higher than the previous year. The income required to afford housing is still above moderate household incomes.
- **Housing Overpayment.** As housing prices have increased faster than household income, the affordability crisis continues to worsen. In 2017, 56 percent of all Pasadena households experienced housing cost burden, meaning more than 30 percent of household income was spent on rent or a mortgage. This degree of overpayment means that many people face having to cut back severely—or forego—spending on healthcare, education, and other life needs.
- **Housing Quality.** Overall, Pasadena’s housing stock is in good condition. However, certain neighborhoods still have many older homes in need of maintenance and repairs. Older homes (pre-1970s) may have lead-based paint, asbestos, and other conditions that require remediation

¹ Redfin.com. Accessed June 22, 2021.



upon remodeling or simply to create a healthier indoor environment. The City's Presale Certification Inspection program provides a means to address major life and safety code corrections, as does the Quadrennial Inspection Program for multi-family units. Continuing such programs allows housing for people of all-income levels to be maintained in good condition.

- **Equal Housing Access for All People.** Pasadena offers a quality of life that continues to attract new residents and investors looking to profit from the successful local housing market. Pasadena does not view housing as a commodity. Housing is a basic human need and right. Every person deserves access to decent, affordable homes. Housing policies and programs must recognize and respond to very specific housing needs in Pasadena, not just for the eight years covered by this Housing Element but over a longer planning horizon. Avoiding displacement, housing the unhoused, creating ownership opportunities, making it easier for essential workers to live and work in the community, providing tenant protections: these represent goals that will strengthen the City and provide places where people can thrive, feel safe, and contribute to Pasadena's continued success.

Demographic Change

Pasadena completed its fifth cycle Housing Element update in 2014, just as the country and region were slowly emerging from the Great Recession brought about by the housing mortgage crisis and resulting economic impacts. Since that time, the housing market has rebounded significantly, due in part to demographic changes and shifts in housing preferences among young adults. Some of the key demographic changes now affecting the housing market are described here.

- **Continued Aging of the Baby Boom Generation.** According to U.S. Census data, between 2010 and 2020, Pasadena's population increased by just over 7,200 residents, to a total of 144,842 residents. The proportion of residents 65 years of age or older grew by two percent and now represents about 16 percent of all residents. This age group captures the oldest of the Baby Boomer generation and those in the 60 to 65 age range who contribute to the number of residents nearing retirement age. While many older residents may wish to stay in their current homes, others may wish to move to smaller units in Pasadena or relocate to make their retirement incomes stretch farther in more affordable cities.
- **Race and Ethnic Change.** Over the several decades preceding 2010, Pasadena's ethnic composition and distribution changed very little, with Whites and Hispanics representing about 70 percent of the population and Blacks around 10 percent. Since 2010, the White population declined four percent and Black only one percent, with parallel increases in Hispanics by one percent and Asian/Pacific

Islanders by four percent. Over this 10-year period, the change has not been dramatic, particularly in recognition that these latter two groups are increasing proportionally throughout San Gabriel Valley cities.

- **Increasing Household Income.** In 1990, the median household income in Pasadena was equal to the median household income of Los Angeles County as a whole; 20 years later it grew to 125 percent of the County's median. In 2018, that trend persisted, with the Pasadena median income 123 percent that of the County. With respect to lower-income residents, they make up 40 percent of all households which is comparable to the share over the last two decades. It is important to note that 15.7 percent of residents in Pasadena live in poverty (per federal criteria). These latter two data points illustrate the critical need for more affordable housing.
- **Special Needs.** The City of Pasadena continues to have a large resident population with special housing needs. This includes seniors, large families, people with disabilities, people who are unhoused, college students, and transitional at-risk youth. Regardless of the broader demographic trends at work, special needs groups in Pasadena continue to be one of the largest groups in need of affordable housing.

Balancing Goals and Resources

Throughout California, people face challenges to finding decent, affordable housing for many reasons: high housing costs; a multitude of lower-paying jobs in the consumer services, tourism, and agricultural industries; and an acute lack of new housing production over the past several decades. The State Department of Housing Community Development (HCD), in assessing statewide housing needs for the sixth housing element cycle identified a need for 1.3 million new homes in the six-county region Southern California region (not including San Diego County)—with about two-thirds representing not growth demand but existing need due to chronic housing under-production.

Pasadena has long recognized the demand, and the City's more recent history has been marked by forward-thinking housing policy, with programs implemented by partnerships between many City agencies and numerous community organizations and other government agencies. Even with the loss of redevelopment in 2012, production of affordable housing has proceeded, largely because of the City's inclusionary housing policies and the success of nonprofit homebuilders in acquiring suitable properties and securing grant and loan funding to provide housing in this high-resource area. But as many people will report, the production is never enough. The gap between household incomes and housing costs—either to rent or buy a home—means that many long-time residents and others looking to locate to Pasadena cannot afford to live here.

In 2020-2021, the COVID-19 pandemic added new pressures. Many residents lost their jobs as businesses were forced to shut down. Unable to pay rent or mortgages, people mostly relied on federal and State payments and programs when assistance was available. City revenues declined due to loss of sales tax

and all-important transient occupancy taxes collected from visitors. For the first time since World War II, Pasadena was effectively closed on New Year's Day in 2021, with no Tournament of Roses Parade or Rose Bowl game. But interestingly, during the pandemic year, local housing construction continued apace.

The City continues to recover from COVID-19 impacts and continues its commitment toward housing. The State legislature continues to create new housing mandates that Pasadena steps forward to meet. The following goals, policies, and programs, demonstrate Pasadena's leadership and resolve to proactively address the community's housing needs.

Housing Plan

The Housing Element vision, goals, and policies are achieved through the implementation of the housing programs described in this section, organized into five overarching goals: 1) maintaining housing and neighborhood quality, 2) increasing housing diversity and supply, 3) providing housing assistance, 4) addressing households with special needs, and 5) affirmatively furthering fair housing.

Quantified Objectives

To maintain consistency among planning efforts and address State law, quantified objectives for all housing programs are provided, where possible. Quantified objectives can refer to the number of households served, housing units built or preserved, or other units of service planned for from 2021–2029. The quantitative objectives are based on current funding known today. Should funding change, the achievable objectives would change as well. Table HE-1 summarizes quantified objectives for these programs.



Table HE-1: Quantified Housing Objectives

Program Area*	Income Category					Totals
	0–30 % of MFI	31–50% of MFI	50–80% of MFI	81–120% of MFI	120%+ of MFI	
Housing Construction ¹	4,472			2,036	4,485	10,953
Housing Rehabilitation ²	0	0	64	0	0	64
Rental Housing Preservation ³	0	0	113	0	0	113
Homeownership Assistance ⁴	0	0	3	3	0	6
Rental Housing Assistance ⁵	1,100	180	0	0	0	1,280
Workforce Housing Conversion ⁶	0	0	0	993	0	993

All quantified objectives are subject to funding availability.
MFI = Median Family Income

¹ Refers to the 2021–2029 Regional Housing Needs Assessment (RHNA). Total RHNA is 9,429. This identifies excess capacity to achieve the RHNA.

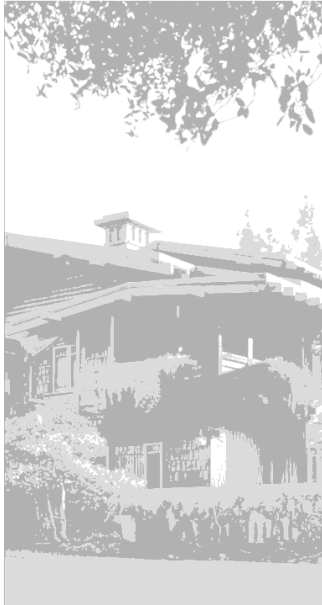
² Refers to City-assisted rental rehab projects and owner-occupied rehab through MASH and HOME Single-Family Rehab.

³ Refers to the provision of incentives, technical assistance, and/or funding (subject to availability) to preserve affordable rental housing

⁴ Refers to repurchase/resale of City deed-restricted homeownership units, and down payment assistance loans funded from repayment of existing BEGIN and Calhome loans for units not included in above program areas.

⁵ Refers to the annual number of housing choice vouchers, subject to federal funding.

⁶ Refers to existing units purchased by a JPA and deed restricted for low and moderate income. This figure includes units already acquired in 2021 at the start of the planning period (e.g., Westgate Apartments).



Goals, Policies, and Programs

Pasadena remains committed to achieving its housing vision and pursuing strategies and programs to address the community's housing needs. These goals and policies further the City's housing vision and establish the framework for decision making.

GOAL HE-1: HEALTHY NEIGHBORHOODS AND LIVING ENVIRONMENTS

Pasadena has a rich mosaic of neighborhoods that have developed over its more than 100-year history. Each neighborhood is distinguished by its history, architecture, housing types, density and urban form, and public amenities. The City has established 45 historic and landmark districts and numerous more neighborhood associations. Some neighborhoods cover a single block and others a square mile or more.

Natural geography and topography define many Pasadena neighborhoods. Residential neighborhoods along the Arroyo or northern foothills are framed by the surrounding hillsides, peaks, washes, and other features of the natural landscape. Neighborhoods are also defined by urban form. While the Central District offers an eclectic and highly differentiated urban form, east Pasadena offers the suburban residential environments of Hastings Ranch, and southern Pasadena provides single-family estate homes on larger lots.

Neighborhoods are defined by more than the homes within a geographic area. Complete neighborhoods are those with essential infrastructure and services: well-maintained streets, sidewalks and bikeways, parks, street trees, libraries and cultural facilities, schools, reliable public services, and easy access to commercial goods and services. Pasadena believes every resident should live in a complete neighborhood.

Regardless of location, urban form, or income level, Pasadena takes great care and pride in maintaining and improving the quality of neighborhoods. From improving infrastructure to planting landscape amenities, and from monitoring the condition of existing housing to carefully guiding the design and development of housing—these activities demonstrate a steadfast commitment to providing a quality environment for all Pasadena residents.

GOAL HE-1

Neighborhoods citywide with quality housing, parks and community services, infrastructure, and public services that maintain and enhance neighborhood quality, character, and residents' health.

Policies

HE-1.1 **Diversity of Neighborhoods.** Provide balanced mixes, densities, and forms of residential and mixed-use districts and neighborhoods.

- HE-1.2 **Property Conditions.** Help property owners maintain the quality of rental and ownership housing by ensuring compliance with City building codes and standards. Facilitate and promote the renovation, improvement, and rehabilitation of housing.

- HE-1.3 **Housing Design.** Require excellence in design of housing through use of materials and colors, building treatments, landscaping, open space, parking, and environmentally sensitive and sustainable building design.

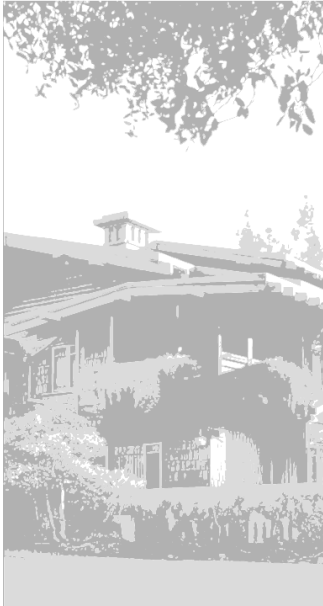
- HE-1.4 **Historic Preservation.** Promote the preservation of historically and architecturally significant buildings and the quality of historic neighborhoods through the appropriate land use, design, and housing policies and practices.

- HE-1.5 **Community Services.** Integrate and maintain the provision of schools, public safety, community centers, infrastructure, green spaces and parks, and other public amenities with the planning and development of housing.

- HE-1.6 **Green Spaces.** Preserve neighborhood and community parks, street trees, open spaces and recreational areas, hillsides, and other landscape amenities that support, define, and lend character to residential neighborhoods. For new development., ensure that residents have ready access to public parks and private open space.

- HE-1.7 **Neighborhood Safety.** Provide City services that contribute to the overall safety of neighborhoods in terms of traffic and circulation, crime prevention, and property conditions. Support the efforts of neighborhood groups to promote safe conditions in their neighborhoods.

- HE-1.8 **Healthful Housing.** Promote indoor air quality through a ban on smoking in apartments and condominiums and with construction materials that are sustainable, green, and not a detriment to indoor air quality.



GOAL HE-2: HOUSING SUPPLY AND DIVERSITY

Pasadena's housing strategy is founded on principles of sustainability, strategic growth, and inclusiveness. Pasadena has and continues to affirm sustainable patterns of development. The City is committed to providing safe, well-designed, accessible, and human-scaled residential and commercial areas where people of all ages can live, work, and play. This includes neighborhood parks, urban open spaces, and the equitable distribution of public and private recreation facilities.

Since the streetcar days of the 1900s to today's use of Metro's light rail system, Pasadena has benefitted by linking land use planning to transit access. The General Plan Land Use Element continues to promote land use patterns that focus higher-density development into the Central District, transit villages, and neighborhood villages, as well as along major corridors where buses travel.

Providing a range of housing choices is fundamental to furthering the housing vision, with housing types and densities that respond to people's needs at all life stages and incomes. In addition to traditional detached homes and multi-family apartments and townhomes/condominiums, local housing choice includes transitional and supportive housing. Increasingly, accessory dwelling units are offering new housing choices, as are small studio apartments and even house sharing. Pasadena looks to accommodate emerging housing trends and development approaches that can both increase housing supply and reduce costs.

The following goal and policies further the production of housing that is affordable and suitable for the varied lifestyle needs of Pasadena residents.

GOAL HE-2

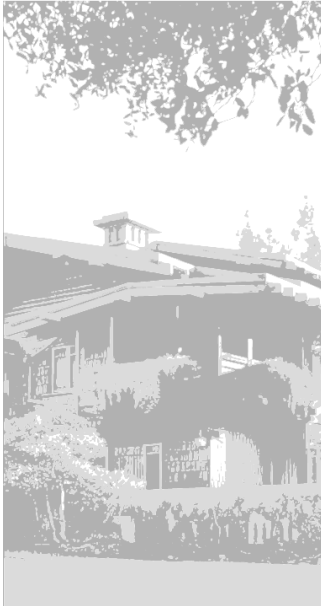
A balanced supply and diversity of rental and ownership housing suited to residents of varying lifestyle needs and income levels.

Policies

- HE-2.1 **Housing Diversity.** Facilitate and encourage diversity in types, prices, ownership, and size of single-unit homes, apartments, homes, mixed-use and transit-oriented developments, work/live housing, and emerging housing types.
- HE-2.2 **Strategic Growth.** Direct new residential development into the Central District, transit villages, neighborhood villages, and along key corridors—neighborhoods where people can live and work, shop, and benefit from access to a rail and bus transit.
- HE-2.3 **Environmental Sustainability.** Encourage sustainable patterns of residential growth and preservation with respect to land use, building and site design, resource conservation, open space, and health considerations.
- HE-2.4 **Affordable Housing.** Facilitate a mix of household income and affordability levels in residential projects citywide, with an

emphasis on ensuring integration of affordable housing into every neighborhood.

- HE-2.5 **Adaptive Reuse.** Support innovative strategies for the adaptive reuse of office, retail, hotels/motels, and industrial buildings, consistent with land use policy, to accommodate innovative housing types and productive use of underused buildings.
- HE-2.6 **Housing Incentives.** Facilitate the development of affordable housing through regulatory concessions, financial assistance, density bonuses, the inclusionary housing program, and other City and outside agency programs.
- HE-2.7 **Missing Middle.** Address the growing need for “missing middle” housing—rental and ownership homes affordable to the moderate-income workforce.
- HE-2.8 **Development Process.** Modify development processes to streamline and simplify the processing of entitlement permits, design review, building permits, and funding of affordable housing projects.
- HE-2.9 **Community Involvement.** Continue and support dialogue with builders, advocates, nonprofits, residents, finance industry, and other stakeholders to understand and address evolving housing needs of residents and the workforce.
- HE-2.10 **Overconcentration of Affordable Housing.** Ensure future development of housing distributes affordable units throughout the City and avoids overconcentration of affordable units.



GOAL HE-3: HOUSING ASSISTANCE AND PRESERVATION

Pasadena residents value social, cultural, and economic diversity and its contribution to the rich character of community life. A diverse community allows for expression of contrasting ideas, sparks creativity, and fosters a greater appreciation of lifestyles. Housing policies and programs have a fundamental role in preserving the social and economic diversity of the community. By providing assistance to households of more limited means, the City and its partner agencies foster this richness and provide opportunities for children to grow up in mixed-income neighborhoods—and for people and families facing homelessness to live in stable environments. Pasadena’s inclusionary housing program, neighborhood reinvestment strategies, rental voucher subsidies, and Ten-Year Plan to End Homelessness, among other strategies, preserve and create these opportunities.

Although affordable housing production is often the focus of State policy, Pasadena’s significant stock of existing affordable housing continues to provide the majority of quality and affordable housing for residents. This includes assisted housing that is deed restricted as affordable to lower- and moderate-income households. Pasadena has more than 3,700 units of assisted housing, including over 1,200 units assisted under the City’s Housing Choice Voucher program. Pasadena also has a larger inventory of non-deed-restricted housing priced at levels affordable to low- and moderate-income households.

The following goals and policies further achievement of the City’s objective to preserve existing affordable housing and provide assistance that results in the production new affordable housing.

GOAL HE-3

Increased opportunities for people to find and retain housing in Pasadena and to afford rental and ownership homes specific to their income and life stage status.

Policies

- HE-3.1 **Financial Resources.** Pursue and maximize the use of State, federal, local, and private funds for the development, preservation, and rehabilitation of housing affordable to lower- and moderate-income households.
- HE-3.2 **Partnerships.** Pursue collaborative partnerships with nonprofit organizations, faith-based organizations, developers, business community, and State and federal agencies to develop, rehabilitate, preserve, and retain affordable housing.
- HE-3.3 **Homeownership Opportunities.** Increase homeownership opportunities for lower- and moderate-income residents, local employees, and essential workers through the provision of financial assistance (subject to funding availability and partnerships).

- HE-3.4 **Preservation of Affordable Housing.** Establish and seek to renew long-term affordability covenants for all City-assisted housing projects. Support the conservation of unassisted housing affordable to lower-income households.

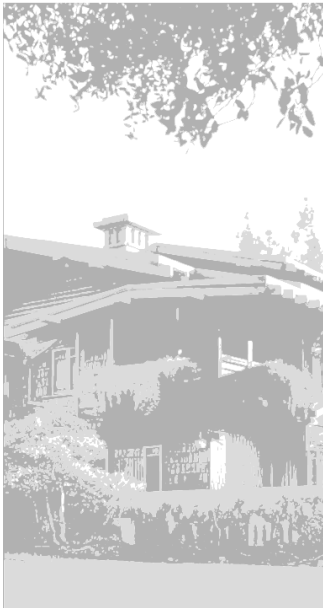
- HE-3.5 **Homeownership Retention.** Create and maintain education and resources that enable residents to make informed decisions on home purchases and maintaining homeownership.

- HE-3.6 **Rental Assistance.** 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.

- HE-3.7 **Workforce Housing.** Work with major employers, educational institutions, health care institutions, and other employers within Pasadena to facilitate and encourage the development of workforce housing opportunities.

- HE-3.8 **Housing Acquisition and Rehabilitation.** Promote the acquisition, rehabilitation, preservation, or purchase of affordability covenants on multi-family housing and the maximum extension of affordability controls.

- HE-3.9 **Neighborhood Stability.** Promote strategies that guard against neighborhood gentrification and facilitate the ability of long-time residents to remain in their neighborhoods as economic conditions change.



GOAL HE-4: SPECIAL HOUSING NEEDS

Pasadena residents have a diversity of backgrounds, family types, lifestyles, income levels, and abilities. Due to their personal financial or physical condition, some residents may have housing needs that are not met by conventional housing types. Seniors or persons with physical disabilities may need to live in group settings where needed services can be provided and where they can benefit from increased interaction with others. People facing homelessness because they have lost a job or cannot work benefit from supportive housing, where they can find programs that help them reenter the work force. Pasadena continues to implement creative responses to these and other special housing needs. The following goal and policies further the provision, maintenance, and improvement of housing for special needs households.

GOAL HE-4

Adequate housing opportunities and support services for seniors, people with disabilities, families with children, college students, and people in need of emergency, transitional, or supportive housing.

Policies

- HE-4.1 **Senior Housing.** Support development and maintenance of affordable senior rental and ownership housing and supportive services that facilitate independence and the ability of seniors to remain in their homes and the community.
- HE-4.2 **Family Housing.** Facilitate and encourage the development of larger housing units for families with children, and the provision of support services such as childcare, after-school care, family development services, and health care.
- HE-4.3 **People with Disabilities.** Support the development of permanent, affordable, and accessible housing that allows people with disabilities to live independent lives.
- HE-4.4 **Service-Enriched Housing.** Support and assist organizations in the provision of support services and service-enriched housing for special needs groups, such as seniors, large families, people with disabilities, people experiencing homelessness, and those with medical conditions.
- HE-4.5 **Large Institutions.** Work with educational and health care institutions to update master plans and provide housing accommodations for students, faculty, and employees that reflect the housing needs and preferences of their respective institution.
- HE-4.6 **Homeless Housing and Services.** Provide support and financial assistance to community service organizations that provide housing opportunities and supportive services for people who are homeless or at risk of being homeless.

GOAL HE-5: AFFIRMATIVELY FURTHERING FAIR HOUSING

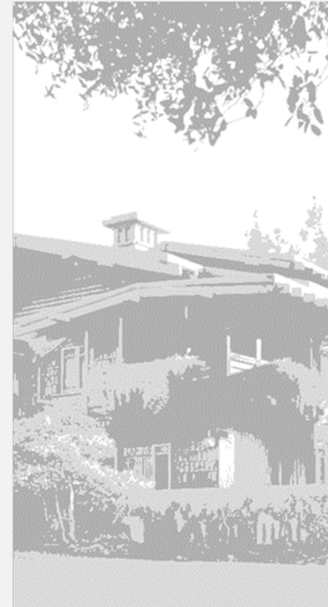
Pasadena supports and promotes a diverse community of unique neighborhoods where all residents are included and valued, no group is privileged above any other group, and all have opportunity to live in neighborhoods of their choosing. Federal and State fair housing laws prohibit discrimination in home sales, financing, and rentals based on race, color, religion, sex, or national origin. Historic housing discriminatory practices nationally and even locally have left a legacy of income-siloed neighborhoods and concentrations of ethnic populations, but Pasadena has worked hard for the past several decades to erase this legacy and create a city marked by diversity and opportunity for all.

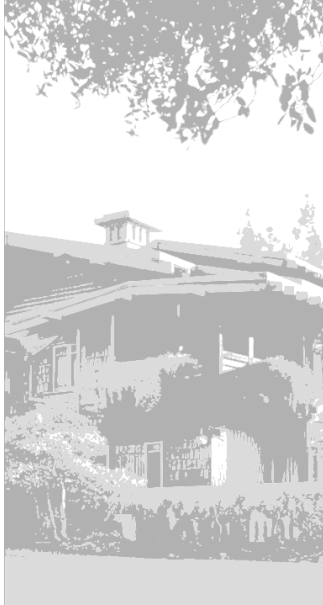
GOAL HE-5

A housing environment in which all people have equal access to the housing of their choice and are treated with dignity and respect in the neighborhoods in which they choose to live.

Policies

- HE-5.1 **Fair Housing.** Support the enforcement of federal and State fair housing laws that prohibit discrimination in the sale, rental, and occupancy of housing on the bases of race, religion, color, ancestry, national origin, age, sex, sexual orientation, family type, handicap, minor children, or other protected status under State and federal law.
- HE-5.2 **Organizational Support.** Support organizations that can receive and investigate allegations of noncompliance with fair housing principles, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
- HE-5.3 **Distributed Housing.** Work to ensure that housing for lower-income households is distributed throughout the City and that concentrations in particular neighborhoods and/or Council districts are explicitly avoided.
- HE-5.4 **Supportive Housing.** Promote a balanced geographical dispersal of assisted affordable housing developments and associated supportive social services for individuals and households throughout the community.
- HE-5.5 **Civic Engagement.** Provide the means for residents and neighborhood organizations to be proactive in identifying and addressing housing and neighborhood needs and seeking solutions in partnership with the City. Facilitate increased participation among traditionally underrepresented groups in the public decision-making process.





PROGRAM #1: CODE ENFORCEMENT AND HOUSING INSPECTION

Code enforcement and other efforts to improve the quality of housing are important tools to maintain home values and to protect residents' health, safety, and welfare. To achieve these goals, the City conducts several code enforcement and housing inspection programs.

- **Code Compliance.** Code compliance is a means to ensure that the quality of the City's commercial and residential neighborhoods is maintained. Code compliance staff enforces State and local regulations governing exterior building conditions, property maintenance, and interior conditions. Code compliance staff also works with neighborhood groups to address common concerns. For properties found in violation, eligible property owners are directed to nonprofit organizations and City rehabilitation loans and grants for assistance in resolving code violations and making repairs. The City has organized the Code Compliance Division to have officers assigned to specific areas of Pasadena, thus achieving faster abatement.
- **Emergency Enforcement.** The City maintains an inter- departmental effort called City Resources Against Substandard Housing (CRASH), chaired by the Code Compliance Manager. The CRASH team includes representatives from Health, Fire, Building, Humane Society, Police, and Code Enforcement. The CRASH team works to correct substandard buildings, eliminate blight, identify solutions to neighborhood crime, and provide emergency response and abatement for the worst properties. The program also encompasses an education component to train property owners in prevention of illegal activity. In addition, Health and Code Compliance staff regularly reassign complaints via the Pasadena Citizen Service Center for appropriate follow-up.
- **Maintenance Assistance to Homeowners.** The MASH program provides free services to low income, senior, or disabled homeowners unable to perform deferred maintenance on their owner-occupied, single-family homes. As a secondary function, the MASH program provides a unique program for providing on-the-job training for adults to gain the skills and work habits necessary to obtain a permanent job. MASH crews may also assist in times of emergencies, such as fire, storms, or earthquakes.
- **Occupancy Inspection.** This inspection is designed to ensure the quality and maintenance of single-family homes, duplexes, and condominiums. Whenever a change in occupancy of an eligible unit occurs, the property is inspected for compliance with City codes. Typical items inspected include electrical, plumbing, heating, structural conditions, and health and safety items. If a housing code violation is found, the property owner is notified of the violations and given a reasonable time to correct them. Upon correction of the violations, a certificate of inspection is issued. To streamline the program, the City has established an online self-certification process at:

<https://www.cityofpasadena.net/planning/code-compliance/presale-program/>.

- **Quadrennial Inspection.** This inspection is designed to ensure that apartments are decent, safe, and well maintained. All rental properties with three or more units are inspected at least once every four years. Typical items inspected include the same as an occupancy inspection. Property owners are notified if code violations exist and, upon remedy, are issued a certificate of compliance. This program continues to be an effective way to identify code violations as they occur, before they affect the condition of the building and quality of life experienced by tenants.
- **Lead-Based Paint Hazards.** The City's Public Health Department has a Childhood Lead Poisoning Prevention Program designed to prevent lead exposure and, when exposure occurs, to care for children with lead poisoning. Public health nurses provide case management for children and their families affected by lead poisoning. Environmental health specialists work with nurses to identify lead sources, provide advice on lead-safe painting and remodeling, enforce City ordinances for lead reduction, and provide information and assistance to care providers of children.

Implementation:

2021–2029 Objectives:

- Continue code compliance efforts; reallocate resources to maximize achievement of code compliance goals.
- Work with Health Department officials to coordinate efforts responding to health and safety concerns.
- Continue implementation of housing inspection programs.
- Continue to educate the community about health and safety hazards with increased outreach, especially to Northwest Pasadena, to connect lower-income households with available resources for housing repairs and rehabilitation. **Post materials at community facilities in Northwest Pasadena annually.**
- Cross-train inspectors to identify and address health and safety hazards.

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Target Population:	Citywide for all economic groups
Time Frame:	Ongoing
Responsible Agency:	Interdepartmental
Funding Source(s):	General Fund, CDBG, rental property fees, other federal sources as available

The City of Pasadena has long directed enhanced efforts at improving conditions in Northwest Pasadena, where a history of discriminatory real estate practices, followed by decades of underinvestment, created neighborhoods in need of focused attention. (The General Plan Land Use Element, on page 39, describes the Northwest neighborhood.) Through community building efforts and enhanced community participation, the City continues to make substantial investments in this area. Prior to the dissolution of redevelopment in California, funds were available for significant investment in housing. Without that resource, the City has had to use federal and State funding sources more creatively to improve the existing housing stock and bring new homes to the Northwest community. Of note: the CDBG Northwest Fund account was discontinued in 2015 due to overall reduction citywide on CDBG resources.

- **Community Building.** Pasadena supports for-profit, nonprofit, and faith-based organizations that are committed to implementing community-building efforts in Northwest Pasadena. These include, but are not limited to, Flintridge Center, Community Bible Church through its work at the Kings Village and Community Arms Apartment projects, and numerous other nonprofit and for-profit organizations. Other efforts include Neighbors Acting Together Helping All (NATHA), which has received three-year grants from the California Community Foundation.
- **Northwest Commission and Programs.** Working in conjunction with the Northwest Commission, the City's Northwest Program office works specifically to maintain a healthy business environment and facilitate housing maintenance and production. These include monitoring of capital improvement projects, improvements to park facilities and community centers, police department activities to address neighborhood safety, and ongoing liaison activities with neighborhoods associations.
- **Citywide Programs.** The many programs described in this element are used to assist households within Northwest Pasadena, from rental assistance to tenant protections to new affordable housing construction. The City will conduct focused outreach for these programs in Northwest Pasadena to increase residents' awareness of available resources.

2021–2029 Objectives:

- Support community building efforts through funding and dedicating staff resources. Annually, through the CDBG funding process, allocate available resources to support community-building efforts, with the goal of assisting other City departments to address public facility and infrastructure improvements in the community.

- Work with the Northwest Commission to address community concerns and support the long-term revitalization of this area. Meet with the Northwest Commission at least once per year. In accordance with the City's CIP, implement the following improvements in Northwest Pasadena:

- Jackie Robinson and Pintesca Park improvements: 2022 (completion of ongoing program)
- Sidewalk repairs and ADA improvements: Through 2026 and beyond
- Raymond Avenue electrical system undergrounding: Through 2026 and beyond
- Various pedestrian and traffic system enhancements: Through 2026 and beyond
- Various water system enhancements: Through 2026 and beyond
- Various electric power system upgrades: Through 2026 and beyond

- **Fair Housing Outreach.** The City will conduct increased outreach in Northwest Pasadena to increase awareness of housing resources, fair housing workshops, and the City's Tenant Protection Ordinance. Specifically, the Housing Department will conduct at least one fair housing workshop each year for community-based organizations that serve residents and housing providers in Northwest Pasadena. At least one workshop annually will be conducted in Spanish. **Assist at least 60 persons annually, inclusive of persons assisted by the Housing Rights Center.**

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- **ADU Production.** Apply for and use funding from CalHome and CalFHA sources to incentive and facilitate construction of ADUs in Northwest Pasadena.

- **Community-building Efforts:** Support community-building efforts by funding organizations and dedicating staff resources to support efforts, subject to funding availability. By FY 2022, expand staff capacity (utilizing CDBG funds) to assist service providers in Northwest Pasadena to apply for CDBG and Pasadena Assistance Fund (endowment for human services).

- **Neighborhood Improvements (infrastructure and community facility improvements):** Target 50 percent of public improvement funds under the CDBG program to Northwest Pasadena and overall, 25 percent of Capital Improvement Program funding.

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- **Community Input.** Meet with the Northwest Commission at least once per year.

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Housing Plan

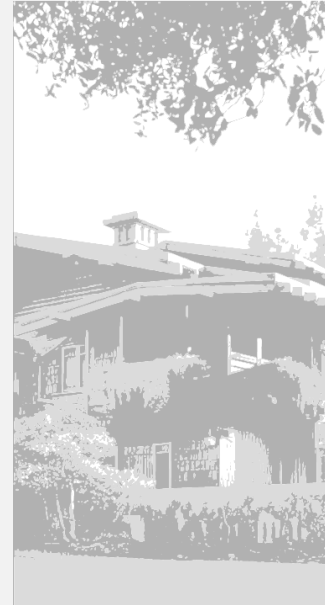
Target Population:	Northwest neighborhoods
Time Frame:	Ongoing
Responsible Agency:	City Manager's Office; Housing Department; Public Works Department
Funding Source(s):	General Fund; grants

PROGRAM #3: HOUSING REHABILITATION

Many housing units in Pasadena are 50 years or older; maintaining housing in good condition is a critical priority since existing units are often the most affordable type of housing. In addition to the programs described in Program #1, the City offers several programs to encourage the maintenance, repair, and improvement of rental and ownership housing.

- **Municipal Assistance, Solutions, and Hiring (MASH).** The MASH program provides free services to low-income, senior, or disabled homeowners unable to perform deferred maintenance on their owner-occupied, single-family homes. As a secondary function, the MASH program provides a unique program for providing on-the-job training for adults to gain the skills and work habits necessary to obtain a permanent job. MASH crews may also assist in times of emergencies, such as fire, storms, or earthquakes.
- **Single-family Rehabilitation Loan.** The City works with Neighborhood Housing Services of Los Angeles County (NHS) to provide services. This program includes a single-family rehabilitation loan program, homebuyer and homeownership education, foreclosure counseling, and other neighborhood services formerly provided by the Pasadena NHS. These programs are offered citywide, although many of the activities are targeted for residents in the Northwest community. Three owner-occupied home rehabilitation projects were completed by the interdepartmental Under One Roof program between 2014 and 2020: 840 Manzanita Avenue, 3570 Cartwright Avenue, and 760 Elmira Street. NHS administers the HOME single-family rehabilitation program in Pasadena. The program is being marketed to identify projects.
- **Acquisition/Rehabilitation.** Pasadena implements multi-family and other housing acquisition and rehabilitation efforts as opportunities arise. However, initiation of a more strategic, proactive program can help fill a needed gap, serve to both upgrade older apartment properties and stabilize rents, and enhance City efforts to improve distressed neighborhoods. One project, 268 Waverly Drive, involved City purchase and rehabilitation of a Caltrans-owned single-family residence and construction of an ADU for City operation of rental Rapid Re-Housing.

Lack of a permanent source of funds limit the City's ability to compete with market rate investors to acquire residential buildings. However, the City used HOME funds to support a nonprofit housing developer's acquisition/rehabilitation and preservation of a 44-unit housing project (The Groves). Also, the City Council continues to consider committing inclusionary in-lieu fees to assist with acquisition/rehabilitation projects. **The City will continue to seek funding from federal and State sources as such funding is available.**



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Implementation:

2021–2029 Objectives:

- Implement the MASH program and focus on lead-based paint abatement and minor repairs. Repair 64 homes over the planning period.
- Implement the single-family home rehabilitation program with the goal of assisting 96 households over the planning period and monitor new contracts to administer the single-family home rehabilitation program on behalf of the City.
- Conduct at least one outreach activity in Northwest Pasadena each year to promote available resources to address issues related to substandard housing conditions.

Target Population: Citywide; Extremely low-, very low-, and low income-income households

Time Frame: OngoingAt least annually **Formatted:** Highlight

Responsible Agency: Housing Department

Funding Source(s): General Fund, CDBG, Grants

PROGRAM #4: HISTORIC PRESERVATION

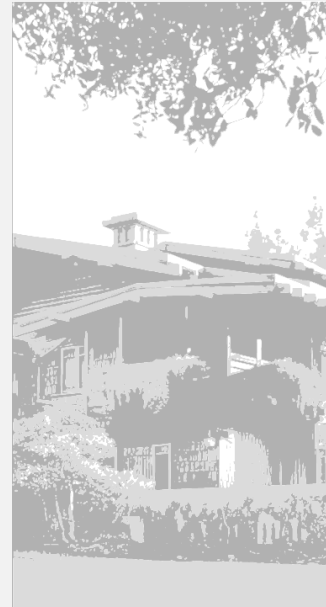
The City's historic preservation program promotes the identification, evaluation, rehabilitation, adaptive use, and restoration of historic structures, neighborhoods, and other landmarks. With respect to housing, key activities directed at historic preservation objectives are as follows.

- Historic Ordinance and Design Guidelines.** The Historic Preservation Ordinance implements the goals, policies, and programs of the General Plan and establishes the review authority of the Historic Preservation Commission and Design Commission. City codes require that properties within historic districts and individually designated historic properties be reviewed and approved prior to alteration or development. Pasadena's "Design Guidelines for Historic Districts" and the Secretary of the Interior's "Standards for Rehabilitation" help guide the review of historic properties. In March 2021, the City adopted changes to the Historic Preservation Ordinance. Details of the historic preservation programs, which promote the identification, evolution, rehabilitation, adaptive reuse, and restoration of historic structures, are advertised on the City's website. Key revisions included in the 2021 update are: 1) the regulations now apply to all buildings 45 years of age or older and 2) for undesignated historic resources, a Certificate of Appropriateness is required for demolitions and major projects (as defined in the ordinance). The requirement to conduct an assessment to building 45 years of age or older can add up to 12 weeks to the entitlement process.
- Historic Preservation Incentives.** The City offers incentives to promote the preservation of historic sites and structures. Incentives include reduction of building permit fees and construction tax, waiver of covered parking requirements in single-family landmark districts, modified City of Gardens standards, and variances for both adaptive reuse and relocation. The City's Mills Act program also allows owners of designated historic properties to reduce their property taxes in exchange for a contract with the City to maintain the property's historic character.

Implementation:

2021–2029 Objectives:

- Continue designating eligible landmark districts and structures, issuing Mills Act contracts, and completing historic design review.
- Continue to advertise incentives for historic preservation and to support historic preservation projects as funding is available.
- Monitor application of the Historic Preservation Ordinance to understand how processes might be streamlined to reduce timelines for overall project entitlement. Make adjustments as needed based on the monitoring activity.



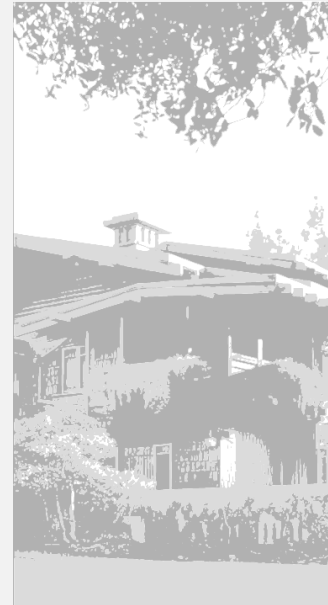
Housing Plan

Target Population:	Citywide; all economic groups
Time Frame:	Ongoing for designation of properties and incentives for preservation Assess application of the Historic Preservation Ordinance and its effects on entitlement timelines during 2022-23
Responsible Agency:	Planning & Community Development
Funding Source(s):	General Fund

PROGRAM #5: HOUSING DESIGN

Pasadena implements design review of proposed projects to ensure that new development is of exemplary quality and appropriately integrated into the surrounding neighborhood context.

- Design Review.** Pasadena requires excellence in architectural design that complements the scale and character of the City. Citywide design principles set the foundation, and City residential design guidelines provide clear examples of the quality and type of design recommended. Design guidelines work in tandem with development standards in the zoning code or appropriate specific plans.
- Neighborhood Development Permit, Hillside Development Permit, and Single-Family Compatibility Permit.** The City has three types of permits that provide a means to ensure proposed new development fits within existing neighborhood context. The Neighborhood Development Permit is required for properties within the Lower Hastings Ranch neighborhood and is intended to preserve the scale and architectural style of this 1950s/1960s era neighborhood. The Hillside Development Permit is required for specific types of projects, including proposed subdivisions, new dwelling units or structures, any new square footage above the first story, and the addition of 500 square feet or greater to the first floor of an existing structure for properties that are within the HD and HD-SR overlay zones. The Single-Family Compatibility Permit applies only to properties within limited designated geographic areas for which applications for second building stories or upper-story additions; the regulations are intended to address concerns regarding “mansionization” in lower-scale single-family neighborhoods.
- City of Gardens Standards.** The City of Gardens Standards apply to multi-family projects within RM districts, certain specific plan areas, and the CL and CO commercial districts. City of Gardens standards are an innovative set of zoning regulations aimed at creating more livable multi-family housing projects, encouraging designs that typify the garden character of earlier apartments and bungalow courts in Pasadena. These standards are also an integral way of encouraging the production of multi-family apartments and condominium projects of lasting quality.
- Historic Review.** Because of the age, history, and rich fabric of Pasadena, many structures contain valuable and historic architectural features. The Pasadena Zoning code requires that properties within historic districts and individually designated historic properties must be reviewed and approved prior to alteration or development. Pasadena’s “Design Guidelines for Historic Districts” and the Secretary of the Interior’s “Standards for Rehabilitation” help guide historic review. City staff carefully reviews such structures to ensure that historic features are preserved.



Implementation:

2021–2029 Objectives:

- Continue to implement development review procedures to ensure maintenance of Pasadena’s architectural character and quality of the built environment.
- Implement City of Gardens standards as a tool to enhance the quality and compatibility of multi-family residential projects.
- Adopt objective development standards and guidelines as part of the Specific Plan updates.

Target Population: Citywide, All economic groups

Time Frame: Ongoing for design review and implementation of City of Gardens standards; adopt objective development standards and guidelines as part of the Specific Plan updates.

Responsible Agency: Planning & Community Development

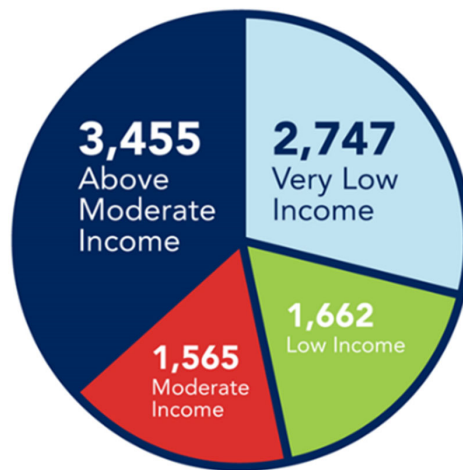
Funding Source(s): General Fund

PROGRAM #6: HOUSING SITES

Since 1994, Pasadena's General Plan has explicitly directed new residential development into seven specific plan areas. The 2015 update of the Land Use Element confirmed this direction and more specifically, stated that growth would occur within the Central District, transit villages, and neighborhood villages and along selected corridors. This strategy is intended to allow for continued growth and development while reducing traffic congestion, improving air quality, providing housing, and stimulating economic development.

Beginning in 2017, the City initiated updates of the seven specific plans and creation of an eighth for Lamanda Park (comprising parts of the current East Colorado and East Pasadena Specific Plans). Adoption of all specific plans should conclude by the end of 2023. (As of summer, 2022, the updated Lincoln Avenue and East Colorado Specific Plans had been adopted.) The 2015 General Plan established residential development caps within each specific plan area. However, the Council removed the caps in early 2022. Also, adoption of the Specific Plans will expand the overall residential capacity in Pasadena by increasing development densities in some areas and allowing residential uses on properties currently zoned exclusively for commercial use.

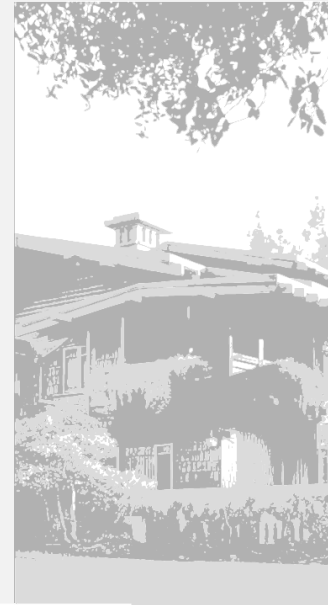
The RHNA for 2021-2029 is 9,429 units, divided among four household income categories as shown on the adjacent graphic. These housing planning targets can be addressed through a combination of housing production credits and available housing sites. As mentioned in Appendix C, adequate sites can be identified to accommodate the full RHNA at the four income levels. If, through the update process of the specific plans, additional housing capacity is created, this can be reflected in any subsequent Housing Element updates.



Implementation:

2021–2029 Objectives:

- Adopt the eight specific plans and expand housing capacity beyond current limits to create additional opportunities over time and to provide additional buffer for no net loss of sites for affordable housing units.
- Build on the existing housing permit tracking system by showing how each specific plan, once adopted, will expand capacity for all types of housing—and lower-income sites in particular, which contribute to the

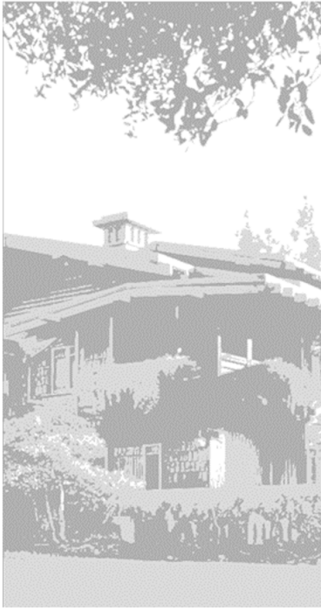


inventory and ease no-net-loss tracking of Housing Element sites citywide.

- Continue to implement the current housing replacement program for non-vacant sites redeveloped with new housing, whereby any project that involves the demolition of existing, vacated, or demolished residential uses that are occupied by, or subject to an affordability requirement for lower-income households within the last five years (relative to demolition) must be replaced by units affordable to lower-income households.
- Investigate new and creative approaches to providing housing, such as allowing units to be constructed on top of or wrapping parking structures and easing conversion of office buildings and commercial space to housing. Amend the Zoning Code to allow housing in commercial zones, where consistent with General Plan objectives, and to incentivize the adaptive reuse of nonresidential buildings for residential uses.
- Explore land use and zoning tools to facilitate additional and diverse housing opportunities in Northwest Pasadena either through alternative housing types and/or acquisition/rehabilitation/adaptive reuse.
- Amend the Zoning Code to establish an ordinance to allow the adaptive reuse of nonresidential buildings for residential uses, including eliminating Pasadena Municipal Code requirements that are not related to fire/life safety requirements.
- Subsequent to the City's acquisition of the former Interstate 710 right-of-way area, study the potential of reclaiming portions of Interstate 210 and the Interstate 710 stub to create additional land area for housing and knit back together the community division created by original freeway construction. For I-710, pursue a federal Reconnecting Communities grant and other grants for the study and implementation of reuse of those portions relinquished to the City by Caltrans.
- Establish a formal system to monitor for loss of sites identified for affordable housing to achieve the RHNA. The program will include the ability of City staff to adjust the Housing Element sites inventory over time—without requiring public hearings—to include new sites included among those for below-market-rate housing and to remove sites developed with fewer affordable units than assumed in the sites inventory. As updated Specific Plan are adopted through 2023, the City will use the information from those plans to update the sites inventory and build buffers for the no net loss program, including a goal to target 20 percent of the rezoned sites within high opportunity areas.
- To affirmatively further fair housing choice, continue to target housing construction of affordable units within high opportunity areas, such as

East Pasadena and portions of the Central District. Aim to establish at least 20 percent of the moderate- and lower-income RHNA units in these high resource areas.

Target Population:	Citywide, All economic groups
Time Frame:	Specific Plans adoption 2022 through 2023
	Incorporate Specific Plans in no-net-loss tracking system in 2022.
	Explore land use and zoning tools to facilitate housing opportunities in Northwest Pasadena by 2024.
	Create an adaptive re-use ordinance by 2023.
	Create a vision plan for the former Interstate 710 right-of-way by 2028.
Responsible Agency:	Planning & Community Development, Transportation Department
Funding Source(s):	General Fund



PROGRAM #7: MIXED USE/TOD STRATEGY

Pasadena housing growth strategy, as noted above, relies predominantly on mixed-use and transit-oriented development focused into specific plan areas, transit villages, and neighborhood villages, plus along key corridors. To implement the Land Use Element, the City has a mixed-use/transit-oriented development strategy described below.

- **Mixed-Use Development.** Mixed use is the key strategy to increase housing choices (including affordable housing), concentrate higher-density projects in specific plan areas, support economic activity, and improve neighborhood/district walkability. To achieve these benefits, the City has codified zoning standards that facilitate and encourage mixed-use projects—such as reducing the project area required for open space, providing flexibility in meeting that requirement, and allowing a larger building envelope.
- **Transit-Oriented Development.** Transit-oriented development, or TOD, closely coordinates land use and mobility planning, making it more convenient to travel throughout the community by transit and foot. Pasadena has embraced TOD planning since establishment of the Gold Line (now called the L Line) in the City in 2003. In 2005, Pasadena adopted TOD standards to encourage projects within a quarter-mile radius of light rail stations and throughout the greater Central District, which has three stations. Allowed densities are substantially higher within one-quarter mile of transit stations. These incentives have resulted in numerous residential and mixed-use projects, including Westgate, Del Mar Station, 10 West Walnut, and numerous projects in East Pasadena near the Sierra Madre station.

Implementation:

2021–2029 Objectives:

- Continue implementation of mixed-use incentives; monitor and assess the effectiveness of the incentives on a bi-annual basis. Explore the adjustment of zoning regulations if the assessment indicates that current incentives no longer spur housing development.
- Continue land use, housing, and mobility strategy of encouraging transit-oriented developments around Metro L Line (Gold Line) transit stations.
- Update all specific plans by the end of 2023 to implement new standards that promote TOD, allowing more housing within all Specific Plan areas.

Through the ongoing Specific Plan update process, evaluate the ability of the density incentives provided to encourage housing development.

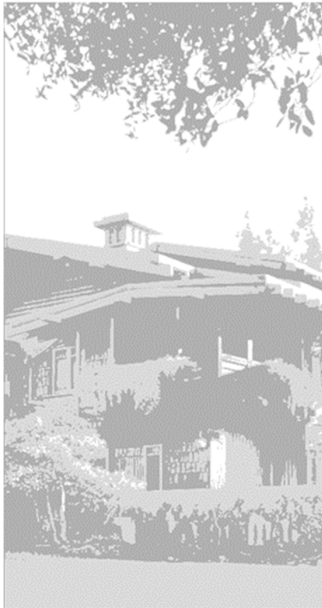
Housing Plan

Target Population: All economic groups

Time Frame: Ongoing

Responsible Agency: Planning & Community Development

Funding Source(s): General Fund



PROGRAM #8: INCLUSIONARY HOUSING

The City's Inclusionary Housing Ordinance requires that residential and mixed-use projects of 10 or more units dedicate 20 percent of the units as affordable to very low-, low-, and moderate-income households. For rental housing, at least five percent must be rented to very low-income households, five percent to very low- or low-income, and 10 percent to very low-, low-, or moderate-income. As an alternative to constructing the inclusionary units, a developer may choose one of three options: 1) pay an in-lieu fee, 2) construct the required units on another site, or 3) donate another site for a portion or total number of units. If existing affordable units are displaced by a development project, the required inclusionary units must be provided on that site.

The City's inclusionary housing ordinance continues to be very effective, benefitting immensely from AB 1505, which eliminated restrictions on the application of inclusionary housing ordinances. From 2014 to 2020, 432 inclusionary affordable units were added (building permits issued, under construction, and completed), and \$14,283,090 in developer-paid in-lieu fees were added to the Inclusionary Housing Trust Fund. During 2020 alone, despite the COVID-19 pandemic, 135 inclusionary units had building permits issued, were under construction, or were issued occupancy permits.

The City updated the ordinance in 2019 to increase the inclusionary requirement from 15 to 20 percent, increase in-lieu fees, and provide a streamlined process for developers to utilize concessions and incentives pursuant to State density bonus law through a local Affordable Housing Concession Menu.

Implementation:

2021–2029 Objectives:

- Continue to monitor effectiveness of the inclusionary housing ordinance and the expenditure of Inclusionary Housing Trust Funds.
- Promote the City's Local Preference Ordinance and upcoming available inclusionary units at least annually at an outreach event in Northwest Pasadena.
- Achieve approval or 146 inclusionary units **Formatted: Highlight**
- By 2027, investigate ways to incentivize creation of three-bedroom units and implement those strategies toward inclusionary units during the housing element cycle. **Formatted: Highlight**

Target Population: Citywide; very low-, low-, and moderate-income households

Time Frame: Ongoing

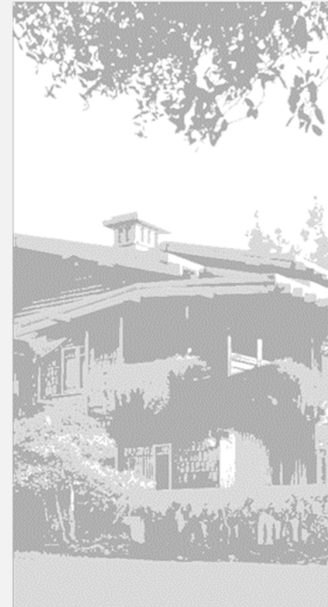
Responsible Agency: Planning & Community Development and Housing Departments

Funding Source(s): General Fund; Inclusionary **Formatted: PasaHeadProgramTitle, Line spacing: single**

PROGRAM #9: REMOVAL OF CONSTRAINTS

The Constraints chapter of this Housing Element identifies several conditions and practices that act to constrain housing development. By addressing these conditions and practices, the City can streamline development processes, thus allowing developers to get housing to market faster and less expensively.

- Development Review.** City staff continues to examine how modifications to development review procedures and requirements—design review, permit processing, commission reviews, and other features—can be improved to streamline the process. In 2020, Pasadena implemented a new Land Management System to consolidate and streamline several processes, including use of an online plan check tool. In the future, further improvements may include broader by-right approval processes, streamlined environmental review, and tighter timeframes to comply with SB 330 (statutes of 2019). The City assesses the improvements in light of staffing loads, community expectations, service demands, and funding.
- Development Fees.** Development fees largely are established based on nexus studies and the cost of providing municipal services and infrastructure to serve new development. The California legislature has focused on fees as significant cost driving up housing prices and proposed laws to control fees. The City sets its fees to reflect cost recovery, will continue to review fees on a regular basis (every two to three years), and will impose fees consistent with community expectations for services and facilities and in compliance with all state laws.
- Short-Term Rentals.** Pasadena is a destination and vacation city, not just during the annual Rose Parade and Rose Bowl festivities but year-round. Some property owners look to profit from this circumstance by renting out their units for short-term vacation stays, thus removing homes from the ordinary rental market and potentially driving up prices to purchase properties because of the income potential. While Pasadena has a short-term rental ordinance, regulations may be revisited if the City finds that short-term rental activities are adversely impacting housing supply.
- Residential Care Facilities.** With the passage of several State laws addressing transitional and supportive housing, the distinction between such housing and group homes has become blurred. The Pasadena Zoning Code (Municipal Code Title 17) subsumes the definition of group homes within that of “residential care facilities,” with the specific distinction that a residential care facility involves 24-hour nonmedical care. Residential care facilities for seven or more persons require a conditional use permit in residential and commercial zones, whereas transitional and supportive housing do not. The regulations will be revisited as part of the comprehensive Zoning Code update to ensure the distinctions are clear, to allow care facilities in all residential zones,



and to ensure all regulations comply with current State law. The City will modify or replace conditional use permit regulations to assure approval certainty and provide objective standards, such as addressing the need for standards and conditions to focus on life safety conditions of such facilities and not the persons being housed.

- **Emergency Housing.** Meeting the needs of Pasadena’s unhoused residents includes ensuring that emergency housing is available commensurate with identified need. Zoning regulations need to clearly identify where emergency housing can be established, and the development regulations need to be crafted in manner that allows such facilities to be readily established. State law is very specific regarding zoning regulations for emergency housing, including requiring Low Barrier Navigation Centers to be a by-right use in mixed-use and nonresidential zones.
- **Ongoing Evaluation.** Over time, potential constraints to the development, maintenance, and improvement of housing will arise due to changing conditions and local needs. These potential constraints may be related to municipal codes, environmental conditions, funding availability, or City processes. The City will respond to changing conditions as they arise and evaluate whether further adjustments to local government practices are needed to provide a welcoming environment for housing production.

Implementation:

2021–2029 Objective(s):

- Study ways to streamline design review process and implement process improvements by 2026.
- Study live/work regulations to determine whether loosening limitations on the residential square footage would help meet targeted housing needs. If changes are determined to be appropriate, implement those changes by 2026.
- Create a modified development review process (from entitlement to building permit) for projects providing at least 50 percent of the total units as affordable and for all projects seeking Low Income Housing Tax Credits to remove timing constraints.
- Review development fees following implementation of development process improvements.
- Periodically review potential constraints to the development, maintenance, and improvement of housing as conditions change.
- As part of the Zoning Code update program, identify and, where feasible, remove constraints in the Pasadena Municipal Code which: 1) prohibit or overburden the use of manufactured and prefabricated housing, and 2) inhibit establishment of residential care facilities for

seven or more persons that may in fact operate as transitional or supportive housing.

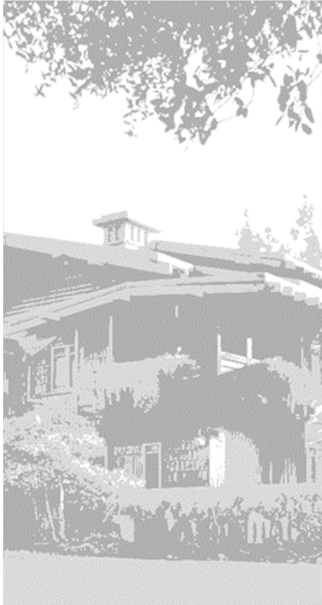
- Eliminate the discretionary Affordable Housing Concessions Permit process that applies to the density bonus program.

Target Population: All economic groups

Time Frame: Create a modified development review process for affordable housing projects in 2022. Other analysis, study, and change by 2026 and ongoing.

Responsible Agency: Planning & Community Development

Funding Source(s): General Fund



PROGRAM #10: REGULATORY INCENTIVES

Because Pasadena is built out with well-established development patterns, housing incentives represent the key means to facilitate the construction of affordable and market-rate housing in targeted growth areas.

- **Density Bonus.** Pasadena implements a density bonus ordinance to incentivize the production of affordable housing. Because the ordinance, as of June 2021, has not been updated to reflect evolving State density bonus law, the City defaults to the requirements of State law where the local ordinance conflicts. Given the effectiveness and flexibility of the City's concession menu ordinance, many developers opt instead to use the concession programs in that ordinance over density bonus provisions. The City, in a May 2021 memorandum, outlined the relationship between density bonus law and the inclusionary housing ordinance to assist the development community.
- **Parking Incentives.** Reductions in parking requirements are available to facilitate affordable, special needs, and transit-oriented housing. For example, tandem parking may fulfill up to 30 percent of the parking requirement in multi-family and mixed-use projects. Parking may be reduced to 0.5 space per unit for senior housing and 0.25 space for single room occupancy units. The City also requires a reduction in parking for transit-oriented development within one-quarter mile of a light rail station and in the Central District Transit-Oriented Area. However, through the public engagement process for the Housing Element, the public noted additional constraints imposed by Pasadena's parking regulations.
- **Minor Variances.** The City has created other flexible tools to facilitate new housing, such as the minor variance process. Eligible projects can receive the following minor variances: 1) yard setback requirements, with no limit on percentage of deviation; 2) size of landscape areas in multi-family districts (including City of Gardens projects); 3) fence/wall height, with no limit on percentage of deviation; 4) building heights; and 5) other development standards set forth in the municipal code.

Implementation:

2021–2029 Objective(s):

- Update the density bonus ordinance to parallel State law and include any additional incentives unique to and desired by Pasadena—and reflective of its relationship to the inclusionary housing ordinance.
- In the updated specific plans and in the Zoning Ordinance, targeted parking regulations reductions with based-bedroom-based ratios: 1 space per studio and one-bedroom units, and 1.5 spaces per 2+ bedroom units on a combination of uses and other factors. **Formatted:** Highlight targeted parking regulations reductions with based-bedroom-based ratios: 1 space per studio and one-bedroom units, and 1.5 spaces per 2+ bedroom units on a combination of uses and other factors. Consider changes to the zoning regulations that allow the unbundling of parking costs from housing rent payments.

Housing Plan

- Update the Affordable Housing Concessions Menu by 2025 to align with the incentives on the menu to be consistent with current State Density Bonus law. Although the City has already eliminated any requirement for separate discretionary approvals for density bonus concessions, the update will include removal of any discretionary approvals from the ordinance.
- Create 100 lower-income units during the eight-year housing cycle.
- By 2023, establish reduced processing time for both entitlement and plan checking for affordable housing projects (with 50 percent or more units for lower-income households). The goal is to reduce the plan check time from the current 30 days to 15 days. Prioritize processing of projects in Northwest Pasadena.

Target Population: Citywide, All economic groups

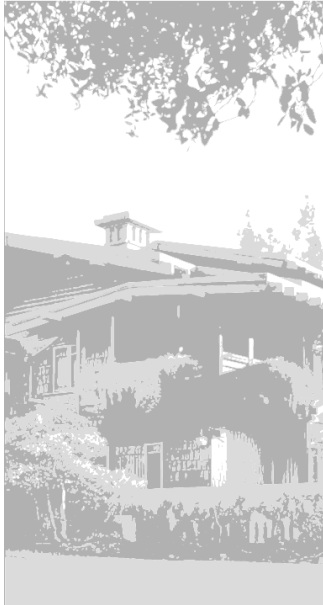
Time Frame: Zoning Code and Specific Plan amendments by 2024

Responsible Agency: Planning & Community Development

Funding Source(s): General Fund

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PROGRAM #11: ALTERNATIVE HOUSING OPPORTUNITIES

Pasadena residential neighborhoods offer a diversity of housing types that vary in type, density, and vintage. The challenge in creating new housing opportunities is how to integrate new units into established and highly defined neighborhoods.

- **Accessory Dwelling Units.** Beginning in 2017, the State legislature passed a series of laws regulating accessory dwelling units, or ADUs, recognizing the ability of such housing to provide an ample source of smaller units considered affordable by design. These laws now largely pre-empt local regulations, and homeowners have the authority to construct a detached ADU as well as a junior ADU (essentially a rented room with an efficiency kitchen) in a single-family residence. Under certain conditions, extra space in multi-family dwellings can be converted to units. Rent from second units can help modest income and elderly homeowners remain in or continue affording their homes. As of June 2020, the City had not adopted a local ADU ordinance and thus relies upon the provisions of State law. In 2019-2020, Pasadena received 150 applications for ADUs. In 2020, the City' Housing Department initiated a pilot program to provide loans to qualifying property owners wishing to construct a new ADU or to legalize an existing ADU constructed without proper permits. Also in 2021, the City launched a joint ADU Technical Services project with SCAG, which includes a review of current ADU approval processes and any recommended improvements; potential prototype plans, together with development of other materials to encourage ADU production in Pasadena.
- **Religious Facilities with Affordable Housing Ordinance.** Pasadena is home to a multitude of properties owned by churches, mosques, temples, and other religious institutions. In 2022, the City started the process of investigating whether to allow housing development to occur on these properties. Local institutions and housing advocacy organizations have expressed enthusiasm over such a program. The City Council adopted an implementing program in July of 2022.
- **Caltrans Houses.** For decades, the California Department of Transportation (Caltrans) has owned the homes located along the planned route for the I-710 freeway extension. With the State Legislature's action not to pursue the extension, plans continue to move forward for reuse of the Caltrans properties. Many of the large homes could readily be converted to supportive housing. The City has already completed a demonstration project by purchasing and rehabilitating a unit, plus adding an ADU, with all units provided for lower-income households.

Implementation:

2020–2029 Objectives:

- Implement the ordinance that allows affordable housing development on properties owned by and zoned for religious institutions. In the future, consider expanding to additional institutional uses. **Achieve at least one affordable housing project (approximately 40 units) on a qualifying property.**
- Investigate how the City or a partner organization may serve as the property manager for property owners who construct ADUs but wish to have a low-cost option for managing the rental.
- Review the current ADU standards and review process and evaluate how best to amend the ordinance to reflect State law while maintaining the character and quality of residential neighborhoods. Make any adjustments needed to facilitate ADU production, including strategies to encourage covenanted affordable ADUs.
- Continue the pilot program to fund legalizing unpermitted ADU conversions and prioritizing the program for households earning less than 80 percent of the area median income. Depending upon the success of the first phase of the pilot program, allocate funding for furthering the program. **Legalize at least five affordable ADUs for income-qualified property owners.**
- Implement recommendations from SCAG’s ADU Technical Services project, where feasible, including developing ADU prototype plans.
- Explore the purchase of Caltrans I-710 properties for creative housing types for lower-income and special needs households. **Purchase four I-710 properties for affordable housing, subject to funding availability.**
- Monitor and review all ADU programs in 2024 for effectiveness to ensure ADU production and affordability goals are being achieved. As necessary, adjust the incentives in 2025 to facilitate production. **Achieve at least 706 ADUs during the planning cycle, with 80 percent in higher opportunity areas.**
- Advertise all ADU incentives and programs, targeting high-resource areas to encourage ADU production for lower-income households in neighborhoods with ready access to good schools, health services, and quality jobs.
- Implement the provisions of SB9 (2021 legislative session), as codified in the Pasadena Zoning Code.

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Target Population: All economic groups citywide

Time Frame: Bring forward an ordinance for Religious Facilities with Affordable Housing in 2022.

Housing Plan

Complete the second phase of the ADU pilot program by 2023.

Follow up on recommendations of the ADU Technical Services project (due October 2022) in 2023-24.

Relinquishment of Caltrans I-710 properties has been initiated and the planning and environmental evaluation process will occur throughout the cycle.

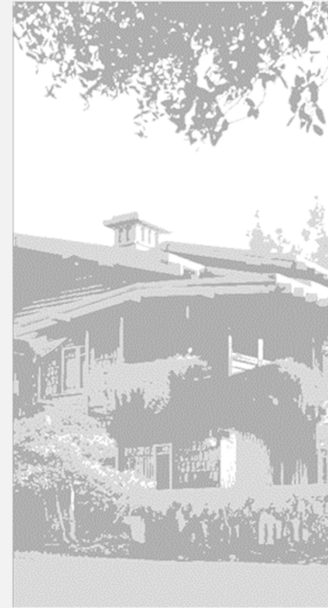
Responsible Agency: Planning & Community Development and Housing Departments.

Funding Source(s): General Fund

PROGRAM #12: FINANCIAL ASSISTANCE

The City provides financial assistance for developers of affordable housing to encourage the production of affordable housing. Assistance may include direct financial contributions, land assemblage/write-downs, and fee modifications or waivers.

- City Assistance.** During 2014-2020, the City provided funding to assist in the rehabilitation, preservation, or development of 225 affordable units. Funding resources include the Inclusionary Housing Trust Fund, HOME, State, and federal funds. Eligible uses include new construction (rental and ownership), property acquisition, rehabilitation (rental and ownership), homebuyer assistance, special needs housing, and affordable housing preservation. When funds are available, the Housing Department issues Notices of Funding Availability (NOFAs) and requests for proposals to solicit competitive proposals. For example, in 2020 the City and nonprofit developer BRIDGE Housing entered into a development and loan agreement with \$4,992,683 in funding assistance for the new construction of a 70-unit permanent supportive housing complex for homeless seniors, located on the City-owned “Heritage Square South” site. In 2021, the City partnered with The California Statewide Communities Development Authority (a joint powers authority) to set aside 513 units in the Hudson and Westgate apartment developments for low- and moderate-income households.
- Land Assemblage/Write-downs.** The City may also provide land write-downs to selected developers in the acquisition and disposition of housing sites and/or surplus properties for the construction or rehabilitation of affordable housing units. Typically, developers acquire and assemble lots before submitting an application for development and City funding. Subject to the availability of funding, the City will continue to seek property acquisition opportunities, consider land write-downs and other creative land subsidies, and assemble sites for affordable housing.
- Fee Reduction.** Developers of affordable housing are not required to request fee waivers or reductions. Projects with affordable units automatically qualify for fee reductions, which are accounted for at the time of building permit issuance. Affordable projects receive fee reductions of up to \$25,000 per unit, with a cap of \$125,000 per project. Fee modifications are increased progressively for projects that provide a higher percentage of affordable units and deeper income targets. The fee modification also includes a reduced residential impact fee and traffic impact fee for affordable housing. From 2014 to 2019, 17 projects received over \$7 million total in impact fee reductions by providing affordable housing.
- The City participates in a State program—Housing Is Key—that provides rental assistance to qualified households. In November 2021, the City



approved 900 rental assistance applications, drawing from a fund of \$11.3M.

Implementation:

2021–2029 Objectives:

- Contingent on availability, provide funding support for the production, rehabilitation, and preservation of up to 90 affordable units annually.
- Continue to provide reduced fees for new affordable housing units and consider applying fee waivers to ADU construction where occupancy is restricted to lower-income households.
- Continue to provide reduced fees for the new affordable housing units. For ADU construction, comply with State requirement to provide waiver of local impact fees. In addition, continue to offer local impact fee waiver for units that exceed the State size requirements if the units are available for family members, deed restricted for seven years as low-income housing, or rent exclusively to Housing Choice Voucher households. In 2024, evaluate the current approach to creating affordable ADUs and develop a program to waive fees, as legally and economically feasible, for affordable ADUs.
- Identify opportunities to convert existing market rate housing to affordable units. Proactively target properties that have a high potential to be converted, and work with the owners to achieve the conversion.
- Use all available and applicable State funding programs for new affordable housing construction and rent subsidies, including the Housing is Key program.
- Investigate the most effective means available to generate funds locally to support the construction of affordable housing in Pasadena, such as but not limited to a residential property vacancy tax, real estate transaction fee, and commercial development linkage fee.
- Annually pursue opportunities for increasing voucher allocations to Pasadena.

Target Population: Citywide; Extremely low-, very low-, low-, and moderate-income households

Time Frame: Ongoing forAt least annually, seeking federal and State funding, ongoing and reducing fee reductions

Identify potential properties for conversion by 2023 and ongoing

Responsible Agency: Housing Department

Funding Source(s): General Fund; grants; loans; set-aside funds

PROGRAM #13: HOMEBUYERS ASSISTANCE PROGRAMS

Pasadena has traditionally offered several homeownership programs to increase the number of affordable housing opportunities. Though the loss of redevelopment funding has significantly curtailed these efforts, the City will be pursuing additional funding to restore past program efforts.

- **Homebuyer Education.** The City contracts with Neighborhood Housing Services of Los Angeles County (NHS) to provide homebuyers' education and counseling to lower-income renters to purchase housing. Program services also include credit counseling, financial prequalification, referrals, and limited financial assistance to first-time homebuyers. NHS also employs certified foreclosure counselors who work with homeowners and lenders in the home mortgage lending process.
- **Homeownership Assistance.** Because the State loan assistance limits under the CalHome program are insufficient to bridge the financing gap between market sale prices and low-income affordability given the high cost of housing in Pasadena, this program does not work locally. However, CalHome assistance may be helpful to provide deeper income affordability in for-sale housing projects that already require low-income units (e.g., projects subject to density bonus or inclusionary requirements). Thus, developers of such projects may opt to apply to the State for CalHome funds. Also, in 2021 the State awarded Pasadena approximately \$5.6M in Permanent Local Housing Allocation funds through 2026, a portion of which will be used to provide workforce housing down payment assistance loans to homebuyers.

Implementation:

2021–2029 Objective(s):

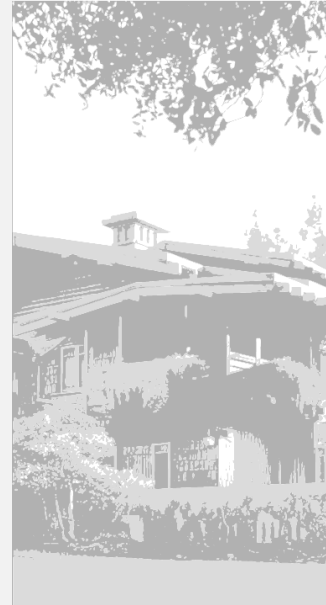
- Continue to provide homebuyer education, foreclosure counseling, and closing cost assistance to prospective homebuyers on an annual basis.
- Conduct at least one homebuyer workshop each year in Northwest Pasadena.
- Seek outside sources for funding a first-time homebuyer assistance program.

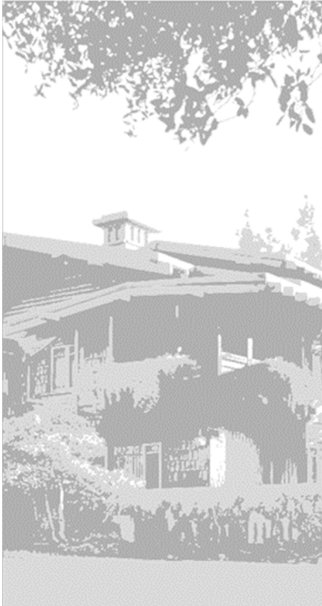
Target Population: Citywide; extremely low, very low, low, and moderate-income households

Time Frame: Ongoing

Responsible Agency: Housing Department, NHS

Funding Source(s): HOME; CalHOME; Permanent Local Housing Allocation funds





PROGRAM #14: RENTAL HOUSING ASSISTANCE

The Housing Department is the federally designated agency for implementing rental assistance programs for income-eligible households, as well as eligible families experiencing homelessness, individuals, and persons with special needs. During the COVID-19 pandemic of 2020-2021, temporary rental assistance and rental forgiveness programs at the federal, State, and local level provided safety nets for residents who lost their jobs during the economic shutdown. Those programs are not anticipated to continue during this sixth cycle Housing Element and therefore are not discussed here as programs to be carried through 2029.

- **Housing Choice Vouchers.** The Housing Department issues approximately 1,285 vouchers annually to income-eligible Pasadena residents. The City's priority and preference system for allocating vouchers adhere to the following order: residency, working, disability, veteran, involuntary displacement, and substandard housing.
- **Special Needs.** Pasadena administers vouchers for special needs groups. These include persons living with HIV/AIDS and their families under the Housing Opportunities for Persons with Aids (HOPWA) program. Vouchers are also issued to non-elderly disabled (NED) people under two programs: NED #1 must be selected from the Section 8 waiting list and meet the definition of non-elderly disabled households, and NED #2 provides rental assistance to very low-income people. Federal funds are also allocated for the Continuum of Care (CoC) program.
- **Rapid Rehousing.** The City continues to receive Los Angeles County Measure H funding for rapid rehousing of single adults as well as homelessness prevention for individuals. This funding is contracted out to local, non-profit homeless service providers. In late 2021, the City submitted a new grant application for \$103,667 in Measure H funds. Additionally, the City has allocated \$1.2 million of Emergency Solutions Grant (ESG-CV) funding made available through the CARES Act for rapid rehousing activities. In fiscal year 2022, the City expects to receive Homeless Housing, Assistance and Prevention Round 2 grant funding from the State of California, which will be allocated toward additional rapid rehousing activities. In 2021, the City approved two projects that will provide housing for homeless individuals and seniors: a Salvation Army development and Heritage Square South in Northwest Pasadena.
- **Case Management.** Case management for rental assistance is supported with Los Angeles Measure H funding. This initiative helps rental assistance participants who had previously experienced homelessness to assist them to remain in good standing with the rental assistance program.
- **Rent Stabilization.** In 2019, the California Governor signed AB 1482, which capped rent increases statewide through December 31, 2030. Rent increases are tied to increases in the consumer price index. Given

that the legislation applies equally throughout the State, it does not reflect unique conditions in more expensive housing markets like Pasadena's.

Implementation:

2021–2029 Objective(s):

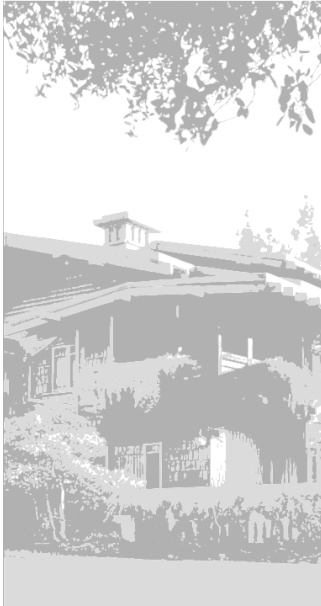
- Assist 1,200 households annually or the number of vouchers allocated under the housing choice voucher program, including project-based vouchers. Target a minimum of ~~320~~ 320 percent of vouchers into higher-resource areas.
- Continue to allocate available vouchers to special needs groups under the HOPWA, NED, and CoC programs.
- Increase the availability of rental vouchers by applying for special needs or other vouchers when available.
- Expand outreach and education on the State's new Source of Income protection (SB 329 and SB 222), prohibiting housing discrimination against those utilizing public assistance for housing payments (including housing choice vouchers).
- Work with local property owners and landlords on an ongoing basis to encourage their willingness to accept vouchers and thus increase the supply of units citywide where vouchers can be used.
- Seek available funding or new grants to continue rapid rehousing activities, particularly funds available through Measure H.
- In the event that the rent control initiative on the November, 2022, ballot fails to pass, investigate the feasibility of enacting local rent stabilization controls, anti-harassment, just cause eviction, and other tenant protection strategies that reflect conditions unique to Pasadena.

Target Population: Citywide; extremely low, very low, and low-income households

Time Frame: Vouchers: Annually
Landlord education: Ongoing
Seek funding and grants: Annually
Develop and distribute information on Source of Income protection by 2022 and ongoing thereafter
Investigate local rent stabilization ordinance: by 2026

Responsibility: Housing Department

Funding Source: U.S. Department of Housing & Urban Development



PROGRAM #15: AFFORDABLE HOUSING PRESERVATION

The City of Pasadena has an expansive inventory of deed-restricted affordable housing and a smaller inventory of market-rate affordable projects. Preserving existing affordable housing, both market rate and government deed-restricted projects, are important goals.

- **Deed-Restricted Affordable Housing.** Pasadena has approximately 3,000 publicly assisted multi-family units that are deed restricted as affordable to lower-income households (owner and rental). Approximately 243 of the covenanted units will come up for renewal by 2031. Properties owned by non-profit entities with an affordable housing mission are less at risk than properties owned by for-profit entities. About half of the units cited above are owned by profit-motivated organizations; most of these units consist of covenanted units within a market-rate multi-family housing development. The City monitors the status of these projects and reaches out to owners to determine ways to preserve the units as affordable. The City proactively monitors the list of at-risk properties, explores funding sources to keep the affordable units as affordable, presents options for developers building new projects to preserve at-risk units, and ensures tenants are properly notified of impending conversions as required by State law. For example, in June 2021, the City closed on the transaction to rehabilitate and preserve the 114-unit La Villa Lake senior rental housing complex at 1070 N. Lake Avenue.

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.

- **Market Rate Affordable Housing.** Pasadena helps to preserve market rate housing affordable to lower-income households through acquisition and rehabilitation (Program #3), historic preservation (Program #4), and funding assistance (Program #11). Developers can fulfill their inclusionary housing ordinance obligations by acquiring, rehabilitating, and preserving existing market rate units as affordable housing. Since this is a complex issue, an objective to study options for preserving non-deed-restricted affordable housing and tenant protections is included as an action for this Housing Element.

Implementation:

2021–2029 Objectives:

- Preserve all possible deed-restricted housing at risk of conversion during the planning period by: 1) conducting early outreach to property owners (at least three years prior to potential conversion), 2) identifying partners to preserve the units, 3) ensuring property owners/landlords comply with notification requirements (three-year, one-year, and six-

month), and 4) discussing with the City Council annually (or as otherwise appropriate) the possible allocation of funds for preservation (balanced with other housing program priorities).

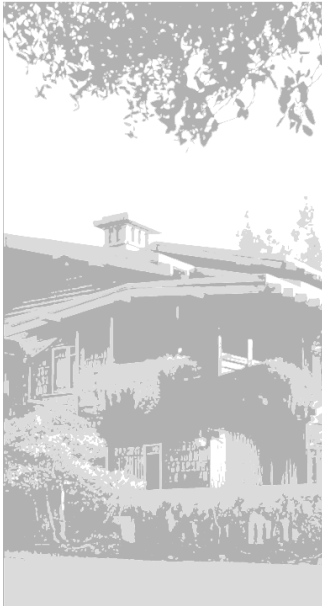
- Continue activities to preserve market rate affordable housing through rehabilitation loans. Inform builders of the option to satisfy inclusionary housing ordinance requirements through acquisition/rehabilitation of rental properties.
- At the predevelopment review stage, inform builders of the option to fulfill inclusionary requirements with off-site acquisition/rehabilitation.
- Beginning in 2023 and updating annually, generate a list of small older multi-family rental properties for potential acquisition/rehabilitation and deed restriction. Target properties in Northwest Pasadena.
- Before 2027, study whether the Inclusionary Housing Ordinance should be amended to provide an option for allowing developers to fund rehabilitation of non-deed-restricted affordable housing. If the study indicates the option to be a productive means of preserving affordable housing, include provisions in the IHO by 2029.

Target Population: Citywide; extremely low, very low, and low-income households

Time Frame: Ongoing

Responsibility: Housing Department

Funding Source: Local, State, and federal funds



PROGRAM #16: HOUSING FOR PEOPLE WITH DISABILITIES

Pasadena encourages the development of housing suitable for people with disabilities (including developmental disabilities) and funds supportive services to address their needs.

- **Building Design.** The Americans with Disabilities Act (ADA) mandates certain requirements for multi-family housing units to be accessible to people with disabilities. There are also techniques for improving the accessibility of housing through the adoption of principles of “universal design,” “visitability,” or “barrier free” housing. Features typically include zero-step entrances, wide doorways that can accommodate wheelchairs, and other key features.
- **Reasonable Accommodation.** Pasadena’s housing stock was predominantly built before ADA requirements and may not be as accessible as new units. Therefore, the City’s municipal code establishes a process for requesting and granting reasonable modifications to zoning, development regulations, building codes, and land use to allow for the fullest access to housing. The City will simplify the process and thus improve access to housing for people with disabilities.
- **Housing Opportunities.** Expanding housing opportunities for people with disabilities (including developmental disabilities) is a necessary step toward achieving Pasadena’s housing vision. The City supports the construction of housing and group quarters suitable for people with disabilities. The City allocates vouchers (Program #15) for people with disabilities to live in housing in an integrated setting with other nondisabled people. The City uses federal and state grants, as well as county and local tax revenue, to provide services and permanent housing for the unhoused population, a significant percentage of whom have disabilities. Notably, \$3.15 million of Continuum of Care funding received from the U.S. Department of Housing and Urban Development (HUD) is utilized for the provision of permanent supportive housing to people with a disabling condition.

Implementation:

2021–2029 Objective(s):

- Continue to process applications for reasonable accommodations in an expeditious manner.
- Seek opportunities and grants to fund the provision of housing and services for people with disabilities (including developmental disabilities) as funding programs make the resources available-arises.
- Amend the Municipal Code to remove the Minor Variance requirement for a request for a reasonable accommodation and replace the process with a staff-level ministerial action. Reduce overall processing time by up to four weeks.

Housing Plan

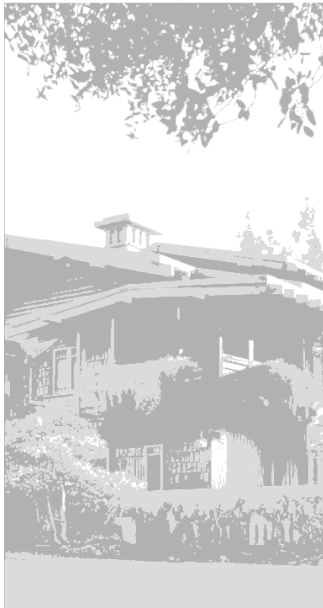
Target Population: All economic groups

Time Frame: Ongoing At least annually for grants; amend Reasonable Accommodation provisions by 2023

Responsibility: Planning & Community Development; Housing

Funding Source: Local, State, and federal funds

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PROGRAM #17: HOUSING FOR SENIORS

Pasadena continues to have a sizable senior population. Many retirement communities have been built in the City since Pasadena was established.

- **Housing Facilities.** Pasadena offers more than 1,200 units of senior housing, the majority of which are deed-restricted affordable to low-income seniors through covenants. In addition, more than 500 housing choice vouchers are allocated to seniors to rent housing in the community. The production of senior housing is also encouraged in multi-family districts, where provisions for parking reductions, density bonus incentives, and fee reductions apply. The City actively seeks partners to preserve affordable senior housing, such as the arrangement with the Retirement Housing Foundation to rehabilitate and preserve the 150-unit Concord senior housing development and the 70-unit Heritage Square rental project for older residents.
- **Life Care Facilities.** As the baby boomer population continues to age and grow, senior housing providers are expanding their housing facilities and services to include “life-care” housing opportunities, ranging from independent and semi-independent to assisted-living housing. The concept is to allow seniors who no longer reside in single-family homes to age in place without having to move to a completely different community or building as their health needs change. To that end, Pasadena works with life-care facility providers and developers to facilitate the construction of senior life-care facilities.
- **At-Risk Seniors.** A significant percentage of grant funding and local dollars spent on homeless services, including Continuum of Care and Emergency Solutions Grant program funding, provide housing and supportive services to seniors. In June 2020, the City and BRIDGE Housing entered into a development and loan agreement for the new construction of a 70-unit permanent supportive housing complex for homeless seniors, located on the City-owned “Heritage Square South” site.
- **Senior Services.** Pasadena seniors benefit from supportive services that enable them to live at home as independently as possible. The City funds organizations that provide meal and nutrition, recreation, health care, and service programs. Many programs operate from Pasadena’s Senior Center. The City’s transit line offers subsidized low-cost public transit for seniors. The City also implements its MASH program, which provides free home maintenance, repairs, and property maintenance for eligible seniors.
- **Shared Housing.** Existing housing units can help meet seniors’ needs through shared housing programs. Seniors who are mobile and wish to remain in their single-family homes but may not have the financial resources for maintenance can look for other seniors or younger roommates to reduce living costs. This model can achieve many

objectives simultaneously: allow seniors to live independently, provide them with companionship and support with daily care/assistance with tasks, create affordable housing options for students, and encourage intergenerational interactions.

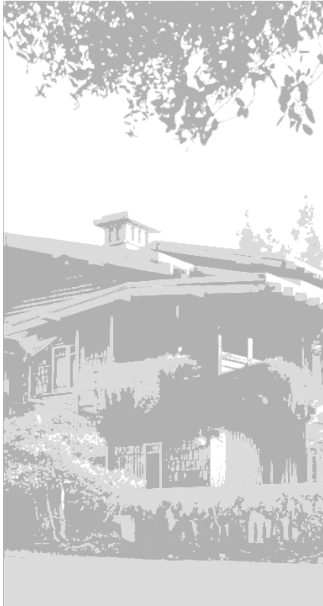
Implementation:

2021–2029 Objective(s):

- Continue to support the construction of new senior housing and life-care facilities and the preservation of affordable senior housing. Target up to 35 percent of such new units into higher resource/opportunity areas.
- Continue to fund the provision of supportive services for senior residents as funding becomes available.
- Use Measure H and other targeted funding sources to meet the particular needs of seniors at risk of becoming homeless or who are currently unhoused.
- Explore the creation of a City-sponsored shared housing program.
- Develop a strategy to help seniors find housing that meets their evolving housing needs. **Reach out to 100 owners and potential occupants (as measured by website hits).**

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Target Population:	Seniors from all economic groups
Time Frame:	Providing senior housing and services: ongoing through the CDBG and other funding programs Shared housing program: Investigate 2022-23 and if feasible, implement by 2025
Responsibility:	Housing Department
Funding Source:	Local, State, and federal funds



PROGRAM #18: FAMILY, YOUTH, AND STUDENT HOUSING

The City of Pasadena implements several programs to assist in developing and providing housing for families, including families with children, emancipated foster-care youth, and college-age persons.

- **Development of Housing for Families.** During the public outreach for this Housing Element, many participants identified the lack of affordable housing for families with children. Residents noted the difficulty of finding three-bedroom or larger apartments and houses that provide the space needed for larger families in particular. Because most new housing production in Pasadena consists of multi-family housing, opportunities to create units with three-plus bedrooms are limited unless incentives or subsidies are provided (as the City has done for the Marv's Place and Summit Grove projects).
- **Housing for Emancipated Youth.** Emancipating youth refers to youth "aging out" of the foster care system, as well as a broader group of youth becoming independent adults before the age of 18. About 1,500 foster youth age out of the Los Angeles County child welfare system each year. Most have nowhere to turn for jobs, housing, education, or support. Studies show that this population is at higher risk of homelessness. The City historically has not provided programs targeted to emancipated foster youth as other programs for affordable apartments and supportive housing help address their needs. The goal is to ensure these youth have access to the information that can help them find appropriate services.
- **Student Housing.** Pasadena is home to Caltech, Fuller Theological Seminary, ArtCenter of Design, Pasadena City College, and other small private colleges that collectively enroll more than 45,000 students. The exceptionally large number of educational institutions in Pasadena creates a high demand for apartments and affordable housing for faculty and students. While Fuller Theological Seminary is moving toward a predominantly online presence, ArtCenter has expanded to a second campus on South Raymond Avenue and has plans to provide housing. Pasadena City College supports the educational aspirations for about 29,000 students every year, and statewide data show that as high as 17 percent of these students face housing challenges. The City will continue to work with the private institutions to prepare and update Master Plans to provide additional housing opportunities. Pasadena City College's land use decisions are not subject to City regulation, but Pasadena supports efforts to allow housing on Pasadena City College lands to meet a significant student housing need.

Implementation:

2021–2029 Objective(s):

- Work with organizations that oversee foster youth to help provide information regarding housing and services available to meet their needs as they transition out of the foster system.
- Identify incentives that can be used to encourage production of multi-family housing units with three or more bedrooms and incorporate those incentives into zoning and other appropriate development regulations.
- Work with private colleges and universities to require that student, faculty, and staff housing be proactively addressed in updated master plans.
- Continue to offer residential impact fee reductions for student housing.
- Support State legislation that authorizes construction of student housing on community college campuses. Encourage Pasadena City College to take advantage of any existing and future State legislation that authorizes construction of student housing on community college campuses, and work with the College to identify potential partnerships.

Target Population: All economic groups

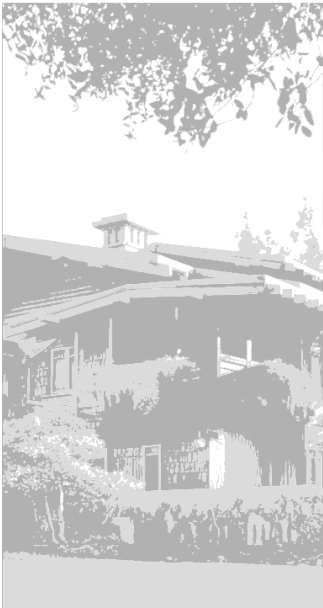
Time Frame: Coordination work and lobbying efforts **annually are ongoing throughout the cycle.**

Incentives for production of 3+ bedroom units will be examined as part of the Specific Plan updates and zoning code update to be completed by 2024.

Responsibility: Planning & Community Development; Housing Department

Funding Source: Local, State, and federal funds

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PROGRAM #19: HOMELESS SERVICES

Pasadena employs a multi-faceted approach to addressing homelessness, as set forth in its Ten-Year Strategy to End Homelessness. As noted in the 2020 Pasadena Homeless Count, “although we continue to battle complex societal factors that are compounded by long-standing structural inequities, an increasing number of people are successfully getting connected to services and housing.”

- **Continuum of Care.** Pasadena has traditionally implemented a Continuum of Care (CoC) approach to addressing homelessness. A network of service agencies has emerged to address the needs of Pasadena’s homeless population: The Pasadena Partnership to End Homelessness. The Pasadena Partnership is the primary entity in Pasadena focused on meeting the housing and service needs of people experiencing homelessness. As a CoC designee, the Pasadena Partnership receives funding from HUD for its programs. The City’s Housing Department is a collaborative applicant for the CoC funding.
- **Rapid Re-housing/Transition.** Pasadena supplements the CoC system with a Rapid Re-housing Approach, as described in Program #15. This highly successful model provides an option for placing individuals and families experiencing homelessness immediately into permanent housing with supportive services. Rapid re-housing participants are provided with short-term interventions such as deposit assistance; short-term rent subsidies; and stabilization services including case management, budgeting assistance, and assistance to increase income.
- **Motel/Hotel Conversions.** Pasadena has many motels that have the potential to be converted to affordable housing. In 2018, the City passed a hotel/motel conversion ordinance to make it easier to convert existing hotels and motels to affordable housing.
- **Supportive Services.** Pasadena continues to support agencies that provide supportive services to people experiencing homelessness. Services are provided by a network of organizations (nonprofit, local government, for-profit, etc.) addressing both chronic and temporary homeless conditions people of all ages and backgrounds face, with the key goals of providing transitional and permanent housing. This assistance may include food services, job training, mental health, substance abuse recovery, referral services, and other services that enable people to transition to live full and productive lives.

Implementation

2021-2029 Objective(s):

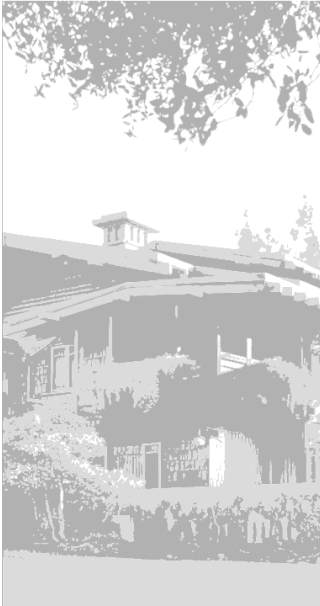
- Update and implement on an ongoing basis the recommendations in the City’s Ten-Year Strategy to End Homelessness.
- Continue programs to allow for the permanent conversion of motels to supportive and transitional housing.
- Continue to provide weather-activated motel vouchers to people experiencing homelessness.
- Working through the CoC Board, continue to prioritize funding for permanent supportive housing when it is eligible and feasible with the funding source.
- Pursue investments in homelessness prevention programming to reduce the number of people who experience homelessness for the first time due to the anticipated sharp increase in demand for prevention and diversion services when eviction moratoria are lifted in response to the COVID-19 pandemic.
- Through the CoC, explore using State funding to support a “Moving On” program for formerly chronically homeless participants living in a local permanent supportive housing site. The program will provide direct assistance via move-in costs, security deposits, etc. to support the transfer over to a less service-intensive housing assistance resource and free up permanent supportive housing units for those currently experiencing homelessness who need the housing and intensive services that accompany it.
- Investigate establishing a “safe parking” ordinance that allows people without permanent housing to park on a temporary basis in designated safe parking areas, with some form of discretionary review required to allow such use. If found to be an appropriate City program, establish an ordinance by 2024.

Target Population: Extremely low-, very low-, and low-income households

Time Frame: Update the Ten-Year Plan by 2025
Investigate “Moving On” program by 2024
All other programs are ongoing

Responsibility: Housing Department working with the Pasadena Partnership to End Homelessness

Funding Source: HUD



PROGRAM #20: FAIR HOUSING

Pasadena's fair housing program supports its vision of a socially and economically diverse community by facilitating the provision of housing opportunities for all persons, regardless of their status. Pasadena's efforts to affirmatively further fair housing law are detailed below. Many of the programs involve work of the Human Rights Center through its contract with the City.

- **Fair Housing Services.** Pasadena contracts with nonprofit agencies to promote the enforcement of fair and equal housing opportunity laws. These agencies provide counseling and referrals, landlord and tenant dispute resolution, discrimination and complaint processing, education, outreach, training, technical assistance, advocacy, and relocation assistance. The City implements its Housing Mediation Ordinance, which oversees landlord-tenant disputes.
- **Fair Housing Impediments.** Fair housing concerns have varied over the past decades concurrent with case law, improved awareness, and contemporary challenges. In accordance with federal and State fair housing law, the City regularly prepares an Analysis of Impediments to Fair Housing Choice that identifies potential impediments and offers a menu of strategies to address them. The City will continue to work with its fair housing provider to affirmatively address identified impediments.
- **Monitoring.** Contracting with non-profit housing organizations, the City will continue fair housing testing every two years starting in 2022. Specifically, upon release of 2020 Census data, random testing will be conducted that reflects the City's changing demographics and emerging fair housing trends. Ensure fair housing testing is conducted in Northwest Pasadena with disproportionate housing needs and displacement risks.
- **Tenant Protection Ordinance.** The City requires property owners to pay relocation assistance for tenants who are involuntarily displaced from housing when the tenant is not at fault. Relocation assistance is required if: 1) the unit is slated for demolition; 2) the building must be vacated due to health and safety violations; or 3) the landlord seeks to remove the unit permanently from the rental market. Tenant protections are also enforceable in the case of condominium conversions. In 2019, updates to the ordinance strengthened tenant protections. The City will strengthen protection efforts as follows:
 - With additional City funding, the Housing Department will continue to provide tenant protections counseling and legal services.
 - Continue implementing the Housing Mediation Ordinance, which oversees landlord-tenant disputes.

- **“Renoviction”:** By the end of 2022, complete amendments to administrative regulations in the existing Tenant Protection Ordinance (TPO) to close loopholes associated with landlord evictions of tenants for unit improvements.
- **Affordable Housing Preferences.** The City will evaluate and revise its local preference policy in compliance with Government Code section 8899.50 and all applicable State and federal fair housing laws. Revisions may consider a local preference policy consistent with SB 649 (Government Code sections 7061 and 7061.1). The evaluation and revision will also consider the intended objectives of anti-displacement, facilitating aging in the community, and reducing commutes for lower-income workers, and that the policy does not have the unintended result of, including but not limited to, perpetuating segregation within the City and across the region and excluding persons and families (e.g., non-elderly) of all incomes, including persons with protected characteristics.
- **Landlord Education.** The Housing Department supports landlord education through funding to non-profit organizations and partners with the HRC to conduct fair housing workshops and informational flyers. Through the contract, the City will expand outreach and education of the State’s Source of Income Protection laws (SB 329 and SB 222) defining public assistance, including housing choice vouchers as legitimate source of income for housing. Also, the City will develop materials regarding source of income protection for distribution to rental property owners, including property owners with ADUs and property owners seeking building permits for small rental complexes such as duplex and triplex developments.
- **Tenant and Homeowner Education.** The City will target dissemination of Fair Housing Outreach information and notices of available services and workshops in Northwest neighborhoods identified with disproportionate housing needs and displacement risks.
- **Unhoused Individuals and Families.** The City will engage Mental Health Advocacy Services to provide fair housing training for homeless services providers who assist with housing locator services.
- **Expanding Housing Opportunities.** A key goal of fair housing is to create opportunities for people to find housing of all types in all neighborhoods. Actions to achieve this goal include:
 - Continue the Second Unit Accessory Dwelling Unit (ADU) Pilot Program to provide easy financing to construct an ADU in exchange for leasing the unit to a Section 8 housing choice voucher holder for seven years. Other options include bringing an unpermitted ADU (e.g., garage conversions) up to code for low- to moderate-income households. The goal is to achieve 20 ADUs over eight years.

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- Initiate a program in 2022 to produce pre-approved ADU building plans to help reduce the cost to property owners of processing building permits and getting a project more quickly to construction.
- Monitor and review all ADU programs for effectiveness to ensure ADU production and affordability goals are being achieved. As necessary, adjust the incentives to facilitate production.
- Continue to implement the 2021 modifications to the Local Preference Ordinance for affordable housing (rental or ownership) developed with City subsidy or under the Inclusionary Housing/Density Bonus Ordinances. The modifications created a new priority category and of a new set-aside designed to address displacement (Over-Housed Priority and Former Resident Set-Aside (20 percent of available units).
- Increase visibility of the <http://pasadenahousingsearch.com> website by publishing an article for the website annually in the City's Pasadena-in-Focus newsletter, which is sent to all Pasadena residents.
- Work with SocialServe.com (the developer of the <http://pasadenahousingsearch.com> website) to include areas of opportunity as a search feature.
- In 2021, as part of its Missing Middle policy to address the growing need for "missing middle" housing—rental units affordable to the moderate-income workforce—the City entered a of a Public Benefit Agreement with the California Statewide Communities Development Authority for the acquisition of existing apartment projects Westgate Apartments Phase II and III (340 units) and The Hudson, with 173 units. The City will consider additional projects if opportunities arise during the planning period, with the goal of acquiring 900 total units.
- Beginning in 2022, promote the City's reduced residential impact fee from \$20,000 to \$3,000 if the developer builds workforce units. Currently, this reduction is not being widely utilized. Promote this incentive during pre-application and initial project reviews. **Achieve 4 eight-year housing cycle.**

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Implementation:

2021–2029 Objective(s):

- Continue to provide fair housing services, tenant-landlord mediation, enforcement, and outreach and education services.

- Expand fair housing outreach and education in Northwest Pasadena, including at least one annual workshop in the neighborhood.
- Update the City's Analysis of Impediments to Fair Housing Choice every five years and implement recommendations contained in it.
- Conduct fair housing testing at least every other year beginning in 2022.
- Continue to implement Pasadena's Tenant Protection Ordinance and applicable provisions of the State 2019 Tenant Protection Act, with expanded tenant protection counseling and legal services.
- Reduce complaints of unlawful eviction by 10 percent relative to a 2022 baseline.
- By 2022, develop materials regarding source of income protection for distribution to rental property owners, including property owners with ADUs.
- At least annually, disseminate Fair Housing Outreach information and notices of available services and workshops, with targeted outreach in Northwest neighborhoods.
- Assist 70 persons annually with fair housing services.
- By 2025, review the City's preference policy to ensure that it is not perpetuating segregation or creating a disparate impact on any racial or ethnic group. Modify the policy as appropriate if it is perpetuating segregation or creating a disparate impact. Determine whether a preference policy based on AB 649 may be implemented.
- Continue programs focused on landlord education of fair housing laws.
- Continue to require affirmative marketing of available affordable housing, especially for inclusionary housing units and affordable housing projects that received City funding or incentives. Annually monitor to verify that each builder follows procedures and requirements for tenant or homebuyer selection.
- On an ongoing basis, publicize fair housing events and program information more prominently on City website and at public locations. Expand methods of outreach and education, especially through social media and community-based organizations.
- At least annually make public announcements, via different media (e.g., social media, newspaper ads, and public service announcements at local radio and television channels) related to fair housing programs and opportunities.
- In 2023, work with KPAS (local public access television) to create an informational video on fair housing, including the new source of income protection.

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- Annually participate in diversity awareness events and programs at a variety of locations throughout the City, with housing inquiries by 10 percent.
- Annually publicize outcomes of fair housing lawsuits and complaints to promote the positive outcomes and resolutions.
- By 2023, establish a method of measuring the progress of fair housing practices which can include the index of dissimilarity, the Regional Opportunity Index, and percentage of residents experiencing extreme housing cost burdens. Report the findings of these metrics as part of the city's Housing Element Annual Progress Report each April, with 2022 as the baseline. Use information collected to adjust and target community outreach.

Target Population:	Persons with protected status under fair housing laws
Time Frame:	Ongoing
Responsibility:	Housing Department
Funding Source:	Local HOME funds; CDBG; California Statewide Community Development Authority (CSCDA) Joint Powers Authority

PROGRAM #21: EDUCATION AND MONITORING

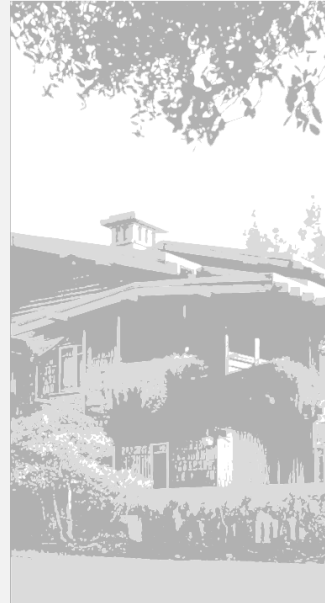
Education and monitoring activities are an essential process for evaluating and refining housing programs. The City has three primary activities geared toward monitoring progress and engaging and educating decision makers and the community about housing policies and programs.

- **Monitoring Program.** For reporting purposes of federal funding programs, Pasadena prepares the required Consolidated Annual Performance Evaluation Report (CAPER) for federal programs. As required by State law, the City prepares the Annual Housing Element Progress report for HCD. The City maintains a tracking program for the specific plans to ensure conformance with General Plan policies regarding development caps (which do not apply to affordable housing production and which the City has committed to removing). Per State law, a similar program will be required to track no-net-loss provisions regarding housing inventory sites identified for affordable housing production.
- **Community/Commission Education.** Housing policy and programs, State and federal mandates, funding sources, and entitlement processes can be confusing to people unfamiliar with their application. To enhance and inform the decision-making process for housing matters and to help the public navigate seemingly complex processes, the City will implement more formal education programs about housing production and policy. Targeted audiences will include elected and appointed City officials, affected City staff, and the public who use and benefit from housing programs and entitlement processes.

Implementation:

2021–2029 Objective(s):

- Monitor annually the progress in meeting the objectives set forth in the Housing Element and prepare Annual Report to HCD as required by law. Adjust strategies as appropriate to address any shortcomings.
- Establish a no-net-loss tracking program that allows the public to readily access information regarding housing sites available for the construction of affordable units.
- Conduct ongoing educational efforts to engage and inform the public, decision makers, and stakeholders about housing issues and programs. Provide informational materials both online and as part of in-person events. In particular, ensure that property owners pursuing ADU construction and new SB9 units are aware that they may not ask prospective tenants of their source of income.



Housing Plan

Target Population:	All economic groups
Time Frame:	Annually and ongoing
Responsibility:	Planning & Community Development; Housing Department
Funding Source:	General Fund

PROGRAM #22: NEIGHBORHOOD AND COMMUNITY PRESERVATION

Several neighborhoods in Pasadena have home values that have stayed lower than the local median prices due to underinvestment in community infrastructure, historic real estate practices that prevented people of color from buying or renting homes in particular districts, and poorly performing local public schools, among other factors. Like other Pasadena neighborhoods, the lower-income areas contain houses with historic character and local shopping districts that people can walk to. They are culturally rich neighborhoods where families have lived for generations.

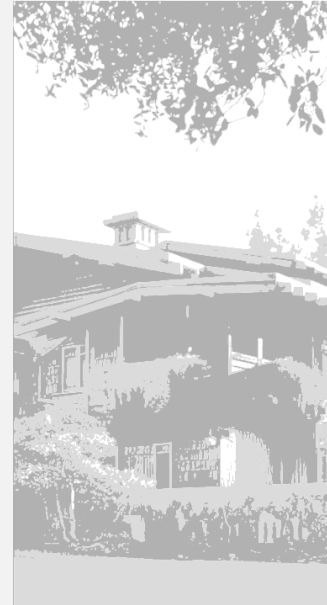
With home prices so high in most of the City, homebuyers and institutional investors see the value in the historically undervalued areas and are buying houses at seemingly bargain prices. They may be purchasing properties now rented as affordable units, rehabilitating the home, and “flipping” them to be bought or rented at higher prices. This practice often forces long-term residents to move. Also, however, long-term residents who own the homes are benefitting from increased home values and can build generational wealth formerly not possible. The process of gentrification creates tensions, and those residents who are adversely affected see a loss not just of their home but their neighborhood.

As of 2021, Pasadena did not have any programs specifically to address the adverse impacts of gentrification. However, the City has adopted strategies and programs to address residents’ concerns, such as expanding the middle-income housing supply and providing opportunities for renters to purchase the units they live in. Through the public engagement process for this Housing Element, residents and neighborhood advocates asked for additional actions to allow long-term residents to remain in their neighborhoods of choice.

Implementation:

2021–2029 Objective(s):

- Annually monitor building and home sales activities in historically under-market neighborhoods to identify any adverse trends. If trends indicate substantial displacement and changes in community character, investigate effective means that can supplement existing City efforts.
- Investigate whether imposition of a vacancy tax would result in keeping properties in the rental and for-sale markets and not held vacant by owners waiting for the market to shift upwards.
- Continue to implement the 2021 modifications to the Local Preference Ordinance for affordable housing (rental or ownership) developed with City subsidy or under the Inclusionary Housing/Density Bonus Ordinances. The modifications created a new priority category and a new set-aside designed to address displacement (Over-Housed Priority and Former Resident Set-Aside 20 percent of available units).



- *Prioritize Former Resident:* Many residents who are being priced out of Pasadena are disproportionately minority. This priority is for people who were priced out within the last ten years. Set aside 20 percent of new affordable units (up to 50 units) for former residents of Pasadena. By 2025, evaluate the effectiveness of this priority and consider modifications and increases to this number.
- *Over-Housed Priority:* Many older City deed-restricted affordable homes (with three or more bedrooms) are being occupied by older adults whose children no longer live with them. These households are “over-housed” but have limited trade down options in Pasadena due to price. This priority allows the over-housed households to access small inclusionary units and be able to remain in the community. Reduce displacement by 10 percent relative to a 2022 baseline.

Target Population: Residents of historically underserved neighborhoods

Time Frame: Ongoing

Responsibility: Planning & Community Development; Housing Department

Funding Source: General Fund

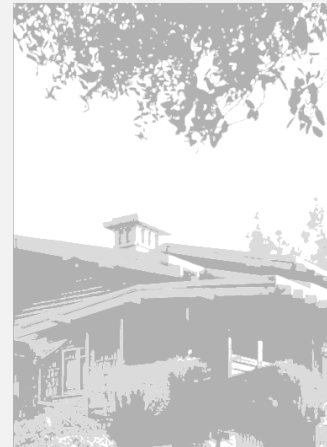
PROGRAM #23: ZONING CODE UPDATES

Beginning in 2017, the California legislature passed several laws aimed at increasing housing production of all types, particularly housing for lower-income and special needs households. To implement the legislation, Pasadena will need to amend its zoning ordinance to address current density bonus regulations, laws applicable to ADUs, low-barrier navigation centers, supportive housing as a by-right use, and application review processes for projects using streamlined approvals pursuant to SB 35 and SB 330. In the absence of tailored local zoning regulations, State law applies.

Implementation:

2021–2029 Objective(s):

- Amend Title 17 (Zoning Code) of the Pasadena Municipal Code to implement current State laws, including provisions related to objective design standards, specifically to addressing the approval findings as a constraint. The provisions will ~~and limiting or modifying decision-making criteria, which may include inclusion of objective design and development standards.~~
- Amend the Zoning Code to reinstate transitional housing regulations the City adopted (that were inadvertently deleted by a subsequent code amendment) to implement State law.
- Update emergency shelter regulations in the Zoning Code to ensure consistency with State law and specifically, to ensure adequate capacity to accommodate the City's unhoused need and address constraints. The updated code provisions will revise parking requirements to comply with State law, increase bed limits above the current 12-bed limit to at least 35 beds based on input from service providers, and allow for Low Barrier Navigation Centers.
- ~~Update emergency shelter regulations in the Zoning Code to ensure consistency with State law to ensure adequate capacity to accommodate the City's unhoused need, reflect reasonable parking requirements per State law, increase bed limits, and allow for Low Barrier Navigation Centers consistent with State law.~~
- Amend Zoning Code regulations regarding employee housing to allow such housing with six or fewer residents in a single-family residential zone to be treated the same as any single-family residence and 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.
- For sites used in prior Housing Elements designated in this element as sites required to achieve the lower-income RHNA, adopt zoning code amendments, in compliance with Government Code section 65583.2, subdivision (c), that establish regulations that allow by-right approval of



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Housing Plan

housing projects without discretionary action. At least 10 percent of the units for lower-income housing shall be located within the subdivision. Under ~~ent~~ State law, by right review under the California Environmental Quality Act (CEQA) and no discretionary approval may be required for projects that require design review approval based on objective standards. In the interim and prior to adoption of the ordinance, the City will establish a process or procedure that implements by-right approval for eligible projects in compliance with Government Code section 65583.2, subdivision (c). -This will include a provision for design review with objective standards.

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- Amend the Zoning Code to create a separate design review process for affordable housing projects, and rezoned sites, and recycled sites to streamline the process, consistent with State law.

Target Population: All income groups

Time Frame: Procedure for by-right housing projects, right Code amendment amendments by 2024

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Responsibility: Planning & Community Development

Funding Source: General Fund

PROGRAM 24: RESOURCE CONSERVATION

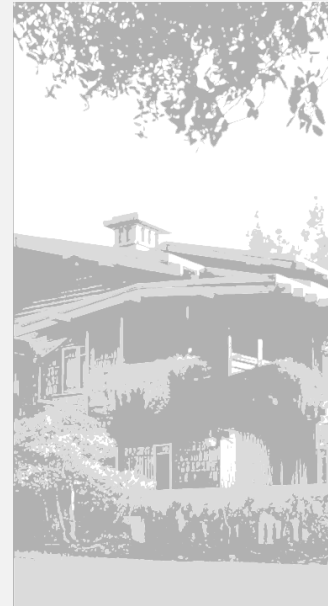
Pasadena encourages sustainable development that reduces energy conservation, protects the environment, and facilitates production of affordable housing. In 2018, the City adopted a Climate Action Plan (CAP) which establishes several strategies applicable to residential development. Notably, the CAP includes a consistency checklist which City staff uses in project review to determine ability of project design features to reduce greenhouse gas emissions.

- **Building Codes.** Pasadena implements the California Green Building Standards Code (CalGreen) to promote sustainable building design and construction practices. Although CalGreen's mandatory provisions apply only to new construction and rehabilitation, the City extends these requirements to additions and alterations. Additional requirements, as permitted under State law, also apply to the residential and mixed-use development.
- **Solar Incentives.** Pasadena Solar Initiative (PSI) promotes the expansion of renewable solar power use locally. Through rebates, additional incentives and education, the PSI aimed to facilitate the generation of 14 megawatts of solar power by 2017. Through these incentives, the City has already facilitated the installation of 380 solar units in residential structures in Pasadena.
- **Water and Sewer Services.** The 2015 General Plan EIR concluded that adequate water supplies are available to meet the projected level of growth, with which this Housing Element conforms. However, statewide drought conditions associated with climate change can be expected to strain water supply. As required by State law, the City has policies in place (City Council resolution #8621) to grant priority for service allocations to proposed projects that include low-income housing. Sewer service capacity continues to be adequate.

Implementation:

2021–2091 Objectives:

- Continue to implement CalGreen and make technical refinements to the code as required to implement its provision.
- Continue to implement the City's solar initiative to help reach targets for nonrenewable energy production.
- Implement Climate Action Plan strategies related to TOD, energy efficiency upgrades, carbon-neutral technologies, and water use reduction.



Housing Plan

Target Population:	All economic groups
Time Frame:	Ongoing
Responsible Agency:	Planning & Community Development; Pasadena Water and Power
Funding Source(s):	Building permit fees; General Fund; grants

TABLE C-7: SITES INVENTORY

Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites
906 GRANITE DR	91101	5327001010	
900 GRANITE DR	91101	5327001011	
896 GRANITE DR	91101	5327001012	
517 S CATALINA AVE	91101	5327001023	
540 S LAKE AVE	91101	5327002001	
923 E CALIFORNIA BLVD	91101	5327002007	
927 E CALIFORNIA BLVD	91101	5327002008	
947 E CALIFORNIA BLVD	91101	5327002088	
1627 POPPY PEAK DR	91105	5482008021	
1135 LINDA GLEN DR	91105	5707010053	
1430 LINDA RIDGE RD	91103	5707014005	
95 PATRICIAN WAY	91105	5708006016	
305 MANFORD WAY	91105	5708021018	
924 CYPRESS AVE	91103	5711001012	
946 CYPRESS AVE	91103	5711001014	
470 CYPRESS WAY	91103	5711001038	
720 W HOLLY ST	91105	5711010041	
25 ORANGE PL	91105	5713022029	
210 S DE LACEY AVE	91105	5713022032	
80 VALLEY ST	91105	5713022033	
40 ORANGE PL	91105	5713023004	
27 PEACH PL	91105	5713023033	
257 S FAIR OAKS AVE	91105	5713023034	
1492 W COLORADO BLVD	91105	5715001015	
280 AVENUE 64	91105	5715003027	
765 ROCKWOOD RD	91105	5717014005	
725 HILLSIDE TER	91105	5717018008	
725 S PASADENA AVE	91105	5719005900	
234 BELLEFONTAINE ST	91105	5719006901	
182 BELLEFONTAINE ST	91105	5719024902	
172 BELLEFONTAINE ST	91105	5719024903	
93 HURLBUT ST	91105	5719025012	
621 S ARROYO PKWY	91105	5720012003	
1001 S MARENGO AVE	91105	5720017010	
1021 S MARENGO AVE	91105	5720017045	
814 MAGNOLIA AVE	91106	5720025003	
621 S LAKE AVE	91106	5721027019	
623 S LAKE AVE	91106	5721027020	
495 S ARROYO PKWY	91105	5722008002	

503 S ARROYO PKWY	91105	5722008012	
323 S ARROYO PKWY	91105	5722009023	
300 S RAYMOND AVE	91105	5722009030	
170 S RAYMOND AVE	91105	5722010001	
182 S RAYMOND AVE	91105	5722010006	
80 S RAYMOND AVE	91105	5722011001	
120 S RAYMOND AVE	91105	5722011002	
132 S RAYMOND AVE	91105	5722011003	
150 S RAYMOND AVE	91105	5722011004	
130 S RAYMOND AVE	91105	5722011015	
100 E GREEN ST	91105	5722011017	
121 S ARROYO PKWY	91105	5722011019	
200 E DEL MAR BLVD	91105	5722014019	
287 PLEASANT ST	91101	5722018018	
213 S EUCLID AVE	91101	5722024117	
192 S MARENGO AVE	91101	5722027038	
253 S LOS ROBLES AVE	91101	5722030163	
400 E GREEN ST	91101	5722030904	
150 E COLORADO BLVD	91105	5722036024	
140 CHESTNUT ST	91103	5723002040	
164 CHESTNUT ST	91103	5723002047	
167 E WALNUT ST	91103	5723002909	
221 E WALNUT ST	91101	5723003038	
241 N EUCLID AVE	91101	5723004018	
333 E WALNUT ST	91101	5723004019	
331 E WALNUT ST	91101	5723004020	
272 N LOS ROBLES AVE	91101	5723005029	
410 E CORSON ST	91101	5723005044	
274 N OAKLAND AVE	91101	5723006037	
230 N EL MOLINO AVE	91101	5723009015	
659 E WALNUT ST	91101	5723009017	
681 E WALNUT ST	91101	5723009018	
689 E WALNUT ST	91101	5723009019	
715 E WALNUT ST	91101	5723009022	
737 E WALNUT ST	91101	5723009034	
711 E WALNUT ST	91101	5723009036	
150 N EL MOLINO AVE	91101	5723013020	
165 N OAK KNOLL AVE	91101	5723013066	

150 N MADISON AVE	91101	5723014027	
99 N EL MOLINO AVE	91101	5723014069	
300 E WALNUT ST	91101	5723018904	
280 RAMONA ST	91101	5723018910	
130 N FAIR OAKS AVE	91103	5723021012	
844 E UNION ST	91101	5723030050	
730 N FAIR OAKS AVE	91103	5725002903	
740 N FAIR OAKS AVE	91103	5725002904	
25 E ORANGE GROVE BLVD	91103	5725002911	
19 E ORANGE GROVE BLVD	91103	5725002912	
710 N FAIR OAKS AVE	91103	5725002913	
722 N FAIR OAKS AVE	91103	5725002914	
40 E VILLA ST	91103	5725003026	
399 N RAYMOND AVE	91103	5725003039	
640 N FAIR OAKS AVE	91103	5725004028	
651 SUMMIT AVE	91103	5725009011	
779 N MARENGO AVE	91103	5725010032	
140 E ORANGE GROVE BLVD	91103	5725014009	
186 E ORANGE GROVE BLVD	91103	5725014015	
176 E ORANGE GROVE BLVD	91103	5725014035	
403 SUMMIT AVE	91103	5725016036	
674 N MARENGO AVE	91101	5725019005	
304 E ORANGE GROVE BLVD	91101	5725019014	
230 E ORANGE GROVE BLVD	91101	5725019027	
870 N MARENGO AVE	91104	5725021004	
826 N MARENGO AVE	91104	5725021008	
814 N MARENGO AVE	91104	5725021024	
818 N MARENGO AVE	91104	5725021025	
417 N MARENGO AVE	91103	5725023040	
172 E VILLA ST	91103	5725023904	
895 N LOS ROBLES AVE	91104	5725026015	
825 N LOS ROBLES AVE	91104	5725026024	
432 N GARFIELD AVE	91101	5725031009	
499 N LOS ROBLES AVE	91101	5725032007	
843 N FAIR OAKS AVE	91103	5726002010	
25 YALE ST	91103	5726002011	
78 YALE ST	91103	5726003010	
849 LINCOLN AVE	91103	5726004021	
747 LINCOLN AVE	91103	5726005023	
660 CYPRESS AVE	91103	5726005035	
899 CHAPMAN AVE	91103	5726006013	
343 BARTHE DR	91103	5726008001	
325 BARTHE DR	91103	5726008003	
317 BARTHE DR	91103	5726008004	

311 BARTHE DR	91103	5726008005	
852 CHAPMAN AVE	91103	5726008006	
890 CHAPMAN AVE	91103	5726008020	
880 CHAPMAN AVE	91103	5726008021	
245 CLINTON ST	91103	5726009034	
227 CLINTON ST	91103	5726009036	
690 N ORANGE GROVE BLVD	91103	5726010016	
700 N ORANGE GROVE BLVD	91103	5726010017	
481 LINCOLN AVE	91103	5726010028	
524 CYPRESS AVE	91103	5726010038	
536 CYPRESS AVE	91103	5726010039	
556 CYPRESS AVE	91103	5726010041	
690 N ORANGE GROVE BLVD	91103	5726010042	
859 SUNSET AVE	91103	5726013007	
872 MANZANITA AVE	91103	5726013012	
814 MANZANITA AVE	91103	5726013019	
515 CHAMPLAIN AVE	91103	5726015052	
514 CHAMPLAIN AVE	91103	5726015053	
489 N FAIR OAKS AVE	91103	5726015905	
779 MANZANITA AVE	91103	5726016001	
176 CLINTON ST	91103	5726016016	
210 CLINTON ST	91103	5726016020	
765 N ORANGE GROVE BLVD	91103	5726018038	
232 CARLTON AVE	91103	5726018034	
1313 LINCOLN AVE	91103	5727009010	
1385 LINCOLN AVE	91103	5727010002	
1399 LINCOLN AVE	91103	5727010003	
1405 LINCOLN AVE	91103	5727010004	
1417 LINCOLN AVE	91103	5727010005	
1435 LINCOLN AVE	91103	5727010040	
1493 LINCOLN AVE	91103	5727011005	
456 DEL MONTE ST	91103	5727011006	
1275 SUMMIT AVE	91103	5728001017	
1138 N RAYMOND AVE	91103	5728002012	
1010 N RAYMOND AVE	91103	5728003019	
919 SUMMIT AVE	91103	5728003039	
930 N RAYMOND AVE	91103	5728003043	
1071 N RAYMOND AVE	91103	5728006008	
1035 N RAYMOND AVE	91103	5728006024	
953 N RAYMOND AVE	91103	5728006042	
244 W HOWARD ST	91103	5728008034	
256 W HOWARD ST	91103	5728008036	
276 W HOWARD ST	91103	5728008038	
1566 MENTONE AVE	91103	5728008040	

1558 MENTONE AVE	91103	5728008041	
247 DEL MONTE ST	91103	5728008051	
1531 MENTONE AVE	91103	5728008059	
293 MACDONALD ST	91103	5728010017	
287 MACDONALD ST	91103	5728010018	
257 MACDONALD ST	91103	5728010023	
305 W WASHINGTON BLVD	91103	5728010043	
1491 MENTONE AVE	91103	5728010056	
1486 N FAIR OAKS AVE	91103	5728011008	
1429 SUNSET AVE	91103	5728012043	
1445 SUNSET AVE	91103	5728012046	
1400 GLEN AVE	91103	5728012060	
1495 SUNSET AVE	91103	5728012065	
1507 SUNSET AVE	91103	5728012067	
1408 GLEN AVE	91103	5728012085	
239 W WASHINGTON BLVD	91103	5728013034	
1323 SUNSET AVE	91103	5728013037	
285 PEPPER ST	91103	5728013049	
1467 EL SERENO AVE	91103	5728014012	
107 CEDAR ST	91103	5728014015	
1470 EL SERENO AVE	91103	5728014042	
1472 EL SERENO AVE	91103	5728014043	
1486 EL SERENO AVE	91103	5728014044	
1502 EL SERENO AVE	91103	5728014046	
1542 EL SERENO AVE	91103	5728014050	
1478 SUNSET AVE	91103	5728016020	
1251 GLEN AVE	91103	5728017045	
1233 SUNSET AVE	91103	5728017054	
1241 SUNSET AVE	91103	5728017055	
1185 SUNSET AVE	91103	5728019031	
281 W HAMMOND ST	91103	5728019056	
271 W HAMMOND ST	91103	5728019057	
1095 SUNSET AVE	91103	5728021038	
1085 SUNSET AVE	91103	5728021039	
1077 SUNSET AVE	91103	5728021040	
1421 SUMMIT AVE	91103	5729005006	
1395 SUMMIT AVE	91103	5729006004	
280 GRANDVIEW ST	91104	5729010028	
290 ROBINCROFT DR	91104	5729011011	
1280 SUMMIT AVE	91103	5729013005	
986 SUMMIT AVE	91103	5729016020	
1075 N LOS ROBLES AVE	91104	5729032015	
361 ADENA ST	91104	5729033005	

1017 N LOS ROBLES AVE	91104	5729033012	
936 N LOS ROBLES AVE	91104	5730012003	
972 N LOS ROBLES AVE	91104	5730012007	
1329 N LAKE AVE	91104	5730028058	
1285 N LAKE AVE	91104	5730028059	
1245 N LAKE AVE	91104	5730028060	
1247 N LAKE AVE	91104	5730028061	
599 N MADISON AVE	91101	5731005052	
826 BOYLSTON ST	91104	5731012040	
791 EARLHAM ST	91101	5731013019	
773 EARLHAM ST	91101	5731013021	
733 EARLHAM ST	91101	5731014031	
582 N EL MOLINO AVE	91101	5731015015	
610 N EL MOLINO AVE	91101	5731015034	
540 N EL MOLINO AVE	91101	5731017023	
410 N EL MOLINO AVE	91101	5731020055	
417 N MADISON AVE	91101	5731021056	
599 MAR VISTA AVE	91106	5732009041	
494 N WILSON AVE	91106	5732010044	
514 N CATALINA AVE	91106	5732012047	
545 N CATALINA AVE	91106	5732014039	
565 N MENTOR AVE	91106	5732016046	
555 N MENTOR AVE	91106	5732016047	
402 N WILSON AVE	91106	5732020046	
392 N WILSON AVE 34	91106	5732020047	
494 S OAKLAND AVE	91101	5734008022	
420 S OAKLAND AVE	91101	5734009016	
448 S OAKLAND AVE	91101	5734009703	
550 E GREEN ST	91101	5734012006	
747 E GREEN ST	91101	5734013004	
140 S MADISON AVE	91101	5734014807	
209 S EL MOLINO AVE	91101	5734015026	
340 S MADISON AVE	91101	5734016008	
212 S EL MOLINO AVE	91101	5734023005	
139 S OAK KNOLL AVE	91101	5734023022	
136 S OAK KNOLL AVE	91101	5734025004	
770 E GREEN ST	91101	5734025014	
790 E GREEN ST	91101	5734025026	
106 S OAK KNOLL AVE	91101	5734025030	
199 S HUDSON AVE	91101	5734026019	
60 S LOS ROBLES AVE	91101	5734036016	
473 E GREEN ST	91101	5734036017	
675 E GREEN ST	91101	5734037022	
689 E GREEN ST	91101	5734037023	

713 E GREEN ST	91101	5734037024	
721 E GREEN ST	91101	5734037025	
735 E GREEN ST	91101	5734037026	
615 E GREEN ST	91101	5734037900	
44 S MADISON AVE	91101	5734037902	
217 S HOLLISTON AVE	91106	5735004004	
240 S MICHIGAN AVE	91106	5735008030	
1207 E GREEN ST	91106	5735009901	
1104 E COLORADO BLVD	91106	5735012001	
1121 STEUBEN ST	91106	5735014030	
1125 STEUBEN ST	91106	5735014032	
141 S MICHIGAN AVE	91106	5735015023	
107 S WILSON AVE	91106	5735024003	
120 S CATALINA AVE	91106	5735024011	
108 S CATALINA AVE	91106	5735024012	
102 S CATALINA AVE	91106	5735024013	
105 S WILSON AVE	91106	5735024041	
34 S CATALINA AVE	91106	5735025005	
42 S CATALINA AVE	91106	5735025006	
1060 E COLORADO BLVD	91106	5735025007	
1070 E COLORADO BLVD	91106	5735025008	
1055 E GREEN ST	91106	5735025011	
50 S CATALINA AVE	91106	5735025012	
1038 E COLORADO BLVD	91106	5735025020	
49 S CATALINA AVE	91106	5735026011	
33 S CATALINA AVE	91106	5735026024	
99 S CATALINA AVE	91106	5735027005	
105 S CATALINA AVE	91106	5735027006	
119 S CATALINA AVE	91106	5735027007	
127 S CATALINA AVE	91106	5735027008	
135 S CATALINA AVE	91106	5735027009	
100 S MENTOR AVE	91106	5735027016	
160 S MENTOR AVE	91106	5735027034	
208 S MENTOR AVE	91106	5735028001	
200 S MENTOR AVE	91106	5735028066	
985 SAN PASQUAL ST	91106	5735029209	
1336 E COLORADO BLVD	91106	5736001001	
1346 E COLORADO BLVD	91106	5736001002	
1348 E COLORADO BLVD	91106	5736001003	
1350 E COLORADO BLVD	91106	5736001004	
1364 E GREEN ST	91106	5736002013	
173 S MERIDITH AVE	91106	5736023027	
183 S MERIDITH AVE	91106	5736023028	
201 S MERIDITH AVE	91106	5736023030	

41 S MERIDITH AVE	91106	5736024005	
193 S ALLEN AVE	91106	5736026014	
81 HARKNESS AVE	91106	5737001020	
1441 E COLORADO BLVD	91106	5737001039	
111 HARKNESS AVE	91106	5737002003	
63 N SIERRA BONITA AVE	91106	5737005023	
48 MARION AVE	91106	5737005030	
1525 E WALNUT ST	91106	5737007011	
1515 E WALNUT ST	91106	5737007012	
1501 E WALNUT ST	91106	5737007060	
1460 LOCUST ST	91106	5737007101	
149 N MERIDITH AVE	91106	5737011043	
1762 E CORSON ST	91106	5737015009	
305 N ALLEN AVE	91106	5737015011	
1745 LOCUST ST	91106	5737015018	
1688 E CORSON ST	91106	5737015026	
1666 E CORSON ST	91106	5737015029	
1632 LOCUST ST	91106	5737016008	
1624 LOCUST ST	91106	5737016009	
308 N MENTOR AVE	91106	5738002019	
989 LOCUST ST	91106	5738002040	
1045 LOCUST ST	91106	5738002043	
104 N MENTOR AVE	91106	5738003901	
45 N CATALINA AVE	91106	5738004002	
45 N CATALINA AVE	91106	5738004003	
47 N WILSON AVE	91106	5738005015	
174 N CATALINA AVE	91106	5738005040	
1010 E UNION ST	91106	5738005050	
1046 LOCUST ST	91106	5738006007	
80 N LAKE AVE	91106	5738008034	
913 BOSTON CT	91106	5738008036	
266 N WILSON AVE	91106	5738010025	
265 MAR VISTA AVE	91106	5738010033	
143 MAR VISTA AVE	91106	5738011074	
56 N WILSON AVE	91106	5738012003	
36 N WILSON AVE	91106	5738012006	
33 MAR VISTA AVE	91106	5738012012	
37 N MICHIGAN AVE	91106	5738013011	
154 MAR VISTA AVE	91106	5738014001	
233 N HILL AVE	91106	5738016102	
264 N CHESTER AVE	91106	5738017044	
1229 E COLORADO BLVD	91106	5738020002	
64 N CHESTER AVE	91106	5738021006	
95 N HOLLISTON AVE	91106	5738021011	

171 N HOLLISTON AVE	91106	5738022006	
439 N HILL AVE	91106	5739001053	
400 N HOLLISTON AVE	91106	5739001056	
443 N HOLLISTON AVE	91106	5739002051	
395 N HOLLISTON AVE	91106	5739002057	
407 N CHESTER AVE	91106	5739003037	
395 N CHESTER AVE	91106	5739003039	
395 N MICHIGAN AVE	91106	5739004039	
449 N MICHIGAN AVE	91106	5739004046	
385 N MICHIGAN AVE	91106	5739004051	
1311 N MENTOR AVE	91104	5740001019	
1260 N LAKE AVE	91104	5740001025	
960 E WASHINGTON BLVD	91104	5740002001	
1300 N HILL AVE	91104	5741003032	
1436 E WASHINGTON BLVD	91104	5741003034	
1153 BRESEE AVE	91104	5741005005	
1280 E WASHINGTON BLVD	91104	5741014036	
1748 E WASHINGTON BLVD	91104	5742004039	
1027 N ALTADENA DR	91104	5743027018	
495 N ALTADENA DR	91107	5744021008	
446 N CRAIG AVE	91107	5744022009	
460 N CRAIG AVE	91107	5744022010	
2162 E VILLA ST	91107	5744022011	
411 CARMELO AVE	91107	5744023039	
1920 E VILLA ST	91107	5745001035	
409 N OAK AVE	91107	5745009035	
440 N OAK AVE	91107	5745009045	
1887 E VILLA ST	91107	5745012042	
1865 E VILLA ST	91107	5745012045	
1817 E VILLA ST	91107	5745012049	
488 N ALLEN AVE	91107	5745012050	
296 N ALLEN AVE	91107	5746004074	
1850 LOCUST ST	91107	5746005026	
234 N ALLEN AVE	91107	5746005035	
27 N GRAND OAKS AVE	91107	5746008044	
53 N GRAND OAKS AVE	91107	5746008050	
70 N CRAIG AVE	91107	5746008053	
132 N CRAIG AVE	91107	5746008068	
118 N OAK AVE	91107	5746009032	
93 N CRAIG AVE	91107	5746009049	
99 N CRAIG AVE	91107	5746009050	
2063 E COLORADO BLVD	91107	5746010026	
2055 E COLORADO BLVD	91107	5746010027	
2045 E COLORADO BLVD	91107	5746010028	

35 N OAK AVE	91107	5746010029	
93 N OAK AVE	91107	5746010036	
2025 E COLORADO BLVD	91107	5746010045	
36 N SAN MARINO AVE	91107	5746010046	
319 N OAK AVE	91107	5746011002	
263 N OAK AVE	91107	5746011009	
302 LINDA ROSA AVE	91107	5746011026	
310 LINDA ROSA AVE	91107	5746011027	
281 N CRAIG AVE	91107	5746013011	
296 N OAK AVE	91107	5746013016	
1999 E COLORADO BLVD	91107	5746014020	
14 N SAN MARINO AVE	91107	5746014021	
35 N SAN MARINO AVE	91107	5746014022	
43 N SAN MARINO AVE	91107	5746014023	
1987 E COLORADO BLVD FRONT	91107	5746014041	
40 N GREENWOOD AVE	91107	5746015023	
100 N GREENWOOD AVE	91107	5746015029	
39 N BERKELEY AVE	91107	5746015055	
82 N PARKWOOD AVE	91107	5746016076	
61 N PARKWOOD AVE	91106	5746017095	
2169 WHITE ST	91107	5746018004	
271 CARMELO AVE	91107	5746021800	
2415 OSWEGO ST	91107	5747002039	
2488 MOHAWK ST	91107	5747002193	
37 S ROOSEVELT AVE	91107	5747006040	
2074 E COLORADO BLVD	91107	5747013033	
2068 E COLORADO BLVD	91107	5747013034	
29 S OAK AVE	91107	5747013035	
103 S OAK AVE	91107	5747013043	
2078 E COLORADO BLVD	91107	5747013048	
2044 E COLORADO BLVD	91107	5747013049	
118 S BERKELEY AVE	91107	5747015031	
125 S SAN MARINO AVE	91107	5747015033	
1860 E COLORADO BLVD	91107	5747018032	
144 S ALLEN AVE	91106	5747019042	
2863 E COLORADO BLVD	91107	5748007020	
2855 E COLORADO BLVD	91107	5748007022	
2801 E COLORADO BLVD	91107	5748007026	
33 S VIRGINIA AVE	91107	5748011052	
84 S VINEDO AVE	91107	5748012007	
2754 E COLORADO BLVD	91107	5748013003	
2744 E COLORADO BLVD	91107	5748013004	
2738 E COLORADO BLVD	91107	5748013005	
41 S DAISY AVE	91107	5748013018	

2830 E COLORADO BLVD	91107	5748014001	
60 S DAISY AVE	91107	5748014015	
2818 E COLORADO BLVD	91107	5748014035	
2800 E COLORADO BLVD	91107	5748014049	
2870 E COLORADO BLVD	91107	5748015006	
75 S SUNNYSLOPE AVE	91107	5748015026	
61 S SUNNYSLOPE AVE	91107	5748015028	
2860 E COLORADO BLVD	91107	5748015033	
2588 MORNINGSIDE ST	91107	5748022002	
2550 MORNINGSIDE ST	91107	5748024016	
491 N ALLEN AVE	91106	5749016011	
430 N HILL AVE	91106	5749019011	
1300 N ALTADENA DR	91107	5751008001	
1070 N ALTADENA DR	91107	5751016001	
3202 E FOOTHILL BLVD	91107	5752023039	
3321 E COLORADO BLVD	91107	5754003029	
3311 E COLORADO BLVD	91107	5754003046	
3299 E COLORADO BLVD	91107	5754004031	
3120 E COLORADO BLVD	91107	5754014024	
3701 E FOOTHILL BLVD	91107	5757023010	
3801 E FOOTHILL BLVD	91107	5757024023	
3452 E FOOTHILL BLVD	91107	5757030041	
975 N MICHILLINDA AVE	91107	5758018011	
965 W FOOTHILL FWY	91103	5823030017	
1731 LINCOLN AVE	91103	5825018044	
1723 LINCOLN AVE	91103	5825018045	
229 W HOWARD ST	91103	5825021002	
247 W HOWARD ST	91103	5825021004	
171 W HOWARD ST	91103	5836008021	
1599 NAVARRO AVE	91103	5836008022	
1589 NAVARRO AVE	91103	5836008023	
1609 NAVARRO AVE	91103	5836008025	
1609 EL SERENO AVE	91103	5836009007	
1615 EL SERENO AVE	91103	5836009008	
1625 EL SERENO AVE	91103	5836009023	
1587 EL SERENO AVE	91103	5836009026	
1709 EL SERENO AVE	91103	5836010003	

1693 EL SERENO AVE	91103	5836010005	
100 W TREMONT ST	91103	5836012006	
1815 EL SERENO AVE	91103	5836012010	
1963 EL SERENO AVE	91103	5836013017	
93 W TREMONT ST	91103	5836013025	
2005 EL SERENO AVE	91103	5836014010	
2051 EL SERENO AVE	91103	5836015001	
2067 EL SERENO AVE	91103	5836015004	
2077 EL SERENO AVE	91103	5836015022	
1980 EL SERENO AVE	91103	5836020013	
1895 N FAIR OAKS AVE	91103	5836020014	
1909 N FAIR OAKS AVE	91103	5836020027	
1780 EL SERENO AVE	91103	5836022004	
1790 EL SERENO AVE	91103	5836022005	
1708 EL SERENO AVE	91103	5836023008	
1720 EL SERENO AVE	91103	5836023009	
1726 EL SERENO AVE	91103	5836023010	
1674 EL SERENO AVE	91103	5836024013	
1624 EL SERENO AVE	91103	5836024019	
1569 N FAIR OAKS AVE	91103	5836024027	
1577 N FAIR OAKS AVE	91103	5836024028	
1931 N RAYMOND AVE	91103	5836028009	
2025 N RAYMOND AVE	91103	5836029004	
2001 N RAYMOND AVE	91103	5836029006	
1991 N RAYMOND AVE	91103	5836029010	
2010 N RAYMOND AVE	91103	5837003004	
100 E MONTANA ST	91103	5837003027	
1908 N RAYMOND AVE	91103	5837004007	
1810 N RAYMOND AVE	91103	5837005006	
1826 N RAYMOND AVE	91103	5837005008	
1719 SUMMIT AVE	91103	5837006012	
1743 SUMMIT AVE	91103	5837006018	
1735 SUMMIT AVE	91103	5837006019	
1700 SUMMIT AVE	91103	5837008005	
1764 SUMMIT AVE	91103	5837009026	
173 E TREMONT ST	91103	5837010016	
2064 SUMMIT AVE	91103	5837013017	
380 E WOODBURY RD	91104	5838001015	
363 E WASHINGTON BLVD	91104	5838014010	
2040 N LOS ROBLES AVE	91104	5838015001	
2036 N LOS ROBLES AVE	91104	5838015002	
1365 N EL MOLINO AVE	91104	5838039010	
1647 N LAKE AVE	91104	5848011005	
1715 N LAKE AVE	91104	5848011011	

1615 N LAKE AVE	91104	5848011800	
1424 N LAKE AVE	91104	5848029001	
1406 N LAKE AVE	91104	5848029004	
1400 N LAKE AVE	91104	5848029005	
1416 N LAKE AVE	91104	5848029021	
916 ATCHISON ST	91104	5848035001	
1670 N HILL AVE	91104	5850008012	
1439 TOPEKA ST	91104	5850008013	
1449 TOPEKA ST	91104	5850008014	
1487 TOPEKA ST	91104	5850008018	
1516 TOPEKA ST	91104	5850010009	
1643 N HILL AVE	91104	5850012011	
1588 N HOLLISTON AVE	91104	5850013027	
1401 N HILL AVE	91104	5850015013	
1408 N HILL AVE	91104	5850016003	
1390 N HILL AVE	91104	5850016005	
1425 WESLEY AVE	91104	5850016020	
1488 N HILL AVE	91104	5850017005	
1443 WESLEY AVE	91104	5850017014	
1449 WESLEY AVE	91104	5850017015	
1615 E WASHINGTON BLVD	91104	5850022004	
1400 WESLEY AVE	91104	5850025001	
1448 WESLEY AVE	91104	5850025006	
1472 WESLEY AVE	91104	5850025010	
1490 WESLEY AVE	91104	5850025011	
1520 E HOWARD ST	91104	5850025018	
1532 E HOWARD ST	91104	5850025019	
1373 BRESEE AVE	91104	5850026017	
1855 E WASHINGTON BLVD	91104	5852004061	
1265 HARTWOOD POINT DR	91107	5860026023	
267 CORDOVA ST	91101	5722027914	
254 E UNION ST	91101	5723026024	
86 S FAIR OAKS AVE	91105	5722001002	
740 E GREEN ST	91101	5734025024	
75 W HOLLY ST	91103	5713002016	
256 N MICHIGAN AVE	91106	5738015130	
244 N MICHIGAN AVE	91106	5738015143	
444 N FAIR OAKS AVE	91103	5725003058	
111 N MADISON AVE	91101	5723015081	
685 E CALIFORNIA BLVD	91101	5734020004	
673 E CALIFORNIA BLVD	91101	5734020003	

488 E VILLA ST	91101	5731021042	
175 N GREENWOOD AVE	91107	5746016046	
170 N PARKWOOD AVE	91107	5746016087	
1890 E WALNUT ST	91107	5746016047	
1870 E WALNUT ST	91107	5746016088	
127 N MADISON AVE	91101	5723015027	
127 N MADISON AVE	91101	5723015028	
141 S LAKE AVE	91101	5734035031	

General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Maximum Density Allowed (units/acre)	Parcel Size (Acres)
MMU	CD5	48	87	0.107923638
MMU	CD5	48	87	0.099359219
MMU	CD5	48	87	0.12011283
HDR	RM48	0	48	0.267512524
MMU	CD5	48	87	0.167431898
MMU	CD5	48	87	0.217562412
MMU	CD5	48	87	0.266296429
HDR	RM48	0	48	0.32118486
LDR	RS6	0	6	0.841370815
LDR	RS2	0	6	1.143919918
LDR	RS2	0	6	1.334753925
LDR	RS2	0	6	1.522186029
LDR	RS2	0	6	2.040936949
LMDR	RM12	0	12	0.201675972
LMDR	RM12	0	12	0.207167117
LMDR	RM12	0	12	0.285945175
MDR	RM16	0	16	0.215156507
MMU	CD1	48	87	0.36335341
MMU	CD1	48	87	1.251889702
MMU	CD1	48	87	0.327231106
MMU	CD1	48	87	0.138844586
MMU	CD1	48	87	0.14922691
MMU	CD1	48	87	0.773674995
LC	CL2	0	16	0.298213273
LDR	RS6	0	6	0.461702192
LDR	RS2	0	6	0.600394251
LDR	RS2	0	6	0.543313394
LDR	RS4	0	6	0.825588335
LDR	RS4	0	6	0.722235903
LDR	RS6	0	6	0.298607099
LDR	RS6	0	6	0.246171389
MMU	RM32	0	32	0.168135103
HMU	CD6	48	87	1.122108291
MHDR	RM32	0	32	0.203071972
MHDR	RM32	0	32	0.648622137
MHDR	RM32	0	32	0.229680196
MHDR	RM32	0	32	0.21967312
MHDR	RM32	0	32	0.2268472
HMU	CD6	48	87	0.387967741

HMU	CD6	48	87	0.648869929
HMU	CD1	48	87	1.080459829
HMU	CD1	48	87	0.834707115
HMU	CD1	48	87	0.22982072
HMU	CD1	48	87	0.148303167
HMU	CD1	48	87	0.112856821
HMU	CD1	48	87	0.472728176
HMU	CD1	48	87	0.103177597
HMU	CD1	48	87	0.272883055
HMU	CD1	48	87	0.661947907
HMU	CD1	48	87	0.683772914
HMU	CD1	48	87	0.737719708
MHDR	RM32	0	32	1.138531032
MHDR	RM32	0	32	0.252127652
HDR	RM48	0	48	1.302025772
MMU	CD2	48	87	0.183688597
HDR	CD2	48	87	0.815767401
MMU	CD2	48	87	1.297321453
HMU	CD2	48	87	1.521953283
MMU	CD1	48	87	1.846559677
MMU	CD1	48	87	0.236934067
MMU	CD1	48	87	0.175219546
LMMU	CD2	48	87	2.250363831
LMMU	CD2	48	87	0.24446318
LMMU	CD2	48	87	0.466468616
LMMU	CD2	48	87	0.056917528
MMU	CD3	48	87	0.21358688
MMU	CD3	48	87	0.686735151
MMU	CD3	48	87	0.246856308
MMU	CD3	48	87	0.242470993
MMU	CD3	48	87	0.110852835
MMU	CD3	48	87	0.035101042
MMU	CD3	48	87	0.050380901
MMU	CD3	48	87	0.153370238
MMU	CD3	48	87	0.369688721
MMU	CD3	48	87	0.381397606
MMU	CD3	48	87	0.639139652
MMU	CD3	48	87	0.791104453

MMU	CD3	48	87	1.508070163
MMU	CD3	48	87	0.682479909
INST	CD2	48	87	1.796118092
MMU	CD2	48	87	1.003828134
MMU	CD1	48	87	0.227019345
HC	CD5	48	87	1.585328793
MMU	FGSPC-3A	0	40	0.183656087
MMU	FGSPC-3A	0	40	0.183659914
MMU	FGSPC-3A	0	40	0.093123421
MMU	FGSPC-3A	0	40	0.157259072
MMU	FGSPC-3A	0	40	0.290735872
MMU	FGSPC-3A	0	40	0.205047163
LMDR	RM12	0	12	0.242432128
LMDR	RM12	0	12	0.195032749
MMU	FGSPC-3A	0	40	1.061382259
LMDR	RM12	0	12	0.24792805
MHDR	RM32	0	32	0.340721787
LMMU	FGSPC-3D	0	32	0.184251749
LMMU	FGSPC-3D	0	32	0.129531487
LMMU	FGSPC-3D	0	32	0.125178035
LMDR	RM12	0	12	0.194463719
LMMU	FGSPC-3D	0	32	0.268106147
LMMU	FGSPC-3D	0	32	0.231999316
LMMU	FGSPC-3D	0	32	0.19207991
LMDR	RM12	0	12	0.208621792
LMDR	RM12	0	12	0.208637517
MHDR	RM32	0	32	0.322956138
MHDR	RM32	0	32	0.322889213
MDR	RM16	0	16	0.275740749
MDR	RM16	0	16	0.233369675
LMDR	RM12	0	12	0.189076328
LMDR	RM12	0	12	0.18365335
MHDR	RM32	0	32	0.228368537
MDR	RM16	0	16	0.225383977
LMU	FGSPC-3A	0	40	0.093667037
LMU	FGSPC-3A	0	40	0.094691738
LMDR	RM12	0	12	0.215976604
LMDR	RM12	0	12	0.493825753
LMDR	RM12	0	12	0.233980155
LMDR	RM12	0	12	0.233691661
LMDR	RM12	0	12	0.172311982
LMDR	RM12	0	12	0.167608224
LMDR	RM12	0	12	0.176426417
LMDR	RM12	0	12	0.188414608

LMDR	RM12	0	12	0.206066857
LMDR	RM12	0	12	0.175649956
LMDR	RM12	0	12	0.323462529
LMDR	RM12	0	12	0.253805934
LMDR	RM12	0	12	0.208855288
LMDR	RM12	0	12	0.194672507
LMU	FGSPC-3D	0	32	0.127160399
LMU	FGSPC-3D	0	32	0.431745613
MHDR	RM32	0	32	0.257849833
MHDR	RM32	0	32	0.235563406
MHDR	RM32	0	32	0.235531734
MHDR	RM32	0	32	0.214875832
MHDR	RM32	0	32	0.368952203
LMDR	RM12	0	12	0.188439789
LMDR	RM12	0	12	0.173774849
LMDR	RM12	0	12	0.174717307
MHDR	RM32	0	32	0.272973094
MHDR	RM32	0	32	0.206626596
MMU	FGSPC-3B	0	32	2.186772876
LMDR	RM12	0	12	0.190545325
LMDR	RM12	0	12	0.200757437
LMDR	RM12	0	12	0.200757888
LMU	FGSPC-3D	0	32	1.000826846
LMDR	RM12	0	12	0.253111568
MMU	LASPCL	0	16	1.264986054
MMU	LASPCL	0	16	0.418629021
MMU	LASPCL	0	16	0.222423252
MMU	LASPCL	0	16	0.221368019
MMU	LASPCL	0	16	0.129100034
MMU	LASPCL	0	16	0.54385149
MMU	LASPCL	0	16	0.151546981
MMU	LASPCL	0	16	0.13958495
LMDR	RM12	0	12	0.220204747
LMDR	RM12	0	12	0.287284233
LMDR	RM12	0	12	0.254556915
LMDR	RM12	0	12	0.17217816
LMDR	RM12	0	12	0.269972656
MHDR	RM32	0	32	0.344011441
MHDR	RM32	0	32	0.239958158
MHDR	RM32	0	32	0.295795329
MDR	RM16	0	16	0.432743714
MDR	RM16	0	16	0.226494476
MDR	RM16	0	16	0.289083569
MDR	RM16	0	16	0.190005187

MDR	RM16	0	16	0.180849268
MDR	RM16	0	16	0.290893517
LMDR	RM12	0	12	0.202279539
MDR	RM16	0	16	0.16546262
MDR	RM16	0	16	0.167262904
MDR	RM16	0	16	0.169868992
MDR	RM16	0	16	0.275494363
LMDR	RM12	0	12	0.261822826
LMU	FGSPRM-16	0	16	0.282062778
LMDR	RM12	0	12	0.35999067
LMDR	RM12	0	12	0.237580058
LMDR	RM12	0	12	0.173235484
LMDR	RM12	0	12	0.247386798
LMDR	RM12	0	12	0.173013788
LMDR	RM12	0	12	0.173129677
LMDR	RM12	0	12	0.326952931
LMDR	RM12	0	12	0.20088767
MDR	RM16	0	16	0.195320794
LMDR	RM12	0	12	0.172178876
LMDR	RM12	0	12	0.172185785
LMDR	RM12	0	12	0.165982012
LMDR	RM12	0	12	0.179557781
LMDR	RM12	0	12	0.184069327
LMDR	RM12	0	12	0.459190142
LMDR	RM12	0	12	0.228519752
LMDR	RM12	0	12	0.174012273
MDR	RM16	0	16	0.193018504
LMDR	RM12	0	12	0.231634497
LMDR	RM12	0	12	0.256454815
LMDR	RM12	0	12	0.202795996
MDR	RM16	0	16	0.207173443
MDR	RM16	0	16	0.215979255
LMDR	RM12	0	12	0.172961733
LMDR	RM12	0	12	0.172960881
LMDR	RM12	0	12	0.172968114
LMDR	RM12	0	12	0.349311469
LMDR	RM12	0	12	0.174823059
MDR	RM32	0	32	0.284004422
MDR	RM16	0	16	0.246104135
LMDR	RM12	0	12	0.352201344
LMDR	RM12	0	12	0.275487318
MDR	RM16	0	16	0.224414594
MDR	RM16	0	16	0.614925013

MDR	RM16	0	16	0.21941734
MDR	RM16	0	16	0.17759586
MDR	RM16	0	16	0.382814509
MMU	CLSP-1b	0	32	2.978707441
MMU	CLSP-1b	0	32	1.429337468
MMU	CLSP-1b	0	32	0.184891622
MMU	CLSP-1b	0	32	0.308822609
MDR	RM16	0	16	0.259923286
MHDR	RM32	0	32	0.391834502
LMDR	RM12	0	12	0.230812174
LMDR	RM12	0	12	0.178012188
LMDR	RM12	0	12	0.173450002
LMDR	RM12	0	12	0.185866698
LMDR	RM12	0	12	0.207931138
LMDR	RM12	0	12	0.176364381
HDR	RM48	0	48	0.179553718
HDR	RM48	0	48	0.303026211
MHDR	RM32	0	32	0.201969958
MHDR	RM32	0	32	0.205832226
MHDR	RM32	0	32	0.181959351
MHDR	RM32	0	32	0.182905067
MHDR	RM32	0	32	0.299726192
MHDR	RM32	0	32	0.276649019
HDR	RM48	0	48	0.212597729
HDR	RM48	0	48	0.209266991
MHDR	RM32	0	32	0.198891963
MHDR	RM32	0	32	0.168960107
MHDR	RM32	0	32	0.407148584
MMU	CD4	48	87	1.111040062
MMU	CD4	48	87	0.785828522
MMU	CD4	48	87	0.751869524
HDR	RM48	0	48	0.235002531
MHDR	RM32	0	32	0.44565957
HDR	RM48	0	48	0.341087813
MMU	CD4	48	87	0.204152095
MMU	CD4	48	87	0.224715813
MMU	CD4	48	87	0.364524099
MMU	CD4	48	87	0.24146914
MMU	CD4	48	87	0.27026903
HDR	RM48	0	48	0.683363354
HMU	CD2	48	87	0.789719636
HMU	CD2	48	87	0.121903008
MMU	CD4	48	87	0.222160586
MMU	CD4	48	87	0.347913312

MMU	CD4	48	87	0.130168944
MMU	CD4	48	87	0.170934272
MMU	CD4	48	87	0.224581734
MMU	CD4	48	87	0.058811787
MMU	CD4	48	87	0.63453076
HDR	RM48	0	48	0.24328343
HDR	RM48	0	48	0.215161713
MMU	ECSPCG-4	0	48	0.927115619
MMU	ECSPCG-1	0	48	0.722715455
HDR	RM48	0	48	0.231213166
HDR	RM48	0	48	0.233515095
HDR	RM48	0	48	0.681285219
MMU	CD5	48	87	0.228602471
MMU	CD5	48	87	0.244845456
MMU	CD5	48	87	0.236402834
MMU	CD5	48	87	0.245938664
MMU	CD5	48	87	0.236115664
MMU	CD5	48	87	0.241188048
MMU	CD5	48	87	0.243162821
MMU	ECSPCG-1	0	48	0.210376342
MMU	ECSPCG-1	0	48	0.231768486
MMU	CD5	48	87	0.286839643
MMU	CD5	48	87	0.243362169
MMU	ECSPCG-1	0	48	0.85525245
MMU	CD5	48	87	0.2233646
MMU	CD5	48	87	0.416842799
MMU	CD5	48	87	0.241406488
MMU	CD5	48	87	0.241527104
MMU	CD5	48	87	0.241689055
HDR	RM48	0	48	0.241772605
HDR	RM48	0	48	0.241895988
MMU	CD5	48	87	0.306165448
HDR	RM48	0	48	0.348172924
HDR	RM48	0	48	0.257288814
HDR	RM48	0	48	0.280987555
HDR	RM48	0	48	0.297907719
MMU	PD35	0	70	0.281018639
MMU	PD35	0	70	0.128646198
MMU	PD35	0	70	0.130919295
MMU	PD35	0	70	0.166326361
MMU	ECSPCG-4	0	48	0.949341186
MDR	RM16	0	16	0.192508735
MDR	RM16	0	16	0.168386414
MDR	RM16	0	16	0.182417741

MHDR	RM32	0	32	0.181954584
MDR	RM16	0	16	0.194172006
MHDR	RM32	0	32	0.279955129
MMU	ECSPCG-2	0	48	0.498350115
MHDR	RM32	0	32	0.274218204
MDR	RM16	0	16	0.246661733
MHDR	RM32	0	32	0.486168271
LC	CG	0	16	0.131068767
LC	CG	0	16	0.146981733
LC	CG	0	16	0.517343311
MDR	RM16	0	16	0.229194003
MDR	RM16	0	16	0.537698064
MDR	RM16	0	16	0.184385182
MMU	ECSPCL-3	0	48	0.40424367
MDR	RM16	0	16	0.209008161
MDR	RM16	0	16	0.193344856
MDR	RM16	0	16	0.19824229
MDR	RM16	0	16	0.188050694
MDR	RM16	0	16	0.207759398
MHDR	RM32	0	32	0.185457154
MHDR	RM32	0	32	0.310420548
MHDR	RM32	0	32	0.31972923
MMU	CD5	48	87	1.0650306
HMU	CD5	48	87	0.181470837
HMU	CD5	48	87	0.36832805
HDR	RM48	0	48	0.193760969
HDR	RM48	0	48	0.224736716
HDR	RM48	0	48	0.564777773
MHDR	RM32	0	32	0.216292802
HC	CD5	48	87	0.352674769
HC	CD5	48	87	0.147860617
MHDR	RM32	0	32	0.191125672
MHDR	RM32	0	32	0.20057667
HDR	RM48	0	48	0.486312146
HDR	RM48	0	48	0.202231297
MMU	RM48	0	48	0.230337549
MMU	RM48	0	48	0.231801488
MMU	RM48	0	48	0.191910543
HDR	RM48	0	48	0.206879258
LC	CG	0	16	0.279116242
MHDR	RM32	0	32	0.178763452
MMU	ECSPCG-1	0	48	0.466954888
MDR	RM16	0	16	0.250465649
HDR	RM48	0	48	0.28005225

HDR	RM48	0	48	0.275448744
HDR	RM48	0	48	0.260209678
HDR	RM48	0	48	0.256985508
HDR	RM48	0	48	0.266388369
HDR	RM48	0	48	0.208274345
HDR	RM48	0	48	0.168828867
HDR	RM48	0	48	0.173208839
HDR	RM48	0	48	0.170030489
HDR	RM48	0	48	0.175468918
HDR	RM48	0	48	0.285221053
LMDR	RM12	0	12	0.215616902
MMU	CLSP-1b	0	32	1.027032472
MDR	RM16	0	16	0.170509999
LC	CL	0	16	0.206551091
LC	CL	0	16	0.319091226
LDR	RS6	0	6	0.176813498
MHDR	RM32	0	32	1.117660019
LC	CL	0	16	0.237949792
MHDR	RM32	0	32	0.293795885
LC	CL	0	16	0.534346441
LC	CL	0	16	0.178550733
LC	CL	0	16	0.160362482
LC	CL	0	16	0.187518322
MDR	RM16	0	16	0.179797345
LMDR	RM12	0	12	0.232026885
MDR	RM16	0	16	0.178158254
MDR	RM16	0	16	0.209711277
LMDR	RM12	0	12	0.170980106
LMDR	RM12	0	12	0.166337578
LC	CL	0	16	0.347890728
LC	CL	0	16	0.20652006
MMU	ECSPCL-3	0	48	0.887029348
MMU	ECSPCG-3	0	60	1.215014804
MMU	ECSPCG-3	0	60	0.744969226
LMU	ECSPCG-4	0	48	0.628352677
MHDR	RM32	0	32	0.189748618
MHDR	RM32	0	32	0.194028426
MHDR	RM32	0	32	0.188746685
MDR	RM16	0	16	0.205138093
MHDR	RM32	0	32	0.210379367
MHDR	RM32	0	32	0.204455199
LMU	ECSPCG-4	0	48	0.273909109
LMU	ECSPCG-4	0	48	0.268876678
LMU	ECSPCG-4	0	48	0.140206933

LMU	ECSPCG-4	0	48	0.208856656
MDR	RM16	0	16	0.204503246
LMU	ECSPCG-4	0	48	0.693113334
LMU	ECSPCG-4	0	48	0.143297078
MDR	RM16	0	16	0.177887899
MDR	RM16	0	16	0.174815292
MDR	RM16	0	16	0.184650068
MDR	RM16	0	16	0.168345603
MDR	RM16	0	16	0.220585395
MDR	RM16	0	16	0.215997852
LMU	ECSPCG-4	0	48	0.352878938
LMU	ECSPCG-4	0	48	0.137232117
LMU	ECSPCG-4	0	48	0.137048831
LMU	ECSPCG-4	0	48	0.137012725
LMU	ECSPCG-4	0	48	0.516110835
MHDR	RM32	0	32	0.179321723
MDR	RM16	0	16	0.18125755
MHDR	RM32	0	32	0.206527892
MDR	RM16	0	16	0.193759565
MDR	RM16	0	16	0.192424546
MDR	RM16	0	16	0.168522129
LC	CL	0	16	1.540406687
MHDR	RM32	0	32	0.224916254
MHDR	RM32	0	32	0.48185132
MHDR	RM32	0	32	0.259902928
LMU	ECSPCG-4	0	48	0.118752802
LMU	ECSPCG-4	0	48	0.117131624
LMU	ECSPCG-4	0	48	0.179377659
MDR	RM16	0	16	0.172136732
LMU	ECSPCG-4	0	48	0.232164385
LMU	ECSPCG-4	0	48	0.684556345
MDR	RM16	0	16	0.19920685
MDR	RM16	0	16	0.203453092
MMU	ECSPCG-4	0	48	1.000307804
MDR	RM16	0	16	0.177556663
LMU	ECSPCG-5	0	48	1.062713105
LMU	ECSPCG-5	0	48	0.288424214
LMU	ECSPCG-5	0	48	1.777613306
LMU	RM32	0	32	0.178044329
MHDR	RM32	0	32	0.231869488
LMU	ECSPCG-5	0	48	0.170512318
LMU	ECSPCG-5	0	48	0.169826655
LMU	ECSPCG-5	0	48	0.168109492
MHDR	RM32	0	32	0.225502812

LMU	ECSPCG-5	0	48	0.253693067
MHDR	RM32	0	32	0.197873359
LMU	ECSPCG-5	0	48	0.299223534
LMU	ECSPCG-5	0	48	0.466798781
LMU	ECSPCG-5	0	48	0.223926531
MDR	RM16	0	16	0.173893434
MDR	RM16	0	16	0.173875821
LMU	ECSPCG-5	0	48	0.227754339
MDR	RM16	0	16	0.177088933
MDR	RM16	0	16	0.301561748
LC	CL	0	16	0.346698035
MHDR	RM32	0	32	0.189951512
MHDR	RM32	0	32	0.175459611
MHDR	RM32	0	32	0.229515474
MMU	PD36	0	66	8.331586763
MMU	ECSPCG-6	0	60	0.855720551
MMU	ECSPCG-6	0	60	0.247525286
MMU	ECSPCG-6	0	60	1.386691099
MMU	ECSPCG-6	0	60	0.54943896
LMU	EPSPd3-CG-E	0	48	6.213168466
LMU	EPSPd3-CG-E	0	48	8.278341651
HMU	EPSPd2-CG	0	48	3.676823564
LC	CL	0	16	4.55439272
LDR	RS4	0	6	1.079769764
MDR	LASPRM-16	0	16	0.080474557
MDR	LASPRM-16	0	16	0.109569784
LMDR	RM12	0	12	0.193510545
LMDR	RM12	0	12	0.202569794
LMDR	RM12	0	12	0.182737173
LMDR	RM12	0	12	0.183359191
LMDR	RM12	0	12	0.183252238
LMDR	RM12	0	12	0.22992496
LMDR	RM12	0	12	0.169815522
LMDR	RM12	0	12	0.174598707
LMDR	RM12	0	12	0.214055876
LMDR	RM12	0	12	0.166663937
LMDR	RM12	0	12	0.252720371

LMDR	RM12	0	12	0.192469523
LMDR	RM12	0	12	0.220311062
LMDR	RM12	0	12	0.279475326
LMDR	RM12	0	12	0.264162798
LMDR	RM12	0	12	0.165293808
LMDR	RM12	0	12	0.244485359
LMDR	RM12	0	12	0.185505438
LMDR	RM12	0	12	0.214192562
LMDR	RM12	0	12	0.215714431
LMDR	RM12	0	12	0.238941841
LMU	FGSPCL-1B	0	16	0.170382434
LMU	FGSPCL-1B	0	16	0.204574367
LMDR	RM12	0	12	0.235133848
LMDR	RM12	0	12	0.24285671
LMDR	RM12	0	12	0.252161309
LMDR	RM12	0	12	0.251676322
LMDR	RM12	0	12	0.253433571
LMDR	RM12	0	12	0.34348588
LMDR	RM12	0	12	0.22728829
LMU	FGSPCL-1B	0	16	0.291026835
LMU	FGSPCL-1B	0	16	0.471458802
LMDR	RM12	0	12	0.23114099
LMDR	RM12	0	12	0.227349345
LMDR	RM12	0	12	0.262080827
LMDR	RM12	0	12	0.190928923
LMDR	RM12	0	12	0.217325389
LMDR	RM12	0	12	0.172420747
LMDR	RM12	0	12	0.19114944
LMDR	RM12	0	12	0.242190063
LMDR	RM12	0	12	0.221299383
LMDR	RM12	0	12	0.196792333
LMDR	RM12	0	12	0.198067898
LMDR	RM12	0	12	0.214666436
LMDR	RM12	0	12	0.22070594
LMDR	RM12	0	12	0.443054837
LMDR	RM12	0	12	0.173975979
LMDR	RM12	0	12	0.232930156
LDR	CL	0	16	0.447026469
MHDR	RM32	0	32	0.522638475
LC	CL	0	16	0.124091277
LC	CL	0	16	0.097908845
MHDR	RM32	0	32	0.167761709
MDR	RM16	0	16	0.442337268
MDR	RM16	0	16	0.471334514

MDR	RM16	0	16	0.362493251
MMU	CLSP-1b	0	32	0.16629252
MMU	CLSP-1b	0	32	0.180779659
MMU	CLSP-1b	0	32	0.154383403
MMU	CLSP-1b	0	32	0.158953161
MDR	RM16	0	16	0.214201463
LMDR	RM12	0	12	0.17646049
LMDR	RM12	0	12	0.184538491
LMDR	RM12	0	12	0.284475795
LMDR	RM12	0	12	0.188059901
LMDR	RM12	0	12	0.187726194
LMDR	RM12	0	12	0.216172586
LDR	RM12	0	12	0.33106414
LMDR	RM12	0	12	0.241506531
LMDR	RM12	0	12	0.173729933
LMDR	RM12	0	12	0.184123372
LMDR	RM12	0	12	0.1681096
LMDR	RM12	0	12	0.166287221
LMDR	RM12	0	12	0.165358677
LMDR	RM12	0	12	0.167015697
LC	CL	0	16	0.114402893
LMDR	RM12	0	12	0.246785958
LMDR	RM12	0	12	0.244125688
LMDR	RM12	0	12	0.269526195
LMDR	RM12	0	12	0.182063182
LMDR	RM12	0	12	0.183684617
LMDR	RM12	0	12	0.165869598
LMDR	RM12	0	12	0.247479188
LC	CL	0	16	0.479237756
LDR	RS1	0	6	1.577188764
MMU	CD2	48	87	0.319709194
MMU	CD2	48	87	0.499147988
HMU	CD1	48	87	0.742931688
MMU	CD4	48	87	0.462840643
MMU	PD34	0	87	5.673539879
MHDR	RM32	0	32	0.401183815
MHDR	RM32	0	32	0.354909705
LMDR	RM12	0	12	1.862813136
MMU	CD3	48	87	1.170215302
MDR	RM16	0	16	0.288782895
MDR	RM16	0	16	0.191988789

MMU	CL	0	16	2.422538175
LC	CG	0	16	0.18009265
MDR	RM16	0	16	0.193569209
LC	CG	0	16	0.238527176
LC	CG	0	16	0.384752684
MMU	CD3	48	87	0.285975255
MMU	CD3	48	87	0.492933513
HMU	CD5	48	87	0.496249052

Commercial	Infrastructure	Publicly-Owned	Site Status
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Vacant	YES - Current	NO - Privately-Owned	Available
Vacant	YES - Current	NO - Privately-Owned	Available
Agricultural/open space	YES - Current	NO - Privately-Owned	Available
Agricultural/open space	YES - Current	NO - Privately-Owned	Available
Agricultural/open space	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Vacant	YES - Current	NO - Privately-Owned	Available
Vacant	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available

Commercial	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Industrial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Vacant	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	YES - City-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Public facilities	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Residential	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available
Hotel/motel	YES - Current	NO - Privately-Owned	Available
Commercial	YES - Current	NO - Privately-Owned	Available

[illegible]

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[illegible]

Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	7	55	0	62
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Used in Prior Housing	0	0	4	4
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	0	20	0	20
Not Used in Prior Hou	68	0	0	68
Not Used in Prior Hou	0	18	0	18
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	42	0	0	42
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	32	0	0	32
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	19	0	0	19
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	95	0	194	289

Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	85	0	0	85
Not Used in Prior Hou	65	0	0	65
Not Used in Prior Hou	0	18	0	18
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	37	0	37
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	21	0	21
Not Used in Prior Hou	52	0	0	52
Used in Two Consecu	0	100	123	223
Not Used in Prior Hou	58	0	0	58
Not Used in Prior Hou	33	0	0	33
Used in Prior Housing	0	3	0	3
Not Used in Prior Hou	13	0	73	86
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	8	0	82	90
Not Used in Prior Hou	102	0	0	102
Not Used in Prior Hou	0	0	98	98
Not Used in Prior Hou	80	0	0	80
Not Used in Prior Hou	2	2	20	24
Not Used in Prior Hou	0	0	100	100
Not Used in Prior Hou	97	0	0	97
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	20	0	20
Not Used in Prior Hou	0	2	0	2
Not Used in Prior Hou	27	79	0	106
Not Used in Prior Hou	54	0	0	54
Not Used in Prior Hou	64	170	1	235
Not Used in Prior Hou	0	0	40	40
Not Used in Prior Hou	0	0	8	8
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	13	13
Used in Prior Housing	5	0	42	47
Not Used in Prior Hou	10	0	40	50
Not Used in Prior Hou	35	0	0	35
Not Used in Prior Hou	62	0	0	62

[illegible]

Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	11	11
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	2	0	2
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	0	18	18
Not Used in Prior Hou	8	0	40	48
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	63	0	0	63
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	21	14	13	48
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	55	55
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	3	0	3
Not Used in Prior Hou	0	3	0	3
Not Used in Prior Hou	0	2	0	2
Not Used in Prior Hou	0	0	8	8
Not Used in Prior Hou	0	2	0	2
Not Used in Prior Hou	0	2	0	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3

[illegible]

Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	86	0	0	86
Not Used in Prior Hou	41	0	0	41
Not Used in Prior Hou	5	0	0	5
Not Used in Prior Hou	9	0	0	9
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	13	0	13
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	5	0	5
Used in Prior Housing	0	9	0	9
Used in Prior Housing	0	8	0	8
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	6	0	49	55
Used in Prior Housing	6	0	66	72
Not Used in Prior Hou	41	0	0	41
Used in Prior Housing	0	0	11	11
Not Used in Prior Hou	0	0	8	8
Not Used in Prior Hou	0	15	0	15
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	2	0	15	17
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	30	0	0	30
Not Used in Prior Hou	62	0	0	62
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	19	0	19

Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	3	0	3
Not Used in Prior Hou	34	0	0	34
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	73	0	0	73
Not Used in Prior Hou	57	0	0	57
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	16	0	0	16
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	37	0	0	37
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	18	0	18
Not Used in Prior Hou	0	0	15	15
Not Used in Prior Hou	0	0	15	15
Not Used in Prior Hou	0	0	15	15
Not Used in Prior Hou	0	0	15	15
Not Used in Prior Hou	0	0	15	15
Not Used in Prior Hou	0	3	13	16
Not Used in Prior Hou	0	15	0	15
Not Used in Prior Hou	0	11	0	11
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	22	0	0	22
Not Used in Prior Hou	10	0	0	10
Not Used in Prior Hou	10	0	0	10
Not Used in Prior Hou	13	0	0	13
Not Used in Prior Hou	55	0	0	55
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2

Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	22	0	22
Used in Prior Housing	0	6	0	6
Not Used in Prior Hou	0	0	4	4
Not Used in Prior Hou	0	14	0	14
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	6	24	51	81
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	23	0	23
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	9	0	9
Used in Prior Housing	0	8	0	8
Not Used in Prior Hou	83	0	0	83
Not Used in Prior Hou	0	14	0	14
Not Used in Prior Hou	0	29	0	29
Not Used in Prior Hou	0	8	0	8
Used in Prior Housing	0	8	0	8
Not Used in Prior Hou	24	0	0	24
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	0	0	0	0
Not Used in Prior Hou	0	0	12	12
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	19	0	1	20
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	18	0	18
Not Used in Prior Hou	0	18	0	18
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	0	6	6
Not Used in Prior Hou	8	50	0	58
Not Used in Prior Hou	0	0	5	5
Not Used in Prior Hou	0	37	0	37
Not Used in Prior Hou	0	0	4	4
Used in Prior Housing	0	10	0	10

Not Used in Prior Hou	0	12	0	12
Used in Prior Housing	0	0	13	13
Used in Prior Housing	0	5	0	5
Used in Prior Housing	0	6	0	6
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	7	0	7
Used in Prior Housing	0	12	0	12
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	30	0	0	30
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	9	0	9
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	18	0	0	18
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	0	9	9
Not Used in Prior Hou	15	0	0	15
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	10	0	10
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	51	0	0	51
Not Used in Prior Hou	70	0	0	70
Not Used in Prior Hou	43	0	0	43
Used in Prior Housing	18	0	0	18
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	6	6
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	8	0	8
Not Used in Prior Hou	0	4	0	4

Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	20	0	0	20
Not Used in Prior Hou	0	4	0	4
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	1	1
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	10	0	0	10
Not Used in Prior Hou	4	0	0	4
Not Used in Prior Hou	4	0	0	4
Not Used in Prior Hou	4	0	0	4
Not Used in Prior Hou	15	0	0	15
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	6	0	6
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	44	0	0	44
Not Used in Prior Hou	0	0	8	8
Not Used in Prior Hou	1	0	20	21
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	3	0	0	3
Not Used in Prior Hou	0	3	0	3
Not Used in Prior Hou	5	0	0	5
Not Used in Prior Hou	0	0	2	2
Not Used in Prior Hou	7	0	0	7
Not Used in Prior Hou	20	0	0	20
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	58	0	0	58
Not Used in Prior Hou	0	0	3	3
Not Used in Prior Hou	46	0	0	46
Not Used in Prior Hou	0	12	0	12
Not Used in Prior Hou	43	0	0	43
Not Used in Prior Hou	0	5	0	5
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	7	0	7
Not Used in Prior Hou	0	0	3	3

[illegible]

[illegible]

[illegible]

Used in Prior Housing	0	0	227	227
Not Used in Prior Housing	0	0	0	0
Not Used in Prior Housing	30	0	28	58
Not Used in Prior Housing	0	0	0	0
Not Used in Prior Housing	0	0	0	0
Not Used in Prior Housing	0	0	0	0
Not Used in Prior Housing	0	4	45	49
Not Used in Prior Housing	5	0	84	89

Optional Information1	Optional Information2
Office	6, 8 (1961), 9
Commercial	6, 8 (1953), 9
Commercial	6, 8 (1971), 9
Single Family Detached,1	6, 8 (1952)
Office	6, 7
Bt Main Street Commercial Low	6, 7
Office	6, 7
Office	6, 7, 8 (1955)
Vacant	2
Vacant	2
Open Space	2
Open Space	2
Open Space	2
Single Family Detached,1	6, 8 (1978), 9
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8 (1977), 9
Single Family Detached,4	6, 8 (1957), 9
Bt Main Street Commercial Low	4, 7 (0.50), 8, 9
Office	6, 8
Transportation	4, 6, 7 (0.11), 8
Office	6, 7 (0.06), 8, 9
Transportation	4, 6, 7 (0.01) , 9
Office	6, 7 (0.54)
Office	1
Single Family Detached,1	6, 8 (1943)
Single Family Detached,1	6, 9
Vacant	2
Vacant	2
Civic Facilities	2
Civic Facilities	2
Civic Facilities	2
Single Family Attached,2	6, 8, 9
Accommodation	1, 6, 7, 8, 9
Office	6, 7 (0.45), 8 (1942), 9
Accommodation	6, 8 (1955), 9
Multifamily,3	6, 8 (1954)
Office	6, 8 (1947), 11
Transportation	6, 8 (1958)
Office	1

Office	1
Bt Commercial Recreation Facility	1
Accommodation	6, 9
Light Industrial	6, 7 (0.31), 8 (1894), 9
Bt Commercial Recreation Facility	6, 8 (1928), 9
Bt Main Street Commercial Low	1
Bt Main Street Commercial Low	1
Transportation	1
Bt Main Street Commercial Low	1
Vacant	1
Other	1
Wholesale Warehousing	1
Office	6, 7
Single Family Detached,4	2
Bt Commercial Storage	1
Multifamily,4	6, 8 (pre-1950), 9, 11
Office	1
Other	4, 6, 7, 8
Office	1
Special Use	4, 6
Accommodation	7 (0.44), 8 (1910)
Utilities Communications	2
Office	4, 6, 9, 11
Transportation	1, 4, 7 (0.02)
Office	1, 8 (1960), 11
Transportation	1, 8 (1960), 11
Multifamily,2	6, 9, 11
Single Family Detached,1	1
Single Family Attached,15	1
Accommodation	1
Bt Large Format Standalone Commercial	1
Single Family Detached	1
Single Family Detached,1	1
Commercial	1
Bt Large Format Standalone Commercial	6, 11
Bt Main Street Commercial Low	6, 8 (1961) 11
Special Use	6, 8 (1940), 9
Accommodation	1

Bt Commercial Storage	6, 9
Bt Low Intensity Strip Commercial	1
Emergency Services	1
Accommodation	1
Commercial	6, 8 (1922)
Office	6, 9
Mixed Use Commercial	1
Other	1
Special Use	1
Other	1
Commercial	1
Transportation	1
Transportation	3, 7 (0.03), 9, 11
Single Family Detached,1	6, 8 (1965), 9
Bt Large Format Standalone Commercial	6, 7 (0.67)
Single Family Detached,1	6, 8 (1979), 9
Single Family Detached,1	6, 8 (1950), 9
Bt Main Street Commercial Low	1
Accommodation	1
Accommodation	1
Single Family Detached,1	6, 8 (1950), 9
Commercial	3, 6, 7, (0.59), 8 (1968), 9
Multifamily,2	6, 7 (0.23), 8 (1950s), 11
Bt Low Intensity Strip Commercial	6, 7 (0.91), 8 (1968)
Single Family Detached,1	6, 8 (1954), 9
Single Family Detached,1	6, 8 (1957), 9
Vacant	2
Vacant	2
Single Family Detached,1	6, 8 (1956), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1941), 9
Single Family Attached,2	6, 8 (1970), 9
Parks Recreation	6, 8 (1961), 9
Other	2
Other	2
Single Family Detached,1	6, 8 (1961), 9
Single Family Detached,1	6, 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1957), 9
Single Family Detached,1	6, 8 (1956), 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1958), 9

Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 9
Single Family Detached,1	6, 8 (1954), 9
Single Family Detached,1	6, 8 (1944), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1950), 9
Agriculture	1
Agriculture	1
Multifamily,5	6, 9
Single Family Detached,1	6, 8 (1937), 9
Single Family Detached,1	6, 8 (1949), 9
Light Industrial	1
Agriculture	1
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1948), 9
Multifamily,3	6, 8 (1950s), 9
Single Family Attached,2	6, 8 (1950), 9
Civic Facilities	1
Single Family Detached,1	6, 8 (1943), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1954), 9
Bt Main Street Commercial Low	1
Single Family Detached,1	6, 8, 9
Heavy Industrial	6, 9, 11
Bt Low Intensity Strip Commercial	6, 8 (1964), 9
Other	6, 8 (1964), 9
Bt Low Intensity Strip Commercial	6, 8 (1964), 9
Light Industrial	6, 8 (1964), 9
Bt Low Intensity Strip Commercial	1, 6, 8, 9
Accommodation	6, 8, 9, 11
Single Family Detached,1	6, 8 (1937), 9, 11
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Attached,1	6, 8, 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1949), 9
Transportation	4, 6, 7 (0.05), 9
Single Family Detached,1	6, 8 (1934), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1967), 9

Single Family Detached,1	6, 8 (1952), 9
Single Family Detached,1	6, 8 (1942), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1975), 9
Single Family Detached,1	6, 8 (1954), 9
Single Family Detached,1	6, 8 (1949), 9
Single Family Detached,1	6, 8, 9
Other	2
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1942), 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1954), 9
Single Family Detached,1	6, 8 (1949), 9
Special Use	6, 8 (1959), 9
Single Family Detached,1	6, 8 (1941), 9
Single Family Detached,1	6, 8 (1967), 9
Single Family Detached,1	6, 8 (1963), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1967), 9
Single Family Detached,1	6, 8 (1967), 9
Single Family Detached,1	6, 8 (1962), 9
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1962), 9
Single Family Detached,1	6, 8 (1946), 9
Single Family Detached,1	6, 8 (1972), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (19457), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1957), 9
Single Family Detached,1	6, 8 (1943), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8, 9
Multifamily,7	6, 8, 9
Single Family Detached,1	6, 8 (1960), 9
Vacant	2
Single Family Detached,1	6, 8 (1956), 9
Single Family Detached,1	6, 8 (1979), 9
Multifamily,5	6, 8, 9

Single Family Detached,1	6, 8 (1979), 9
Single Family Detached,1	6, 8 (1922), 9
Single Family Detached,1	6, 8 (1965), 9
Bt Large Format Standalone Commercial	6, 7 (0.64), 9
Bt Large Format Standalone Commercial	6, 7 (0.64), 9
Office	6, 7 (0.64), 9
Bt Large Format Standalone Commercial	6, 7 (0.64), 9
Single Family Detached,1	6, 8 (1950), 9
Transportation	6, 7 (0.23)
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8, 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,2	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1958), 9
Single Family Attached,2	6, 8, 9
Bt Main Street Commercial Low	6, 8 (1946), 9, 10
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1945), 9
Transportation	4, 6, 7 (0.18), 9
Transportation	4, 6, 7 (0.25), 9
Multifamily,4	6, 8 (1955), 9
Multifamily,4	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1950), 9
Multifamily,4	6, 8 (1970), 9
Single Family Attached,1	6, 8 (1972), 9
Special Use	1
Office	1
Utilities Communications	1, 4, 7, 9
Multifamily,8	6, 8 (1907), 9
Multifamily,4	6, 8 (1919), 9
Office	6, 7, (0.52), 8 (1953), 9
Transportation	1, 4, 6, 9
Office	1, 4, 6, 9
Bt Main Street Commercial Low	6, 8 (1956), 9
Bt Main Street Commercial Low	6, 8 (1958), 9
Bt Low Intensity Strip Commercial	6, 8 (1962), 9
Office	6, 7 (0.71), 8 (1967), 9
Accommodation	6, 7 (0.30). 9
Commercial	4, 6, 9
Bt Main Street Commercial Low	1, 6, 7 (0.02), 8 (1956), 9, 11
Bt Main Street Commercial Low	1, 6, 7 (0.02), 8 (1946), 9, 11

Bt Large Format Standalone Commercial	6, 8 (1940), 9
Bt Main Street Commercial Low	6, 8 (1951), 9
Bt Large Format Standalone Commercial	6, 8, 9
Bt Main Street Commercial Low	6, 8, 9
Bt Main Street Commercial Low	4, 6, 9
Single Family Detached,2	6, 8 (1944), 9
Primary Secondary Education	6, 7 (0.25), 8 (1956), 9
Bt Low Intensity Strip Commercial	4, 6
Bt Main Street Commercial Low	6, 7 (0.27), 9
Transportation	4, 6, 7 (0.01), 9
Transportation	4, 6, 7 (0.01), 9
Special Use	1, 8, 9
Transportation	4, 6, 8 (1969), 9
Transportation	4, 6, 8 (1962), 9
Transportation	4, 6, 8 (1958), 9
Transportation	4, 6, 7 (0.01), 9
Transportation	4, 6, 8 (1953), 9
Bt Large Format Standalone Commercial	4, 6, 7 (0.01), 9
Bt Main Street Commercial Low	6, 7 (0.81), 8 (1955), 9
Bt Main Street Commercial Low	6, 8 (1955), 9
Bt Main Street Commercial Low	6, 8 (1925), 9
Bt Large Format Standalone Commercial	6, 8, 9
Bt Large Format Standalone Commercial	4, 6, 7 (0.01)
Bt Large Format Standalone Commercial	6, 7 (0.47), 9
Bt Commercial Storage	6, 7 (0.05), 8 (1948), 9
Bt Commercial Storage	6, 7 (0.58), 9
Transportation	6, 8 (1948), 9
Transportation	6, 8 (1948), 9
Transportation	6, 8 (1966), 9
Transportation	6, 8 (1958), 9
Transportation	6, 8 (1962), 9
Office	6, 8 (1941), 9
Transportation	6, 8 (1969), 9
Transportation	6, 8 (1970), 9
Transportation	6, 8 (1969), 9
0	1
Bt Commercial Recreation Facility	6, 8 (1953), 9
Bt Low Intensity Strip Commercial	6, 8 (1953), 9
Bt Low Intensity Strip Commercial	6, 8 (1952), 9
Bt Commercial Recreation Facility	6, 8 (1952), 9
Transportation	4, 6, 7 (0.01), 9
Single Family Detached,1	6, 8 (1957), 9
Single Family Detached,1	6, 8 (1980), 9
Single Family Detached,1	6, 8 (1941), 9

Bt Main Street Commercial Low	6, 8 (1960), 9
Single Family Detached,7	6, 8 (1915), 9
Single Family Detached,2	6, 8 (1936), 9
Bt Low Intensity Strip Commercial	6, 7 (0.44), 9
Multifamily,2	1
Multifamily,4	1
Transportation	6, 8 (1976), 9
Commercial	6, 8 (1973), 9
Commercial	6, 8 (1950), 9
Bt Large Format Standalone Commercial	6, 7 (0.49), 8 (1970), 9
Single Family Detached,1	6, 8 (1942), 9
Multifamily,3	6, 9
Single Family Detached,1	6, 8 (1950), 9
Bt Low Intensity Strip Commercial	6, 7 (0.44), 8 (1954), 9
Single Family Detached,1	6, 8 (1949), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1969), 9
Single Family Detached,1	6, 8 (1985), 9
Single Family Detached,1	6, 8 (1942), 9
Single Family Detached,1	6, 8 (1950), 9
Transportation	4, 7 (0.01)
Single Family Detached,1	6, 8 (1939), 9
Commercial	6, 9
Transportation	4, 7 (0.01)
Transportation	4, 7 (0.01)
Transportation	4, 7 (0.06)
Multifamily,2	6, 8, 9
Office	6, 7 (0.32)
Single Family Attached,2	6, 9
Bt Main Street Commercial Low	6, 8 (1946), 9, 10
Bt Low Intensity Strip Commercial	6, 8 (1975), 9
Single Family Detached,1	6, 8 (1952), 9
Single Family Attached,2	6, 8, 9
Multifamily,20	6, 8, 9
Multifamily,4	6, 8 (1952), 9
Bt Low Intensity Strip Commercial	6, 8 (1970), 9, 11
Bt Low Intensity Strip Commercial	6, 7 (0.06), 1970
Bt Main Street Commercial Low	3, 7 (0.01)
Multifamily,2	1, 6, 8
Vacant	2
Single Family Detached,2	6, 8 (1965), 9
Bt Low Intensity Strip Commercial	6, 8 (1940), 9
Transportation	3, 7 (0.01), 9, 11
Multifamily,2	1, 6, 9

Transportation	3, 6, 11
Single Family Detached,1	1, 6, 9
Single Family Attached,6	1, 6, 9
Multifamily,6	1, 6, 9
Single Family Detached,2	1, 6, 9
Multifamily,3	6, 8 (1958), 9
Single Family Detached,1	6, 8 (1959), 9
Single Family Detached,1	6, 8 (1975), 9
Single Family Detached,1	6, 8 (1960), 9
Multifamily,4	6, 8 (1964), 9
Transportation	6, 8 (1954), 9
Bt Large Format Standalone Commercial	6, 7 (0.58), 9
Bt Commercial Storage	6, 8 (1978), 9
Other	6, 9, 11
Multifamily,5	6, 8, 9
Single Family Detached,1	6, 8 (1961), 9
Special Use	1
Bt Large Format Standalone Commercial	6, 7 (0.43), 8 (1964), 9
Bt Low Intensity Strip Commercial	1, 6, 9
Bt Large Format Standalone Commercial	6, 7 (0.56), 9, 11
Bt Main Street Commercial Low	6, 8, 9
Single Family Detached,1	6, 8 (1950), 9
Bt Main Street Commercial Low	6, 7 (0.50), 8 (1924)
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1963), 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8 (1924), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1972), 9
Bt Large Format Standalone Commercial	6, 7 (0.40), 8 (1965), 9
Accommodation	6, 7 (0.48), 8 (1930)
Bt Commercial Storage	6, 8 (1978), 9
Wholesale Warehousing	6, 8, 9
Wholesale Warehousing	6, 8, 9
Bt Low Intensity Strip Commercial	3, 11
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1957), 9
Single Family Attached,1	6, 8 (1941), 9
Single Family Detached,1	1, 6, 9
Single Family Detached,1	1, 6, 9
Multifamily,2	1, 6, 9
Bt Low Intensity Strip Commercial	6, 7 (0.18), 8 (1940), 9
Bt Low Intensity Strip Commercial	6, 7 (0.25), 8 (1960), 9
Accommodation	7 (0.41), 10

Single Family Detached,1	6, 8 (1906), 9
Single Family Attached,2	1, 6, 9
Accommodation	7 (0.30), 10
Bt Low Intensity Strip Commercial	3, 4, 7 (0.06), 9
Single Family Detached,1	6, 8 (1960]), 9
Single Family Attached,2	1, 6, 9
Single Family Detached,1	6, 8 (1980), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1942), 9
Single Family Detached,1	1, 6, 9
Bt Low Intensity Strip Commercial	4, 7 (0.00), 10
Bt Low Intensity Strip Commercial	4, 7 (0.09), 10
Bt Low Intensity Strip Commercial	4, 7 (0.09), 10
Bt Low Intensity Strip Commercial	4, 7 (0.09), 10
Bt Low Intensity Strip Commercial	6, 7 (0.06), 8 (1931), 9
Single Family Detached,1	6, 8 (1932), 9
Single Family Detached,1	1, 6, 9
Single Family Attached,2	1, 6, 9
Single Family Detached,1	1, 6, 9
Single Family Attached,3	1, 6, 9
Single Family Detached,1	6, 8 (1950), 9
Utilities Communications	1, 6, 9
Single Family Detached,9	1, 6, 9
Multifamily,11	1, 6, 9
Special Use	1, 8 (1964)
Bt Low Intensity Strip Commercial	6, 7 (0.27), 9
Bt Low Intensity Strip Commercial	6, 7 (0.71), 9
Bt Low Intensity Strip Commercial	6, 7 (0.49), 9
Single Family Detached,1	6, 8 (1950), 9
Bt Commercial Recreation Facility	6, 7 (0.49), 9
Bt Commercial Recreation Facility	6, 7 (0.78), 9
Single Family Detached,1	6, 8 (1952), 9
Single Family Detached,1	6, 8 (1947), 9
Bt Large Format Standalone Commercial	6, 7 (0.41), 9
Single Family Detached,1	6, 8 (1956), 9
Office	6, 8 (1970), 9
Accommodation	6, 7 (0.81), 9
Special Use	1, 8 (1955)
Transportation	4, 6, 7 (0.02), 9
Single Family Detached,2	6, 8 (1946), 9
Bt Low Intensity Strip Commercial	6, 7 (0.23), 8 (1974),9
Bt Low Intensity Strip Commercial	3, 6, 7 (0.00)
Bt Low Intensity Strip Commercial	3, 6, 7 (0.00)
Single Family Attached,2	6, 8 (1906), 9

Bt Low Intensity Strip Commercial	3, 6, 7 (0.09), 9 ,11
Single Family Detached,2	6, 8 (1962), 9
Accommodation	6, 7 (0.49), 8 (1962),9
Accommodation	6, 7 (0.83), 8 (1962), 9
Accommodation	6, 7 (0.21), 8 (1947), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1944), 9
Accommodation	4, 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8 (1960), 9
Bt Large Format Standalone Commercial	1, 6, 7 (0.42), 8 (1968), 9
Single Family Detached,1	6, 8 (1948), 9
Office	6, 7 (0.12), 8 (1956), 9
Commercial	6, 7 (0.77), 8 (1972), 9
Bt Large Format Standalone Commercial	1, 6, 7 (1.28)
Accommodation	6, 7 (0.81), 9
Light Industrial	6, 7 (0.42), 9
Bt Large Format Standalone Commercial	6, 7 (0.77), 9
Bt Low Intensity Strip Commercial	6, 7 (0.17), 8 (1966), 9
Bt Commercial Recreation Facility	6, 9
Bt Regional Mall	6, 9, 11
Bt Commercial Storage	1, 4, 6
Bt Low Intensity Strip Commercial	6, 8 (1960s), 9, 11
Open Space	2
Vacant	2
Single Family Detached,1	6, 8 (1940s), 9
Single Family Detached,1	6, 8 (1923), 9, 11
Single Family Detached,1	6, 8 (1951), 9
Single Family Detached,1	1
Single Family Detached,1	1
Single Family Detached,1	1
Primary Secondary Education	1
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8 (1975), 9

Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8 (1953), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1948), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1959), 9
Single Family Detached,1	6, 8 (1975), 9
Other	1
Special Use	1
Single Family Detached,1	6, 8 (1952), 9
Single Family Detached,1	6, 8 (1947), 9
Single Family Detached,1	6, 8 (1963), 9
Single Family Detached,1	6, 8 (1964), 9
Single Family Detached,1	6, 8 (1978), 9
Single Family Detached,1	6, 8 (1959), 9
Single Family Detached,1	6, 8 (1960), 9
Commercial	3, 6, 7 (0.25), 9, 11
Single Family Detached,1	6, 8 (1965), 9
Single Family Detached,1	6, 8 (1978), 9
Single Family Detached,1	6, 8 (1980), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1949), 9
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1963), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1953), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1961), 9
Single Family Detached,1	6, 8 (1955), 9
Single Family Detached,1	6, 8 (1951), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Attached,2	6, 8 (1971), 9
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1975), 9
Special Use	4, 8 (1960), 9
Multifamily,3	6, 8 (1940s), 9
Bt Large Format Standalone Commercial	6, 7 (0.65), 8 (1935), 9
Transportation	4, 6, 7 (0.07), 9
Single Family Detached,1	6, 8 (1945), 9
Multifamily,2	1
Single Family Attached,2	1

Utilities Communications	7 (0.00)
Other	2
Commercial	6, 8 (1960), 9, 11
Transportation	4, 6, 7 (0.00), 9
Bt Main Street Commercial Low	6, 9, 11
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1941), 9
Single Family Detached,1	6, 8 (1944), 9
Single Family Detached,1	6, 8 (1945), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1966), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1950), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1960), 9
Single Family Detached,1	6, 8 (1947), 9
Single Family Detached,1	6, 8 (1959), 9
Single Family Detached,1	6, 8 (1964), 9
Single Family Detached,1	6, 8 (1975), 9
Commercial	1
Single Family Detached,1	6, 8 (1946), 9
Single Family Detached,1	6, 8 (1966), 9
Single Family Detached,1	6, 8 (1943), 9
Single Family Detached,1	6, 8 (1970), 9
Single Family Detached,1	6, 8 (1961), 9
Single Family Detached,1	6, 8 (1958), 9
Single Family Detached,1	6, 8 (1975), 9
Transportation	1
Open Space	2
Multifamily,150	6, 8 (1966), 9
Bt Main Street Commercial Low	1
Transportation	1
Bt Main Street Commercial Low	1
Office	1
Vacant	1
Vacant	1
Civic Facilities	1
Bt Low Intensity Strip Commercial	1
Single Family Detached,1	1
Single Family Detached,1	1

Bt Low Intensity Strip Commercial	1
Transportation	1
Bt Main Street Commercial Low	1
Bt Commercial Storage	1
Commercial	1
Bt Low Intensity Strip Commercial	1
Bt Main Street Commercial Low	1
Office	1

Optional Information3

Common ownership with adjacent lot

Common ownership with adjacent lot

Common ownership with adjacent lot

Owned by Caltech

Common ownership with adjacent lot

Common ownership with adjacent lot

Common ownership with adjacent lot

Common ownership with adjacent lot

Common ownership with adjacent lot

Former Caltrans future ROW

Former Caltrans future ROW

Former Caltrans future ROW

Common ownership with adjacent lot

Common ownership with adjacent lot

Project approved

Project approved
Project approved
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Common ownership with adjacent lot; previous application filed
Active application
Active application
Common ownership with adjacent lot
Common ownership with adjacent lot
Common ownership with adjacent lot
Owned by Fuller Theological Seminary
Active application
Active application
Active application
Active application
Active application
Active application

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[illegible]

[illegible]

[illegible]

Owned by Caltech
Owned by Caltech
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Church-owned property
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Active application
Common ownership of adjacent parcel
Common ownership of adjacent parcel
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Common ownership of adjacent parcel

Active application
Active application
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Active application
Active application
Active application
Active application
Active application
Active application

Active application
Active application
Active application
Active application
Church-owned property
Active application
Nonconforming commercial use
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Active application
Active application
Active application

Active application
Active application
Active application
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Active application
Active application
Active application
Active application
Active application
Active application
Active application
Church-owned property
Church-owned property
Use car sales lot
Use car sales lot

Old motel
Old motel
Old motel
Trends in east Pasadena near L Line station
Trends in east Pasadena near L Line station
Trends in east Pasadena near L Line station
Trends in east Pasadena near L Line station
Trends in east Pasadena near L Line station
Trend of building on parking lots; trends in east Pasadena near L Line station
Closed Sears store and extensive parking lots
Developer interest in building on surface parking lot
Common ownership of adjacent parcel
Common ownership of adjacent parcel
Active application
Active application
Active application
Active application

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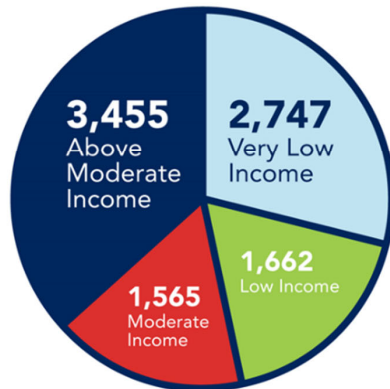
Appendix C: Housing Resources

This Appendix C describes the land, financial, and administrative resources available in Pasadena to address current and future housing needs, including the City's share of the Regional Housing Needs Assessment (RHNA). California General Plan law requires every city and county to have land zoned to accommodate its fair share of the regional housing need, which is quantified by the RHNA. The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to ensure that zoning is in place and appropriately zoned sites are available to address anticipated housing demand during the Housing Element planning period.

Government Code Section 65583(a) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment. The inventory of land suitable for residential development is used to identify sites that can be developed for housing within the planning period. Toward this end, this Appendix discusses:

- **Housing Production.** This section documents housing production credits toward the 2021–2029 RHNA for units built and planned for construction during the planning period.
- **Land Inventory.** This section identifies and describes the sites that have the appropriate zoning to accommodate development of a variety of housing types and sufficient to accommodate the RHNA. ~~A general assessment of infrastructure—An assessment of water and sewer capacity~~ also accompanies the analysis.
- **Financial Resources.** This section identifies the financial resources available to the City to assist in implementing the housing programs in the housing element. This includes the major funding sources and organizational entities that implement programs.
- **Administrative Resources.** This section identifies the primary administrative resources to be used to implement housing programs.

Planning for 9,429 New Homes Over the Next 8 Years



This analysis in this Appendix shows that Pasadena has the land use/zoning capacity to accommodate the 2021-2029 RHNA of 9,429 housing units, distributed among the four household income categories as shown here.

Note: Pursuant to AB 2634, jurisdictions are also required to project the housing needs of extremely low-income households (0-30% of Area Median Income, or AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. Therefore, the City's very low-income RHNA of 2,747 units can be split into 1,373 extremely low-income and 1,374 very low-income units.

Housing in Pasadena

As described in the Housing Plan section of this element, demand for housing in Pasadena, and all of California, has significantly increased over the past two decades due to slow housing production. Almost two-thirds of the RHNA for this sixth cycle consists of “catch-up” production to account for the lackluster pace of housing construction, and particularly affordable housing. Compared to neighboring jurisdictions, Pasadena has produced several hundred affordable units. The City's Inclusionary Housing Ordinance ensures that every new development with 10 or more units includes at least 20 percent of those units as affordable housing. Certainly, Pasadena has production constraints similar to those of fully urbanized cities throughout the Los Angeles region: lack of vacant properties, high land prices, open space deficits, and productive industrial uses that create land use conflicts if too close to residential neighborhoods. Factors such as major freeways further limit development potential, as adequate buffers around those locations are needed to create suitable living environments. However, Pasadena's reputation as a highly desirable community in which to live has spurred landowners and investors to build rental and for-sale units in districts that the General Plan targets for growth: around light rail stations, within neighborhood villages, along major corridors, and within the Central District. Nonetheless, as many residents expressed through the public engagement process for this Housing Element, affordable housing remains the key focus: production of new affordable units and protections for people currently living in covenanted affordable units and units affordable due to age.

The cost of developing subsidized affordable housing has increased while public funding has decreased. According to a study produced by the Turner Center at UC Berkeley, across the United States, the high costs of developing subsidized housing hinders efforts to address the affordability crisis of low- and moderate-income families and provide homes for unhoused individuals. The number of people overpaying for housing remains at historically high levels, and after many years of decline, homelessness has been on the rise in California. Levels of public

Housing Resources

subsidy for housing have not kept pace with these growing needs. At the same time, higher costs per unit to build affordable housing means that localities produce fewer units with the same amount of subsidy, even as more people need these homes. Many of the factors that have influenced housing affordability and availability were intensified by the COVID-19 pandemic of 2020-2021. The rise in cost of building materials, the skyrocketing demand for more affordable housing, and the increase in persons struggling to afford housing costs have exacerbated an already serious situation.



Pasadena continues to experience significant new housing construction.

Housing Production

State law allows two ways of counting housing construction credits toward the RHNA: 1) preservation of affordable units and 2) new construction. The City is not proposing to count the preservation of publicly assisted affordable units at risk of conversion to market rates toward the 2021–2029 RHNA. All but three projects have covenants expiring in 2024 or later, past the time frame allowed by the Government Code for counting the units toward the RHNA. For two of the three, the City committed funding in 2020 to assist preserving the 114-unit La Villa Lake senior housing complex and 150-unit Concord Apartments. In the future, provided all requirements of Government Code Section 65583.1(c) can be met, these may be considered to contribute to either the low- or very low-income RHNA categories. For the third at-risk unit, the owner did not indicate interest in preserving the units.

Approved and Proposed Projects

In Pasadena, nearly every conceivable type of housing product continues to be developed: townhomes, apartments, condominiums, senior housing, mixed-use development, work/live units, senior life care facilities, housing for people with disabilities, and accessory dwelling units (ADUs). The City is crediting the following approved and proposed projects to the 2021–2029 RHNA, totaling ~~3,995~~3,950 units:

- 410 units outside of the eight Specific Plan areas
- 3,540~~3,495~~ units within the eight Specific Plan areas

The units can be credited towards the RHNA as shown in Tables C-1 and C-2 and located on Figure C-1 (on page C-7).

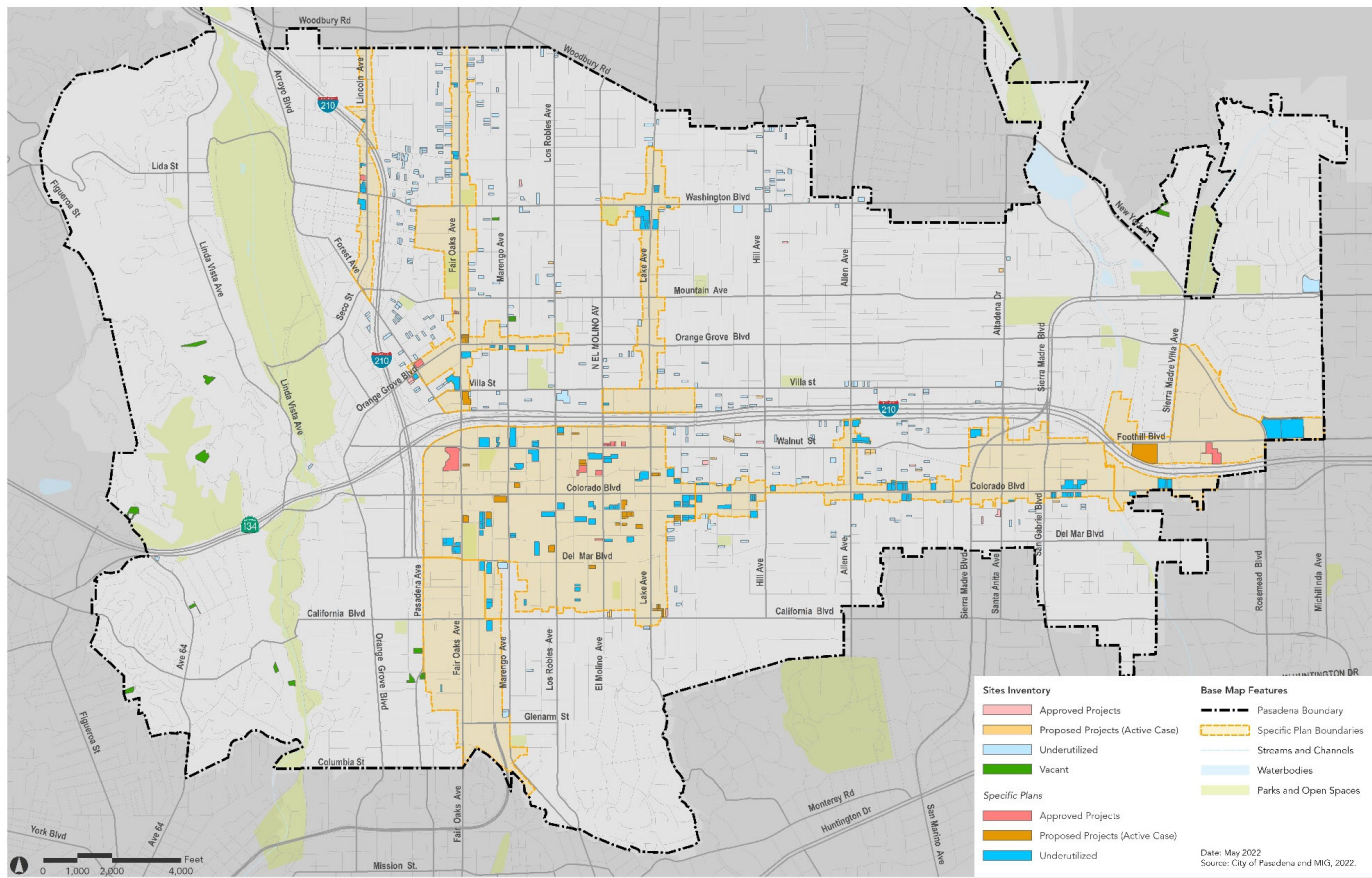
Table C-1: Approved Projects

Project Name and/or Status	Affordability Level				Total
	EL/VL Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Outside of Specific Plan Areas					
CBG Homes (2488 Mohawk St.)	1	--	--	20	21
National Community Renaissance (143 Mar Vista Ave.)	19	--	--	1	20
947 E California Blvd.	--	--	--	4	4
233 N Hill Ave.	8	--	50	--	58
1153 Bresee Ave.	--	--	--	1	1
690 N Orange Grove Blvd.	--	8	--	40	48
280 Grandview St.	--	--	--	9	9
118 N Oak Ave.	--	--	--	1	1
2415 Oswego St.	--	--	--	8	8
556 Cypress Ave.	--	--	--	18	18
Subtotal	28	8	50	102	188
Within Specific Plan Areas					
MW Lofts (711 E. Walnut St.)	12	3	--	107	122
100 W. Walnut/75 W. Holly St.	--	--	--	475	475
843 N. Fair Oaks Ave.	--	--	--	7	7
765 N. Orange Grove Blvd.	21	--	14	13	48
1435 Lincoln Ave.	--	--	--	8	8
209 S. El Molino Ave.	--	--	--	11	11
3452 E. Foothill Blvd.	--	--	--	233	233
99 N. El Molino Ave.	--	--	--	40	40
95 N. Madison Ave.	10	10	--	76	96
25 Yale St.	--	--	--	4	4
690 N. Orange Grove Blvd.	--	--	--	11	11
230 E. El Molino Ave.	--	--	--	40	40
Subtotal	43	13	14	1,025	1,095
Total	71	21	64	1,127	1,283

Housing Resources

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Figure C-1: Sites Inventory



Housing Resources

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Housing Resources

The **75 W. Holly Street** project (475 units) is part of a large mixed-used development under construction on former surface parking lots of the Parsons headquarters site. (Parking for Parsons and the new development is provided in adjacent parking structures.) Marketed as 10 West and being developed by LPC West, this project in Old Pasadena is within one-half mile of the Memorial Park L Line light rail station. The project is subject to the City's Inclusionary Housing Ordinance (20 percent affordable units on site, in-lieu fee payment, or provision of affordable units off site). Notably, this project involved developing on the surface parking lots serving the Parsons building, which continues for be fully occupied.

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The project at **711 E. Walnut Street** includes 122 units as part of a mixed-use development and is also subject to the Inclusionary Housing Ordinance.

Several projects are in the development pipeline and undergoing review, as shown in Table C-2 and Figure C-1. Pipeline projects include those in preliminary stages: predevelopment plan review, preliminary consultation, concept design review, preliminary plan check for City of Garden projects, and other similar reviews.

Determining the affordability of proposed residential projects is based on several criteria. These include:

- Whether the Inclusionary Housing Ordinance applies and the applicant has indicated the affordable units will be provided on site
- Density bonus or other controlling affordability mechanisms
- Developer agreements or Specific Plan guidance
- Proposed density, with densities of 30 units per acre or higher presumed to be affordable housing based on the "default density" criteria allowed by housing element law

Where it is known that developers propose to pay in-lieu fees to satisfy the requirements of the Inclusionary Housing Ordinance, no affordable units are counted even though the fees paid will be leveraged for affordable housing in the future.

In total, the approved and proposed projects will result in 3,905,950 units. After these projects are considered, a RHNA of 5,524,479 units remains to be achieved via redevelopment and ADU construction.

Housing Resources

Table C-2: Proposed Projects

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Project Name		Affordability Level				Total
		EL/VL Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Outside of Specific Plan Areas						
19 E. Orange Grove Blvd		69	--	--	1	70
673 E. California Blvd		--	--	--	13	13
170 N. Parkwood Ave		--	30	--	28	58
244 N. Michigan Ave		3	--	2	29	34
1027 N. Altadena Dr		--	--	--	9	9
1075 N. Los Robles Ave		--	--	--	2	2
154 Mar Vista Ave		--	--	--	6	6
264 N. Chester Ave		--	--	--	5	5
41 S. Daisy Ave		--	--	--	3	3
439 N. Hill Ave		--	--	--	13	13
93 N. Craig Ave		--	--	--	6	6
936 N. Los Robles Ave		--	--	--	3	3
Subtotal		72	30	2	118	222
Within Specific Plan Areas						
100 E Green St		--	--	100	123	223
1501-1525 E Walnut Ave		3	3	24	51	81
444 N. Fair Oaks Ave		22	--	10	174	206
540 S Lake Ave		7	--	55	--	62
105 S Catalina Ave		--	--	--	45	45
740 E Green St		23	--	--	250	273
141 S Lake Ave		56	--	--	--	--
127 N Madison Ave		--	--	4	--	--
130 N Fair Oaks Ave		--	--	--	--	--
136 S Oak Knoll Ave		2	--	--	--	--
150 E Colorado Blvd		--	--	--	98	98
253 S Los Robles Ave		8	--	--	82	90
254 E Union St		15	--	--	44	59
272 N Los Robles Ave		27	--	79	--	106
274 N Oakland Ave		54	10	170	1	235
340 S Madison Ave		--	--	--	--	--
747 E Green St		6	--	--	--	--
86 S Fair Oaks Ave		14	--	--	--	--
913 Boston Ct		--	--	--	--	--
3202 E Foothill Blvd		--	46	23	--	--
Subtotal		187	59	465	--	--
Total		259	89	467	--	--

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Inventory of Housing Sites

Assumptions and Methodology

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site and the assumed RHNA income category must account for land use controls, site size, and site improvements. Due to the limited availability of residential land in Pasadena, some developers may opt for a density bonus to increase the unit count. Starting in 2021, residential projects in California with on-site affordable housing ~~can~~could receive a density bonus of up to 50 percent. Larger bonuses are available for 100% affordable projects. Previously, under Government Code Section 65915—commonly known as the State Density Bonus Law—the maximum bonus was 35 percent.

In Pasadena, developers may apply for a density bonus in addition to meeting the requirement for if they provide on-site affordable housing per the Inclusionary Housing Ordinance. Per City practice, the inclusionary requirement is applied to the base density, not the total yield of units with a density bonus.

Site Capacity Assumptions. Review of ~~development applications~~developments completed in the CD and RM zones projects that have been constructed in approximately the past five years shows that the unit yield on development sites in Pasadena approach the maximum yield allowed by zoning regulations—or exceeds the maximum permitted densities through density bonuses. 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 177 N. Hudson in the CD-3 zone (87 units per acre maximum) achieved 91 units on a 0.99-acre lot, resulting in a density of 92 units per acre.
- The Avila Apartments 75 W. Walnut (201 total units) yielded 106 units per acre in the CD-1 zone (87 units per acre maximum).
- At 138 S. Wilson, 30 units (including two very low-income units) on a 0.48-acre property in the RM-48 zone yielded 62 units per acre.
- The project at 125 Hurlbut is zoned RM-32 (32 units per acre) and yielded 36 units per acre.

Thus, the sites inventory is actually conservative with the by estimating that the identified sites will be developed at 90 percent of capacity ~~estimate~~, as described below.

The following assumptions are consistent with observed trends and thus have been used to calculate the realistic yield ~~on the~~ included in the site inventory:

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Housing Resources

- **RM-12 zoned sites:** The RM-12 zone is referred to as the duplex zone, with a minimum lot size of 7,200 square feet. Zoning regulations permit up to two units per lot. Thus, any site zoned RM-12 that is smaller than 14,400 square feet (twice 7,200) can only support two units.
- **RM-16, RM-32, and RM-48 zoned sites.** Sites zoned for multi-family development have been calculated at 90 percent maximum density based on recent trends and the assumption that development standards, combined with unique site features, may not always lead to 100 percent buildout.
- **CL and CO zoned sites.** Multi-family residential and mixed-use developments are permitted in these zones. Allowed densities range from 48 to 87 units per acre. Ninety percent capacity has been assumed based on observed trends citywide. Also, the analysis below examines trends regarding residential development occurring on sites that allow 100 percent nonresidential uses, such as the CL and Coas in these zones.
The inventory only includes sites with char Formatted: Highlight
CO-zoned sites that have been redeveloped Formatted: Highlight
have active residential development applic Formatted: Highlight
- **Central District Specific Plan.** The Central District Specific Plan has six subdistricts, all of which but one (CD-6) allow multi-family and mixed - use development, with densities varying based on location (see figure on page B-13 of Appendix B). Designated Formatted: Highlight
have been assumed to be built at 90 percent of maximum capacity.
- **East Colorado Specific Plan.** The updated East Colorado Specific Plan, adopted in February 2022, has five subdistricts, all of which allow multi-family uses and four of which allow mixed use, in recognition of proximity to the Allen Avenue L Line light rail station and frequent bus traffic along Colorado Boulevard. Maximum densities are 32 or 64 units per acre depending upon subdistrict and proximity to the rail station. Build-out assumptions are 90 percent of maximum density based on recognized trends recent development proposals.
- **East Pasadena Specific Plan.** In the East Pasadena Specific Plan, of the 11 subdistricts, nine allow multi-family development and two permit mixed use. Maximum densities are either 32 or 48 units per acre based on subdistrict, or 60 units per acre within one-quarter mile of the rail station. Ninety percent capacity of the permitted maximum density has been assumed given experiences recent development proposals particularly with density bonus requests.
- **Fair Oaks/Orange Grove Specific Plan.** This Specific Plan's land use districts mirror the RM-12 and RM-16 residential districts and in the commercial zones, allows only limited multi-family and mixed-use

projects at 16 to 40 units per acre. Build-out assumptions are 90 percent based on **trends recent development proposals.**

- Lincoln Avenue Specific Plan.** The Lincoln Avenue Specific Plan Update was approved on November 15, 2021. The update intends to help establish Lincoln Avenue as the heart of the greater residential neighborhood, where commercial and multi-family uses co-exist in a walkable, vibrant environment with public realm improvements that create a cohesive and well-connected corridor. A portion of the updated Specific Plan (MU-N district) was up_zoned to allow 32 units per acre. Other areas of the plan continue to allow 16 units per acre. A recent development application within this Specific Plan area requested a Planned Development (PD) for a 59-unit project, including four very low-income units, **at a density of 28.2 units -per acre. The application was submitted prior to the up zoning. The applicant plans to resubmit to take advantage of the higher density limit.**
- North Lake and South Fair Oaks Specific Plans.** In **these** Specific Plans, standard zoning land use regulations generally apply (with limited prohibitions on residential use within two North Lake subdistricts). Thus, based on trends citywide, a 90 percent capacity has been assumed **for those sites where residential use is allowed. The South Fair Oaks Specific Plan was adopted on February 11, 2022, just one week prior to adoption of this Housing Element.**
- South Fair Oaks Specific Plan.** The South Fair Oaks Specific Plan was adopted on July 11, 2022, just prior to City Council adoption of this Housing Element. The plan envisions new residential development in four mixed-use districts at densities from 16 to 87 units per acre. Based on past projects within and adjacent to the plan area, as well as trends throughout Pasadena, a 90 percent capacity has been assumed.

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Densities Appropriate for Accommodating Lower-Income Housing

Generally, ~~s~~ites that allow development densities of **at least 30 or more** units per acre have been credited toward the lower-income RHNA, as allowed by State law (the “default density”). The California Government Code states that if a local government has adopted density standards consistent with **the-its** population **and** based upon criteria set by State law (at least 30 units per acre for Pasadena), **HCD is obligated to accept sites with those density standards (30 units per acre or higher) as those sites are deemed** appropriate for accommodating the jurisdiction’s share of regional housing need for lower-income households. Land use designations with density ranges near the default density are considered appropriate for accommodating housing for moderate-income households.

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Assembly Bill 1397 Site Suitability

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Consistent with updated Housing Element law, (A Section 65583.2) related to the suitability of small and large sites for housing production, the lower-income sites inventory presented in this Appendix is predominately limited to parcels between 0.5 and 10 acres in size, as HCD has indicated these size parameters best accommodate lower income housing projects from an economic perspective additional justification is required to designate sites for lower income housing that are smaller than 0.5 acres or larger than 10 acres. In the inventory, several sites des housing comprising include one or more parcels that in size. These sites are included because the multiple parcels function as one site, particularly when under common ownership. Small (less than 0.5 acres) meeting the default density standard are credited toward the moderate- and above-moderate income categories to account for a potential variety of types, sizes, and amenity levels in future higher-density development projects.

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AB 1397 State law also adds includes specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present “substantial evidence” that the existing use does not constitute an impediment for to additional residential use on the site. Due to the built-out nature of Pasadena, most sites have existing uses. Non-vacant sites included in the inventory have been chosen selected using the following criteria, which are indicated for each non-vacant site in the detailed sites matrix included at the end of this appendix. A site identified under criteria 1, or 2, or 5 requires no further factors. All other sites qualify using at least three of the criteria. For sites zoned exclusively for residential use, factor 6 has been applies in most instances.

1) Interest: Developer interest or property owner interest

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2) Vacant Lots: Completely vacant lot

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3) Lot with Minimal Improvements: Minimal existing improvements on site, such as a storage shed.

4) Underutilized Parking Lot: Associated with a use that could incorporate parking into a new development on the parking lot (a common redevelopment approach in Pasadena)

5) City or Caltrans Ownership: Property is under City or Caltrans ownership, with defined intent to redevelop the site with a residential use at a higher density

6) Redevelopment Trend for Existing Use: Uses that are similar to those that have been previously recycled in Pasadena (e.g., industrial uses, small shopping centers, offices, stand-alone restaurants and retail uses, properties zoned exclusively for residential use that are currently developed well below the zoning capacity, as described in greater detail below under Vacant and Undertutilized Residential Sites)

- 7) Building/Land Value: Property improvement value is less than half of the land value (ratio is less than 1.00), indicating substantial underinvestment and the ability of a property owner to achieve financial gain through redevelopment
- 8) Year: Structure was built prior to 1985 (and therefore over 36 years of age) but is not a designated or eligible historic structure, indicating that properties may need substantial improvements or replacement for maximum financial return
- 9) Building Intensity: Low existing floor-area ratio (FAR) under 1.00 or lot coverage of less than 50% (for residential uses), thus indicating substantial underinvestment and the ability of a property owner to achieve financial gain through redevelopment
- 10) Lease: Site has no existing tenant lease(s) or lease(s) expires within early in 6th cycle planning period (where known)
- 11) Building Condition: Building deteriorating and/or many tenant vacancies

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These criteria have been applied across all income categories, not just non-vacant sites identified to accommodate the lower-income RHNA. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain officially designated historic buildings are not included.

Table C-3 on the following pages documents projects in Pasadena that have recently been completed and have been approved within specific plan areas, on residentially zoned sites, and on sites that permit 100 percent commercial uses. The information presented demonstrates that projects have been and will be built in all zones under a variety of conditions. The table indicates the factors that contributed to site redevelopment from the list above. These same factors are shown for each site in the sites inventory at the end of this Appendix C to justify its inclusion based on either similarities to approved/built projects, developer/property owner interest, or because a site is vacant.

Regarding the inclusion of sites currently used as parking lots for adjacent uses (factor 4 above), several projects in Pasadena involve this development approach, in which the existing buildings that the parking lots serve will remain; the required parking for the existing use is incorporated into the new development. In addition to the Parsons site described above, examples include:

- 388 Cordova, which involved conversion of an existing office building to residential uses and wrapping the existing parking structure with new units
- 535 E. Union, being built on the parking lots for Pasadena Presbyterian Church
- 3452-3488 E. Foothill, which involves building 233 apartments on the lot serving the flagship Panda restaurant (while the restaurant continues to operate)

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Housing Resources

Several properties are subject to the reuse provisions of **AB 1397** **State law**, which requires that vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element only be deemed adequate to accommodate a portion of the housing need for lower-income households if the site is zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households **and which c** **Formatted: Highlight**

The parcels subject to **AB 1397** **these requirements** are identified in the accompanying sites inventory table, **and the Elem** **Formatted: Highlight**

adopt the required by-right zoning. Non-vacant sites identified in the previous Housing Element but credited toward the moderate-or above moderate-income RHNA in the current Housing Element are not subject to **these** provisions of **AB 1397** since they are not being used to address the lower-income RHNA.

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Table C-3: Approved Projects Illustrating Redevelopment Factors Used#

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*No FAR maximum; approximate based on development standards.

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Accessory Dwelling Units

Accessory dwelling units, or ADUs, as a result of State laws in 2017 and 2019 that facilitated the ability of property owners to construct ADUs, represent a rapidly emerging form of housing and affordable housing in particular. While ADU building permits issued in 2018 were low, the pace picked up significantly between 2019 and 2021. Pasadena's Building and Safety Division issued 47 ADU building permits in 2019, 68 ADU permits in 2020, and 141 ADU permits in 2021. In averaging the number of building permits for ADUs between 2019 and 2021 (not including 2018 since the new regulations that encourage ADU production had not yet taken effect in Pasadena), the City projects that at least 85 building permits will be issued each year during the sixth cycle. Thus, the City has assumed that 706 ADUs will contribute toward meeting the RHNA during the planning period (85 ADUs x 8.3 years of the sixth cycle). In the inventory, the City has assigned ADU production to the income categories consistent with a methodology developed by SCAG and approved by HCD. Although the building permit data are inconsistent the Annual Planning Reports (APRs) submitted to HCD previously, this Housing Element includes a program to update the APRs for the years 2019, 2020, and 2021 to ensure consistency with the building permit data.

Given the City's strong programs to encourage actual ADU construction, the projection of 85 ADUs annually is sound—and consistent with legislative intent to promote ADUs as a form of affordable housing. Additionally, the 706 ADUs represent a reasonable projection because of 1) the fact that the City has a successful pilot program to encourage ADUs as affordable housing and 2) the City's participation in a SCAG program to identify and implements strategies to accelerate ADU production, as described in the main body of this Element.

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Detailed Sites Inventory

Currently Available Sites

The inventory of sites that have appropriate zoning in place largely consists of underutilized properties in the RM-12, RM-16, RM-32, RM-38, CL, and CO zoning districts, as well as properties within each of the Specific Plans. Pasadena is in the process of updating all seven Specific Plans and creating a new Specific Plan—Lamanda Park—from portions of the current East Colorado and East Pasadena Specific Plans. As part of this effort, the City's consultant conducted detailed analysis of the potential for properties to recycle based on economic data and contact with property owners. While the proposed land use regulatory changes for each Specific Plan area have not been considered in this sites analysis for the purpose of projecting capacity, the information has been used to inform the likelihood of a property transitioning from its current use to a future residential or mixed-use development. For example, the Affinity project at 555 South Arroyo Parkway, which the City Council approved in December 2022, lies within the South Fair Oaks Specific Plan area. Because that Specific Plan had not been adopted at the time revised version of this element was provided to HCD

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for review, the City did not include the Affinity project in this sites inventory. Affinity is a mixed-use project that includes 95 units of independent senior living housing.

Per the Pasadena Land Use Element, each Specific Plan area formerly had a cap on the ultimate development yield, both for residential and nonresidential development. This cap did not include affordable units produced in any manner, except within the Fair Oaks/Orange Grove Specific Plan (based on historic practices of directing affordable housing to the Northwest neighborhood). Also, in any Specific Plan, a developer had the opportunity to petition to convert nonresidential capacity to residential capacity to create additional housing opportunities through adaptive reuse or new construction. In early 2022, the City Council amended the General Plan to eliminate the development caps. Also, as each amended Specific Plan is adopted, no cap provisions will be included.

Table C-6 at the end of this Appendix catalogs currently available sites, and Figure C-1 shows the locations.

Vacant and Underutilized Residential Sites

Underutilized sites included in this inventory have been chosen based on observable and well-established redevelopment trends exclusively for residential use. As is demonstrated in Table C-4 below, the trends illustrate the potential capacity increase available to owners actions to redevelop to take advantage of the underused capacity. On these sites, the residential capacity is two to 13 times the existing development. Existing uses on the sites are older or show signs of disinvestment or deferred maintenance, indicating a “ripeness” for private redevelopment. This includes sites in exclusively residential zones. The current trends involving redevelopment of such sites are documented in the comprehensive sites inventory table at the end of the

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The inventory includes 0.4 acres of vacant and 30.4 acres of underutilized properties in the RM-12 zone. As described above, these sites generally allow only two units per lot unless the lot size exceeds 14,400 square feet. Altogether, RM-12 sites account for 282 units, or only 4.4 percent of the overall sites inventory. Most of these sites are in Northwest Pasadena and represent properties that currently are developed with one single-family home. Given inquiries by several property owners regarding potential redevelopment, these sites have been included development of these sites appears feasible and the subject of market interest. Virtually all of these sites have been included in the above moderate-income RHNA category since densities fall below the default density of 30 units per acre.

Sites zoned RM-16, RM-32, and RM-48 occur citywide. For the inventory, the City has selected sites that currently support only generally are larger than one-quarter acre. Properties zoned RM-16, RM-32, and RM-48 have been assigned to the moderate-income RHNA category, although RM-32 and RM-48 could be reassigned are also suitable to accommodate both lower income housing and above moderate-income housing, if the City requires

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additional capacity for the lower-income or above moderate-income categories.

Table C-43 identifies many examples of property owners tearing down an existing single-family residence and building as few as three replacement units (net gain of only two units). The trends identified in Table C-43 have been applied to properties citywide where one unit exists on a lot and the building-to-land-value ratio is low. The age of a property was not necessarily used since Pasadena has many homes dating 50 years or older that are well preserved. Also, Assessor's data frequently does not list the age of a structure, as it may be unknown; Table C-43 indicates information regarding year built when known.

Table C-43: Underutilized Residential Sites – Redevelopment Trends

Address	Existing Use	Proposed Use	Age (if known)
RM-16 Zone			
120 N Oak	Single-family unit	3 detached units	
199 S Meredith	Single-family unit	3-unit townhouse	
884 S Marengo	Duplex	5-unit apartment	1926
936 N Los Robles	Single-family unit	One single-family unit and a duplex	1922
44 N Oak	Single-family unit	3 units	1924
100 N Greenwood	Single-family unit	3-unit multifamily	1912
63 N Sierra Bonita	Single-family unit	4-unit townhome	1922
1645 N Lake	4 detached units	6-unit multifamily	
1715 N Lake	Single-family unit	1 single-family unit and 6 multifamily	1920
82 N Parkwood	Single-family unit	3-unit townhome	1920
281 N Craig	Single-family unit	Add duplex	1942
RM-32 Zone			
266 N Wilson	Single-family unit	5-unit apartment	1932
597 N Mar Vista	2 single-family units	6 units	
1135-1137 E Villa	Single-family unit	4 units	1908
814 Magnolia	4-unit apartment	7-unit condo	1954

Table C-43: Underutilized Residential Sites – Redevelopment Trends

Address	Existing Use	Proposed Use	Age (if known)
264 N Chester	Single-family unit	5-unit multifamily	1935
93 N Craig	Single-family unit	6-unit multifamily	1920
1045 Locust	Single-family unit	9-unit multifamily	1939
515 Champlain	5-unit multifamily	9-unit multifamily	
340 S Madison	4-unit multifamily	9-unit multifamily	1919
524 Cyprus	Single-family unit	8-unit townhouse	
264 E Bellevue	Single-family unit	8-unit multifamily	1925
2434 Oswego	2 single-family units	10 condo units	
81 Harkness	Single-family unit	6-unit multifamily	1936
241 Mar Vista	Single-family unit	6 townhomes	
500 S Oakland	Single-family unit	5-unit multifamily	
RM-48 Zone			
93 N Holliston	2 single-family units	9 condo units	
439 N Hill	Single-family unit	13-unit apartment	1920
983 San Pasqual	Single-family unit	1 single-family unit and 6 condo units	
395 N Holliston	Single-family unit	5-unit multifamily	1922
398 N Holliston	2 single-family units	9-unit townhome	
350 Cordova	Office building	84-unit multifamily	1978
130-140 N Mar Vista	Single-family unit	23-unit multifamily	1925
397 N Catalina	Single-family unit	3 units plus retain existing	1908

Housing Resources

Underutilized Sites that Permit 100 Percent Nonresidential Uses

To a more limited degree, the inventory includes sites outside of the Specific Plan areas that allow 100 percent nonresidential uses, in the CL and CO zones, as well as such sites within the Specific Plans and the Central District in particular. The rationale for using such sites is threefold: 1) reduced demand for retail space due to internet sales, 2) decline in demand for office space due to COVID-19 impacts, and 3) a clearly increased observable demand for housing on all sites.

Regarding reduced demand for retail and office space, data maintained by the City's Economic Development Division indicate that retail vacancy rates were as high as 25.5 percent in the third quarter of 2021. Retail storefront occupancy has been improving since then, with an 8.1 percent vacancy in the 2022 second quarter. However, the City has not received any applications for new retail commercial development. The limited demand for retail space is being accommodated by existing vacant storefronts. Also, in 2022, office vacancy remained between 13 and 18 percent through the third quarter.

Many Several examples of the trend of converting sites that allow 100 percent commercial and office to residential use include are described in Table C-3 above the following:

- In 2019, at 388 Cordova, an existing high-rise office building was converted to condominiums.
- In 2021, at the former Twin Palms restaurant site at a prime location in Old Pasadena, the Design Commission approved a mixed-use project of ground-floor commercial and 18 residential units. On a 0.28-acre commercial parking lot at 533 E. Union, five units have been approved. At 740 E. Green, the developer plans to demolish an office building and replace it with 250 residential units.
- A three-story office building at 139 S. Oak Knoll will be replaced with 17 units.
- Along the Colorado Boulevard commercial corridor, at 150 E. Colorado, a 62,268-square-foot office building will be torn down and replaced with a mixed-use project with 98 units.
- At 178 S. Euclid, 43 condominiums are nearing completion on a site formerly occupied by a commercial building.
- On a portion of a former shopping mall at E. Colorado and S. Los Robles, a mixed-use project with 77 condominium units and 65,000 square feet of commercial space is under construction.
- Pasadena Presbyterian Church sold its commercially-zoned properties at 535 E. Union Street and 54 S. Oakland Avenue for development, respectively, of 86 mixed-income units and 55 apartments reserved for seniors.

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- The Summit Grove project at Orange Grove and Summit Avenue will replace a liquor store and small retail buildings with 21 multifamily units, half of which will be for lower-income households.
- At 995 S. Fair Oaks, a small office building and warehouse will be replaced by 76 units for seniors.
- The owners of the Panda Inn flagship restaurant site at 3452-3488 E. Foothill are proposing to redevelop the parking lot area with a project that includes 233 apartments, 21 of which will be affordable housing.

- In 2021, for the Throop Lumber Yard site on 444 N. Fair Oaks Avenue within a commercial district, the City received an application for a 206-unit multifamily project that includes 23 very low-income and 10 moderate-income units. On a commercial property at 1878-1890 Walnut Avenue, 58 for-sale townhomes for restricted-income households have been approved.
- At 3200 E. Foothill Boulevard, a large self-storage business on a 8.32-acre site is proposed to be replaced with 550 units (including at least 20% affordable units consistent with the City's IHO) and a small 9,800-square-foot retail building.

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- In 2019, a developer proposed a 31-unit condominium project on a former railroad right-of-way property on Michigan Avenue; in 2021, the Design Review Commission reviewed updated plans.
- On a 1.3-acre site at the southwest corner of Euclid and Cordova, a low-rise medical office complex dating to the 1970s will be replaced with 86 residential units, 13 of which will be reserved for low- and very-low-income households.

These development applications presented in Table 1 show an overwhelming interest of commercial property owners to tear down all types of commercial buildings—small offices, restaurants, strip commercial centers, and even a self-storage facility—and replace them with housing of all types, including 100 percent affordable projects.

The City examined 2017-2021 building permit data for CL and CO. Of the 25 sites for which permits were issued for improvements or minor additions to existing commercial buildings, of the remaining 10 permits, six were for residential and mixed-use projects. Not all CL- and CO-zoned sites are included in the inventory. Of the properties citywide zoned CL, the inventory includes only 19 of the 481 properties—four percent. No sites zoned CO are included in the inventory. The targeted CL- and CO-zoned sites in the inventory were selected based on the presence of the factors described previously.

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Housing Resources

Table C-3 and the paragraphs above report development projects that have been built or are nearing completion, as well as development applications approved on sites that allow exclusively nonresidential uses. The City notes that in addition to those projects, staff has ~~had~~ been approached by owners of the commercially and industrially zoned sites described below about redeveloping their properties for residential use. These inquiries and conversations illustrate clear property owner interest in transitioning currently viable business enterprises to residential development—even if a General Plan Amendment and rezoning would be required. None of these sites are included in the inventory, but they are presented here as evidence of developer owner interest even if a General Plan amendment and zone change would be required to facilitate residential development.

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The City largely did not include specific plan sites in the inventory since at the time the initial sites inventory was prepared because only the Lincoln Avenue Specific Plan update had been adopted. Any of the sites described below that now permit residential uses could be used in the future if the City should need to designate additional sites for lower-income housing in response to “no net loss” findings.

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- Three properties supporting auto services businesses at 1501-1521 E. Walnut are proposed for redevelopment with an 831-unit single-room occupancy project, with 30 units set aside as below-market-rate homes. (As of May 2002, a formal application was submitted in late 2022, has not been submitted, but this thus further demonstrates the extent to which redevelopment is of interest to developers.) The property is zoned CG.

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- At 3341 E. Foothill Boulevard, the owner of the Hastings Village shopping center (a center with eight “big box” stores and several smaller stores and restaurants) has inquired about building housing on the site. The site is in the East Pasadena Specific Plan and zoned EPSP-d2-CG-C (commercial).

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- The owner of the Michael’s craft store at 1155 E. Colorado Boulevard has had conversations with City staff about replacing the building with a residential development. The site is in the East Colorado Specific Plan and zoned ECSP-MU-N (mixed use).

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- The owner of the 99 Cents store property at 442 N. Los Robles Avenue has approached City staff about filing an application to redevelop the site with residential uses. The site is zoned CL.

- During preparation of the Housing Element but prior to adoption of the amended South Fair Oaks Specific Plan in July 2022, the property owner of a car wash at 346 S. Fair Oaks Avenue asked during Housing Element study sessions to rezone his property to allow residential use. With adoption of the specific plan amendment, the site is now zoned SFO-MU-N (mixed use).

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- The owner of the Rusnak Volvo site at 1987-2025 E. Colorado Boulevard has expressed interest in converting the site to residential or mixed use.

The site, in the East Colorado Specific Plan, is zoned ECSP-MU-G (mixed use).

- The owner of a now-closed assisted living facility at 1450 N. Fair Oaks Avenue, within the Fair Oaks/Orange Grove Specific Plan, has indicated interest in converting the site to residential use. The site, zoned FGSP-RM-16, allows a maximum density of 16 units per acre. As part of the specific plan update, the owner may ask that a higher density be applied.
- The owner of the Eaton Canyon Industrial Park at 2923-2947 Bradley Street, which is zoned exclusively for light industrial use, has inquired about changing the General Plan land use designation and zoning to allow conversion to residential use. The properties abut residential neighborhoods.
- Another industrial property owner, of properties located at 2990-3000 E. Colorado Boulevard, has had discussions with City staff about processing a General Plan amendment and zone change to allow residential use. The site abuts neighborhoods zoned exclusively for multi-family.

Table C-76 at the end of this Appendix lists all housing sites that have been considered, as described above, in determining the suitability of these sites as viable housing sites and their ability to be assigned to lower-income and moderate-income categories. Based on the information provided, the following sites are shown to convert to residential or mixed-use development.

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As the discussion above indicates, more than 20 active applications propose conversion of sites currently developed with a commercial use to high-density residential and mixed-use development. Moreover, of the 1,283 approved units shown in Table C-1, approximately 80 percent of those units are being built on properties that allow 100 percent commercial uses, with the remainder consisting of properties zoned RM-16, RM-32, and RM-48 (converting from lower-density to higher-density developments). These data clearly indicate trends of higher-density residential and mixed-use projects replacing both existing commercial developments and aging lower-density units. Market forces in Pasadena are driving these trends, and the City's Inclusionary Housing Ordinance is providing for the new projects to include affordable units.

Specific Plans

The Specific Plans have been developed for the purpose of creating regulatory provisions that encourage focused residential development in the Central District, Transit-Oriented Villages, and Neighborhood Villages and along major travel corridors. This zoning approach reflects long-established General Plan policy that was confirmed and refined in the 2015 Land Use Element update.

Consistent with this policy direction, development applications since 2015 have been concentrated within the Specific Plan areas. Examples, from among applications and approvals, include:

- 762 N. Fair Oaks Avenue with 70 units, 69 for very low-income households
- 75 W. Walnut Street with 201 units, 20 for low-income households
- 178 S. Euclid Avenue with 40 units, three for very low-income households
- 645 E. Union Street with 40 market-rate units
- 263 S. Los Robles Avenue with 95 units, eight for very low-income households
- 83 N. Lake Avenue with 54 market-rate units
- 3425 E. Foothill Boulevard with 211 units, 21 for very low-income households
- 141 S. Lake Avenue with [13489](#) units, [sixfive](#) for very low-income households
- 3202 E. Foothill Boulevard with 481 units, 46 for low-income and 23 for moderate-income households

This list, representing only a fraction of units recently built, under construction, or in review, demonstrates the intense interest in developing projects of scale in Pasadena and at densities approaching the maximum permitted.

The sites inventory includes properties within Specific Plan areas that, [similar to properties that have been redeveloped over the past eight or so years, are characterized by: 1\) single-story commercial or industrial buildings that have not had significant investment in many years, 2\) parking lots not needed to support demand of associated uses, and 3\) retail commercial and office buildings for which property owners have inquired with City Planning staff regarding reuse potential. The sites inventory matrix provided to HCD in conjunction with this Housing Element provides detail regarding conditions on each site and in particular, the fact that building to land value ratios generally fall well below 0.50, indicating that many properties have unrealized land use value meet the criteria discussed previously.](#)

Table C-[54](#) summarizes the number of units, by RHNA income category, that can be accommodated by vacant and underutilized sites within and outside of the Specific Plan areas.

Housing Resources

Table C-54: Vacant and Underutilized Sites

Areas		Affordability Level			Total
		Lower Incomes (0-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Outside of Specific Plan Areas					
Vacant		--	18	18	36
Underutilized		291,274	644		
	Subtotal	291,274	662		
Within Specific Plan Areas					
Central District		1,421	517		
East Colorado		572	151		
East Pasadena		777	-		
Fair Oaks/Orange Grove		102	53		
Lamanda Park		133	102	-	235
Lincoln		-	21	55	76
North Lake		171	27	2	200
South Fair Oaks		97	5	-	102
Subtotal		3,273	876	560	4,709
	Total	2,564,547	1,538		

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Replacement Housing Requirements

Government Code Section 65583.2(g)(3) requires that all sites included in the sites inventory be subject to a policy requiring that identify sites with existing residential uses and whether the current residential uses are affordable to residences occupied by lower-income households, subject to rent control, 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 (so-called "protected units"), there must be a replacement housing program for units affordable to lower income households be "replaced" as provided by state Density Bonus Law (Government Code Section 65915(c)). Government Code Section 66300 (the Housing Crisis Act of 2019) also includes protections for existing covenanted affordable units, as well as units occupied by residents with incomes meeting affordable levels. Section 66300 requires that these "protected units," requiring that they be "replaced" like for like in any new housing developments. Developers are also required to provide existing lower income tenants with relocation benefits and the first right of refusal to the replacement units and must provide relocation benefits. The Housing Element includes a program requiring that listed sites be subject to this policy. Government Code Section 65583.2(g)(3) requires that the sites inventory identify sites with existing residential uses and 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. Government Code Section 66300 includes protections for existing covenanted affordable units, as well as units occupied by residents with incomes meeting affordable levels. Section 66300 requires that these "protected units" be replaced like-for-like in any new housing developments. Developers are also required to provide first right of refusal to the replacement units and must provide relocation benefits.

The sites matrix identifies sites with existing residential uses. ~~Other than The City tracking~~ affordable units created via the City's IHO or density bonus ordinance, ~~affordable units with restrictive covenants, and or~~ units with Section 8 vouchers, ~~the City does not have data regarding unit affordability.~~ The City also has its own mechanism to ensure that 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 adjusted for FY 2019 and will continue to be adjusted as provided in paragraph C below." ~~This expands benefits to moderate-income households as well as lower income households, but under the Housing Crisis Act, lower income households are entitled to even greater benefits than provided by the City's ordinance.~~

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Housing for Homeless Individuals and Families

In accordance with State law, the City permits by-right emergency shelters for persons experiencing homelessness in the following zoning districts:

- SP-2 (South Fair Oaks Specific Plan) ~~overlay district west of Fair Oaks Avenue and south of Hurlbut Street in all subdistricts except MU-G~~
- East Pasadena Specific Plan EPSP-D1-1G

In both zones, emergency shelters are limited to 12 total beds each. As discussed in Appendix B – Constraints on Housing Production, the City has identified 24 sites within the above zones that could accommodate by-right emergency shelters. Collectively, the sites could accommodate 288 beds. ~~With adoption in July 2022 of the updated South Fair Oaks Specific Plan, approximately 272 acres of the 311 acres comprising the plan area now allow emergency shelters by right, thus increasing the potential sites.~~

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Emergency shelters of larger size are permitted in several zones with a conditional use permit (CG, IG) or a minor conditional use permit (EC-CG1, 2, 4, 5, 6; East Pasadena Specific Plan d1-CG, d1-IG, d2-CG, d2-IG, d3-CG). During inclement weather, temporary shelters may be opened at religious institutions. While Pasadena currently may not have the number of shelter beds needed to meet demand, zoning regulations do not constrain opportunities for new shelters to be established. Rather, the cost of acquiring properties and building emergency shelters is the challenge. Also, the 12-bed

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requirements for by-right shelters creates financial and siting challenges. Programs 12, 14, 17, 18, 19, ~~and 20~~, and 23 in the Housing Plan set forth actions the City will take, in cooperation with community partners, to address the needs of unhoused individuals and families, including increasing allowed occupancy above the 12-bed limit.

Adequacy of the Sites Inventory

Overall, the sites inventory identified in this Appendix totals 10,409~~10,261~~ units, 4,003~~3,908~~ of which are in the very low- and low-income RHNA categories. Overall, the City can adequately accommodate—and have excess capacity for—the RHNA under existing land use regulations. Table C-65 shows a surplus of 75~~59~~ lower-income units, 519 moderate-income units, 1,686~~1,614~~ moderate income units, for a total surplus of 1,686~~1,614~~ units.

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Regarding sites that have been used in prior cycles that are ~~again~~ included in this sites inventory, and designated as appropriate for low

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~~must has included~~ a program to allow residential use sites at a minimum density of 30 units per acre when at least 20 percent of the units are affordable to lower-income households, and

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~~Because Pasadena already allows residential use by right subject to design review, no program or rezoning is required to comply with this State law requirement.~~

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Table C-65: RHNA/Sites Inventory Summary

Site Type	Affordability Level			Above Moderate Income (120%+ AMI)	Total
	EL/VL Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)		
Approved Projects	71	21	64	1,127	1,283
Proposed Projects	259,258	89	467	1	Formatted: Highlight
Sites Available	3,564,547	1,538	1	Formatted: Highlight	Formatted: Highlight
ADUs	481	15	1	Formatted: Highlight	Formatted: Highlight
Total Site Capacity	4,484,468	2,084	1	Formatted: Highlight	Formatted: Highlight
2021-2029 RHNA	2,747	1,662	1,565	Formatted: Highlight	Formatted: Highlight
RHNA status (-shortfall/+ surplus)	59,258	+519	1	Formatted: Highlight	Formatted: Highlight

Financial Resources

A variety of potential funding sources are available to finance housing activities in Pasadena. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds, layering of funding sources are often required for affordable housing programs and projects. Of particular note for 2020-2021 is the fact that the COVID-19 pandemic created temporary federal and State funding sources, as described below, to assist households suffering economic impacts affecting their ability to pay rent and mortgages.

Local Resources

Inclusionary Fees. The City of Pasadena's Inclusionary Housing Ordinance provides for in-lieu fee payments for developers opting not to provide required affordable units on site. These funds are used for the production, rehabilitation, and preservation of housing. Fees are charged based on square footage and vary depending upon whether the housing is rental or owner and consists of 10 to 49 or 50+ units. Additionally, the City is divided into subdistricts that determine the fee rate. The in-lieu fees can be substantial depending upon the level of development in any given year. For example, in 2019, in-lieu fee receipts totaled \$2,810,840. In 2020, receipts increased to \$3,994,356.

Housing Successor Funds. With the demise of redevelopment in California in 2012, assets of former redevelopment agencies were in part transferred to so-called successor agencies. The City's Housing Successor and Finance Department manage the Low and Moderate Income Housing Asset Fund (LMIHAF). At the

Housing Resources

close of fiscal year 2019-2020, the LMIHAF had a balance of \$7,033,181. The monies are used to fund housing development expenditures for lower-income units. For example, LMIHAF funds have enabled construction, in partnership with affordable housing developers, of the Heritage Square “A” 70-unit apartment project for very low-income seniors and will be used for Heritage Square “B”, a mixed-use development that includes 70 units for extremely low-income seniors.

City General Fund. The City’s General Fund supports staffing of the 80+ member Housing Department, many of whom manage the programs that support housing production and housing services assistance. In fiscal year 2020, the Department was allocated \$1.3M General Fund dollars.

Los Angeles County Measure H Funding. The City receives voter-authorized Measure H funding through the Los Angeles Homeless Services Authority (LAHSA). For fiscal years 2018 and 2019, the City received \$1,326,405 available to be used for: 1) homelessness prevention for individuals, 2) rapid re-housing for single adults, 3) strengthening the coordinated entry system, and 4) enhancing the emergency shelter system. With these funds, the City works with private non-profit organizations to fund the homeless services they offer.

Local Early Action Planning Grant Program (LEAP). The City received funding from the State for planning activities that accelerate housing production. LEAP provides one-time grant funding to cities and counties to update their planning documents and implement process improvements that will facilitate the acceleration of housing production and help local governments prepare their sixth cycle housing elements.

Southern California Home Financing Authority (SCHFA). This is not a City funding source but a joint powers authority that issues tax-exempt bonds to fund mortgages for low- and moderate-income first-time homebuyers.

State Resources

Low Income Housing Tax Credits. Low Income Housing Tax Credits (LIHTC) are an important source of funding production of affordable housing. Additionally, the State of California sets aside a dedicated pool of tax credit funds for self-designated at-risk projects. Pasadena developers have used LIHTCs to build a wide range of affordable housing projects. LIHTCs have also been used to preserve at-risk affordable rental housing units.

Homeless Emergency Aid Program (HEAP). This one-time block grant program was created in 2018 to address the homelessness crisis. The City has received \$1,428,226 in funding, which has been spread over several fiscal years.

California Emergency Solutions and Housing (CESH) Fund. The City has received \$720,214 in funding beginning in 2020, with funds to be allocated to programs over three years. These funds are used for activities to assist persons experiencing or at risk of becoming homeless.

Other State Programs. The State offers many other housing-related funding programs available to the City and developers; during the COVID-19 pandemic,

rent relief programs were available. In the summer of 2021, Governor Gavin Newsom authorized the \$12B *California Comeback Plan*, a three-pronged effort to end/prevent homelessness, provide mental health services, and assist cities financially in their efforts to keep parks and streets safe. Other available programs include:

- Cap and Trade Affordable Housing Sustainable Communities Fund
- Building Equity and Growth in Neighborhoods Program (BEGIN)
- CalHome Program
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding

Federal Resources

HOME Funds. Pasadena is an entitlement jurisdiction and receives HOME Partnership Program funds directly from HUD. HOME funds can be used for activities that promote affordable rental housing and lower-income homeownership, including but not limited to building acquisition, new construction, reconstruction, moderate or substantial rehabilitation, first-time homebuyer assistance, and tenant-based assistance. Between fiscal years 2011 and 2014, funds declined dramatically. The federal government increased funds slightly in 2019 and 2020, but they still fall short of the 2011 high. Funds in 2020 totaled \$735,000. The City has actively used these financial resources for preservation of affordable housing.

Housing Vouchers. This federal housing program provides rent subsidies to very low-income households with a housing cost burden or who are at risk of becoming homeless or displaced. The federal government provides approximately \$15 million annually to the Pasadena Housing Department to administer its housing voucher program.

Community Development Block Grants. The federal government provides CDBG funds for community development and housing activities that benefit low- and moderate-income persons, aid in the prevention or elimination of blight, and meet other urgent needs. Eligible activities include property acquisition, rehabilitation, affordable housing preservation, economic development, code enforcement, public facilities, and services. As with HOME funds, deep cuts in federal allocations have reduced CDBG funds. Since 2018, the City has not offered capital funding to non-profit organizations using CDBG funds due to the City's obligation to repay a Section 108 loan for the Robinson Park renovation project.

Other Federal Programs. The federal Department of Housing and Urban Development and other agencies offer multiple programs (with extensive application and reporting requirements) available to Pasadena. The City regularly participates in the Supportive Housing Program and Emergency Shelter Grant program and receives HOPWA funds (Housing Opportunities for Persons with AIDS).

Private Resources

Private charitable organizations such as the United Way and Melville Charitable Trust sponsor programs to help make housing more affordable and assist unhoused individuals and families.

Administrative Resources

Work of the Housing Department

The City of Pasadena Housing Department represents the primary agency charged with implementing housing policy directives established by the City Council. The department, as its mission statement declares, is “dedicated to providing affordable housing and community development opportunities for low- and moderate-income persons and employment resources to enhance and strengthen our community.” This commitment is evidenced in the many programs the department administers: Section 8 vouchers, emergency rental assistance, tenant protections, homeowner improvement services through the MASH (Municipal Assistance, Solutions, and Hiring) program, services for people experiencing homelessness, funding support to non-profit housing developers, and inclusionary housing requirements, among others. With more than 3,775 affordable units in the City and 972 more in the development pipeline as of early 2021, the Housing Department has a significant responsibility to ensure existing affordable units remain so and new units continue to fill demand.

For fiscal year 2021, the Department had a budget of \$37.5M and staffing of 87.7 full-time equivalent employees.

Housing Rights Center

The City contracts with the Housing Rights Center to provide information to the public about housing discrimination and landlord/tenant rights and responsibilities.

Pasadena Power and Water Department

The City of Pasadena Power and Water Department (PWP) provides water service to all residents and businesses. As discussed in Appendix B – Constraints on Housing Production, water and sewer infrastructure are in place to serve all residents. In compliance with Government Code § 65589.7, on July 17, 2006, the City Council adopted Resolution No. 8621 to state its policy of prioritizing water service to lower-income households.

The RHNA detailed sites inventory table is provided on the following pages.

Detailed Sites Inventory

The RHNA detailed sites inventory table—including identification of factors for each site—is provided on the following pages.

Housing Resources

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Appendix F: Affirmatively Furthering Fair Housing

A. Introduction and Overview of AB 686

AB 686, passed by the California legislature in 2017, requires the inclusion in the Housing Element an analysis of barriers that restrict access to opportunity and a commitment to specific meaningful actions to affirmatively further fair housing. AB 686 added an assessment of fair housing to the Housing Element, which includes the following components: a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity, analysis of segregation patterns and disparities in access to opportunities, assessment of contributing factors, and identification of fair housing goals and actions.

The City conducted an Analysis of Impediments (AI) to Fair Housing Choice in 2020 pursuant to federal law requirements. As appropriate, data and discussions from the 2020 AI are incorporated here.

B. Assessment of Fair Housing Issues

1. Fair Housing Enforcement and Outreach

As outlined in Pasadena's 2020 Analysis of Impediments to Fair Housing Choice (2020 AI), the City has committed to complying with applicable federal and State fair housing laws including the Fair Housing Act of 1968, the Fair Housing Amendments Act of 1988, and the Fair Housing Employment and Housing Act (FEHA).

The Housing Rights Center (HRC), under contract with Pasadena, provides fair housing services to City residents. HRC is a non-profit agency whose mission is to actively support and promote fair housing through education and advocacy. The services provided by HRC include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. The materials are made available free to the public in several different languages, including English, Spanish, Korean, Mandarin, Armenian, Cantonese, and Russian. Depending on the audience, the presentations can be translated by staff into Armenian, Mandarin,

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Spanish, or Russian. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations, as well as mediating disputes between tenants and landlords.

Between fiscal years (FY) 2014 and 2018, HRC served 6,804 clients, including 992 clients in FY 2018. Approximately 40.4 percent of clients were Black/African American. A majority of clients were in the extremely low-income category (73.3 percent).

Table F-1: Characteristics of Clients Served by HRC (FY 2014-2018)

Pasadena	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Total Clients Served	1,487	1,594	1,490	1,241	992	6,804	100.0%
Ethnicity							
Hispanic	439	446	480	377	320	2,062	30.3%
Non- Hispanic	1,048	1,148	1,010	864	672	4,742	69.7%
Race							
White	327	298	299	222	190	1,336	19.6%
Black/African American	615	728	575	497	334	2,749	40.4%
Asian	54	50	58	38	36	236	3.5%
Hawaiian/Pacific Islander	7	9	8	4	2	30	0.4%
American Indian/ Alaska Native	16	78	15	34	4	147	2.2%
Other/Multi-Racial	460	409	521	438	416	2,244	33.0%
Income Level							
Extremely Low Income (<30% AMI)	1,080	1,172	1,058	945	729	4,984	73.3%
Very Low Income (<50% AMI)	194	230	217	160	60	861	12.7%
Low Income (<80% AMI)	87	91	98	69	48	393	5.8%
Moderate Income (>80% AMI)	126	101	117	67	155	566	8.3%

Source: 2020 Pasadena Analysis of Impediments to Fair Housing Choice.

Discrimination complaints from both in-place and prospective tenants that are filed with HRC (or screened from regular calls) are first referred to the HRC Counseling Department. The complaining party is asked to describe the events and issues that prompted the complaint. Complaints are then passed to the HRC Investigations Department and reviewed to see if the facts provided warrant an investigation.

Between FY 2014 and FY 2018, 398 complaints of housing discrimination were reported by Pasadena residents. Most allegations were related to physical disability (55 percent), but a significant number of complaints involved mental disability (18 percent), familial status (7 percent), and race (5 percent). Of the 398 complaints of discrimination received between FY 2014 and FY 2018, 113 (28 percent) were deemed significant and turned into fair housing cases, and 60 percent of the cases opened had evidence to sustain the allegation of discrimination (Table F-2).

Table F-2: Discrimination Complaints by Protected Classification (FY 2014-2018)

	2014-15	2015-16	2016-17	2017-18	2018-19	Total	Percent
Physical Disability	35	35	43	53	51	217	54.5%
Mental Disability	9	13	16	12	22	72	18.1%
Discrimination General Information	2	10	12	4	1	29	7.3%
Familial Status	3	5	5	8	6	27	6.8%
Race	4	2	10	2	0	18	4.5%
National Origin	3	3	3	3	1	13	3.3%
Gender	2	0	5	2	2	11	2.8%
Age	0	2	0	0	2	4	1.0%
Sexual Orientation	1	0	1	0	1	3	0.8%
Arbitrary	0	0	1	1	0	2	0.5%
Religion	0	1	0	0	0	1	0.3%
Source of Income	0	0	0	1	0	1	0.3%
Total	59	71	96	86	86	398	100.0%

Source: 2020 Pasadena Analysis of Impediments to Fair Housing Choice.

The 2020 AI also found that a large portion of listings for for-rent and for-sale ads contained discriminatory language, primarily expressing preference for families, no-pet policy, and explicitly requiring minimum income levels or rejecting Section 8 assistance.

During the 2020 AI outreach process, residents commented that they had trouble finding assistance on fair housing issue and many feared retaliation from reporting acts of discrimination. Despite extensive fair housing activities and programs by the City through Housing Rights Center, participation is limited in them. Also, while fair housing testing is included in the scope of activities for the Fair Housing provider, no results of testing were provided in the 2020 AI nor could they be found on the City website.

For the sixth cycle Housing Element, the City conducted two community workshops and an online survey to hear from residents regarding housing issues of concern, including fair housing issues. Specific Spanish-language workshops were held, and the survey was available in a variety of languages. To encourage increased participation from lower-income and minority households and individuals, as well as organizations focused on fair housing, targeted notifications were sent to organizations such as the Northwest Commission, Pasadena *En Español*, NAACP Pasadena, Pasadena Tenants Union, and Abundant Housing LA.

The fair housing concerns expressed during the engagement process focused on:

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- Historic land use and transportation planning actions that profoundly segregated and displaced people of color, most notably the construction of Interstate 210 and the Interstate 710 stub
- Limited supply of affordable housing
- Displacement of lower-income households resulting from private redevelopment activity
- Lower-income households disproportionately affected by COVID-19 pandemic
- City's unwillingness to make it easier to provide emergency shelters for the community's unhoused residents

In response and guided by recommendations from the Housing Task Force, this element includes policies and programs to:

- Removing development caps set forth in the General Plan and implementing specific plans, thereby increasing capacity for all housing types (which was accomplished prior to adoption of the Housing Element)
- Adopting measures that encourage ADU production (Programs 2 and 11)
- Adopting meaningful actions to affirmatively further fair housing, including metrics to measure progress toward goals, as detailed in the table beginning on page F-71 of this appendix (see also Program 20)
- Creating/Implementing the required a housing non-vacant sites included in the sites inventory
- Investigating means to establish local revenue housing production, such as a residential property vacancy tax, real estate transaction fee, and commercial and industrial development linkage fee (Program 22)
- Finding ways to increase the number of housing vouchers available in Pasadena (Program 14)
- Identifying older multifamily rental properties for potential acquisition and rehabilitation (Program 3)
- Using a joint powers authority to acquire existing housing developments and restrict tenancy to middle- and lower-income households (Program 12)
- Allowing residential development within Specific Plan areas on properties zoned primarily for commercial
- Strengthening the City's Tenant Protection
- Committing to reimagine the I-710 "stub" for housing and recreating community connections (Program 6)

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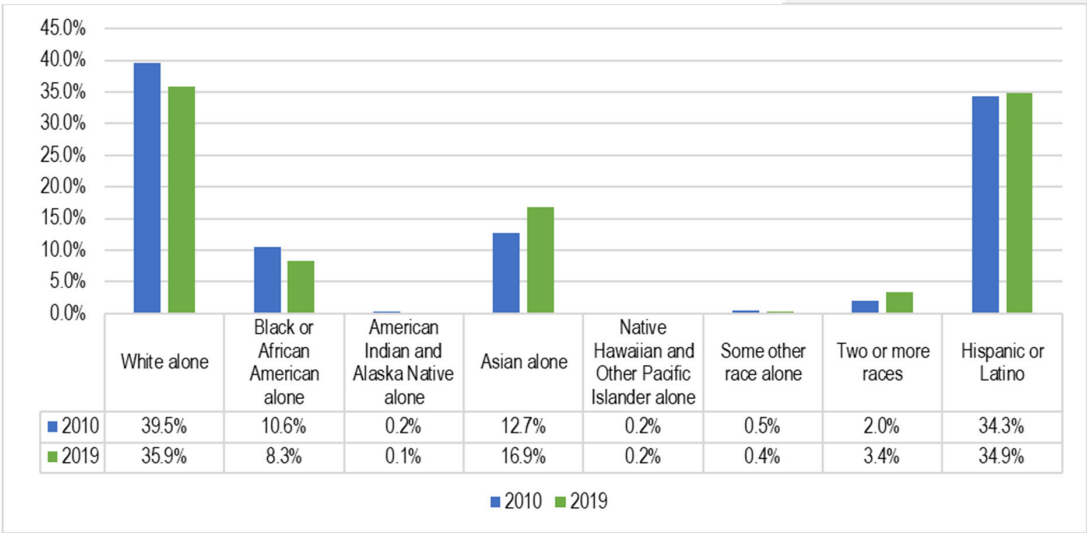
2. Integration and Segregation

Race/Ethnicity

Ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns, as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences and mobility.

Pasadena’s population is mostly White and Hispanic/Latino. As shown in Figure , White population has decreased, proportionally, since 2010, while the Asian and Hispanic/Latino populations have grown. Pasadena has a White population similar to the neighboring city of San Marino, larger than Alhambra, Arcadia, and the County, and smaller than Glendale and La Cañada Flintridge (Table). Pasadena has a substantially larger Hispanic/Latino population than Arcadia, Glendale, La Cañada Flintridge, and San Marino. The City also has a larger Black/African American population compared to most nearby cities.

Figure F-1: Race/Ethnicity Composition Changes



Affirmatively Furthering Fair Housing

Table F-3: Racial Composition in Neighboring Cities and Region

Jurisdiction	White Alone	Black	American Indian/ Alaskan	Asian	Hawaiian/ Pac. Islr.	Other	Two or More	Hispanic/ Latino
Alhambra	10.9%	1.2%	0.2%	52.6%	0.1%	0.0%	0.8%	34.1%
Arcadia	27.7%	0.9%	0.2%	57.4%	0.1%	0.0%	1.6%	12.1%
Glendale	63.5%	1.7%	0.1%	16.2%	0.1%	0.2%	1.4%	16.8%
La Cañada Flintridge	67.1%	0.2%	0.4%	26.0%	0.0%	0.1%	2.0%	4.2%
Pasadena	35.9%	8.3%	0.1%	16.9%	0.2%	0.4%	3.4%	34.9%
San Marino	38.3%	0.0%	0.1%	50.9%	0.0%	0.2%	2.7%	7.8%
Los Angeles County	28.4%	8.5%	0.2%	13.6%	0.2%	0.3%	1.7%	47.1%

Source: American Community Survey (2015-2019 Estimates).

Dissimilarity indices can be used to measure the extent to which a distribution of any two groups differs across block groups. Racial and ethnic dissimilarity trends for Pasadena and Los Angeles County are shown in Table F-4. The following shows how HUD views various levels of the index:

- <40: Low Segregation
- 40-54: Moderate Segregation
- >55: High Segregation

From 1990 to 2020, the White and non-White communities in Pasadena have become less segregated. Segregation between White and non-White residents, White and Black residents, and White and Hispanic is considered moderate, while segregation between White and Asian/Pacific Islander communities is low. While segregation between White and non-White groups in Pasadena has lessened over the past 30 years, since 2010 they have become increasingly segregated. Overall, Pasadena shows a lower degree of segregation compared to the County as a whole.

Table F-4: Dissimilarity Indices

	1990 Trend	2000 Trend	2010 Trend	Current
Pasadena				
Non-White/White	48.17	46.20	37.91	40.11
Black/White	61.79	57.25	49.47	52.87
Hispanic/White	50.86	53.93	49.62	50.66
Asian or Pacific Islander/White	15.98	20.03	21.61	25.65
Los Angeles County				
Non-White/White	56.66	56.72	56.55	58.53
Black/White	73.04	67.4	64.99	68.24
Hispanic/White	60.88	63.03	63.35	64.33
Asian or Pacific Islander/White	46.13	48.19	47.62	51.59

Source: HUD Dissimilarity Index, 2020.

Block groups in Pasadena have racial/ethnic minority concentrations ranging from 28.4 to 96.8 percent. There is a higher concentration of minority groups in the northwest section of the City. Block groups along the southwestern City boundary and in the northeastern corner of the City have the lowest concentration of racial/ethnic minorities.

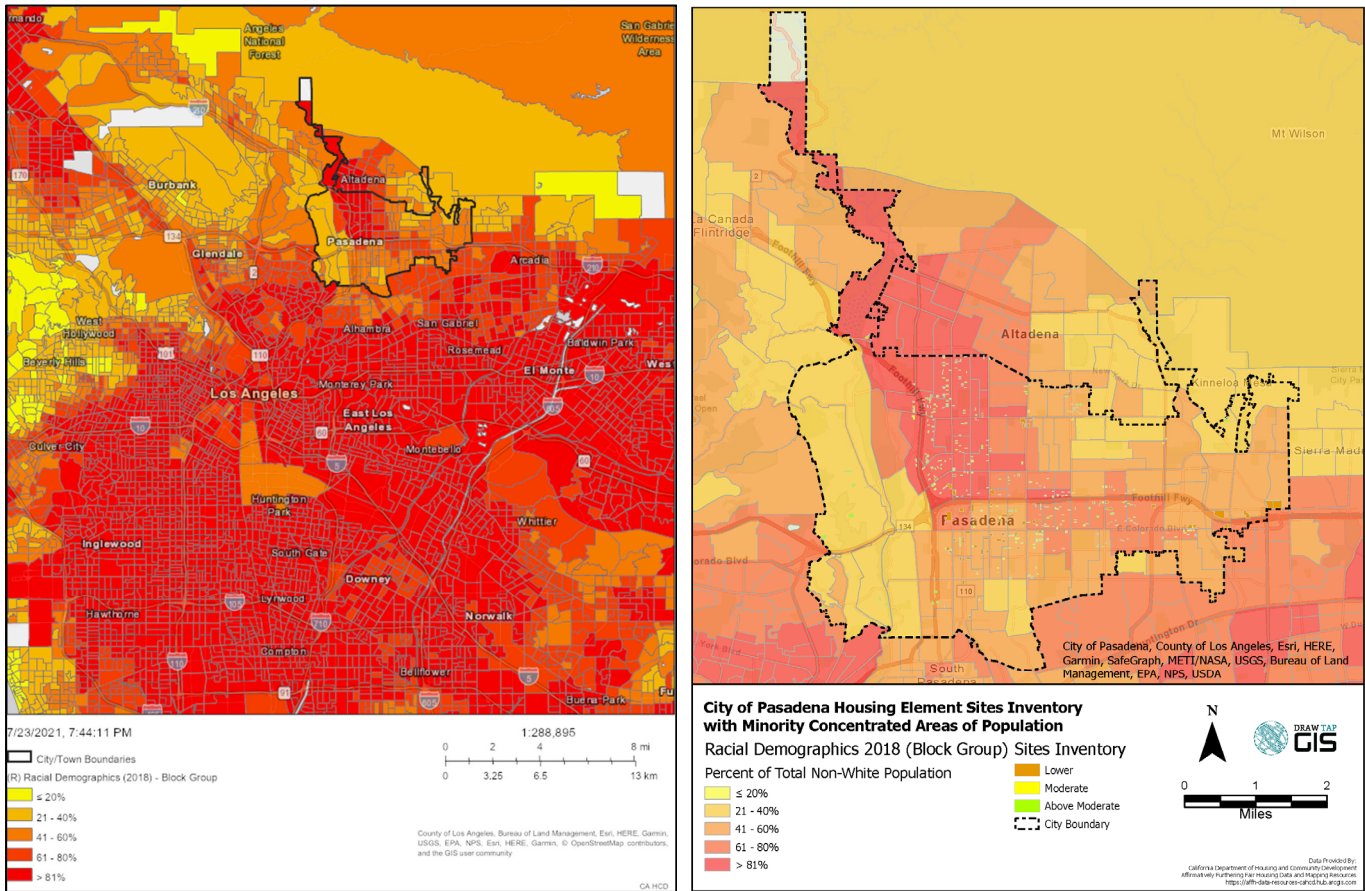
Distribution of RHNA Units by Percentage Minority Concentration

Most sites used to meet the City's 2021-2029 RHNA are in block groups where the racial/ethnic minority population makes up 41 to 60 percent of the population. Approximately 56 percent of lower-income units, 78 percent of moderate-income units, and 59 percent of above moderate-income units are in block groups with 41 to 60 percent racial/ethnic minorities. Proportionally, fewer lower-income units (2.6 percent) are in block groups where the racial/ethnic minority concentration between 61 to 80 percent, compared to moderate-income units (6.7 percent) and above moderate-income units (15.3 percent).

Table F-5: RHNA Unit Distribution by Percent Minority Concentration

% Minority Concentration	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
11 - 20%	0.0%	1.0%	0.2%	0.3%
21 - 40%	41.9%	14.0%	25.8%	29.7%
41 - 60%	55.5%	78.3%	58.7%	61.3%
61 - 80%	2.6%	6.7%	15.3%	8.7%
Total	3,997	2,045	4,286	10,328

Figure F-2: Racial/Ethnic Minority Concentration and Sites Inventory



Persons with Disabilities

In Los Angeles County, about 9.9 percent of the population has a disability. Pasadena has a population of persons with disabilities (9.4 percent) comparable to the County and the neighboring cities of Alhambra (9.5 percent) and Arcadia (8.1 percent). Pasadena has a smaller disabled population than Glendale (13.8 percent) but larger than La Cañada Flintridge (5.5 percent), and San Marino (5.5 percent).

Figure F-3 shows that persons with disabilities are concentrated in census tracts in the center of Pasadena and along the northern City boundary. In most tracts, persons with disabilities make up less than 10 percent of the total population. One tract located in the center of the City has a disabled population between 20 and 30 percent.

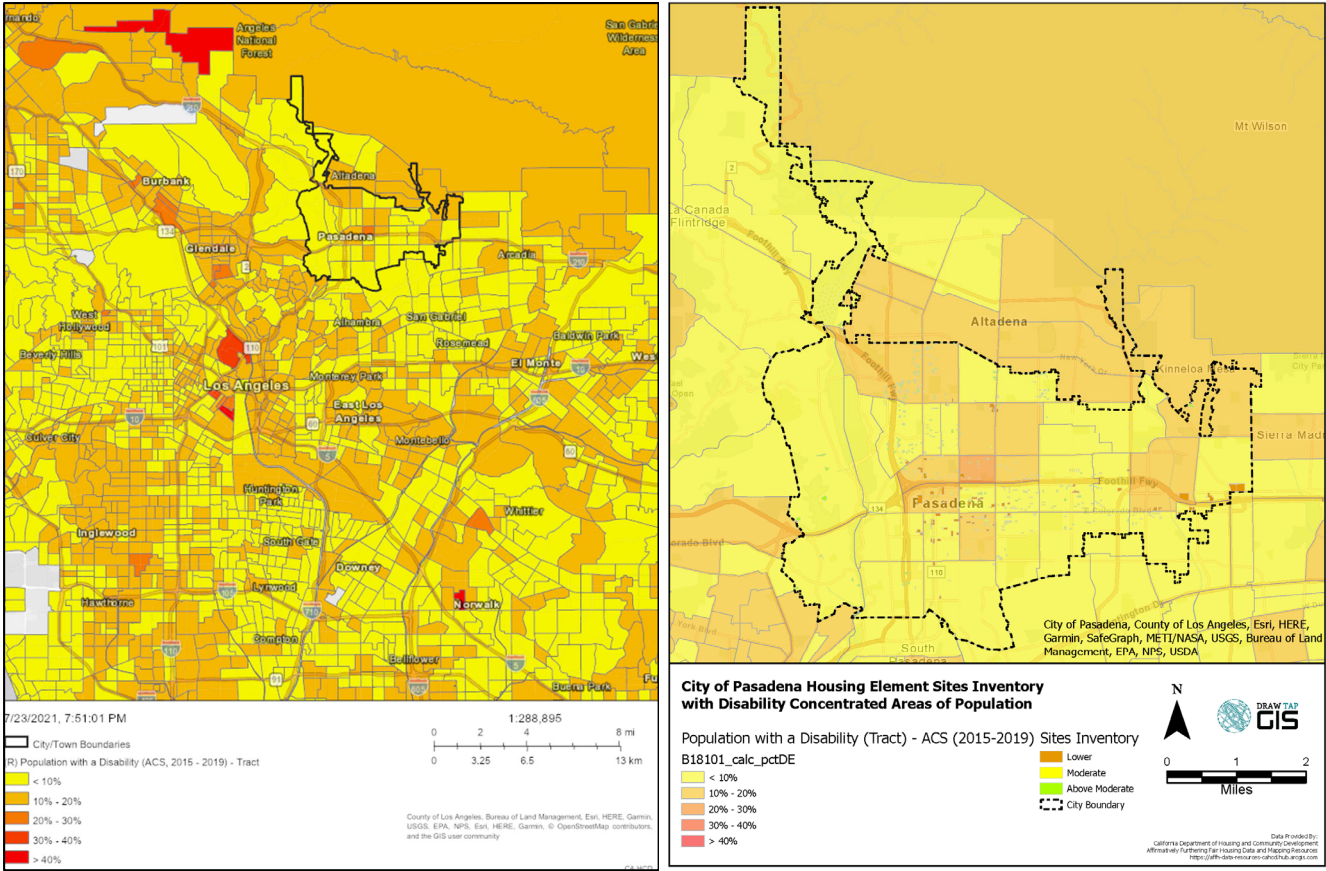
Distribution of RHNA Units by Percent Population with Disabilities

Most RHNA units (61.0 percent) are in tracts where the population of persons with disabilities is lower than 10 percent. A larger proportion of above moderate income RHNA units (6.8 percent) are in the tract with a higher concentration of disabled persons, compared to moderate income units (1.0 percent) and above lower-income units (0.0 percent). Lower-income RHNA sites are placed near public transit and along the City's transportation corridors—convenient locations for persons with disabilities.

Table F-6: RHNA Units by % Population with Disabilities

% Persons with Disabilities	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 10%	72.2%	77.3%	42.9%	61.0%
10% - 20%	27.8%	21.7%	50.3%	35.9%
20% - 30%	0.0%	1.0%	6.8%	3.0%
Total Units	3,997	2,045	4,286	10,328

Figure F-3: Distribution of Population with Disabilities and Sites Inventory



Familial Status

Familial status refers to the presence of children under the age of 18, whether the child is biologically related to the head of household, and the marital status of the head of household. Families with children may face housing discrimination by landlords who fear that children will cause property damage. Some landlords may have cultural biases against children of the opposite sex sharing a bedroom. Differential treatments such as limiting the number of children in an apartment complex or confining children to a specific location are also fair housing concerns.

Single parent households are also protected by fair housing law. Approximately 21.5 percent of households in Pasadena have children of the householder, fewer than the surrounding jurisdictions of Alhambra (24.1 percent), Arcadia (33.3 percent), Glendale (24.9 percent), La Cañada Flintridge (38.8 percent), San Marino (36.1 percent), and the County (28.3 percent). According to the HCD AFFH map in Figure F-4, children in married households are most concentrated along the western and southern City boundaries and on the eastern side of the City. The percent of children living in married households in these tracts is over 80 percent, while tracts in the central areas of Pasadena have fewer children in married couple households.

Female-headed households with children require special consideration and assistance because of their greater need for affordable housing and accessible day care, health care, and other supportive services. Approximately 3.9 percent of Pasadena households are single female-headed households with children compared to 6.4 percent countywide. Children in single female-headed households are concentrated in the south central and northwestern tracts of the City. Most tracts have less than 20 percent of children living in female-headed households.

Distribution of RHNA Units by Familial Status

Most RHNA units are located in tracts where the percent of children in married couple families is between 60 and 100 percent. Fewer lower-income RHNA units (40.3 percent) are in tracts where more than 80 percent of children live in married couple households compared to moderate-income units (48.4 percent) and above moderate-income units (436.7 percent).

The majority of lower-income RHNA units (75.4 percent), moderate-income units (67.9 percent), and above moderate-income units (67.0 percent) are in tracts where fewer than 20 percent of children live in female-headed households.

Most lower-income RHNA sites are higher density sites in mixed use areas where the existing units may be primarily smaller units and therefore may be proportionally occupied by fewer families with children.

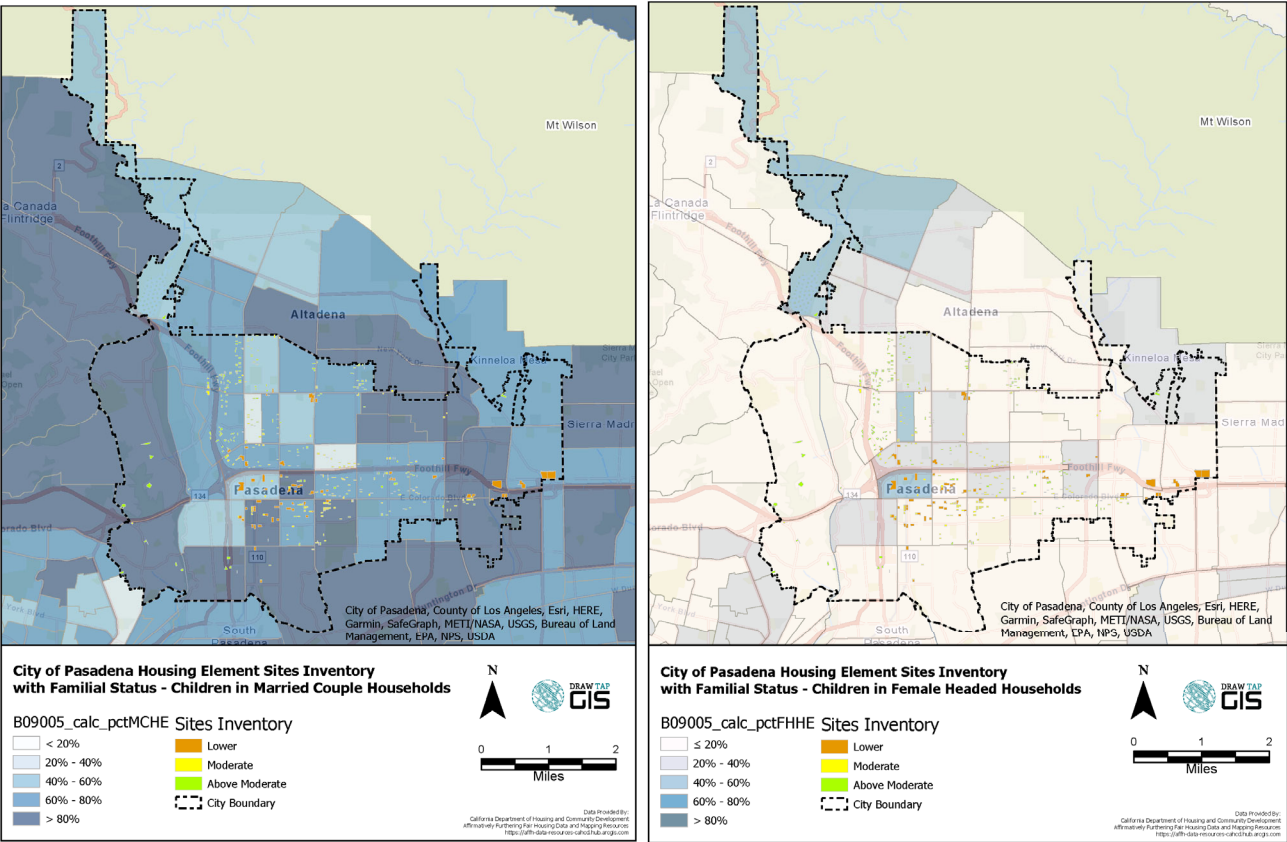
Table F-7: RHNA Units by Percent Children in Married-Couple Households

% Children in Married-Couple HH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
20% - 40%	1.7%	7.0%	0.7%	2.4%
40% - 60%	14.2%	5.7%	17.5%	13.9%
60% - 80%	43.8%	38.9%	45.1%	43.3%
> 80%	40.3%	48.4%	36.7%	40.4%
Total Units	3,997	2,045	4,286	10,328

Table F-8: RHNA Distribution by Percent Children in Female-Headed Households (FHH)

% Children in FHH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 20%	75.4%	67.9%	67.0%	70.4%
20% - 40%	15.2%	28.8%	16.4%	18.4%
40% - 60%	9.4%	3.3%	16.6%	11.2%
Total Units	3,997	2,045	4,286	10,328

Figure F-4: Children in Married Households and Single Female-Headed Households and Sites Inventory



Income Level

Identifying low or moderate income (LMI) geographies and individuals is important to overcome patterns of segregation. Figure F-5: Low- and Moderate-Income Household Distribution shows the Lower and Moderate Income (LMI) areas in the County by Census block group. HUD defines a LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). LMI areas are concentrated in census tracts in the center of Pasadena, along the northern City boundary, and southeast corner. A higher concentration of LMI households is located in the City of Los Angeles and the surrounding areas south of Pasadena.

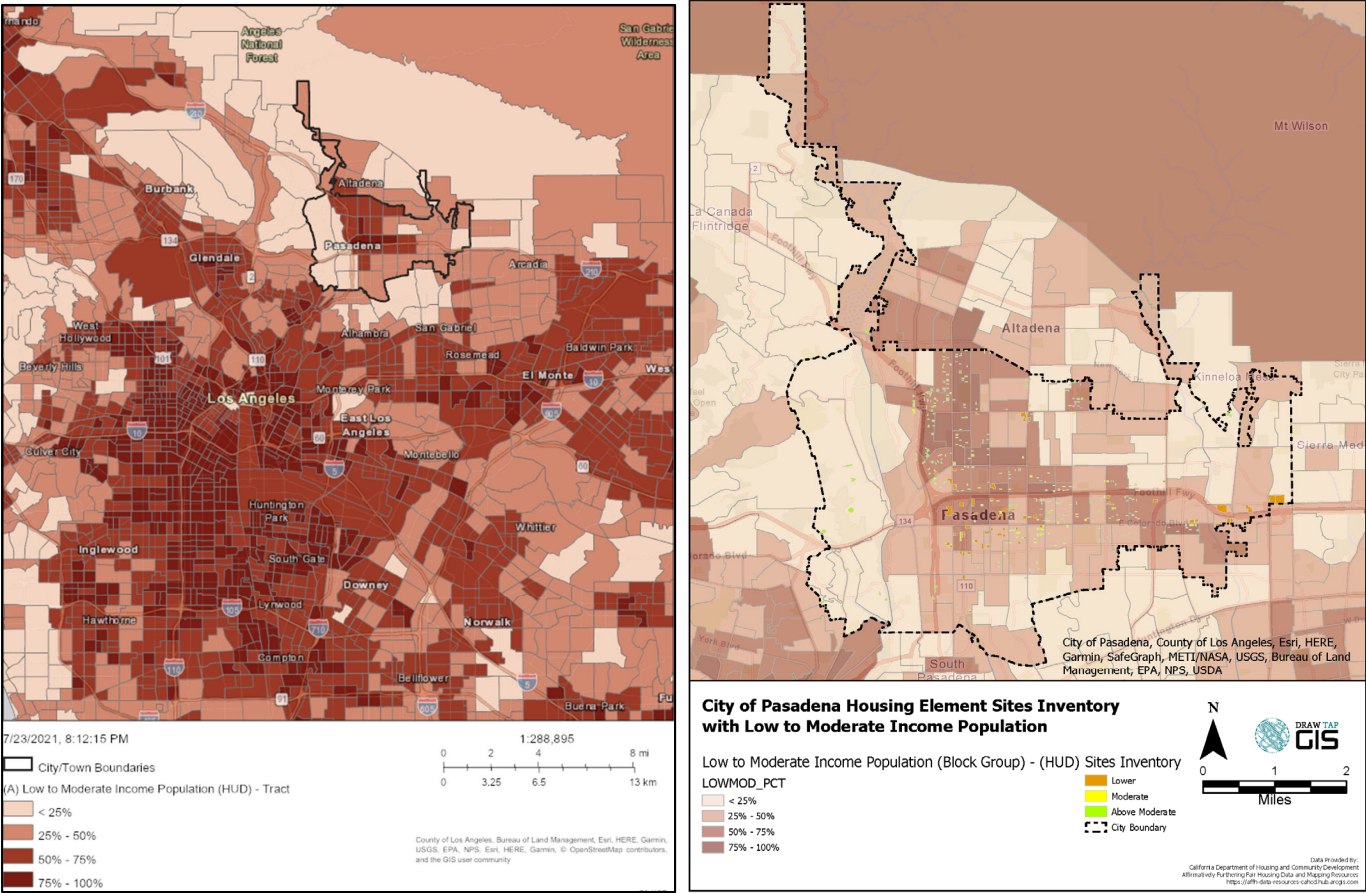
Distribution of RHNA Units by Percent Low- and Moderate-Income Population

About 46.1 percent of RHNA units are located in census tracts where LMI households make up 25 to 50 percent of the population. Approximately 7.3 percent of lower-income RHNA units, 12.6 percent of moderate-income units, and 10.8 percent of above moderate-income units are in tracts with a high concentration of LMI households, making up between 75 and 100 percent of the total population.

Table F-9: RHNA Unit Distribution by Percent LMI Households in Census Tract

% LMI HH	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
< 25%	19.8%	4.2%	0.7%	8.8%
25% - 50%	46.8%	40.0%	48.4%	46.1%
50% - 75%	26.1%	43.2%	40.1%	35.3%
75% - 100%	7.3%	12.6%	10.8%	9.8%
Total Units	3,997	2,045	4,286	10,328

Figure F-5: Low- and Moderate-Income Household Distribution



3. Racially and Ethnically Concentrated Areas

Racially and Ethnically Concentrated Areas of Poverty (R/ECAP)

To identify racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has identified census tracts with a majority non-White population (greater than 50 percent) and a poverty rate that exceeds 40 percent or is three times the average tract poverty rate for the metro/micro area, whichever threshold is lower. There are no R/ECAPs identified in Pasadena. The R/ECAPs closest are located in the City of Los Angeles southwest of Pasadena. Because of this, zero percent of RHNA units are located in R/ECAP sites.

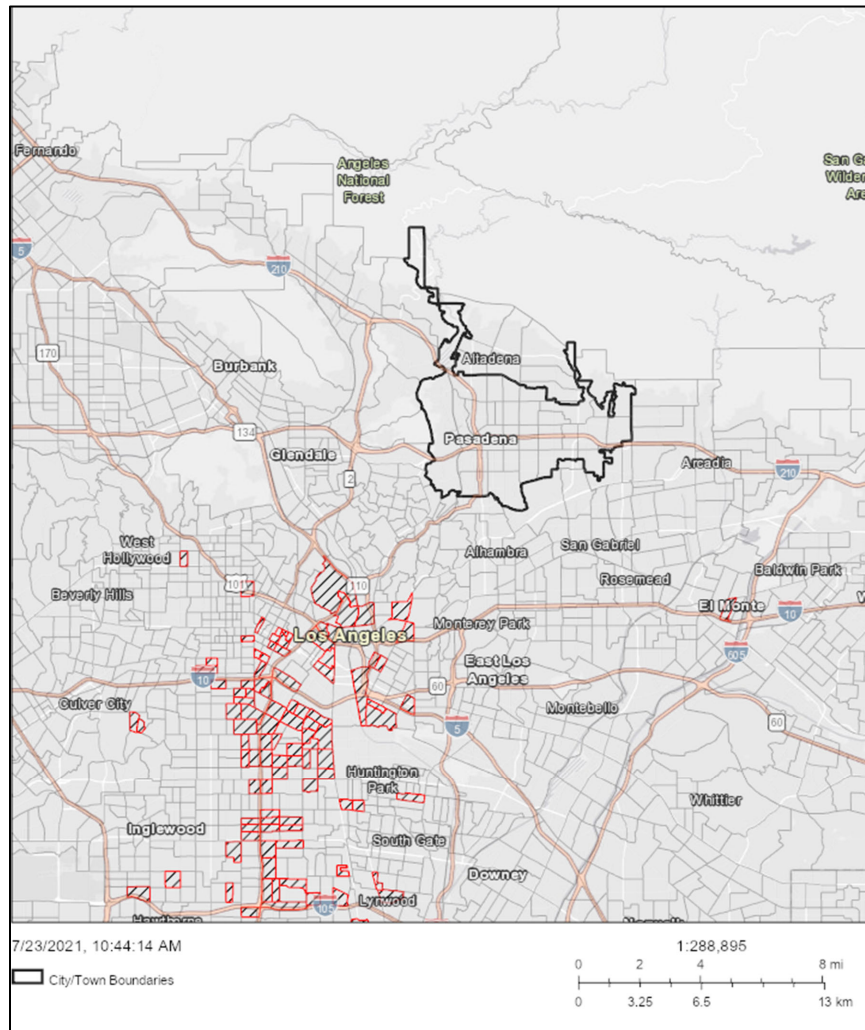
However, as shown in the next section (Access to Opportunities), some tracts in the City are classified as areas of High Poverty and Segregation according to the California Fair Housing Task Force Opportunity Maps. A specific analysis of these areas is included in the next section.

Racially Concentrated Areas of Affluence (RCAs)

While racially concentrated areas of poverty and segregation (R/ECAPs) have long been the focus of fair housing policies, racially concentrated areas of affluence (RCAs) must also be analyzed to ensure housing is integrated, a key to fair housing choice. According to a policy paper published by HUD, RCAs are defined as affluent, White communities. According to HUD's policy paper, Whites are the most racially segregated group in the United States and in the same way, neighborhood disadvantage is associated with concentrated poverty and high concentrations of people of color, conversely, distinct advantages are associated with residence in affluent, White communities.

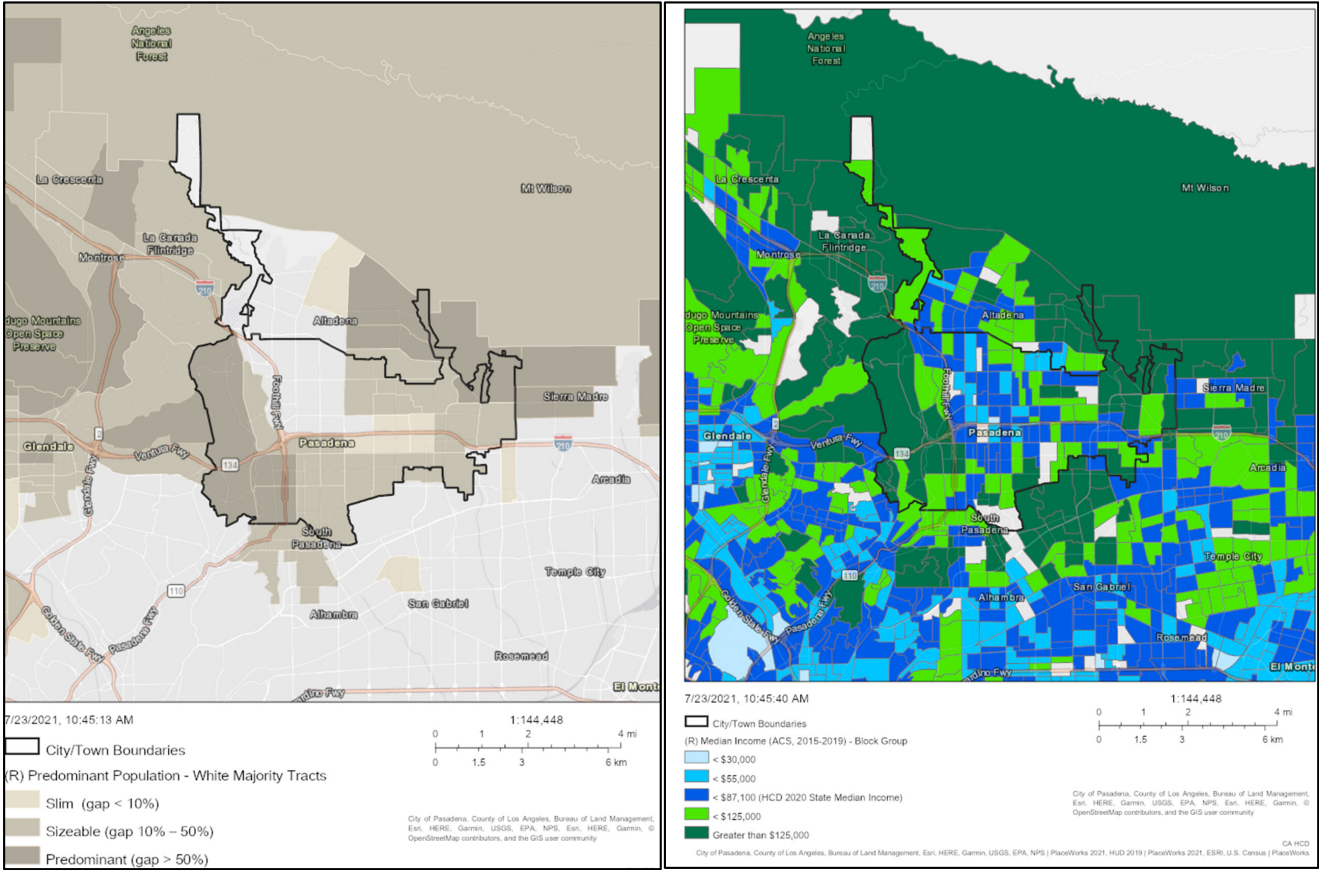
While HCD has created its own metric for RCAs, at the time of this writing the map on the AFFH tool is not available. Thus, the definition of RCAs used in this analysis is the definition used by the scholars at the University of Minnesota Humphrey School of Public Affairs cited in HCD's memo: "RCAs are defined as census tracts where: 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). As discussed previously, there are no block groups in Pasadena with a racial/ethnic minority population below 20%. Therefore, none of Pasadena is considered an RCA. Block groups with median incomes exceeding \$125,000 are most concentrated along the western City boundary and in the northeast corner of Pasadena. Most of the block groups in the center of the City have median incomes below \$55,000.

Figure F-6: Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)



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Figure F-7: Racially Concentrated Areas of Affluence (RCAs)



Although there are no RCAAs in the City, it is important to consider median income gaps within the City and regionally. As Figure F-4 shows, median household incomes range from less than \$55,000 in the downtown (\$13,434 in the tract with the lowest median income) to more than \$125,000 in the edges of the City (\$215,227 in the northwesternmost tract of the City). As housing prices increase in the City and across the State, residents with lower incomes are more likely to be affected and displaced. The areas with lower incomes are also the more “affordable” areas in the City, which correspond with the concentration of HCV renters in the central tracts. Despite being more affordable, these central tracts with lower incomes also tend to have higher concentrations of cost-burdened renter and owner households, as shown in Figures F-16 and F-17.

Regionally, Pasadena has among the highest median incomes and housing prices in the County. In 1990, the median household income in Pasadena was equal to the median household income of Los Angeles County as a whole; 20 years later it grew to 125 percent of the County’s median. In 2018, that trend persisted, with the Pasadena median income 123 percent that of the County. With respect to lower-income residents, they make up 40 percent of all households, which is comparable to the share over the last two decades. It is important to note that 15.7 percent of residents in Pasadena live in poverty (per federal criteria) and are concentrated in the downtown and Northwest areas of the City. These latter two data points illustrate the critical need for more affordable housing citywide.

4. Access to Opportunities

“Significant disparities in access to opportunity” are defined by the AFFH Final Rule as “substantial and measurable differences in access to educational, transportation, economic, and other opportunities in a community based on protected class related to housing.”

TCAC Opportunity Maps

The Department of Housing and Community Development (HCD) and California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task force to “provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/ departments to further the fair housing goals (as defined by HCD).” The Task Force has created Opportunity Maps to identify resource levels across the state “to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with nine percent Low Income Housing Tax Credits (LIHTCs)”. These opportunity maps are made from composite scores of three different domains made up of a set of indicators. Table F-10 shows the full list of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation. To identify these areas, census tracts were first filtered by poverty and then by a measure of racial segregation. The criteria for these filters were:

- Poverty: Tracts with at least 30 percent of population under federal poverty line

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- Racial Segregation: Tracts with location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County

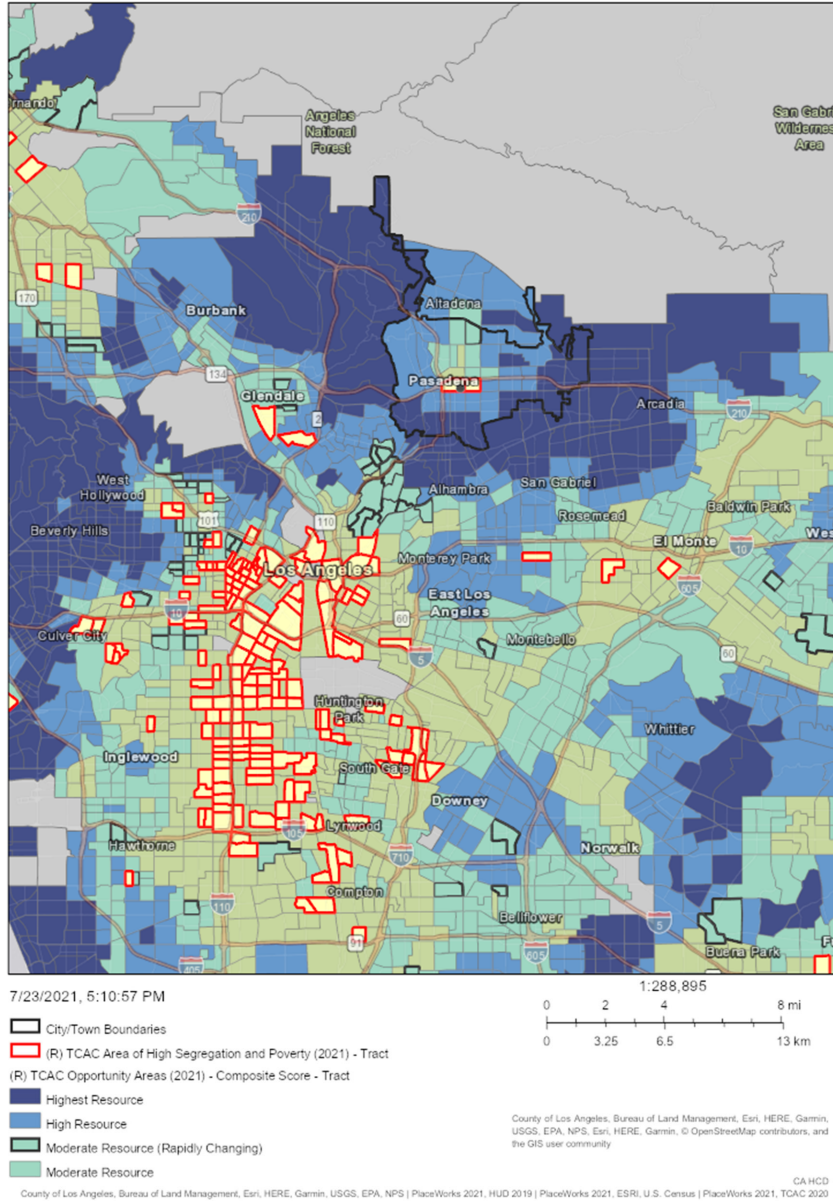
Table F-10: Domains and List of Indicators for Opportunity Maps

Domain	Indicator
Economic	Poverty Adult education Employment Job proximity Median home value
Environmental	CalEnviroScreen 3.0 pollution Indicators and values
Education	Math proficiency Reading proficiency High School graduation rates Student poverty rates

Source: California Fair Housing Task Force, Methodology for the 2021 TCAC/HCD Opportunity Maps, December 2020

According to the 2021 TCAC/HCD opportunity area map, two census tracts or areas of high racial segregation and poverty exist in Pasadena (Figure F-8). These tracts are located south of the intersection of the I-210 and SR-134 freeways. The regional map in Figure F-8 identifies most areas with high segregation and poverty in the downtown Los Angeles area and south of the downtown. The closest tracts to Pasadena with high segregation and poverty are in Glendale.

Figure F-8: TCAC Opportunity Areas in the Region



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According to the HCD/TCAC opportunity map, Pasadena is made up of Census tracts with varying degrees of resources. Categorization is based on percentile rankings for census tracts within the Los Angeles Region. Locally, Northwest census tracts scored lower (as low and high concentration of poverty and segregation), indicating lower resources than other tracts within the City. Tracts adjacent to the low resources tracts in the Northwest region are moderate, and the tracts with the highest resources are located on the edges of the City.

Areas of High Segregation and Poverty

Tracts with high poverty and segregation are located in the Central District and bounded by I-210 freeway to the north, South Lake Avenue to the east, East Colorado Boulevard to the south, and South Saint John Avenue to the west. These tracts are part of the Central District Specific Plan vision that “the Central District will function as the City of Pasadena’s vibrant urban core, providing a diversity of economic, residential, and cultural opportunities. Downtown will be a place to work, shop, live, and play, with convenient access by foot, bicycle, and transit, as well as by car.” In this role, much of the City’s future growth has been directed at this area. The challenge is to direct this growth to achieve a high quality of life for the entire community.

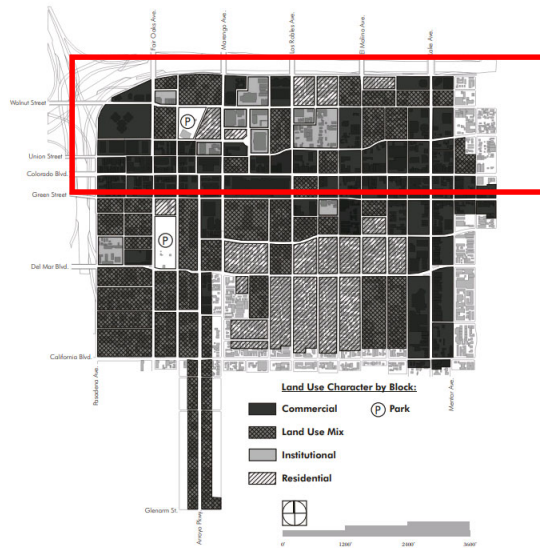
Historically, Downtown’s streets and urban land patterns began developing as far back as the 1880s, with Colorado Boulevard and Fair Oaks Avenue as Pasadena’s main commercial corridors, with a commercial district surrounding the intersection of these two streets. Like most cities, however, the character of Downtown began to change at a more rapid pace following World War II. Large-scale, single use projects often built on an auto-oriented, suburban model were introduced with increasing frequency, interrupting the urban fabric.

Numerous historically significant structures are still found within the Central District, specifically within the tracts having a high concentration and poverty, including City Hall and the Public Library. Tracts with high poverty and segregation also extend through the northern parts of three National Register Historic Districts in the City: Old Pasadena, Pasadena Civic Center, and Pasadena Playhouse. Old Pasadena is the historic core of the City that has developed into a vibrant retail and entertainment destination. The Civic Center is the governmental center of the City, distinguished by the landmark City Hall, and Pasadena Playhouse is developing as an arts-oriented area, anchored by the Pasadena Playhouse.

As shown in Figure F-8, the tracts with high poverty and segregation are mostly commercial areas along with outer boundary streets, with a mix of land uses and residential in the middle. Figure F-9 shows that Colorado Boulevard and Lake Avenue are Downtown’s most intensely developed streets, although building intensities along these streets are far from consistent. This is apparent in the periodic presence of multi-story office buildings and towers. On the other hand, properties in the northern areas of the district, along I-210, are developed at much lower intensities. Because of the proximity to anticipated rail stations,

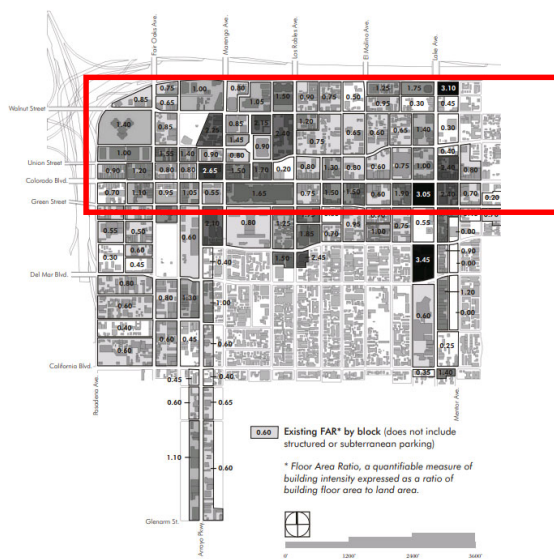
these areas are identified as ripe for infill and higher-density transit-oriented development.

Figure F-9: District Land Use Patterns (1999)



Source: Central District Specific Plan (2004)

Figure F-10: District Development Intensity



Source: Central District Specific Plan (2004)

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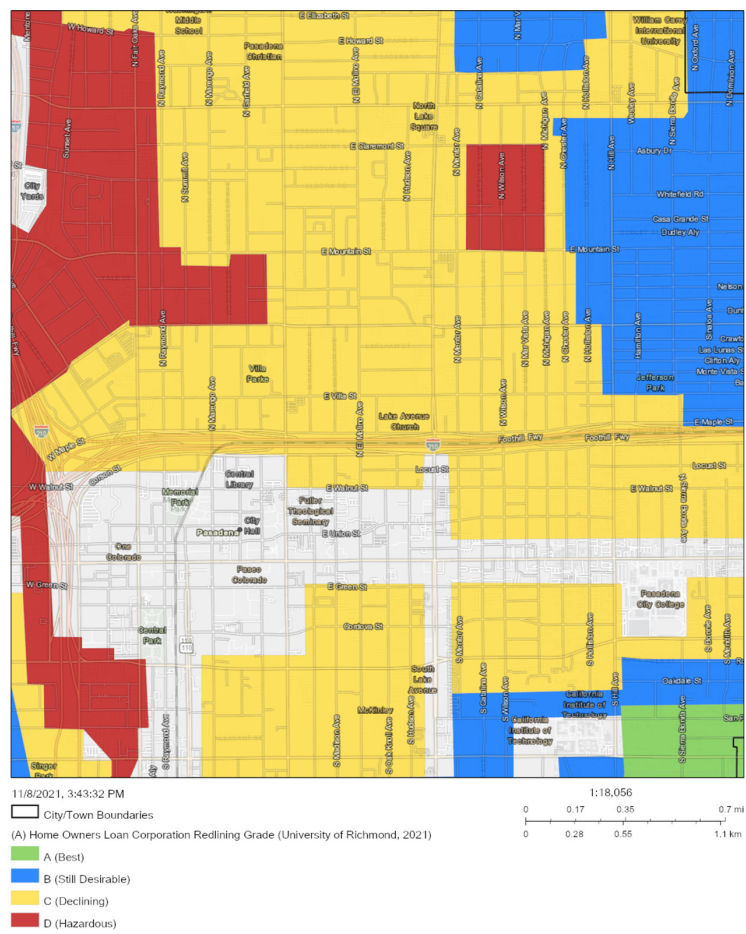
Between 2000 and 2017, Pasadena's housing stock increased by over 11 percent to 60,286 units. However, the growth mostly occurred between 2000 and 2010 (10 percent, compared to 1.2 percent between 2010 and 2020). Between 2000 and 2010, developers concentrated on building apartments and condominiums (which includes single-family attached and multi-family housing) in Pasadena, particularly along transportation corridors. Of the total housing growth from 2000 through 2010, the vast majority of units were built within the Central District Specific Plan area. Based on the housing type and price points, developers appeared to be building multi-family housing for two broad demographic groups: seniors and single professional adults or recently married couples.

HCD's AFFH mapping tool shows that in the past 10 years, the percent of residents living under the federal poverty line has increased significantly in these tracts. In 2010, about one-fourth of the population in these census tracts was living under the poverty line. By 2019, 42 percent of people were living under the poverty line in the western tract and 31 percent in the eastern tract that make up the area with high poverty and concentration.

The tracts with high poverty and segregation are also directly south of the historically African American business district on North Lincoln and the mixed-income, racially diverse neighborhoods of Northwest Pasadena that were displaced by the construction of I-210 in the 1970s. Much of the Lincoln Avenue corridor and surrounding residential neighborhoods are located within one of Pasadena's historically "redlined" communities, meaning residents were systematically blocked from mortgage or home improvement loans between 1939 and 1968 due to the Home Owners' Loan Corporation (HOLC) investment risk-grading documents (Figure F-11). The explicitly racist and discriminatory HOLC documents, which referred to the Lincoln neighborhood as a "blighted" area with "subversive racial elements," are now infamous for their long-term influence on housing policy and access to services including banking, insurance, and healthcare within racially and economically marginalized communities throughout the United States. While the tracts now classified as high poverty and segregation were classified as commercial and not given a HOLC grade, the small areas that did receive a grade classified as "declining," or areas where the residents were often working-class and/or first- or second-generation immigrants from Europe. These areas often lacked utilities and were characterized by older building stock.

This history of disinvestment, combined with the new focus on growth in these areas since the 2000s, has created conditions that make residents susceptible to displacement.

Figure F-11: Homeowner’s Loan Corporation Redlining Grade



City of Pasadena, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA, Esri, HERE, Garmin, © OpenStreetMap contributors, and the GIS user community

CA HCD
City of Pasadena, County of Los Angeles, Bureau of Land Management, Esri, HERE, Garmin, INCREMENT P, USGS, EPA | PlaceWorks 2021, HUD 2019 | PlaceWorks 2021, Esri, U.S. Census | PlaceWorks 2021.

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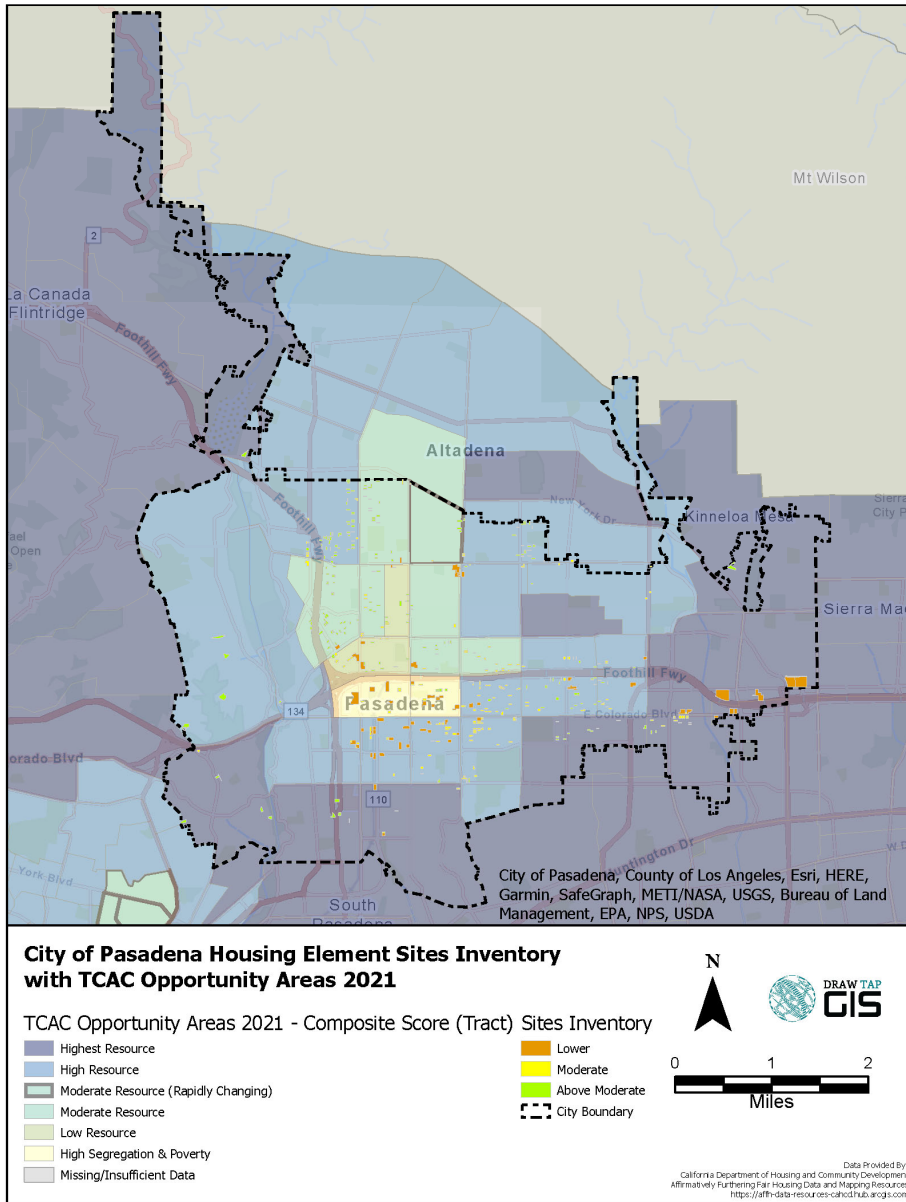
Distribution of RHNA Units by TCAC Opportunity Area

Figure F-11 also shows the distribution of RHNA sites across the TCAC opportunity areas. About 65 percent of all RHNA units are located in high or highest resource areas (F-10). Of the 3,997 lower-income RHNA units, 60 percent are in the high and highest resource tracts.

Table F-11: RHNA Units by TCAC Opportunity Areas

Opportunity Area	Very Low	Low	Mod	Above Mod	All Units
Highest	31.1%	22.3%	9.2%	18.7%	21.1%
High	35.9%	72.6%	61.1%	38.6%	44.2%
Moderate	7.2%	0.0%	10.1%	12.4%	9.5%
Moderate (Rapid Change)	0.0%	0.0%	0.6%	0.3%	0.3%
Low	4.2%	1.3%	4.9%	6.6%	5.2%
High Segregation & Poverty	21.6%	3.8%	14.1%	23.4%	19.8%
Total	3,373	624	2,045	4,286	10,328

Figure F-12: TCAC Opportunity Areas in Pasadena



Opportunity Indicators

While the Federal Affirmatively Furthering Fair Housing (AFFH) Rule has been repealed, the data and mapping developed by HUD for the purpose of preparing the Assessment of Fair Housing (AFH) can still be useful in informing communities about segregation in their jurisdiction and region, as well as disparities in access to opportunity. This section presents the HUD-developed index scores based on nationally available data sources to assess Pasadena residents' access to key opportunity assets in comparison to the County. Table F-12 provides index scores or values (the values range from 0 to 100) for the following opportunity indicator indices:

- **Low Poverty Index:** The low poverty index captures poverty in a given neighborhood. The poverty rate is determined at the census tract level. The higher the score, the less exposure to poverty in a neighborhood.
- **School Proficiency Index:** The school proficiency index uses school-level data on the performance of 4th grade students on state exams to describe which neighborhoods have high-performing elementary schools nearby and which are near lower performing elementary schools. The higher the score, the higher the school system quality is in a neighborhood.
- **Labor Market Engagement Index:** The labor market engagement index provides a summary description of the relative intensity of labor market engagement and human capital in a neighborhood. This is based upon the level of employment, labor force participation, and educational attainment in a census tract. The higher the score, the higher the labor force participation and human capital in a neighborhood.
- **Transit Trips Index:** This index is based on estimates of transit trips taken by a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region (i.e., the Core-Based Statistical Area, or CBSA). The higher the transit trips index, the more likely residents in that neighborhood utilize public transit.
- **Low Transportation Cost Index:** This index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region/CBSA. The higher the index, the lower the cost of transportation in that neighborhood.
- **Jobs Proximity Index:** The jobs proximity index quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within a region/CBSA, with larger employment centers weighted more heavily. The higher the index value, the better the access to employment opportunities for residents in a neighborhood.

- **Environmental Health Index:** The environmental health index summarizes potential exposure to harmful toxins at a neighborhood level. The higher the index value, the less exposure to toxins harmful to human health. Therefore, the higher the value, the better the environmental quality of a neighborhood, where a neighborhood is a census block-group.

In Los Angeles County, Black and Hispanic residents were more likely (compared to other racial/ethnic groups) to be impacted by poverty, limited access to proficient schools, lower labor participation, lower jobs proximity, and lower environmental health scores. For population living below the federal poverty line, scores decreased for among all races, though Blacks and Hispanics continued to score the lowers.

Within Pasadena, Blacks and Hispanics were more likely (scored lowest) to be impacted by poverty, limited access to proficient schools, lower job participation, and lower jobs proximity. Unlike the County trends, Pasadena Hispanics and Blacks did not score lowest among the race/ethnic groups in the environmental health index. Like the County, the Pasadena population living below the poverty line scored lower than the population at large across most indices, except for the transit index and the job proximity index.

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Table F-12: Opportunity Indicators by Race/Ethnicity

City of Pasadena	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	62.03	60.77	80.84	88.69	78.00	74.98	17.67
Black, Non-Hispanic	39.76	50.89	58.97	88.77	78.76	69.34	20.58
Hispanic	40.41	49.66	58.06	89.37	79.59	72.04	19.09
Asian or Pacific Islander, Non-Hispanic	59.40	60.23	79.73	89.92	81.80	79.45	17.04
Native American, Non-Hispanic	47.95	55.90	67.34	89.57	80.15	75.03	17.95
Population below federal poverty line							
White, Non-Hispanic	52.64	55.06	73.14	89.90	82.11	76.06	17.17
Black, Non-Hispanic	31.63	43.03	54.60	90.54	81.60	73.81	18.83
Hispanic	33.34	45.00	50.17	89.95	81.45	75.01	18.20
Asian or Pacific Islander, Non-Hispanic	50.90	52.90	70.94	91.67	85.09	82.37	16.72
Native American, Non-Hispanic	25.21	39.13	38.27	93.88	81.88	78.25	17.02
Los Angeles County							
Total Population							
White, Non-Hispanic	62.59	65.09	65.41	82.63	74.09	55.80	18.99
Black, Non-Hispanic	34.95	32.37	34.00	87.70	79.18	40.13	11.66
Hispanic	33.91	38.38	33.18	87.19	77.74	41.53	11.91
Asian or Pacific Islander, Non-Hispanic	53.57	59.34	55.94	86.52	76.45	51.82	12.16
Native American, Non-Hispanic	45.04	46.90	44.50	83.17	75.65	44.24	16.74
Population below federal poverty line							
White, Non-Hispanic	50.68	58.06	57.49	86.42	79.48	57.52	16.66
Black, Non-Hispanic	23.45	27.16	25.52	88.65	81.18	36.59	11.62
Hispanic	23.66	32.87	27.66	89.45	81.02	42.84	10.30
Asian or Pacific Islander, Non-Hispanic	42.97	54.52	50.06	89.62	81.49	54.19	9.84
Native American, Non-Hispanic	29.85	35.12	32.02	85.23	78.70	46.35	16.01

Note: American Community Survey Data are based on a sample and are subject to sampling variability. See narrative for index score meanings. Table is comparing the total Pasadena and County population, by race/ethnicity, to the Pasadena and County population living below the federal poverty line, also by race/ethnicity.

Source: AFFHT Data Table 12; Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

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Education

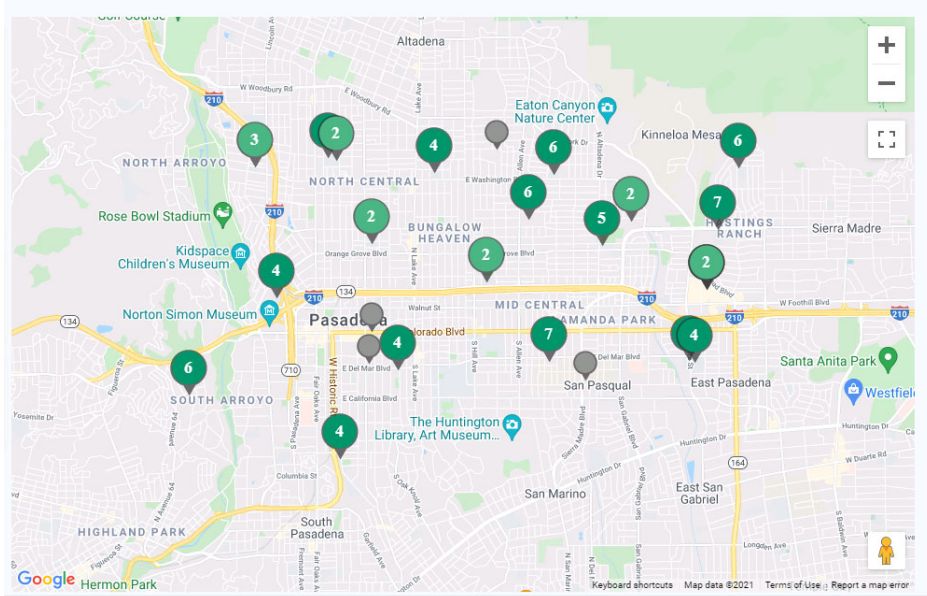
School proficiency scores are indicators of school system quality. In Pasadena, school proficiency indices ranged from 50 to 61 across all races and from 39 to 55 across all races living below the federal poverty line (Table F-12). The differences in scores among the races indicate a dissimilar access to schools, where Blacks and Hispanics scored the lowest. However, Black and Hispanic residents at-large and those living below the poverty level had access to higher quality schools in Pasadena compared to the County overall, where school proficiency scores were in the 30s. The higher the score, the higher the quality of schools.

Greatschools.org is a non-profit organization that rates schools across the States. The Great Schools Summary Rating calculation is based on four ratings: the Student Progress Rating or Academic Progress Rating, College Readiness Rating, Equity Rating, and Test Score Rating. Ratings at the lower end of the scale (1-4) signal that the school is “below average,” 5-6 indicates “average,” and 7-10 means “above average.” Figure F-13 shows that Pasadena elementary, middle, and high schools mostly rate as below average and average, with the exception of a few schools on the northwestern edges of the City. Lower educational opportunities across the City is shown in TCAC’s Education Score2 map. Census tracts in the Northwest region had the lowest education scores, while Census tracts in the edges have greater scores (meaning more positive education outcomes).

¹ For more information of GreatSchools ratings, visit: <https://www.greatschools.org/gk/ratings/>

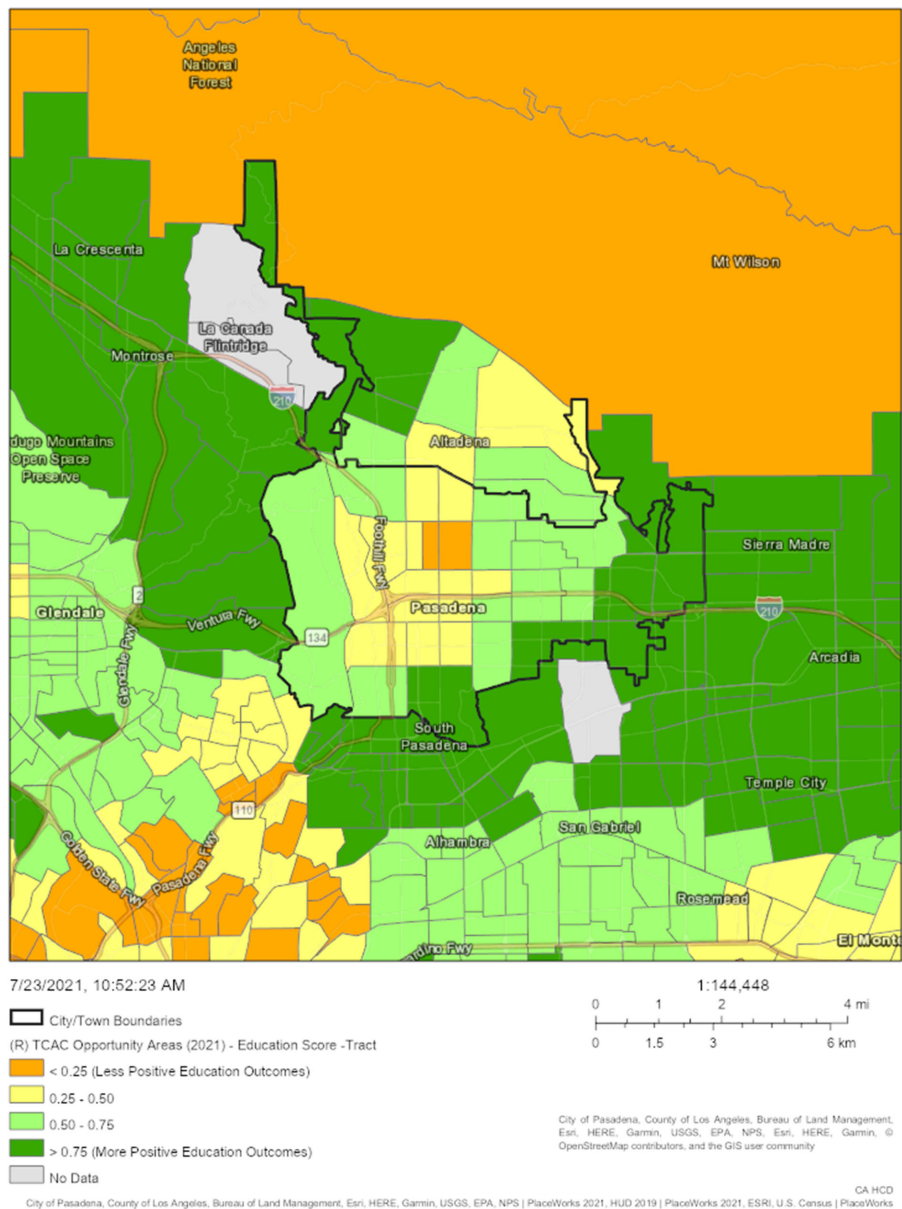
² Education scores are a composite of different indicators including: math proficiency, reading proficiency, high school graduation rates, student poverty rates

Figure F-13: GreatSchools Ratings



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Figure F-14: TCAC Education Score Map



Transportation

HUD's opportunity indicators have two categories to describe transportation-transit index and low transportation cost. Transit index scores did not differ significantly between races or between the total population and the population living in poverty. Transit index scores fell in the between 89 and 94 across all races. Low transportation cost scores were lower but had similar range (78 to 81) between all races in the entire population and were slightly higher for the population living below the poverty line (81 to 85). Considering that a higher transit index score indicates a higher likelihood to use public transit and a higher "low transportation cost" indicates a lower cost of transportation, Pasadena's lower income population has better access to transit compared to the entire population.

All Transit explores metrics that reveal the social and economic impact of transit, specifically looking at connectivity, access to jobs, and frequency of service. According to the most recent data posted (2019), Pasadena has an AllTransit Performance Score of 8.3 (Figure F-15). This is a relatively high score and the shows that most of the City has similarly high scores, with scores in the eastern part of the City being slightly lower. Figure F-16 shows that the number of transit stops within one-half mile is greatest in the Census tracts along I-210 but does not differ across the greatly across most of the City.

Figure F-15: AllTransit Performance Score

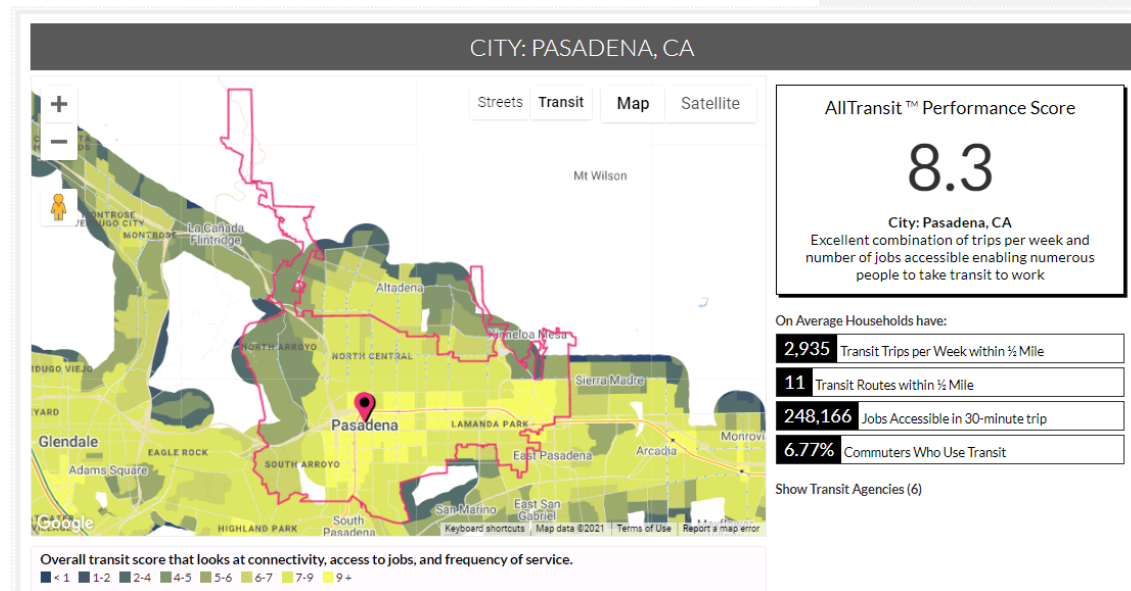
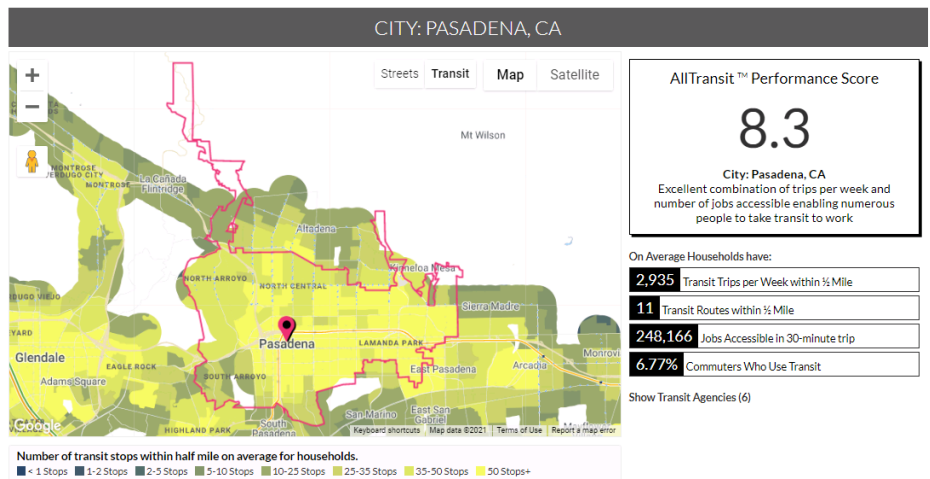


Figure F-16: Number of Transit Stops within One-half Mile of Households



Economic Development

HUD’s opportunity indicators provide scores for labor market and jobs proximity. The labor market score is based the level of employment, labor force participation, and educational attainment in a census tract. Pasadena had higher labor market index scores (58 to 80) than the County overall (33 to 65), indicating a higher labor force participation and human capital in a neighborhood. However, within the large range of labor market index scores in the City, Whites and Asians scored the highest, and Blacks and Hispanics scored the lowest.

The jobs proximity score quantifies the accessibility of a neighborhood to jobs in the region. Pasadena scored higher (64 to 79) than the County overall (40-56). Within the City, higher job proximity scores are located near downtown, mostly south of I-210 along the I-710 freeway stub. Some tracts north of I-210 also scored among the highest in jobs proximity within the City.

TCAC Economic Scores are based on a composite of the following area characteristics: poverty, adult education, employment, job proximity, median home value. The areas surrounding Pasadena and in the southern census tracts of Pasadena have the highest economic scores among the northeastern Los Angeles region. The census tracts with the lowest scores within the City and the surrounding region are located within Pasadena in the Northwestern census tracts.

Figure F-17: Jobs Proximity Index

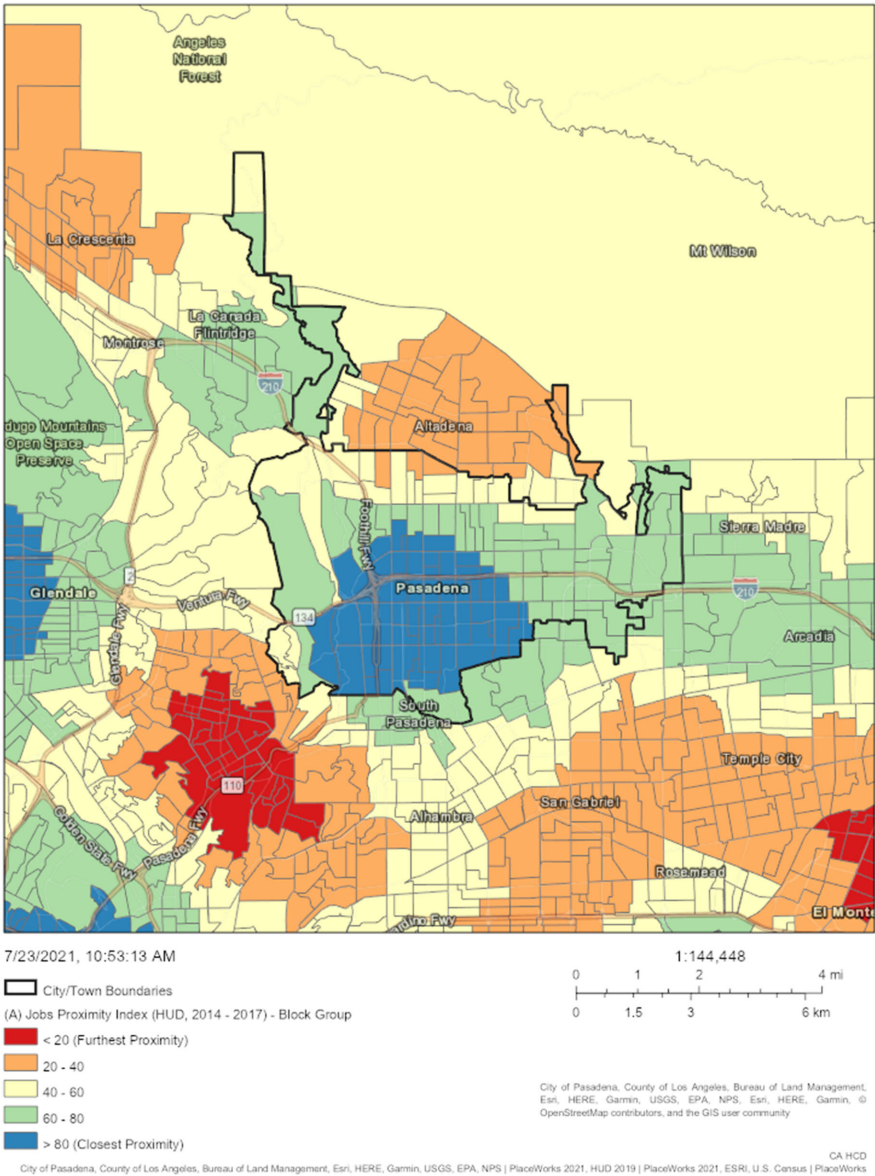
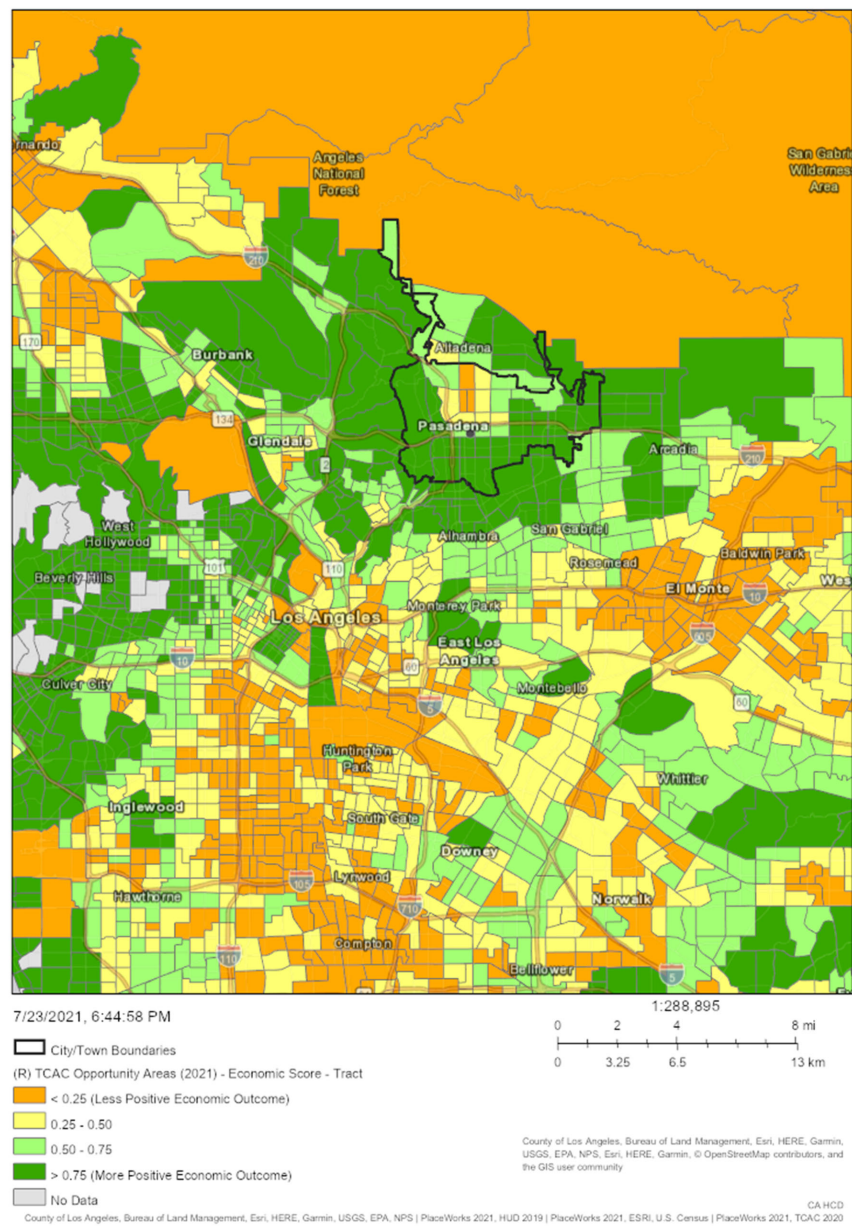


Figure F-18: TCAC Economic Score

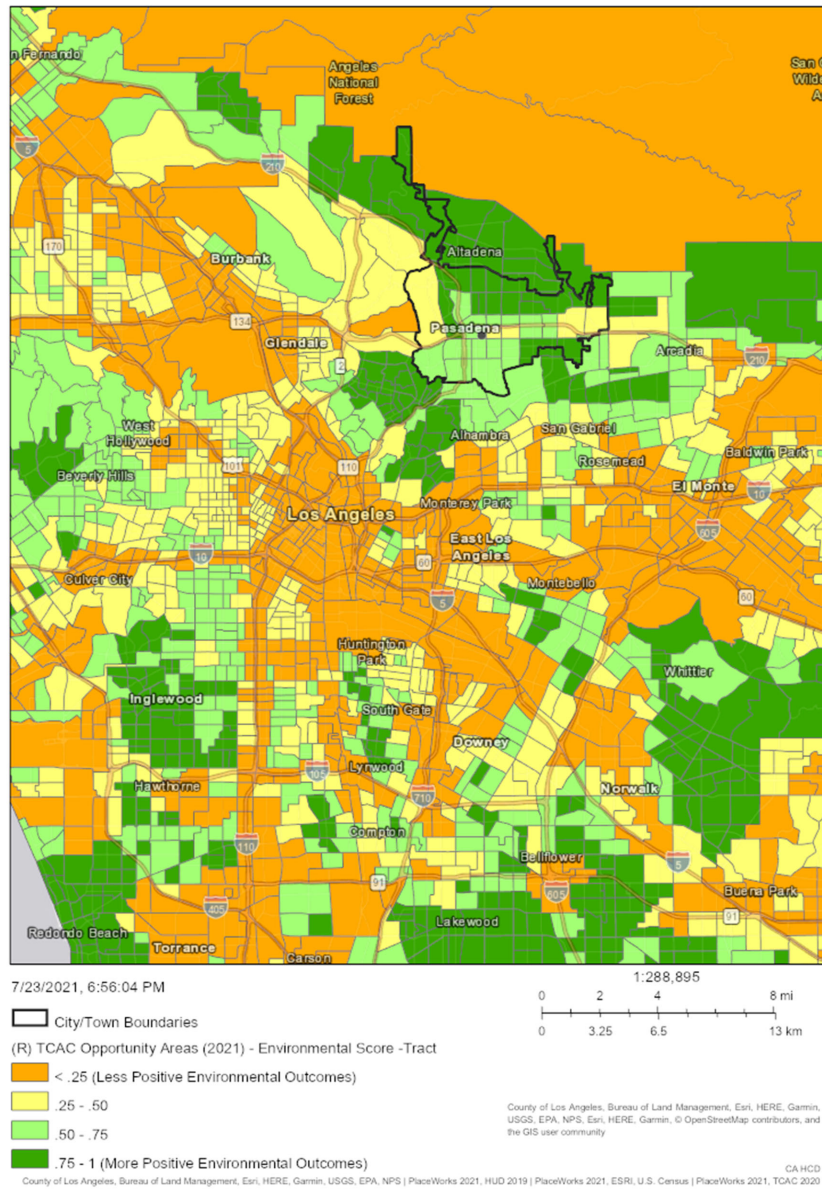


Environment

The TCAC Environmental Score is based on CalEnviroScreen 3.0 scores. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Similar to economic scores, the TCAC's environmental scores were highest near and within part of Pasadena when compared to the immediate surrounding region and downtown Los Angeles. However, within the City, the lowest environmental scores were concentrated along I-210 and south of it. The westernmost and easternmost census tracts along that transect scored the lowest (0.25 to 0.50).

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Figure F-19: TCAC- Environmental Score



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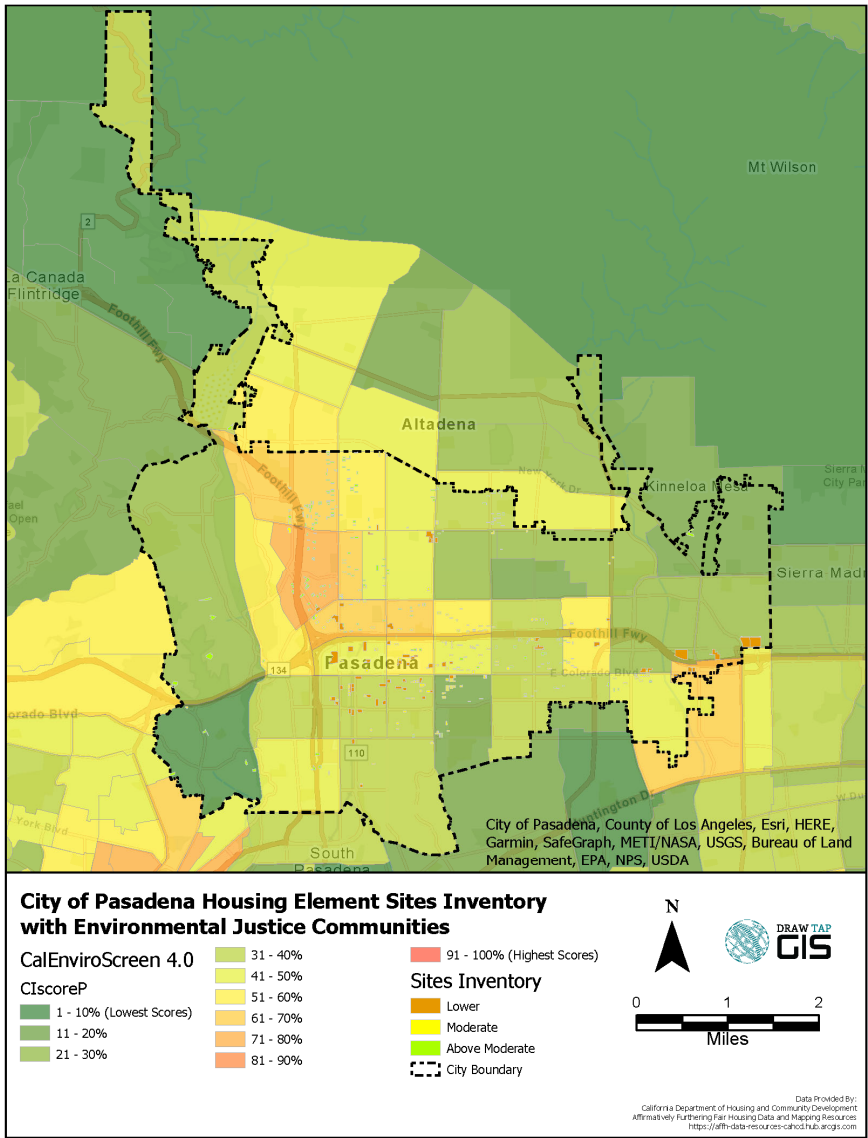
Distribution of RHNA Units by CalEnviroScreen Scores

The February 2021 update to the CalEnviroScreen (CalEnviroScreen 4.0) shows even more differentiation in CalEnviroScreen scores and shows that the Northwestern census tracts of the City have the highest (worst) scores (Table F-13). These census tracts fall between the 60 and 80 percentile of scores relative to other census tracts. Only 18 percent of lower-income RHNA units are located in the lowest scoring tracts (61-80 percentile). Overall, only 15 percent of all RHNA units are located in these tracts.

Table F-13: RHNA Units by CalEnviroScreen 4.0 Scores

CalEnviroScreen Score (Percentile)	Very Low Income RHNA	Low Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA Units
1 - 10% (Lowest Score)	0.0%	0.0%	0.1%	0.2%	0.1%
11 - 20%	0.9%	22.7%	17.6%	0.2%	6.1%
21 - 30%	24.8%	0.0%	5.1%	36.0%	21.3%
31 - 40%	31.1%	0.0%	30.2%	14.2%	26.4%
41 - 50%	14.7%	0.0%	16.2%	22.6%	17.1%
51 - 60%	10.6%	9.1%	21.9%	10.9%	14.2%
61 - 70%	17.4%	68.2%	7.8%	11.5%	13.1%
71 - 80%	0.5%	0.0%	1.1%	4.4%	1.7%
81 - 90%	0.0%	0.0%	0.0%	0.0%	0.0%
91 - 100% (Highest Score)	0.0%	0.0%	0.0%	0.0%	0.0%
Total Units	3,946	44	2,849	2,295	9,134

Figure F-20: RHNA Unit Distribution by CalEnviroScreen 4.0 Score³



³ The results for each indicator range from 0-100 and represent the percentile ranking of census tract relative to other census tracts

5. Disproportionate Housing Needs

The AFFH Rule Guidebook defines disproportionate housing needs as a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing needs when compared to the proportion of a member of any other relevant groups or the total population experiencing the category of housing need in the applicable geographic area (24 C.F.R. § 5.152). The analysis is completed by assessing cost burden, severe cost burden, overcrowding, and substandard housing.

Cost Burden

The Comprehensive Housing Affordability Strategy (CHAS) developed by the Census for HUD provides detailed information on housing needs by income level for different types of households in Pasadena. Housing problems considered by CHAS include:

- Housing cost burden, including utilities, exceeding 30 percent of gross income;
- Severe housing cost burden, including utilities, exceeding 50 percent of gross income;
- Overcrowded conditions (housing units with more than one person per room); and
- Units with physical defects (lacking complete kitchen or bathroom)

Pasadena households experience housing problems (46 percent) and cost burdens (42 percent) at lower rates than the County overall (52 percent and 46 percent) (Table F-14). As shown in Table F-14, households of all Black, American Indian, and Hispanics race experience housing problems at a higher rate than White and Asian households and all households in the City (46 percent). Renter-households, independent of race, experience housing problems at higher rates than owner-occupied households in Pasadena. Renters are also cost burdened at higher rates than owners, independent of race. Similar trends are seen in Los Angeles County, where Black and Hispanic households experience cost burdens and housing problems at higher rates than other races and the County overall, and renters experience problems at a higher rate than owners.

Elderly and large households may also be subject to disproportionate housing problems. Table F-14 shows that renter-elderly and large households experience housing problems and cost burden at greater rates than all renter-households and all households in the City. More than two thirds of elderly renter-households experience housing problems and cost burdens. Large renter households experience housing problems and cost burden at the highest rates (80 percent). Among owner households, large households also have the highest rates of housing problems and cost burdens (45 percent and 37 percent, respectively).

In the County, renter and owner large households experience the greatest rates of housing problems, compared to all households in the City and other

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household types of the same tenure. However, elderly households are more likely to experience cost burdens and renter elderly households are most affected (66 percent).

Table F-14: Housing Problems by Race, Pasadena vs. Los Angeles County (2017)

Pasadena	White	Black	Asian	Am. Ind.	Pac Isl.	Hisp.	Other	All
With Housing Problem								
Owner-Occupied	29.3%	40.8%	33.5%	50.0%	0.0%	45.4%	28.9%	33.9%
Renter-Occupied	49.2%	66.3%	42.5%	66.7%	33.3%	64.6%	50.9%	54.5%
All Households	39.0%	58.1%	38.3%	55.0%	22.2%	58.2%	43.8%	45.5%
With Cost Burden >30%								
Owner-Occupied	28.8%	38.3%	32.4%	14.3%	0.0%	41.1%	27.7%	32.4%
Renter-Occupied	45.9%	64.7%	37.9%	83.3%	33.3%	57.2%	49.1%	50.1%
All Households	37.1%	56.2%	35.4%	35.0%	22.2%	51.8%	42.2%	42.4%
Los Angeles County	White	Black	Asian	Am. Ind.	Pac Isl.	Hisp.	Other	All
With Housing Problem								
Owner-Occupied	32.1%	41.5%	38.3%	39.7%	39.7%	48.2%	36.5%	39.0%
Renter-Occupied	52.6%	63.7%	56.3%	56.4%	55.5%	71.1%	55.7%	62.3%
All Households	41.4%	56.3%	46.8%	49.4%	50.2%	62.3%	48.4%	51.6%
With Cost Burden >30%								
Owner-Occupied	31.1%	40.0%	34.4%	36.9%	33.3%	39.5%	34.9%	35.0%
Renter-Occupied	49.4%	59.6%	47.6%	48.8%	47.9%	58.3%	50.9%	54.2%
All Households	39.4%	53.0%	40.6%	43.7%	43.0%	51.1%	44.8%	45.4%

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD CHAS, (2013-2017).

Table F-15: Housing Problems, Elderly and Large Households, Pasadena vs Los Angeles County

Pasadena	Renter-Occupied			Owner-Occupied			All HHs
	Elderly	Large HH	All Renter	Elderly	Large HH	All Owners	
Any Housing Problem	69.0%	80.9%	54.5%	35.5%	45.0%	33.9%	45.5%
Cost Burden > 30%	66.6%	59.1%	50.1%	35.1%	36.7%	32.3%	42.4%
Los Angeles County							
Any Housing Problem	66.1%	84.8%	62.3%	36.8%	54.6%	39.0%	51.6%
Cost Burden > 30%	63.0%	55.9%	54.2%	36.2%	33.5%	35.0%	45.4%

Note: Data presented in this table are based on special tabulations from sample Census data. The number of households in each category usually deviates slightly from the 100% total due to the need to extrapolate sample data out to total households. Interpretations of these data should focus on the proportion of households in need of assistance rather than on precise numbers.

Source: HUD CHAS, (2013-2017).

Between 2014 and 2017, the share of cost burdened households in the City has increased by less than one percent (42.0 percent in 2014). However, only renter households had an increase in cost burden rates (from 47 percent to 50 percent). Owner cost burden rates decreased from 35 percent in 2010 to 32 percent in 2017. While cost burdens have increased slightly between 2010 and 2017 for renters, the distribution of cost-burdened households has not changed significantly across the City. Figure F-21 shows the concentration of renter cost-burdened households remaining concentrated in the Northwestern neighborhoods. However, some of the westernmost census tracts increased in their concentration of cost-burdened households from 60 to 80 percent to over 80 percent in the five-year time period mapped. By contrast, many tracts in the southwestern part of the City decreased their concentration of cost-burdened owner households (Figure F-22). Cost-burdened owner households remain present in the central tracts north to south and east to west in the City.

Figure F-21: Change in Cost-Burdened Renter Households, 2014 to 2019

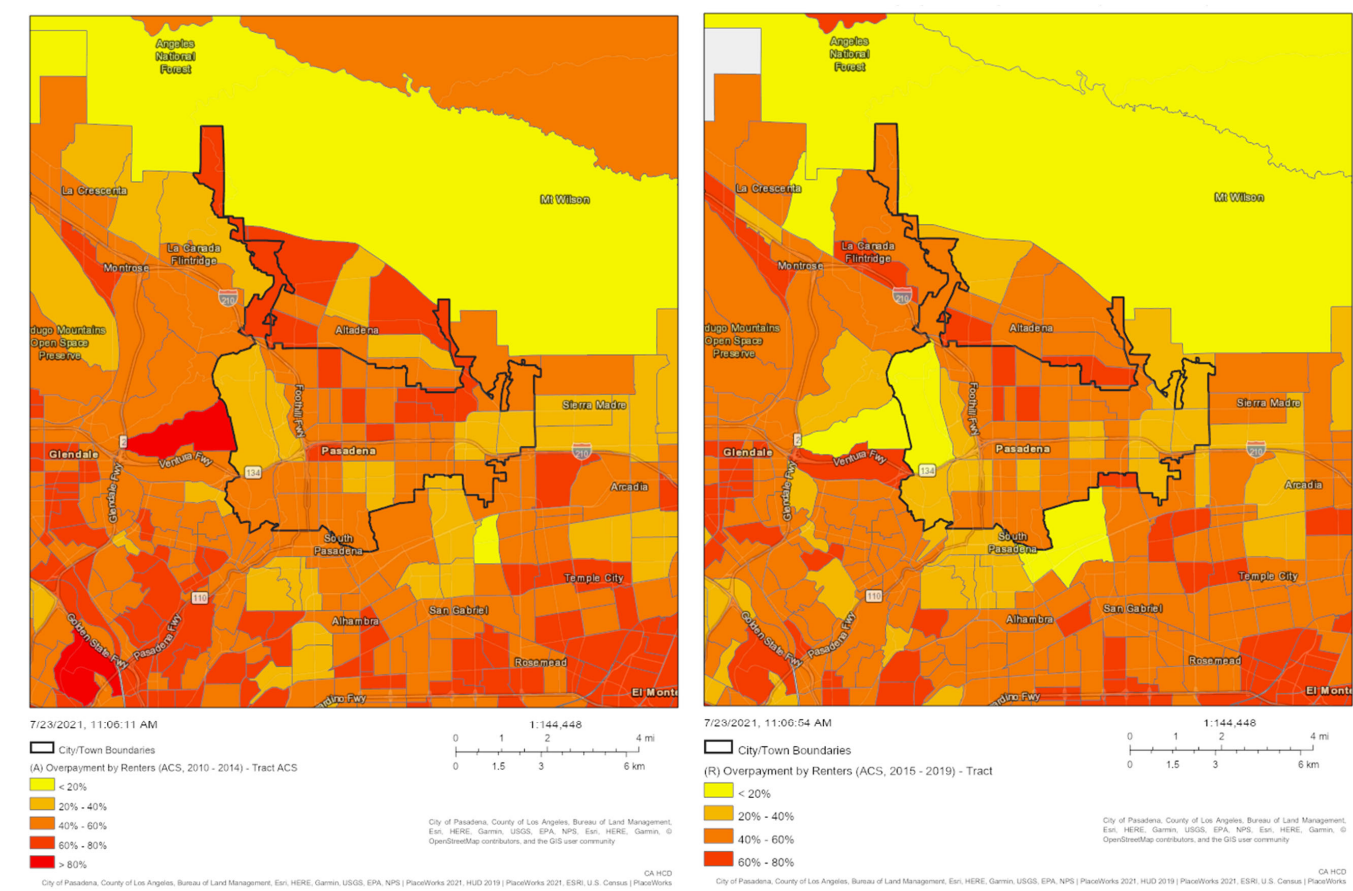
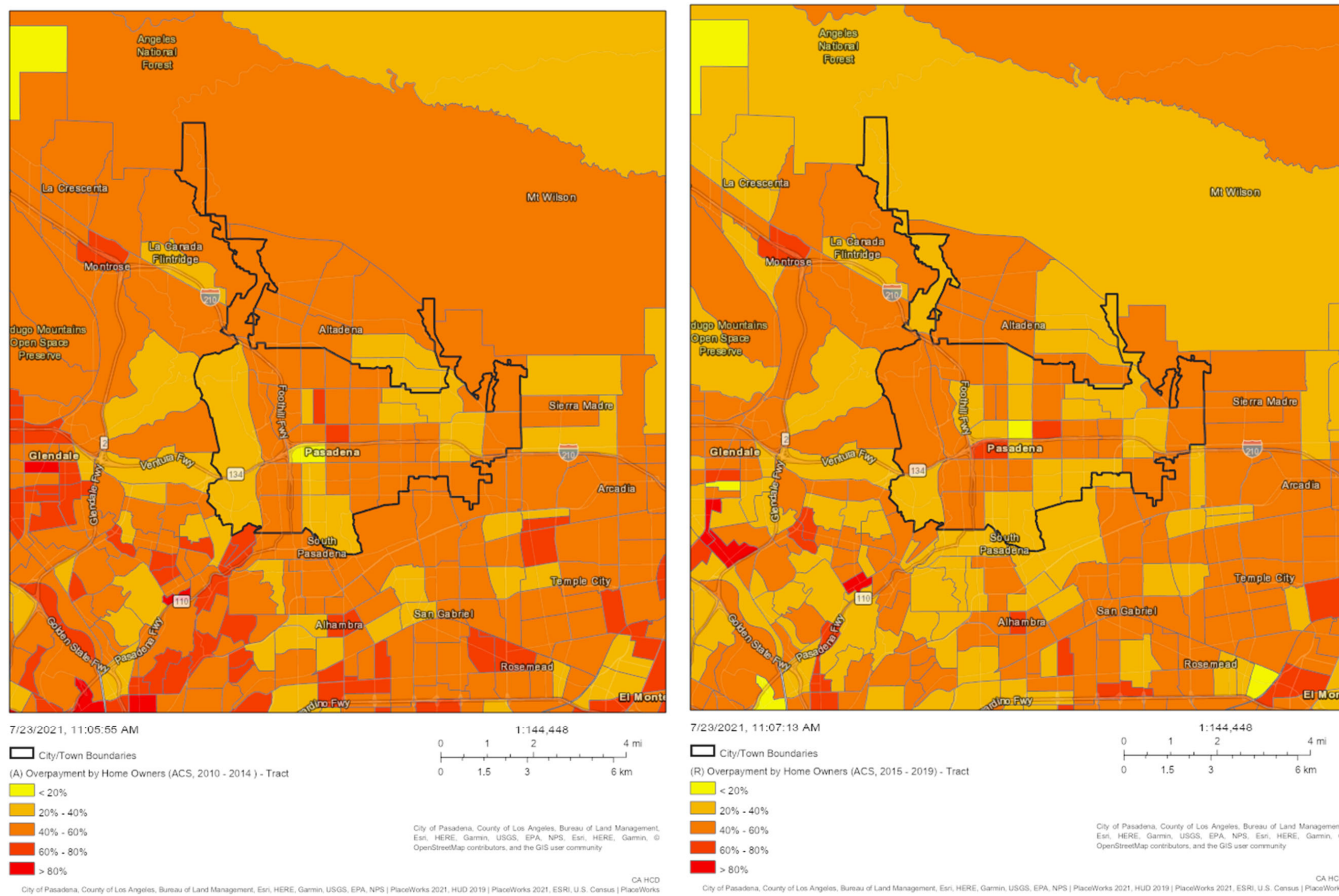


Figure F-22: Change in Cost-Burdened Owner Households, 2014 to 2019



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Overcrowding

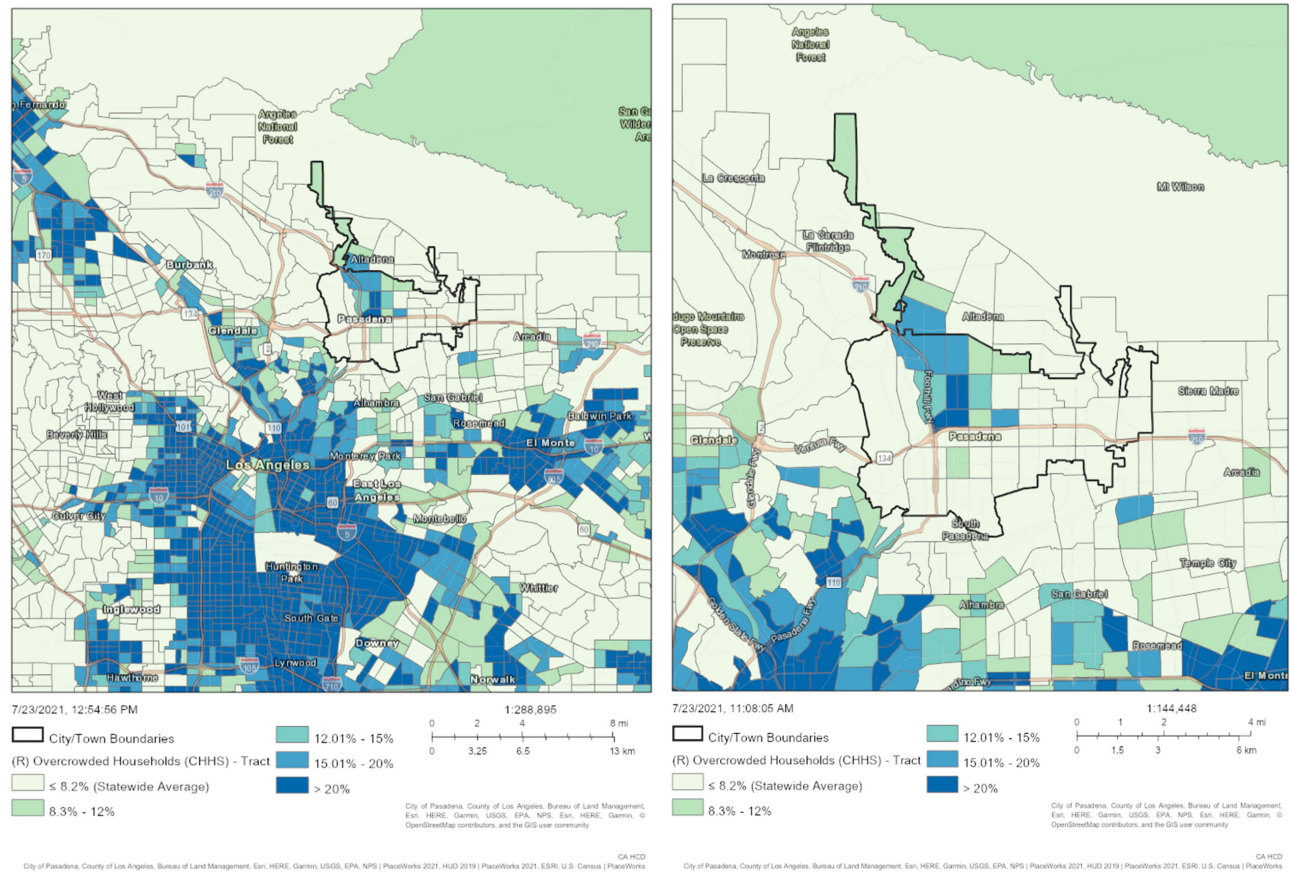
Overcrowding is defined as housing units with more than one person per room (including dining and living rooms but excluding bathrooms and kitchen). According to the 2019 five-year ACS estimates, a lower percentage of households in Pasadena (5.8 percent) are living in overcrowded conditions than the County (11.3 percent) (Table F-16). Renter households are also more likely to live in overcrowded condition in both Pasadena and Los Angeles County. Table F-16 shows that overcrowding is more prevalent in downtown Los Angeles and its surrounding areas but low in the cities adjacent to Pasadena. Pasadena has the highest concentration of overcrowded households among its neighboring cities. Within the City, overcrowded households are concentrated in the north central part of the City, north of I-210.

Table F-16: Overcrowded Households, Pasadena vs. Los Angeles County

Overcrowded	Pasadena		Los Angeles County	
	Owner-Occupied	Renter-Occupied	Owner-Occupied	Renter-Occupied
Overcrowded (>1 person per room)	1.9%	8.6%	5.5%	16.2%
Severely Overcrowded (>1.5 persons per room)	0.6%	3.7%	1.5%	7.5%
Total Overcrowded Households (>1 person per room)	5.8%		11.3%	

Source: 2015-2019 ACS (5-Year Estimates).

Figure F-23: Overcrowded Households



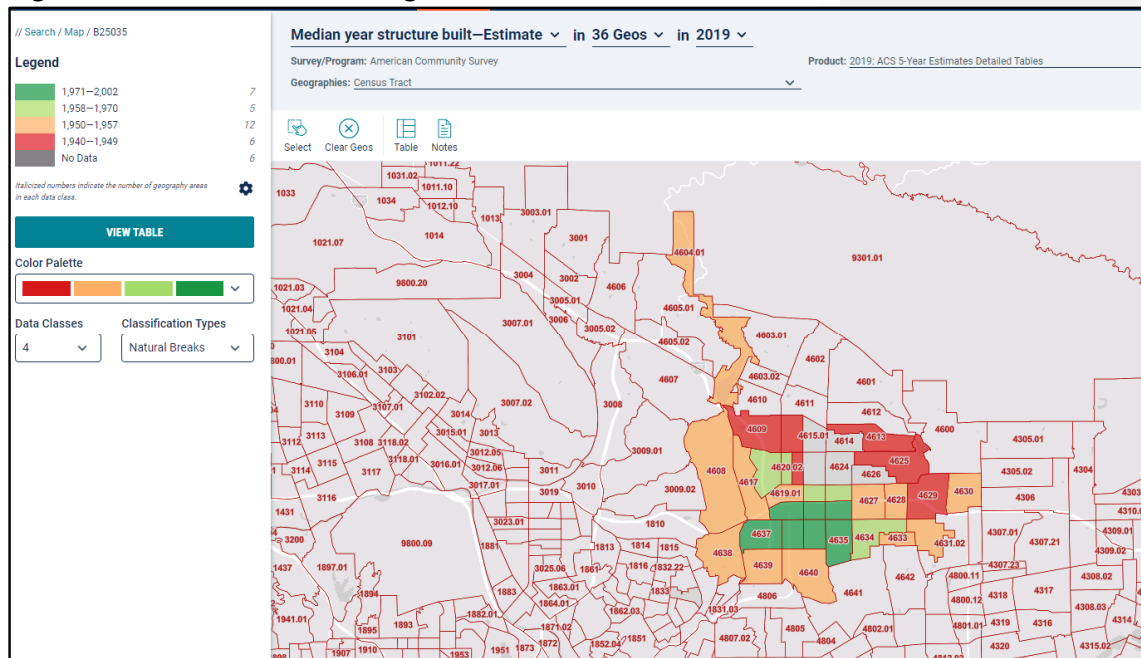
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Substandard Conditions

Housing that is 30 years or older is assumed to require some rehabilitation. Such features as electrical capacity, kitchen features, and roofs, usually need updating if no prior replacement work has occurred. Pasadena's housing stock is similarly aged to the County's; 85 percent of the City's housing stock was constructed prior to 1990 (and thus over 30 years old), compared to 86 percent of the County's housing stock.

Nearly 91 percent of the City's existing housing stock will exceed 30 years of age by the end of this Housing Element planning period (built before 2000). As shown in Figure F-24, the median year of housing built varies across the City. Housing in the central census tracts has been built more recently (after 1971, 50 years ago) while the housing by the City edges tends to be older.

Figure F-24: Median Year Housing Built



Source: 2015-2019 ACS (5-Year Estimates).

Displacement Risk

UCLA’s displacement project defines residential displacement as “the process by which a household is forced to move from its residence - or is prevented from moving into a neighborhood that was previously accessible to them because of conditions beyond their control.” As part of this project, the UCLA team has identified populations vulnerable to displacement (named “sensitive communities”) in the event of increased redevelopment and drastic shifts in housing cost. They defined vulnerability based on the share of low-income residents per tract and other criteria, including share of renters is above 40 percent, share of people of color is more than 50 percent, share of low-income households severely rent burdened, and proximity to displacement pressures. Displacement pressures were defined based on median rent increases and rent gaps. Using this methodology, sensitive communities are concentrated in downtown Los Angeles and adjacent to major freeways, with the highest concentrations south and west of downtown (Figure F-24). East of Downtown and in the Pasadena area, only Pasadena had census tracts identified as sensitive communities (Figure F-25). These census tracts were concentrated in the north central area of the City, north and west of I-210.

Figure F-25: Sensitive Communities Map, Regional

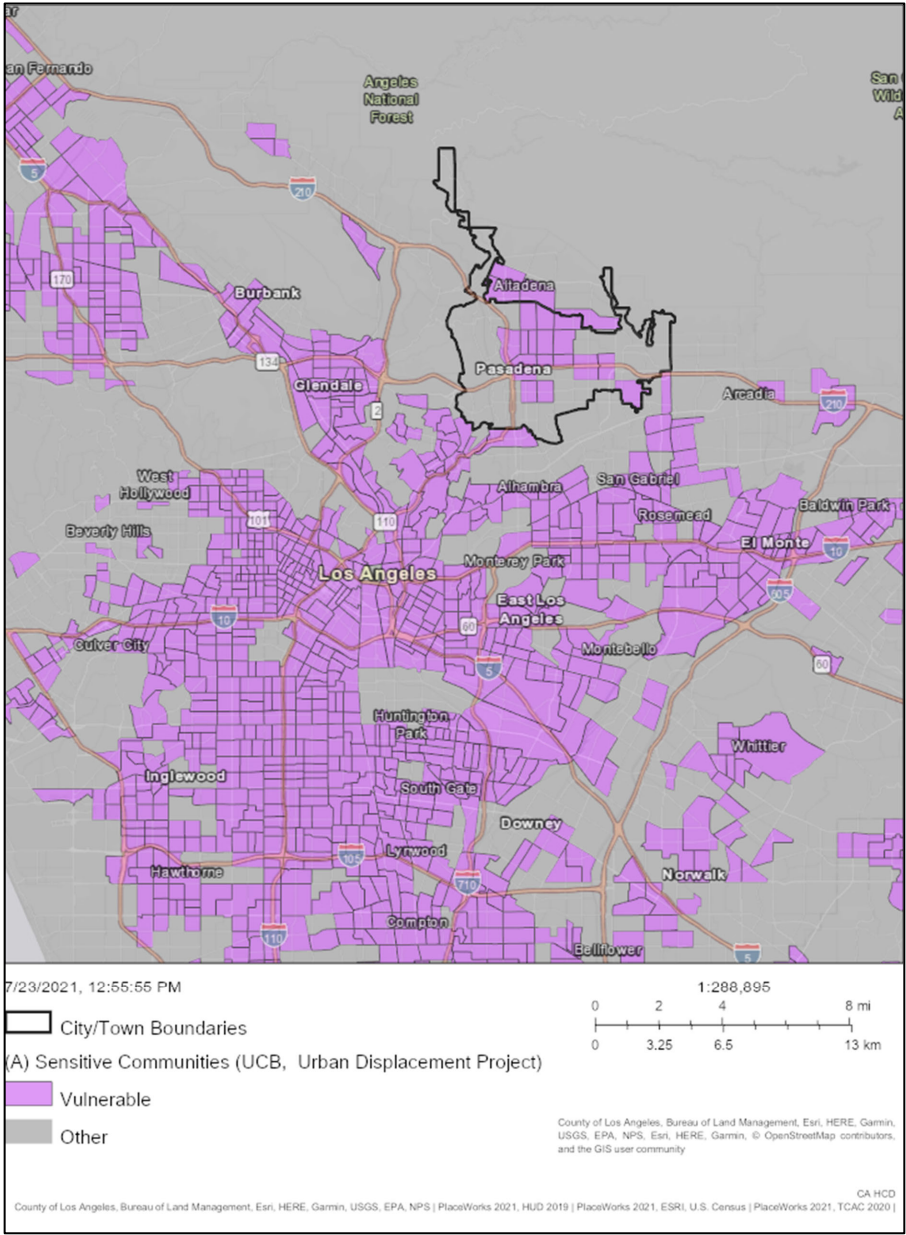
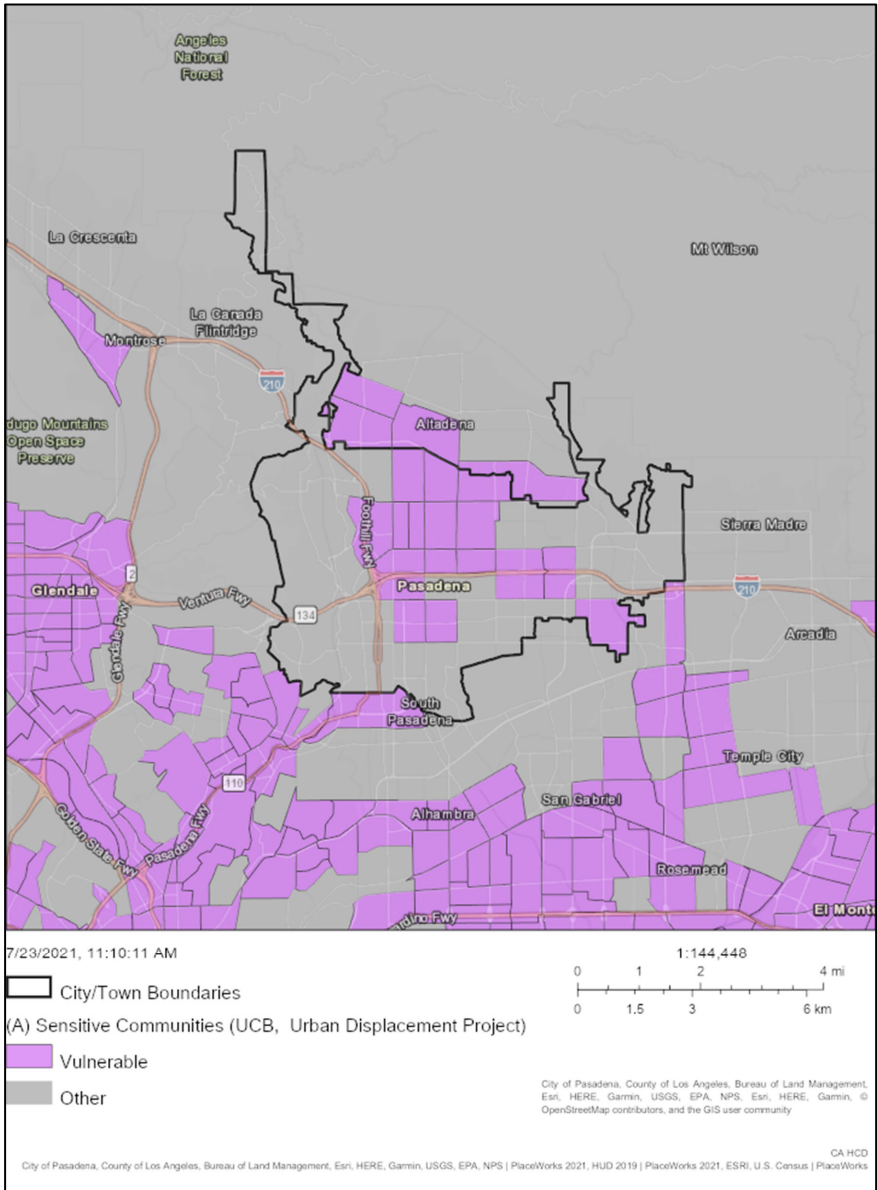


Figure F-26: Sensitive Communities, City of Pasadena



6. Other Relevant Factors

Lending Patterns

A key aspect of fair housing choice is equal access to credit for the purchase or improvement of a home, particularly in light of the recent lending/credit crisis. In the past, credit market distortions and other activities such as “redlining” were prevalent and prevented some groups from having equal access to credit. The Community Reinvestment Act (CRA) in 1977 and the subsequent Home Mortgage Disclosure Act (HMDA) were designed to improve access to credit for all members of the community and hold the lender industry responsible for community lending. Under HMDA, lenders are required to disclose information on the disposition of home loan applications and on the race or national origin, gender, and annual income of loan applicants. Table F-17 examines detailed 2017 HMDA data for Pasadena and the County.

The 2020 Pasadena Analysis of Impediments to Fair Housing Choice identified access to financing as an impediment to Fair Housing choice. All racial/ethnic groups had lower approval rates for home mortgage financing than non-Hispanic Whites and Asian (Table F-17). Approval rates ranged between 40 percent (American Indian and Alaska Natives) to 64 percent (Whites and Asian). The Citywide approval rating was 58 percent. The AI further broke down approval rates by race and income level. Approval rates for loans tend to increase as household income increases; however, lending outcomes should not vary significantly by race/ethnicity among applicants of the same income level. The AI found that while approval rates were lower for lower income applicants, White applicants had the highest approval ratings at all income levels and Hispanics and Blacks had the lowest⁴.

Hispanics were the most under-represented in the applicant pool, making up only 11 percent of the City’s applicant pool but 34 percent of the City’s population in 2017. Other minority groups (Blacks, Hawaiian Native/Pacific Islanders, American Indian and Alaska Native) were also underrepresented.

In the County, approval rates were also lowest for Black, Hispanics, and American Indian/Alaska Natives. These groups were approved at lower rates than Whites, Asians, and the County overall. Like in Pasadena, Hispanics were the most underrepresented in the applicant pool, making up 11 percent of the County applicant pool but 26 percent of the County’s population.

⁴ The AI analysis only showed the approval ratings by race and income for Whites, Hispanics, Blacks, and Asian applicants.

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Table F-17: Loan Applications and Approval by Race (2017)

	Pasadena			Los Angeles County		
	% Applicant Pool	% Pop	Approval	% Applicant Pool	% Pop	Approval
Non-Hispanic White	39%	37%	64%	33%	26%	63%
Black	5%	10%	54%	7%	8%	53%
Hispanic	11%	34%	56%	25%	48%	59%
Asian	15%	16%	64%	13%	14%	67%
Hawaiian / P.I.	1%	0.1%	49%	1%	0.2%	57%
Am. Ind./Alaska Native	0%	16%	40%	1%	0.2%	47%
Other	3%	1%	64%	2%	2%	65%
Total	5,970		58%	303,275		62%

Source: www.lendingpatterns.com, 2019. 2013-2017 ACS 5-Year Estimates.

Housing Choice Voucher Use

Trends related to housing choice vouchers (HCV) can show patterns of concentration and integration. As of March 2021, 1,202 low-income Pasadena families are recipients of Housing Choice Vouchers (Section 8) for rental assistance. The map in Figure F-27 shows that HCV use is concentrated in the Northwest downtown census tracts of the City. In these tracts, between five and 15 percent of the renter households are HCV users. HCV use is also highly concentrated in the Central District tract at the southeastern intersection of I-210 and SR-134. This pattern may be because these areas have the lowest “affordability index” or median gross rents (Figure F-28). Despite low rents, between 40 and 80 percent of renter households in these areas are considered cost burdened.

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Figure F-27: Housing Choice Voucher Use

Housing Choice Vouchers

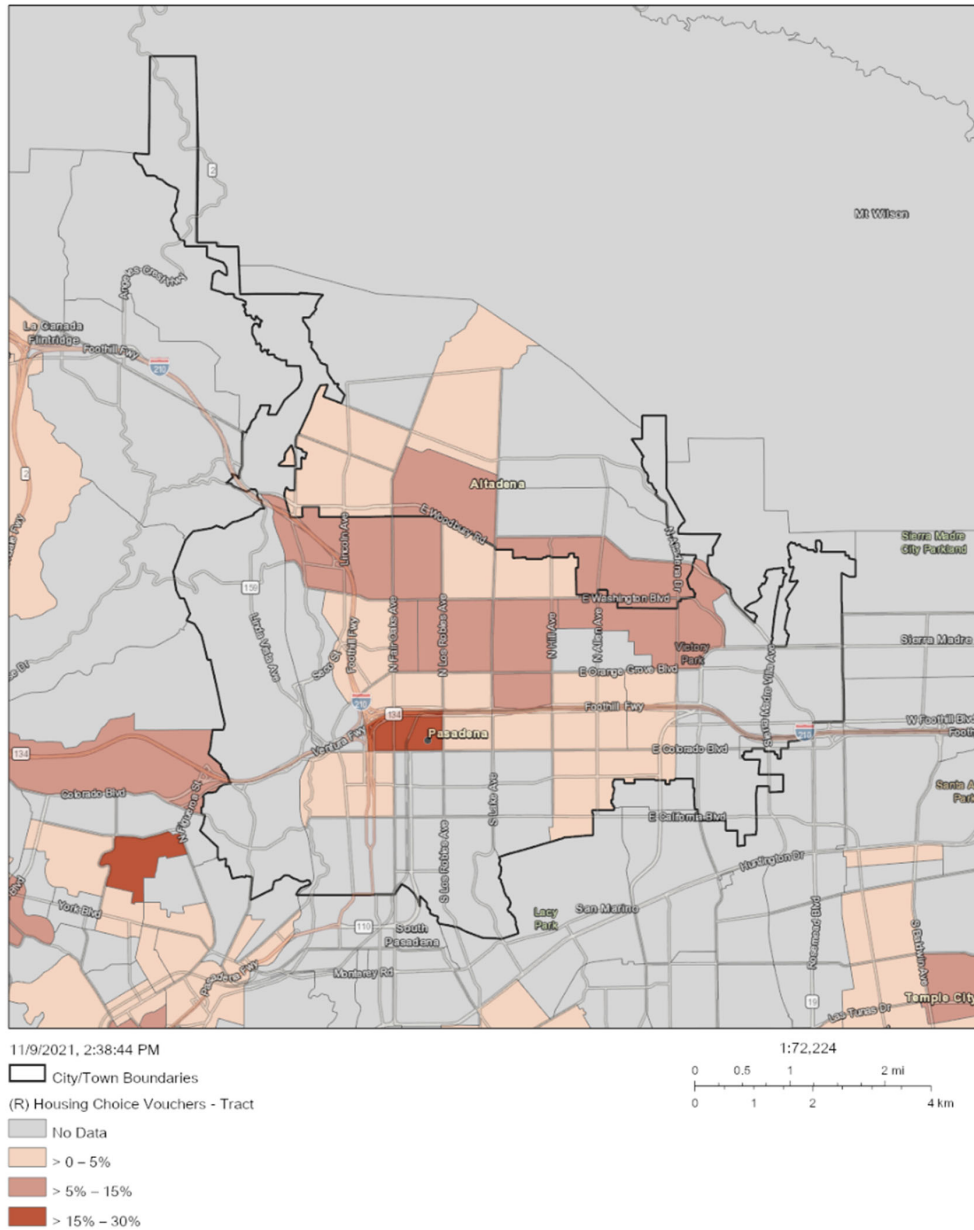
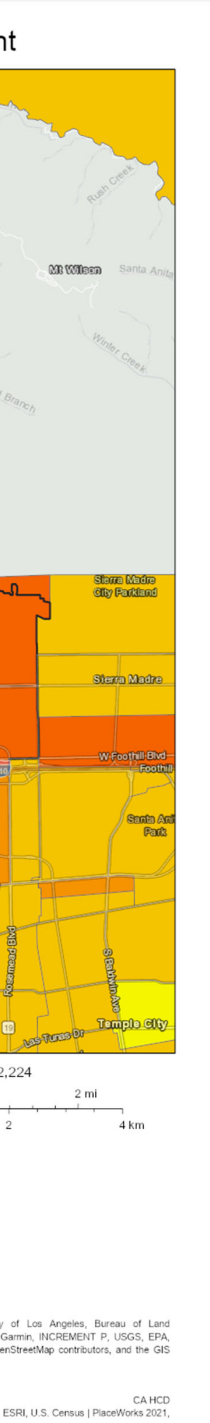


Figure F-28: Median Gross Rent



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Displacement and Gentrification

Urban Renewal and Redevelopment

Northwest Pasadena has history of discriminatory real estate practices and planning, followed by decades of underinvestment, that created neighborhoods in need of focused attention. In the 1950s, central and Northwest Pasadena was a racially diverse community of working-class Whites, African Americans, Mexican Americans, and Japanese Americans living in both single-family and multi-family homes of varying sizes. However, federal officials and the local Chamber of Commerce classified the area as “blighted” in the late 1950s, allowing City officials to use federal funds to redevelop the area through the 1949 US Housing Act. While 20 percent of the redevelopment funds were supposed to be allocated to affordable housing, Pasadena passed a law to use instead the funds for Police and Fire pensions. During this time, redlining and racially restrictive covenants were also allowed and in place. Northwest Pasadena residents were unable to obtain loans to rehabilitate their homes or purchase new homes. In the end, though redevelopment funds were able to rebuild and revive Old Pasadena and other neighborhoods, many residents were displaced by these investment practices. According to A Voice Within⁵, “by the late 1960s, an estimated 299 families had been displaced by urban renewal projects in Pasadena, 91 percent of which were families of color.” In 1968, the Fair Housing Act allowed Blacks to move to other areas outside of Northwest Pasadena, which opened a disinvestment vacuum that led to gentrification in the Northwest area.

Gentrification

As the areas surrounding Northwest Pasadena improved and experienced increased investment, Northwest Pasadena was largely disinvested and became a neighborhood for low-income families. However, with the improvements in the surrounding areas that connected Pasadena to major work hubs and transit networks, many people have begun moving back into Northwest Pasadena. This has led to further displacement as homes are remodeled and sold, apartments are converted to condos, or landlords increase their rents and displace existing residents.

I-210 Freeway Construction

Construction of the I-210 freeway in 1970s also displaced communities of color, especially Black communities. During freeway construction, southeast Pasadena residents (a majority White community) were able to keep freeway construction from affecting their neighborhoods. However, this meant diverting the freeway through the African American business district on North Lincoln and the mixed-income, racially diverse neighborhoods of Northwest Pasadena. Displaced individuals were offered \$75,000 for their homes despite no homes in Pasadena costing less than \$85,000 at the time, worsening the displacement.

⁵ A Voice Within, “Black History in Pasadena.” <https://www.anoisewithin.org/black-history-in-pasadena/>

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Zoning Laws

Published sources⁶ point to zoning laws as a tool to prevent mixed-income communities in the City. In the 1970s, local no-growth and slow-growth movements led to downzoning and large lots only zoned for single-family homes. Also, for many years the City's ADU ordinances made it impossible to build ADUs, having requirements for two-car garages, a minimum 15,000-square-foot lot size requirement, and other restrictions. Between, 2001 and 2017 only one ADU was built.

Community Knowledge

The City received many useful comments regarding AFFH comments throughout the outreach process, especially from Our Future LA Coalition and Abundant Housing LA. Our Future LA Coalition commented on the disproportionate housing needs of Black and Latino residents. Black residents are more likely to experience homelessness and evictions due to effects of decades of racist policies like restrictive covenants, exclusionary zoning, and redlining made it impossible for Black families to build wealth through home ownership and result in lower homeownership and higher rents today. Latino and Black communities in Los Angeles County were also disproportionately affected by COVID 19. According to Our Future LA, "essential workers living in overcrowded housing were exposed to COVID at work and had no choice but to expose their families at home, leading to disproportionate deaths among Black and Latino people." The Coalition recommended making every neighborhood resource-rich and avoiding displacement while also achieve equitable land use and zoning so that new areas can have higher densities and increase their values. At the same time, areas already zoned for density need to be protected from environmental and spatial racism.

The Abundant Housing LA group also provided more comment on the history of housing policy and land use regulation use to segregate Latino and Black residents. "From its incorporation in 1886, Pasadena's Latino and Black residents were essentially confined to segregated neighborhoods in the southwest and northwest parts of the City. In response to efforts by such residents to seek to move outside those areas, a drive was launched in the 1930s to enlist white homeowners to sign real estate covenants to forbid occupancy by anyone "whose blood is not entirely that of the Caucasian race." This effort was supported by the Pasadena Board of Realtors, Pasadena Chamber of Commerce and members of the City Council. By 1940, 60 percent of the homes in Pasadena were covered by such covenants, which were enforced by the California courts until the United States Supreme Court banned them in 1947. Pasadena continued to pursue policies rigidly reinforcing racial segregation and discrimination in housing, education and public employment well into the 1960s. The U.S. Justice Department introduced compelling testimony in the 1970 case of Spangler v. Pasadena of the long-standing and pernicious practices of realtors in continuing to keep Blacks and Latinos from buying in white neighborhoods. Moreover, with

⁶ Jill Shook, "Pasadena's Racialized History"
<https://makinghousinghappen.net/2020/06/23/pasadenas-racialized-history/>

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the overt aim of “urban renewal,” known nationally as “Negro removal,” the Pasadena Redevelopment Agency during the 1960s and 1970s deliberately demolished the homes and businesses of hundreds of established Black and Latino residents in northwest and southwest Pasadena (including the childhood home of Jackie Robinson).

During the same period, Caltrans (with City concurrence) removed the homes and businesses of thousands more for the I-210 and I-710 freeway projects. The pattern of locating “affordable housing” projects in majority Black and Brown neighborhoods and keeping them out of white majority neighborhoods is apparent today. The demographic map of Pasadena reflects the result of decades of deliberate public policies to deny Black and Latino households the opportunity to live in Pasadena’s choicest neighborhoods. The Abundant Housing LA group recommended that lower-income housing opportunities be located in high-resource areas and near jobs and transit. More housing opportunities would be created by allowing higher-density development near transit, thus promoting goals to affirmatively further fair housing and prices out a more diverse community of potential Pasadena residents.

Existing Ordinances and Programs to Combat Displacement and Gentrification

The City has taken great steps to address previous discriminatory practices and affirmatively further fair housing.

Northwest Pasadena

The City of Pasadena has long directed enhanced efforts at improving conditions in Northwest Pasadena. Through community building efforts and enhanced community participation, the City continues to make substantial investments in this area. Prior to the dissolution of redevelopment in California, funds were available for significant investment in housing. Without that resource, the City has had to use federal and State funding sources more creatively to improve the existing housing stock and bring new homes to the Northwest community.

- **Community Building.** Pasadena supports for-profit, nonprofit, and faith-based organizations that are committed to implementing community-building efforts in Northwest Pasadena. These include, but are not limited to, Flintridge Center, Community Bible Church through its work at the Kings Village and Community Arms Apartment projects, and numerous other nonprofit and for-profit organizations. Other efforts include Neighbors Acting Together Helping All (NATHA), which has received three-year grants from the California Community Foundation.
- **Northwest Commission and Programs.** Working in conjunction with the Northwest Commission, the City’s Northwest Program office works specifically to maintain a healthy business environment and facilitate housing maintenance and production. These include updating the Fair Oaks/Orange Grove and Lincoln Avenue Specific Plans, monitoring of capital improvement projects, improvements to Robinson Park, police

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department activities to address neighborhood safety, and ongoing liaison activities with neighborhoods associations.

Local Priority Preference

The Local Preference and Priority System Guidelines ("Local Preference Guidelines") were adopted by City Council in 2006 to determine the order in which eligible applicants receive priority to rent or purchase available affordable housing units, including units developed with City subsidy and units created under the Inclusionary Housing Ordinance. Under the 2006 Ordinance, applicants who live and work in the City currently received the highest priority, followed by applicants who live in the City, those who work in the City, and those who were involuntarily displaced from Pasadena by government action, improper termination of tenancy, domestic violence, participation in the Witness Protection program, hate crimes, inaccessibility issues or substandard housing, and homelessness. ~~All~~ other applicants are considered after those who meet the priority category criteria.

However, there has been a recognition among policy makers, stakeholders, and housing advocates that the 2006 local preference policies, while perhaps successful in achieving their stated purposes, did not address the impacts of housing displacement created by high housing costs and gentrification. In 2021, the City adopted changes to the Local Preference Ordinance which created a new priority category (Over-Housed Priority) and a new set-aside.

Over-Housed¹ Priority, which is an uncapped priority category that gives preference to residents of deed restricted affordable housing units in Pasadena who are currently considered over-housed (e.g., a single-person household residing in a three-bedroom unit). This new "Over-Housed" priority is intended to address inefficiencies in the match between household size and unit size (which occur over time as dependents in larger households move out) and will allow such households the opportunity to move to smaller units and pay a lower rent, while freeing up larger units for larger eligible households.

Former Resident Set-Aside (20 percent) creates an additional set-aside of up to 20 percent of the units to be available to former Pasadena residents ("Former Resident Set-Aside"). This modification is meant to provide households who were unable to remain in Pasadena, whether due to rising housing costs or gentrification, with the opportunity to return to the City. This set-aside applies to developments with five or more affordable housing units. Under the set-aside, up to 20 percent of the units ~~would be~~ available to households who can demonstrate that they had maintained a primary residence in Pasadena ~~for two years sometime in of~~ the five years prior to their application for ~~available affordable housing. In addition, to be eligible for this set-aside, a household must have maintained a primary residence in Pasadena for at least two years.~~ Within this set-aside, households ~~will~~ receive priority based on length of ~~their~~ tenure in Pasadena. This means, for example, that a household who had lived in Pasadena for five years prior to application would receive priority over a household who had lived in Pasadena for two years during the same time period. Table F-18 summarizes the new local preference categories.

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Table F-18: Local Preference Categories (2021)

Set-Aside	
First	Former Resident Set-Aside (capped at 20 percent)
Priority	
First	Over-Housed Priority
Second	Resides and works in Pasadena
Third	Resides (but does not work) in Pasadena
Fourth	Works (but does not reside) in Pasadena
Fifth	Involuntarily displaced from Pasadena
Sixth	All other applicants

While some may argue that local preference ordinances can perpetuate patterns of segregation and inequality in areas already wealthy and predominantly white, Pasadena's Local Preference ordinance has been implemented successfully, providing affordable housing opportunities to income-eligible households who live and/or work in Pasadena. For example, the 69-unit Heritage Square senior apartments, completed in 2016, achieved about 94 percent local preference upon initial occupancy. The Theo apartments project was placed in service in April 2020 with all nine of the inclusionary units leased to applicants who resided and/or worked in Pasadena. Most recently, the 17-unit Decker/Gill affordable homeownership project achieved approximately 75 percent local preference. In addition, by adding a former resident set-aside, the City provides opportunities to those that have already been displaced.

While local preference ordinances can benefit existing residents by allowing them to remain in their City, local preference ordinances can affect regional housing mobility by limiting the opportunities for low-income residents in other cities to procure affordable housing in neighborhoods or cities with higher resources and opportunities. In Pasadena, many of the City's tracts are considered areas of high and moderate resources, so it is likely that many nonresidents would look for housing in the City. However, the City has prioritized the needs of its existing residents and former residents that have been displaced in response to public comments.

The two highest priority categories in the Pasadena local preference policy have two specific objectives: 1) to reverse the trend of displacement and 2) to facilitate aging in the community for seniors. High rents in Pasadena have displaced many Pasadena tenants to other communities. Displacement disproportionately affects lower- and moderate-income residents (and who are disproportionately comprised of minority persons). Therefore, the Pasadena preference policy reserves a small number of inclusionary units to allow income-eligible displaced residents the opportunity to move back to Pasadena. This policy aims to benefit those who have been impacted by displacement.

The second component of the policy highest priority provides a preference to income-eligible seniors for small inclusionary units. Many seniors who desire to trade down the homes for smaller units have limited housing choices in the

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community due to the high costs of housing. Therefore, Pasadena has experienced a trend of seniors being displaced out of the community or even out of state. To allow low-income seniors to age in the community, the City's policy provides a preference to those income-eligible seniors who have sold their homes to relocate to smaller inclusionary units within Pasadena, while making larger homes available for families.

The City's local preference policy has been in place since 2006 and has been successful in protecting residents from displacement and in allowing lower income workers to live closer to where they work. Between 2014 and 2020 (under the previous preference policy), about 90 percent of the affordable units were occupied by those who reside and work in Pasadena; reside (but do not work) in Pasadena; work (but do not reside) in Pasadena; or those had been involuntarily displaced from Pasadena. This policy allows the City to address the needs of not only those who live in the City but also those who work in the City. The Former Resident set-aside and Over-Housed Priority have been in place since 2021. However, no residents have claimed the Over-Housed priority to date.

Based on available demographic data, the preference policy helps maintain a diverse household profile among the affordable units: 18 percent Asian; 25% Black; 28% Hispanic; and 28% White. Because the affordable units are primarily available through the City's inclusionary housing program, this policy also helps integrate lower income and minority residents into market-rate housing throughout the City. This is especially the case for for-sale affordable units. City data shows that homeownership is beyond the reach of most lower income households who are disproportionately minority households of color.

SB 649 (Affordable Housing: Local Tenant Preference) effective January 1, 2023, allows cities to provide preferences to lower income households residing in neighborhoods and communities experiencing significant displacement pressures and gentrification due to rapid growth and densification. The City has included a program to consider establishing a preference consistent with SB 649. In addition, the City will monitor the application of the various preference criteria to ensure the policy is achieving its intended objectives of anti-displacement, facilitating aging in community, and reducing commutes for lower income workers, and that the policy does not have unintended results of perpetuating segregation.

Tenant Protection Ordinance (TPO)

The ordinance, adopted in 2004 and amended in 2017, requires landlords to provide relocation benefits to tenants who are displaced under specific circumstances. In 2019, the City amended the Ordinance to strengthen tenant protections. The modified TPO now covers situations in which a change in property ownership has occurred within 18 months prior to the tenant being issued a notice of eviction, tenancy termination, or rent increase which exceeds five percent plus the percentage annual change in the Consumer Price Index. Other circumstances which require landlords to pay relocation benefits to displaced tenants are: demolition, conversion to condominium, or permanent removal of the unit from the rental market; occupancy by the landlord or landlord's family member; government order to vacate; or the displacement of

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tenants from housing owned by educational institutions under certain situations. Multi-family rental properties with two or more units on a single parcel are subject to TPO. Single-family homes and condominium units are exempt from TPO. In late 2020, the City provided funding to the Housing Rights Center to enhance tenant protection and legal services. In early 2022, the City began drafting updates to the administrative regulations of the TPO to close loopholes associated with landlord evictions of tenants for improvements to units (“renovictions”).

ADU Units

The City has gone above the State-mandated efforts to promote ADU construction and rental to low- and moderate-income residents through:

Second Unit Pilot Program: The Housing Department launched the Second Unit Accessory Dwelling Unit (ADU) Pilot Program to provide easy financing to construct an ADU in exchange for leasing the unit to a “Section 8” housing choice voucher holder for seven years. Other options include bringing an unpermitted ADU (e.g., garage conversions) up to code for low- to moderate-income households.

Pre-Approved Plans: City has initiated a program to produce pre-approved ADU building plans to help reduce the cost to property owners of processing building permits and getting a project more quickly to construction.

Reduced Residential Impact Fees: The City offers reduced impact fees for units 750 square or larger if the unit is rented to a lower income household, to a City’s rental assistance client, or a family member.

The City has a dedicated page with ADU information on its City website:

<https://www.cityofpasadena.net/planning/planning-division/community-planning/accessory-dwelling-units/>

Sites Inventory Analysis

AB 686 requires a jurisdiction’s site inventory “...be used to identify sites throughout the community, consistent with...” its duty to affirmatively further fair housing. The number of units, location, and assumed affordability of identified sites throughout the community (i.e., lower, moderate, and above moderate income RHNA) relative to components of the assessment of fair housing was integrated throughout the discussion in the fair housing assessment section. The overall strategy for the Sites Inventory was to remain consistent with established land use policy in the 2015 General Plan. The foundational General Plan land use principle is to locate housing near transit and services, largely within the eight specific plan areas. This practice also encourages private investment in areas like North Lake Avenue and East Colorado Boulevard with more need since housing tends to attract services. The City identified sites based on existing land use policy, current trends, and development feasibility within the planning period, with income levels based on the 30 unit per acre default density allowed under State law.

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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 only two of those amended specific plans have yet been adopted—with the sixth others to be completed by 2023—the sites inventory does not include many potential sites for new high-density residential development. However, as shown in the Housing Resources section of this 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.

As demonstrated throughout the assessment and in

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Table F-19, 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-income or above-moderate income. For example, virtually all of these sites in the Northwestern 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.

Specific Plans have been developed for the purpose of creating regulatory provisions that encourage focused residential development in the Central District and Transit-Oriented Villages areas and along major travel corridors. By locating the majority of RHNA units within these specific plan areas (4,709 of the 6,504), the City intends to focus investment in these areas in an environmentally sustainable manner. While a majority of these RHNA units are lower income in Specific Plan areas, private investment through housing is expected to ameliorate conditions in these areas, specifically the Central District. The sites inventory includes properties within Specific Plan areas that, similar to properties that have been redeveloped over the past eight or so years, are characterized by: 1) single-story commercial or industrial buildings that have not had significant investment in many years, 2) parking lots not needed to support demand of associated uses, and 3) retail commercial and office buildings for which property owners have inquired with City Planning staff regarding reuse potential. As such, these properties do not currently offer benefits to the residents of the area as they could with housing.

While the proposed land use regulatory changes for each Specific Plan area were not considered in this sites analysis, the Specific Plan updates are expected to expand the available sites that can accommodate housing beyond RHNA obligations, especially lower-income housing (Program 6).

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Table F-19: Sites Inventory by Area

Areas	Affordability Level			Total
	Lower Incomes (0-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Outside of Specific Plan Areas				
Vacant	--	18	18	36
Underutilized	291	644	824	1,759
Subtotal	291	662	842	1,795
Within Specific Plan Areas				
Central District	1,421	517	470	2,408
East Colorado	572	151	-	723
East Pasadena	777	-	13	790
Fair Oaks/ Orange Grove	102	53	20	175
Lamanda Park	133	102	-	235
Lincoln	-	21	55	76
North Lake	171	27	2	200
South Fair Oaks	97	5	-	102
Subtotal	3,273	876	560	4,709
Total	3,564	1,538	1,402	6,504

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Summary of Fair Housing Issues, Contributing Factors, and Meaningful Actions

The following text and table summarize fair housing issues and contributing factors and indicate the meaningful actions the City will take to address each issue. Contributing factors were evaluated and prioritized. Contributing factors were prioritized based on their impact on fair housing issues, as well as the City's ability to address the contributing factors.

Fair Housing Outreach and Enforcement

Issue #1: Limited public participation in fair housing activities and limited enforcement.

Housing discrimination activities persist in Pasadena, with discrimination against persons with disabilities (physical and mental) as the leading basis for discrimination, followed by familial status. According to the 2020 AI, fair housing discrimination may also go unreported, as many residents fear retaliation or are unclear where to look for assistance with fair housing issues. In addition, a large portion of listings for for-rent and for-sale ads contain discriminatory language, primarily expressing preference for families, no-pet policy, and explicitly requiring minimum income levels or rejecting Section 8 assistance. Overall, participation in fair housing activities and programs has been mostly limited despite extensive outreach efforts.

Also, while fair housing testing is included in the scope of activities for the Fair Housing provider, no results of testing were provided in the 2020 AI nor could they be found in the City website.

Contributing Factors

- Lack of education in fair housing laws¹
- Limited participation in outreach events and fear of retaliation¹
- Lack of a variety of media to publicize fair housing resources¹
- Lack of testing¹

Evaluation and Prioritization

The analysis found that while there are fair housing services available to residents, one of the biggest factors that limit its fair housing goals is low participation, which in turn means low awareness of fair housing rights and laws. Given the limited funds available to the City, the City will focus on expanding awareness of the resources available citywide, as well as specifically to residents in Northwest Pasadena.

Since fair housing services are provided by the Housing Rights Center, the City will work the organization to provide targeted outreach not only of fair housing services but monitor consistent testing and enforce federal, State, and local laws.

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Segregation and Integration

Issue #2: Segregated living patterns with a concentration of minorities, persons with disabilities, and low- and moderate-income households in Northwest Pasadena and Central District tracts south of I-210. There is also a concentration of HCV users in these areas.

Contributing Factors

- Location and type of affordable housing ¹
- Historical discriminatory practices¹
- Disinvestment in the 1970s²
- Lack of private investments ²
- Lack of public investments in specific neighborhoods, including services or amenities²

Evaluation and Prioritization

Patterns of concentration and segregation need to be addressed by providing opportunities for lower-income residents to live in areas with higher resources. The City's strategy is to create housing opportunities, especially lower income housing, across all neighborhoods of the City, to explore alternative housing options, and to improve housing accessibility.

Access to Opportunities

Issue #3: Lower access to opportunities in Northwest Pasadena.

Northwest Pasadena and the Central District directly south of I-210 were classified as lower resource and areas of high poverty and segregation (respectively) and had lower TCAC education, economic, and environmental scores.

Contributing Factors

- Location of lower quality schools in Northwest areas ²
- Lack of access to local jobs²
- Location near environmental pollutants (freeways) ²
- Lack of private investments¹
- Lack of public investments in specific neighborhoods, including services or amenities¹

Evaluation and Prioritization

Disproportionate access to opportunities can be addressed with place-based strategies to improve the conditions to existing residents. The contributing factors that have the highest impact on the conditions on areas of need are the lack of private and public investment. The City's strategy is to continue to invest public funds for the improvement of areas with low resources.

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Displacement

Issue #4: Communities with disproportionate housing needs (renter cost burdens, overcrowding, and vulnerability to displacement) are concentrated in Northwest Pasadena.

Northwest Pasadena neighborhoods have home values that have stayed lower than the local median prices due to underinvestment in community infrastructure, historic real estate practices that prevented people of color from buying or renting homes in particular districts, and poorly performing local public schools, among other factors. These lower-income areas contain houses with historic character and local shopping districts that people can walk to. With home prices so high in most of the City, homebuyers and institutional investors see value in historically undervalued areas and are buying houses at seemingly bargain prices. They may be purchasing properties currently rented at affordable rates, rehabilitating the home, and “flipping” them to be bought or rented at higher prices. This practice often forces long-term residents to move.

Evaluation and Prioritization

All three contributing factors work in combination to create a community that is at risk of displacement. As explained earlier, the areas with the disproportionate needs and concentration of poverty and segregation have older housing with lower home values but high historic values and transit. The City’s anti-displacement strategies include actions that directly address displacement as well as providing affordable housing options and rental assistance.

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<p>Mfettfa~ #. #; j} · flE ; afE# 9 E ·flvt #</p>	<p>. E ; +v ·n#E #~ « }n~ n; #un#q j} · flE ; afE#uE ·flvt # Efil va; jn#</p>	<p>E ; tE vt #</p>	<p>. v#» vln#</p>	<p>2 ; fl ·fn#q j} · flE ; afE# · ; vfl#fn#ffE "vlnl # jE ; flfn; # v# Efil va; jn# fn> ·fn~ n; fl# # % juvn"n#««fE "a)#E # ' , . #q j} · flE ; afE# uE ·flvt # · flvt #un# « }a ; vt #j} n#</p>

% 779 #B n a j v t s . } # j t F ; f l b a f l v . #				
9 2 # f f e t f a ~ f l f f # f u n f # % j t v f n f #	Q < n j v s j # . f ~ ~ v t ~ n ; #	S v ~ n } M n #	8 n f t f a « u v j # S a f i t n t v t t #	" ~ " ' D ' ~ " E # B n # i x j f l #
M f e t f a ~ # ~ # P n t . } a f f f # ; j n ; t v n f #	. f h a n n a # n i . # S # a f f i l a i } n # f . f l m t # . f ; j n f l f # ; f l # u n f n # n " n } « n f l # j a ; # n h j # l . f l m t # a l ~ v l f f a t v n # n " n » # S # u n # f f e } j t #	" ~ " ~ #	. v # « » v l n #	. f h a n n a # ~ ~ # } « n f f # v j f ~ n # ; v f l # . f l m t # t u n # t v t u # a n a f # u f . f l m t t # } j } n #
M f e t f a ~ # ' # } n f i j a t v n # 9 f . f l m t # « « f f # ; v n f #	~ « } n ~ n ; # # u n # f l v a j j n # u a # } } « f l # f f # a a f f i l a i } n # f . f l m t # n " n } « ~ n ; # # ; # f f e « n f i t n f # f » ; n l # # a ; l # f ; n l # f f f n } t v . f l m t # t # f ; f l #	" ~ " . #	. v # « » v l n #	% j u v n " n # # n a f l # ; n # a a f f i l a i } n # f . f l m t # « f f e } j j # f a « « f f e . v a n } # , ~ # . ; v f l # ; # a ; # v f l t # t # ; a # « f f e « n f i # a f l # « n f i . v n l # # # u n # a l f « n l # f l v a j j n #
	. f ; t v . n # u n # v } # f f e t f a ~ # f # ; l # t a } v t # . ; « n f i . v n l # 0 T # j f ; " n f l f ; f l # ; l # f f e f a t v t # t u n # f f e t f a ~ # f f f # f . f l n u f } l f l # a f i j v t # } n f l # u a ; # ~ # « n f j n ; # # # u n # f h a # n l v a ; # v j f ~ n # } n < n ; l v t # . « f ; # u n # l . j j n f l # S # u n # f f l # u a f n # S # u n # v } #	" ~ " ~ #	. v # « » v l n #	A n t a } n # " # 0 a a f f i l a i } n # 0 T f l # f f # v j f ~ n D . a } n l # « f f e « n f i # f » ; n f l #

% 779 #B n a ; v t s . } # j t # ; f l B a # i r . #				
9 2 # f i e t f a ~ f l # f i # t u n f # % j t v v n f #	Q < n j v s j # . f ~ ~ v t ~ n i #	S v n } m n #	8 n f t f a « u v j # S a f i t n t v j t #	" ~ ~ ' D ' ~ " # # B n # i v j l #
	« f i e t f a ~ } # a } } e j a t n # ; l v t t # e f i # f i a u n f i t t # u n t « f i e t f a ~ #			
	B f ; v e f i # a i l # n " v " # a } } # O T # f i e t f a ~ f l # m # " ~ , # e f i # n s n j v n ; n f l # # e # a ; f l . f n # O T # f i e l . j t # e ; # a i l # a s e f i l a i v } # # e f a } # f n # n v t t # a j u v n " n l # # f l # i n j n f l a f # # a l { . f l # # u n # m j n ; v n f l # m # " ~ " # e # a j v } # a n # # f i e l . j t # e ; #	" ~ ~ , D ' ~ ~ " #	. v # » v l n # a i l # u t u n f # e < « e f i t . i v # # a f n a f #	% j u v n " n # " ~ , # O T f l # l . f i m t # u n # } a i ; v t t # j s j h # ~ i # m # u t u n f # e < « e f i t . i v # # a f n a f #
	2...« } e f n # u n # . f i j u a f n # e # a } # a ; f l # D ' ~ # f i e « n f i n f l # e f i # f i n a v n # u i e . f l m t # « n f i # e f l # e » n f i m j e ~ n # a i l # f l « n j a } # n n l f l # u e . f i n u e } l f l #	E i t e v t #	% } e i t # M a f a l n ; a # a i l # Q t # e f u ; # # % " n i . n f l # a i l # a l { a j n ; # « f i e « n f i n f l # e » ; n l # % # . a } # a ; f l # # #	M . f i j u a f n # e . f i # D ' ~ # « f i e « n f i n f l # e f i # a s e f i l a i h # u e . f l m t # f l . i f i j # # e # ; l v t t # a " a v a i v } # #

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% 779 #B na;v;ts. }# j+e; i;B a#iv.#				
9 2#Mf;tfa~ fl#f#B t#nf# % j+V"v#nf#	Q«njwvj# E~ ~ v~ n; #	Sv~ n}v;n#	8 nftfa«uvj# Safit n+vt#	"~" 'B' ~" E# B n#i;jf#
M}ajnD-afnl #Q #fa#nt vnf#E f#C nvt ui f#iufel#~ «fE "n~ n; #f#f#D vt u#Mf#f#v#				
Mf;tfa~ # # fln#; efijn~ n; # a;l#D f·flvt#;f«nj+e; #	. E; +v·n#E #l·ja+n#un#E ~ ~ ·;v# #aif·#una}u# a;l#Ean# #a`afil# v#u# jfnafnl#E· #hajuj# nfl«njv}# #E #C f#i#u» nfl#Mafaln;a#E #E; ;nj# }E» nftD; jE~ n#iE·fnue }lf# v#u# "avai }n# fnfE·fijnf#E f#i#E·flvt# #n«avf# a;l#fnuai v#u#E; # E » ;nft# vnl#E f#j#fln# "E }a#E; f#afn# }E# «fE "vnl# a~ «u}n#E #un# v#D# "avai }n# fnfE·fijnf#E f#i#E·flvt# #fnuai v#u#E; #	E ;tE vt#	C f#i#u» nfl# Mafaln;a#	Safit n# #f#M#a; jn#E# " #iE·fnue }lf# a; ;a}# #E Z # Mafaln;a# # Mefl#- a#fia }#a# jE~ ~ ·;v# #aj v#v# v# #C f#i#u» nfl# Mafaln;a# a; ;a}#
Mf;tfa~ # #C f#i#u» nfl# Mafaln;a#	. E~ ~ ·;v# #· v}lv;t# • Q·««f#f#E ~ ~ ·;v# #· v}lv;t# n#f#f# tufE·tu# ;lv;t# a;l# n}lv;a+vt# #Eas# fnfE·fijnf# ; ;a}# #tufE·tu#un# 0-8 # s ;lv;t# #E f#jnf# }E ja+n# "avai }n# fnfE·fijnf# #E #l·««f#f#E ~ ~ ·;v# #· v}lv;t# n#f#f# v#u#un# E a}E #f#f#v;t#E t#nf#	E ;tE vt#	C f#i#u» nfl# Mafaln;a#	Safit n# «#E #~ # «nfijn; #E #· i }v# v~ «fE "n~ n; # ;lf# · ;lnf# 0-8 #E# v~ « }n~ n; # v~ «fE "n~ n; # «fE {nj#l#

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% 779 #B na;v;ts. }# j+e;fB a#iv. #				
9 2#f#tfa~ fl#f#B tunf# % j+~v~vnl#	Q«njwvj# f~ ~ v~ n; #	Sv~ n}v; n#	8 nftfa«uvj# Safitn+vt#	"~" 'D' ~" # B n#ixjfl#
	. v%#n«af#~ n; #E# #allfnf# . i }j+ ajvj%# #; l #; falfi~ j+~fn#~ «f# "n~ n; # v; #un#j# ~ ~ . ; v%#			
	. ffil v; a#E; # vu#C f#u» nfl# f~ ~ vln#; # <ul style="list-style-type: none"> Z ffil # vu#un#C f#u» nfl# f~ ~ vln#; #E# allfnf#j# f~ ~ . ; v%#; jnf; f#; l # fl~ ««f# #un#; ; tDnfi~ #n"va }/a#E; # s#uv# afha# 	% i i . a) #	C f#u» nfl# Mafaln;a#	B nn# vu#un# C f#u» nfl# . f~ ~ vln#; # #; nafi# f; jn# nfi# nafi#
	M . i }j# «f# "n~ n; #; #; #ajjefil a; jn# vu#un# . v%# M# « }n~ n; #un#E }# » vt# v~ «f# "n~ n; #; #C f#u» nfl#Mafaln;a# <ul style="list-style-type: none"> ?aj v#P f i v; f#; #; l #v; # f#f#ja#Maf # v~ «f# "n~ n; #; #~ " #j# ~ « }n#; #E# E; tE vt# f#tfa~ # 	"~" "D' ~" . #	C f#u» nfl# Mafaln;a#	Safitn# «#E# ~ # «nfjn; #E# . i }j# v~ «f# "n~ n; #; #; l f# . jlnf# 0 - 8 #E# v~ « }n~ n; # v~ «f# "n~ n; # «f# {j #l# #

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% 779 #B na;v;ts- }# j+e; iB a#iv.#				
9 2#Mf;tfia~ fl#f#B tunf# % j+~v~v~vfl#	Q<njwsj# E~ ~ v~ n; #	Sv~ n}v; n#	8 nftfa<uvj# Safit n+vt #	"~" 'B' ~" E# B n#ixjfl#
	<ul style="list-style-type: none">Qvln» a) #in<avfl#; l# 0 % #- <fE"n~ n; #l# SuffE·tu# ~", #a; l# n#E; l#Pa%~ E; l# "n;·n#hj#ija}Bfln~ # ·; llnftfE·; lvt#SuffE·tu# ~", #a; l# in#E; l#Yafie·fl#nlnfl#ia; #a; l#fiasvj#Bfln~ # n;ua;jn~ n; #l#SuffE·tu# ~", #a; l# in#E; l#Yafie·fl#anfi#Bfln~ #n;ua;jn~ n; #l# SuffE·tu# ~", #a; l# n#E; l#Yafie·fl#hj#ij#kE>nf#Bfln~ # <tfaInfl# SuffE·tu# ~", #a; l# n#E; l#			Safit n# <#E# ~+ <nfi;n; #E# M# S; lvt#E# v- <fE"n~ n; #l# C ffitu» nfl# Mafaln;a#
	% 0 T#Mf;l·j+e; # <ul style="list-style-type: none">% << }#Efl#; l# fln#; lvt#E~ #M9A% # . a}E~ n#; l# a}79% #E·fijnfl#E#	% i; a}#	C ffitu» nfl# Mafaln;a#	E ;n# 0 T#nf#anafi# E f#vtu# # 0 Tf#E "nf# nvtu#anafi# E f#Bafit nfi#Bant%#

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§ 779 (b) (1) (A) (i) (I) (B) (a) (iv). #				
9 (2) (b) (i) (A) (i) (B) (a) (iv). # § 779 (b) (1) (A) (i) (B) (a) (iv). #	Q «njwvj# E ~ ~ v# n; #	Sv~ n}vj n#	8 nftfa«uvj# Safit n#vj t#	" ~ " ' B' ~ " E# B n#vjfj#
	<p>vj jn; #vvn#; l#ajvj#n#E; fji- j#E; #E# % 0 Tfj# E fju» nfi#Mafaln;a#</p>			<p><u>E#; j#E·fatn#</u> <u>uE·fvt#fcl·j#E; #</u> <u>vj#E fju» nfi#</u> <u>Mafaln;a#</u></p>
	<p>. E ~ ~ · ; v# · vj vj t#E fji#</p> <ul style="list-style-type: none"> Q·««E fji#E ~ ~ · ; v#E· vj vj t#E fji#E# s ; l vj t#E fta; v#E; fji#; l#nl vja#vj t# fja#fji#E·fji#E#E·««E fji#E fji#E·i h j # E# ; l vj t#E"avai v#E# 	" ~ " · #	C fju» nfi# Mafaln;a#	<p>; j fnafn#E#E·fji# lnlvja#l#E#E·fji# aj#v#E#E# ~ i #</p>
<p>Mfttfa~ # E·fvt# Pnuai v#E; #</p>	<p>Qvj t#E#a~ v#Pnuai v#E; #Ea; #</p> <ul style="list-style-type: none"> Z fji# v#E#CnvtuifjuE#E·fvt#Qnf'vjnf# E#E fji#; tn}nf# E·; E#E 9 Q#E#E"vn# fnt'vjnf#E#E fjtfa~ #j}· l nfi#E vj t#E E~ v#E#nuai v#E; #Ea; #E fjtfa~ # uE~ ni·E#E; l#E~ nE» ; nfi#E#l·ja#E; # E fji#E·fji#E·; fji#E; l#E#E# 	E i tE vj t#	C fju» nfi# Mafaln;a#	<p>% fji# " # uE·fjuE}fji# a; i·a}E#E#E# uE·fjuE}fji#"nf# nvtu#E#E# # . E; l·j#E#E#E# E;n#E·E#E#</p>

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% 779 #B na;v;ts. }# j+e; iB a#iv.#				
9 2#Mf;tfa~ fl#f#B tunf# % j+~v~v~vfl#	Q<njwvj# E~ ~ v~ n; #	Sv~ n}v; n#	8 nftfa<uvj# Safit n+vt t#	" ~ " ' B' ~ " E# B n#ivjfl#
	fin< }ajnl # % # ; vfl#asfil ai }n#E #E> nfvj jE~ n+ uE·fnuE jfl#			utunf#E <<Efi#· i v# afnafl#
Mf;tfa~ #<#; j}·f#E; af# 9 E·flvt #	% #un#finln"n)E<~ n; #fin"v> #latn}#v; sfi- # i·v}lnff#E s#un#E <#E; #E#> }#}#j}·f#E; af# fin>·vfin~ n; #> vu#aj>·v#E; }#inuai v}#a#E; #	E ;tEvt t#	C f#iu> nfl# Mafaln;a#	% j>·vfin}#inuai v}#a#E; # > E#l~ a})#fin; }a}# <f#E<nfinfl#u#E·tu# tun#; j}·f#E; af# E filv;a; jn# ln<n; ln; #> <E; # ln"n)E<nfin}n}#E; # E s#uv#E <#E; #
	. E; +v·n#E#> < }n~ n; #un# ~ " ' #. E l vja+e; i}#E # tun#Eja}#finfin; jn#E filv;a; jn#E f#asfil ai }n# uE·flvt t#fin; }a}#E#E> ; nfflu> }#ln"n)E<nl # vu# . v#>#l·ifnl %Efi#; lni#un#; j}·f#E; af# 9 E·flvt }0 n; f#E# E; ·fl#E filv;a; jnfl#Sun# ~ E l vja+e; i}#finatn l #a#n> #f#E f#> #jant E f#> l # a#n> #ln #afnl n#lnft; nl #E hal l finfl#	E ;tEvt t#	. v#> vln#	" ~ #>nfin; #E# v; j}·f#E; af#> i v#

% 779 B na;v;ts. }# j t e ; f B a f i . #				
9 2 # f i e t f a ~ f i f i f e t u n f # % j t v v n f i #	Q < n j v s j # . f ~ ~ v ~ n ; #	S v ~ n j n #	8 n f t f a < u v j # S a f t n t v j t #	" ~ " ' D ' ~ " . # B n f i v j f i #
M f i e t f a ~ # , d P n ; t a } p f . f i v t # % f i v t a ; j n #	l v k } a j n ~ n ; # E " n f 9 f . f n l # m f i f i e # a ; l # f e f i n f # P n f i m n ; # Q n e f i m n # E ' ~ # n f i j n ; # E s t a " a v a i h # ; v f i #			
	% ; i . a } # . E ; v e f i # E # n f i e # u a # h a j u # . v j n f i # e } e > f # f e j n l . f i n f a ; l f i n > . v i n ~ n ; f i f e f i n ; a ; # f i f u e ~ n i . # a n f i n h j t e ; #	% ; i . a } #	. v e > v n #	% j u v n " n h a l v n f i n e # e s h n ; a ; f i e > ; n f i # v i h j j } . f i e ; a f e # ; v f i #
	P n ; # Q t a i v j a t e ; d • : ; # u n h " n ; # u a # u n # i n ; # j e ; # e } h v a t v n # e ; # u n c f " n ~ i n f # ~ " " # a } e # a v j i e # « a f i # m " n f i t a t a n # u n # a f i v j e # e # n ; a j v t t # e j a f i n ; # f a i v j a t e ; # j e ; # e } i # a ; t u a f a f i l ~ n ; # f i f i a . f i n h " v j t e ; # a ; l # e t u n f i n ; a ; # f e t n j t e ; # f i t a n t v f i # u a # f i n s h j # j e ; l v e ; f i ; v . n # e # a f a l n ; a # #	" ~ " ' D ' ~ " . #	. v e > v n #	% f i } p . # e # f a j i # j e ~ « } a v # i f e # n " v j t e ; # e # e # n # a ; l # f i t a i } u h a # i a f n j n t a v j f i # » u v j u # e # . n a f i . f i n # « f e j n f i # e » a f i # f n l . j v t t # u n # i ~ i n f i e # j e ~ « } a v # i f a ; l # n " v j t e ; f i #

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779 B n a i v i t s . } B j t E i l B a f i v . #				
9 2 # M f i e t f a ~ f l # f i # B t u n f # % j t v v n f l #	Q « n j w s j # E ~ ~ v t ~ n i # #	S v ~ n } v i n #	8 n f t f a « u v j # S a f i t n t v i t #	" ~ " ' B ' ~ " E # B n f i v j f l #
	j E . i f i n } t # a i l # n t a # f i n f i v j n f l # v # # v } # j E i t v i . n t v « h ~ n i t v i t # u n # B . f l v t # B n l v a t E i # B f i l v a i j n # » u v j u # E " n f i h n f l # a i l E f i l D n i a i # B v l « . t n f l #	a i i . a } # t u n f i n # a s n f #		
	Á P n i E " v j t E i Q # M f i E t n j t E i f l # l E « # a i l # n t v i # v « h ~ n i t a t E i # E s # n » # i n i E " v j t E i # k f i E t n j t E i f l # i % # . } # ~ " " # . f i h i t # # i n f i n l n i # # H j a i # n # n " v j t n l # l . n # E # i n i E " a t E i # E s # u n # k f i E « n f i t n f l #	" ~ " " #	. v # » v l n #	P n l . j n # j E ~ « } a v i # # E s # i } a » s ' } h " v j t E i # <u>i % # ~ i # i n } a t v n # E #</u> <u>" ~ " " # a f i n } v i n #</u>
M f i e t f a ~ # " # n t u i f f i u f f l # a i l # E ~ ~ . i v # # M f i n f i n f i ' a t E i #	% i i . a } # E i v E f i # . v j l v i t # a i l # i E ~ n # f a } n f l # a j t v v n f l # i u v l E f i v j a } # i l n f D a f i l n # i n t u i f f i u f f l # E # l n i t # a i % # a l " n f i n # # i n i l f i n s # # i n i l f i # l v j a t n # i i f l a i t a } # v l « } a j n ~ n i # a i l # j u a i t n f l # j E ~ ~ . i v # # j u a f a j t n f l # " n f l t a t n # n s n j t v n # n a i f l # u a # j a i # l . « « h ~ n i # h . v l t v t # v # # n s E f i f l #	% i i . a } #	. v # » v l n #	0 n t n f i v i n # u n # a « « f i E « f i a t n # n f i v j # E i j n # n a f l . f l v t # « f i E t f i n f l # E s a v # u E . f l v t # f a j t v j n f l # v # n f i t a i } f i u n l # i # " ~ " " # v a # u n # t E a } # E s a j u v n " v i t # f i n l . j n l # l v l « } a j n ~ n i # # E # # <u>" ~ i # i n } a t v n # E # u n #</u>

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F - 9 6 C I T Y O F P A S A D E N A | H O U S I N G E L E M E N T

Affirmatively Furthering Fair Housing

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HCD Comments and Responses

HCD COMMENT	RESPONSE
<u>1. Local Data and Knowledge:</u> As noted in the prior review, the element must provide more evidence of outreach conducted for affirmatively furthering fair housing (AFFH) and show how that local data is integrated into the overall AFFH analysis. The element now provides additional explanation of how outreach was conducted relative to AFFH but must still integrate that outreach into the overall AFFH analysis and add or modify programs as appropriate.	Pages F-3 and F-4 of Appendix F (Affirmatively Furthering Fair Housing) describe the primary AFFH concerns heard from the community and lists the policies and programs that are directly responsive to those community concerns.
<u>Other Relevant Factors:</u> The prior review found the element should provide more information on City's local preference policy and should also discuss the impacts of this policy on housing mobility and patterns of segregation within the City. In response, the element now generally describes the objectives of the policies, and that the policy only reserves a small number of inclusionary units, minimizing the impact of the policy on patterns of segregation. The element should provide additional information and evaluation to support this conclusion. Please see HCD's prior review for additional information.	Modifications have been made to pages F-61 to F-63 in Appendix F in response to this comment. In particular, it provides data regarding the ethnicity of those residing in the City's affordable housing projects, which indicates that the majority of residents are households of color, with a broad range of ethnicities represented.
<u>Goals, Actions, Metrics, and Milestones:</u> Based on the outcomes of a complete analysis, the element should add or modify action to be significant and meaningful to overcome patterns of segregation and foster more inclusive communities, including specific commitment, metrics and milestones as appropriate.	<p>The City has added an objective to Program #20, Fair Housing, indicating that the City will evaluate and revise its local preference policy to ensure that the intended objectives are met and that the policy does not have unintended consequences of perpetuating segregation or excluding households with children or with other protected characteristics.</p> <p>Commitments, metrics, and milestones have been added to this program.</p>
<u>2. Realistic Capacity:</u> HCD prior review found residential capacity assumptions must account for the likelihood of 100 percent nonresidential uses. In response,	Appendix C has been modified to provide further evidence that sites that may be developed for 100

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<p>the element now explains that 50 percent of the permits in the CL and CO zones have been issued permits for residential or mixed-use development and the remaining permits were mainly modifications to existing building. However, the element should clarify how many of the remaining 100 percent nonresidential permits were new developments and account for that likelihood in the calculation of residential capacity or add or modify programs as appropriate to promote certainty for residential development in these nonresidential zones.</p>	<p>percent commercial use have experienced significant residential development. In particular, it has analyzed those projects that have redeveloped to residential use and identified 11 factors that seem to predict conversion to residential use. Rather than consider all the sites in these zones and then reduce the site capacity, the City has selected from these zones only the sites that are most likely to redevelop, selecting only 4% of the sites with appropriate zoning. This may underestimate the City's residential capacity. As described on pages C-27 to C-28, the City has received inquiries regarding residential development on at least 8 sites that are not even listed in the site inventory.</p>
<p><u>Suitability of Nonvacant Sites:</u> HCD's prior review found the element must 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. In response the element contains adequate analysis related to underutilized residential sites and explains and lists various factors for sites to meet the lower Regional Housing Needs Allocation (RHNA). If needed to accommodate the RHNA, this analysis must be extended to the moderate and above moderate RHNA. In addition, the element should provide supporting information for the validity of these factors such as recent development trends and should provide evaluation of the extent existing uses impede additional development, including addressing public comments on existing uses.</p>	<p>Appendix C has been extensively modified to show recent developments, development trends, and market conditions and to determine the factors that predict conversion to residential use. Pages C-14 and C-15 list the 11 criteria used to designate non-vacant sites. Table C-3 shows how those factors were applicable to sites that converted to residential use. Pages C-27 to C-28 list additional residential development inquiries that the City has received regarding sites not listed in the inventory. The site inventory now lists which of the 11 criteria is applicable to each site.</p> <p>The City has addressed in a separate document the public comments on existing uses.</p>
<p>As noted in the prior review, absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional</p>	<p>The City's adoption resolution contained the required findings. The Community Development</p>

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residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA. While Resolution Number 9935 contains the findings, any future re-adoption of the element should adjust findings, as appropriate, based on a complete analysis.	Department has the authority to make non-substantive changes to the Element. Because no additional sites are needed, the Element will not need to be readopted.
<u>Electronic Site Inventory</u> : 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 re-adopted versions of the element must also submit the electronic version of the sites inventory.	The electronic inventory will be attached to the City's formal re-submittal.
<u>Programs</u> : As noted above, 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.	As described above, the City's additional review demonstrated that the existing site inventory is adequate.
In addition, as noted in the prior review, 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 one or three years (Please note timing provisions described below). The element now clarifies which sites were identified in prior planning periods and appears to include Program 23 to amend zoning to create a separate design review process for recycled sites. However, Program 23 should include specific commitment to zone prior identified sites at appropriate densities and allow residential use by-right (without discretionary action) for housing developments in which at least 20 percent of the units are affordable to lower-income households pursuant to Government Code section 65583.2, subdivision (c).	Program 23 has been modified as suggested by HCD to state that the City will adopt by-right zoning for sites used in prior housing elements, and will review projects on these sites 'by right' until the ordinance is adopted.
Based on this analysis, the element should add or modify programs. Programs should include a schedule of actions to facilitate development in the planning	Additional timelines and commitments have been added to many of the housing element programs.

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<p>period in stride with assumptions in the inventory such as numerical objectives, compliance with the Surplus Land Act, outreach with developers or property owners, removing barriers to development, issuing requests for proposals, incentives, fee waivers, priority processing and financial assistance.</p>	
<p>3. <u>Special Needs</u>. HCD's prior reviews found the element quantifies some special housing needs but include analysis including, but not limited to, factors such as trends, household income, tenure, housing types, zoning, and available resources. The reviews also found 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. In response, the element now identifies 512 unhoused persons and makes a brief statement about disproportionate impacts on some protected characteristics. However, the element largely was not revised to address HCD's finding and still must include a complete analysis. Based on the outcomes of that analysis, the element should add or modify programs as appropriate.</p>	<p>Appendix A has been extensively revised to review trends, tenure, housing types, and available resources for special needs groups, in particular persons with disability by type, elderly households by tenure, farmworkers (to the extent that data is available), and characteristics of persons experiencing homeless. Please see pages A-10 to A-18.</p>
<p>4. <u>Programs</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.</p>	<p>Specific timelines have been added to these programs.</p>
<p>5. <u>Constraints</u>. The element now describes various constraints on housing such as parking requirements, approval findings and development standards on emergency shelters (e.g., bed limits and parking) and includes ambiguous commitment to address those constraints. However, programs must be revised with specific commitment and discrete timelines early enough in the planning period to have a beneficial impact on the goals and objectives of the housing element.</p>	<p>See response to comments on Programs 10 and 23. Specific timelines and commitments have been added to other programs as well.</p>
<p><i>Program 10 (Regulatory Incentives)</i>: The element (p. B-18) notes parking requirements will be relaxed to a more appropriate sliding scale and pursuant</p>	<p>Program 10 has been revised to include revisions to the zoning code as well as to specific plans and</p>

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<p>to SB 2097 as part of specific plan and zoning code updates. In response, Program 10 commits to targeted parking reductions only in specific plans based on a combination of uses and other factors – An ambiguous commitment. However, the element should include specific commitment with discrete timelines early in the planning period as described on page B-18. In addition, multifamily parking requirements of two covered spaces for greater than 650 square feet is a constraint. The element should include specific commitment with discrete timelines to address the constraint City-wide.</p>	<p>includes a specific commitment to reduce parking standards to those based on number of bedrooms rather than unit size in 2024.</p>
<p><i>Program 23 (Zoning Code Updates).</i> The Program commits to amend zoning with objective design standards and emergency shelters regulations to reflect “reasonable” parking requirements. Instead, the program should specifically commit to address the approval findings as a constraint and limit or modify decision making criteria which may include objective design and development standards. In addition, the Program should specifically commit to increase bed limits (e.g., 50 or more beds) and revise parking requirements in compliance with state law (e.g., limited to staff).</p>	<p>Program 23 has been revised to include a commitment to address approval findings as a constraint, to modify the parking standards for emergency shelters to meet state law, and to increase bed limits, with completion by 2024.</p>

The August 18, 2022 Pasadena Affordable Housing Coalition (PAHC) letter identifies a number of criticisms of the Sites Inventory, specifically:

Here we suffice to say that the current sites inventory places big bets on highly questionable sites, such as these below:

Address	Current Use	Zoned Density	Units (Lower)	Units (Mod)	Units (Above Mod)
3701 E. Foothill Blvd.	Whole Foods Market, Starbucks, Wells Fargo Bank, The Habit, Vroman's Bookstore	48 w/ CUP	268	0	0
3801 E. Foothill Blvd.	Sears (closed), HomeGoods	48 w/ CUP	358	0	0
1247-1329 N. Lake Ave.	Food4Less, Pizza Hut, Subway, WingStop	32	141	0	0

Reviewing Pasadena's 5th cycle and current history of applications and constructed projects, there are multiple reasons why these capacities are non-realistic:

- No projects have been built on multi-tenant community centers (the largest center intended to be replaced is one with Del Taco as the anchor, and it is in an 87 du/ac zone)*
- No supermarkets have been redeveloped*
- No projects have been built with over 69 affordable housing units (one is currently proposed for 111 units, but both are on City-owned land).*

It is important to note the City's strong recent record of redevelopment of existing surface parking lots and either taking advantage of recent parking reductions or developing subterranean parking to replace the surface parking spaces. Several projects in Pasadena involve this development approach, in which the existing buildings that the parking lots serve will remain; the required parking for the existing use is incorporated into the new development. In addition to the Parsons site described above, examples include:

- 75 Holly St, known as the Parsons project, involved building a mixed use project on the large surface parking portion of the site, while retaining the existing 12-story office building
- 388 Cordova, which involved conversion of an existing office building to residential uses and wrapping the existing parking structure with new units
- 535 E. Union, being built on the parking lots for Pasadena Presbyterian Church
- 3452-3488 E. Foothill, which involves building 233 apartments on the lot serving the flagship Panda restaurant and the 11-story office building on site, which are both proposed to be retained.

In addition to meeting the factors for redevelopment into housing in the Housing Element's factor analysis, these sites have additional factors that support their redevelopment.

Additionally, there is no CUP requirement to develop the properties at 3701 E. Foothill Blvd. and 3801 E. Foothill Blvd. with housing.

- 3701 E Foothill Blvd. is within ½ mile of the Sierra Madre Villa L-Line station, meaning that it is eligible for the TOD parking reduction in the City's Zoning Code, as well as the reductions in AB 2097. Further, the site has two large surface parking areas, one in the front of the commercial structure and one behind it. The surface parking lot to the rear of the existing building is particularly suited to be redeveloped into housing, as it has existing frontage on Rosemead Boulevard, Hastings Ranch Drive and Sears Way.
- 3801 E Foothill Blvd is the site of a recently closed Sears building and has been the subject of a number of developer inquiries just before the retail store's closure as well as after it was closed. The property owner submitted a letter to the City requesting a 64 du/ac residential density in the updated East Pasadena Specific Plan. The building currently is mostly vacant, with a single tenant taking up a portion of the first floor.
- 1247-1239 N. Lake Ave. is a similar retail center with a grocery store as an anchor. This site has a large field of surface parking and zoning that supports multi-family development. A density bonus project on this site would be eligible for a base density of 87 du/ac, so the 32 du/ac is a conservative approach to the site's density.

"Furthermore, the City has not taken into account the likelihood of nonresidential development. It makes some very broad arguments to dismiss nonresidential development, but in reality nonresidential development does occur in Pasadena – a few examples would be recently constructed and entitled medical office buildings on Fair Oaks Avenue, a new Kaiser Permanente medical school, and a new ground-up suburban grocery store in the East Pasadena Specific Plan. The inventory must reduce capacities by the historical likelihood of nonresidential development."

The revised Resources section addresses the likelihood of nonresidential development in greater detail. The selected sites have been chosen for their specific characteristics that they share with sites that have been redeveloped with housing. Of the examples stated, the medical office buildings on Fair Oaks Avenue were all permitted and entitled when the South Fair Oaks Specific Plan did not allow housing at those location. The Kaiser Permanente Medical School is an example of non-residential development and is accounted for on the Housing Element analysis. The newly opened grocery store that is referenced (Amazon Fresh, 3425 E Colorado Blvd.) is not a new ground-up grocery store, it is a change of use from a home improvement store that closed recently (OSH).

Another blatant example of the City's unrealistic Inventory analysis is the project under consideration for 444 N. Fair Oaks. While listing 206 units on the Inventory, City staff recommended to the Planning Commission at the August 10, 2022 meeting that the density be reduced by 37 units, with a proportionate 20% reduction in the projected 32 units of affordable housing in the project.

The project remains proposed at the density identified in the sites inventory. Additionally, the staff recommendation will no longer include a reduction in density for this project.

The August 27, 2021 PAHC letter also identifies a number of criticisms of the Sites Inventory, specifically:

To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain officially designated historic buildings are not included.” Beyond these statements the City makes no attempt to provide substantial evidence that these non-vacant sites will realistically be developed for low-income housing over the next eight years. In fact, many of these sites violate these guidelines, making dubious assumptions about properties that are actually highly unlikely to be redeveloped:

- *It assumes that many productive, occupied and even high-FAR commercial uses will be replaced by housing, often housing built at only 32 dwelling units per acre. Examples include:*
 - *There are many examples of two-story office buildings that are supposed to be replaced with housing as low as two stories (the height limit for a 32 dwelling unit per acre development). These include buildings such as 200 E. Del Mar Ave and 1010 E. Union St, which have high FAR and subterranean parking, and some of which have a strong attachment to the community.*
 - *The Element supposes the replacement of community-oriented shopping centers into housing, despite a lack of any track record to the contrary. Examples of shopping centers to be replaced include:*
 - *1329 N. Lake Ave. – This shopping center hosts the only supermarket in a mile radius (Food4Less), pharmacy and inline shops. The property is only zoned for 32 dwelling units per acre.*
 - *3701 E. Foothill Blvd. – This popular shopping center includes Whole Foods Market, Starbucks and The Habit Burger Grill. The entire 6.21-acre site is assumed for housing at 48 du/ac. Any project here will probably require a CUP if commercial uses remain on-site.*
 - *The Element supposes that motels (likely profitable in non-pandemic times) will be converted to housing. While the most common way for this to happen is through adaptive reuse into permanent supportive housing, the City’s only proposed project of this type was killed by neighborhood opposition.*
- *Capacity assumptions in excess of what would be allowed by-right on parcels have been made for projects which have not been approved, or which are even dead. While 488 E. Villa St. allows 77 units at its zoned density of 32 du/ac, a project proposal was made for a 227-unit market rate development. The project was then subsequently dropped, yet the Element now credits the site with 227 lower-income units, at nearly three times the legal density.*
- *The inventory contains properties which may have historic value. Historic preservation is very important to Pasadena, and projects which involve the demolition of historic buildings, even if undesignated, are unlikely to proceed. An example is 300 S. Raymond Ave., which is comprised of two buildings: a very successful brewery (Congregation Ale House), made of brick, and an office building, made of stucco, which was restored and now occupied by Hartman Baldwin, a historic preservation architecture firm.*
- *The inventory assumes the replacement of existing, naturally occurring affordable multifamily housing stock. Examples include:*

- *1305 N. Garfield Ave. – This is currently the site of 24 housing units, and the Element claims credit for a potential 17-unit development which would decrease housing.*
- *363 E. Washington Blvd. – The Element assumes the replacement of 8 housing units with 12 new units.*
- *740 E. Green Street – This is a 0.46-acre site with a maximum zoned capacity of 60 units per acre. The maximum legal capacity is 27 units and the claimed capacity of this site in the draft housing element is 273 units.*

These comments refer to the Housing Element that has been iteratively revised since the version that was reviewed in August 2021. Additionally, the most recent version includes a factor analysis and a substantial amount of documentation supporting the factors and trends that the sites inventory is based on.

- 200 E. Del Mar Ave. & 1010 E. Union St. – both sites are two-story office buildings constructed in the early 1980's, less than 1.0 FAR, and low building to land value. They fit the demonstrated profile for redevelopment as housing sites.
- 1329 N Lake Ave. and 3701 E. Foothill Blvd. have been addressed above.
- 488 E. Villa St. – while the developer is no longer pursuing the proposed project, the application remains open at the request of the property owner, and the property owner has communicated a desire to pursue a similar project at the same density. With the changes in AB 2334, the project could utilize density bonus provisions to achieve the identified density, and would no longer need a Planned Development application.
- 300 N. Raymond Ave. – the 1906 building on this site has been surveyed and determined to be ineligible for city listing or historic designation.
- 1305 N. Garfield Ave. – this comment is accurate and the site has been removed.
- 363 E. Washington Blvd. – this site has common ownership with an adjacent site at 373 E. Washington Blvd. and the inventory lists both in order to achieve the increase of 12 units.
- 740 E. Green St. – the City has an active application that includes this site as well as an assemblage of other sites located at 770 and 790 E. Green St., 106 and 118 S Oak Knoll Ave., and 111 S. Hudson Ave. – which is reflected in the Housing Element. The proposed project includes 273 units.