



Pro Housing Pomona

*An Update to the Housing Element of the Pomona General Plan
for the Sixth Cycle, 2021 to 2029*





Acknowledgements

Mayor and City Council

- ▶ Mayor Tim Sandoval
- ▶ Vice-Mayor Steve Lustro
- ▶ Councilmember John Nolte
- ▶ Councilmember Victor Preciado
- ▶ Councilmember Nora Garcia
- ▶ Councilmember Elizabeth Ontiveros-Cole
- ▶ Councilmember Robert S. Torres

Planning Commission

- ▶ Chair Alfredo Camacho
- ▶ Vice-Chair Kristie Kercheval
- ▶ Commissioner Yesenia Miranda Meza
- ▶ Commissioner Gwen Urey
- ▶ Commissioner Carlos Gomez
- ▶ Commissioner Ron VanderMolen
- ▶ Commissioner Kyle Brown

City Manager

- ▶ James Makshanoff

Development Services & Planning Division Staff

- ▶ Anita D. Gutierrez, AICP
- ▶ Ata Khan
- ▶ Geoffrey Starns, AICP, LEED AP BD+C
- ▶ Vinny Tam, AICP
- ▶ Alex Jimenez
- ▶ Alina Barron
- ▶ Lynda Lara
- ▶ Alan Fortune
- ▶ Carlos Molina
- ▶ Lina Do
- ▶ Zully Villegas

Pomona Housing Authority & Housing Services Staff

- ▶ Benita DeFrank
- ▶ Beverly Johnson
- ▶ George Montano
- ▶ Donyielle Holley
- ▶ Maria Siacunco

Kimley-Horn Staff

- ▶ Dave Barquist, AICP
- ▶ Molly Mendoza, AICP
- ▶ Ines Galmiche
- ▶ Erik Mumm
- ▶ Clara Eddy
- ▶ Bryant de la Torre



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Introduction

The “Housing Crisis,” which means housing availability and affordability, is one of the biggest challenges facing communities across the State of California, including the City of Pomona. This document discusses what that specifically means for Pomona at a policy and program level, accounting for State mandates, existing constraints, and the unique attributes of being an urban City with a majority Hispanic/Latino population, with a disproportionately high number of households with below moderate-income levels, and the fifth highest Regional Housing Needs Assessment allocation in Los Angeles County.

Pomona is committed to supporting the production of quality, affordable housing across all economic strata, as evidenced by recent policies, streamlining efforts, and pursuit of the State’s Pro Housing designation. Pomona’s focus over the next eight years will be to provide both the policy framework and regulatory mechanisms to encourage a range of quality, affordable housing options to meet our State-mandated goals, support our existing residents in their housing needs, and accommodate future population growth.

What is the purpose of this document?

The purpose of this document is twofold. First, to function as the City’s **“Housing Element”** that fully complies with State law. Second, to establish Pomona’s vision for **“Pro Housing Pomona.”**

What is a “Housing Element?”

The Housing Element is one of the seven State mandated elements included in the City of Pomona’s General Plan. The purpose of the Housing Element is to identify and plan for the City’s existing and projected housing needs; it contains a detailed outline and work program of the City’s goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. Each eight-year planning cycle, the City is allocated a specific number of housing units through the Regional Housing Needs Allocation (RHNA). The RHNA quantifies current and future housing growth within a city and allows for synchronization with the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS). Through research and analysis, the Housing Element identifies available candidate housing sites and establishes the City’s official housing policies and programs to accommodate the City of Pomona’s RHNA as determined by the Southern California Association of Governments (SCAG). The RHNA allocation given to each jurisdiction intends to accomplish the following:

- ▶ Increase the housing supply and the mix of housing types, tenure (rental or ownership), and affordability in all cities and counties within the region in an equitable manner.
- ▶ Promote infill development and socioeconomic equity, the protection of environmental and agricultural resources, and the encouragement of efficient development patterns.
- ▶ Promote an improved intraregional relationship between jobs and housing.

What is the RHNA for Pomona?

The California Department of Housing and Community Development (HCD) established the planning period for the current 6th Cycle RHNA from October 15, 2021 to October 15, 2029. For the 2021-2029 planning period the City is allocated a total of 10,558 units, including 2,799 units affordable to very low-income households, 1,339 units affordable to low-income, 1,510 units affordable to moderate-income, and 4,910 units affordable to above-moderate (market-rate) income households.



What does “Pro Housing Pomona” mean?

“Pro Housing” is a specific term defined by State law that is intended to give cities like Pomona a clear pathway to establish housing policy that addresses Statewide housing needs. Cities designated “pro housing” by the State receive priority on grant funding applications.

Pro Housing Pomona is based on the following ten action steps:

1. *Establish financial incentives for housing, including a housing trust fund.*
2. *Improve development standards to reduce barriers to on-site housing production.*
3. *Allow residential land uses by-right.*
4. *Maximize zoning density for residential units.*
5. *Streamline the production of accessory dwelling units and duplexes.*
6. *Improve permit processes to reduce time and cost for housing construction.*
7. *Establish objective design standards and pre-approved site plans for housing permits.*
8. *Establish development standards for affordability, choice, and equity, including inclusionary housing.*
9. *Develop a Housing Element with policies that are pro-housing and anti-racist.*
10. *Engage the public, including advocacy groups and State, County, and local partners, early and often.*

Who is this document for?

- ▶ **Pomona Residents.** The housing policy contained in this document is intended to benefit all residents of Pomona. It is imperative that the City write a document that not only meets the technical requirements of State Agency and City Official audiences, but that can be plainly and easily understood by the community. To that end, the format of this document has been intentionally framed to walk readers through the housing policy process, providing definitions of terms, frequently asked questions, and key findings. The goal is to enable residents to advocate for or provide constructive criticism of the housing policies shaping their households.
- ▶ **Housing Stakeholders.** Housing policy involves multiple groups and individuals working together towards a common goal. This may include non-profit organizations, housing developers, architects, engineers, community-based organizations, and local public and private institutions. This document contains information that can benefit all of these stakeholders, by providing a clear sense of Pomona’s position on housing policy, housing needs determined from surveying and data analysis, and sharing a housing inventory.
- ▶ **State Agency.** The agency responsible for administering State laws related to housing is called the California Department of Housing and Community Development, or HCD. HCD will review this document for consistency against Government Code statutes contained in the California Code of Codes, and to determine if the City of Pomona can defensibly and adequately meet its RHNA allocation. The consistency analysis is contained in **Appendix F: Consistency Check**. The RHNA analysis is contained in Section 3: Housing Resources and **Appendix C: Housing Resources & Inventory**.
- ▶ **City Officials.** Any element of the Pomona General Plan must go through a General Plan Amendment if changed. Since the Housing Element is updated every eight years, it requires a General Plan Amendment adopted by the Pomona City Council. In adopting this document, the City Council will also review for consistency against other elements of the General Plan and its own Council Goals and Priorities. This consistency analysis is contained in **Appendix F: Consistency Check**. Beyond adoption,



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this document serves as the definitive Pomona housing policy guide through 2028 for city officials to use in conversations related to housing.

How was this document developed?

The Housing Element uses a robust set of data and information to understand current housing needs, potential housing opportunity and access challenges and housing development barriers or challenges. US Census data, American community survey data and Economic and Employment data provide a foundational understanding of existing housing conditions and needs in Pomona. Data from the City's Assessment of Fair Housing, UC Berkeley's Urban Displacement project, UC Davis' Center for Regional Change data and other regional and state data develop a deeper understanding of fair housing issues in the City. Additionally, local sources such as the City's municipal code, local ordinance, the City's General Plan and General Plan Elements all support an analysis of potential development challenges or opportunities in Pomona. A complete list of data sources used in this document can be found in **Appendix F: Consistency Check**.

In addition to local, state and federal data, the community of Pomona was a vital partner in understanding key issues and challenges and providing input on program opportunities to address such concerns. During the Housing Element Updated process, the City hosted multiple community workshops, provided print and online surveys, and gathered stakeholder and community members together to understand the community's key concerns about housing. The input and feedback received was developed into *Section 1: Housing Needs Assessment*. Additionally, feedback and input received from the community shaped the programs developed in **Section 5: The Plan for Pro Housing Pomona**.

How is this document organized?

This document meets the two purposes of State compliance and establishing Pro Housing Pomona through the following five sections. All evidence and consistency checks are contained in the Appendices for those readers seeking to review the full City analysis.

Section 1. Housing Needs Assessment

This involves analyzing public data to find unique housing needs in Pomona. It also involves engaging the Pomona community to learn directly from residents about their housing needs. Supportive Evidence for Key Findings in Section 1 can be found in **Appendix A-Housing Needs Assessment**.

Section 2. Existing Housing Constraints

Once the City understands housing needs, it identifies all of the existing barriers that may prevent it from addressing these needs. Barriers can be governmental, such as permitting processes and City codes, or non-governmental, such as housing market forces. Ideally, these barriers can be removed over the next eight years. Supportive Evidence for Key Findings in Section 2 can be found in **Appendix B-Existing Housing Constraints**.

Section 3. Existing Housing Resources

The City identifies all of the existing resources at its disposal to help address identified housing needs. These resources can be existing Pomona Housing Authority programs and subsidies, the Pomona General



Plan encouraging housing growth, an existing suitable inventory of land to accommodate housing needs, and housing-forward rules and regulations. Ideally, these resources are strengthened and deepened over the next eight years. Supportive Evidence for Key Findings in Section 3 can be found in **Appendix C-Existing Housing Resources**.

Section 4. Affirmatively Furthering Fair Housing

State law recently mandated that cities updating Housing Elements analyze fair housing within the context of their population. This law, known as Affirmatively Furthering Fair Housing, was also previously adopted as a Federal rule in 2016. The City of Pomona published a comprehensive AFFH document in 2017. Supportive Evidence for Key Findings in Section 4 can be found in **Appendix D-Affirmatively Furthering Fair Housing**.

Section 5. The Plan for Pro Housing Pomona

After evaluating Sections 1 through 4, the City establishes an eight-year plan and vision for meeting all housing needs, removing barriers, and strengthening resources, which establishes Pro Housing Pomona. This plan includes goals, policies, and programs that will be adopted by the City Council and certified by HCD.

Appendices: Consistency & Supportive Evidence

As a final measure, the City holds the plan up against State law, the Pomona General Plan, City Council goals and priorities, and the Pomona Housing Authority's Strategic Plans to make sure it's consistent with laws and existing City policies. Furthermore, all support evidence, such as publicly available data sets that have been analyzed, are included in respective appendices.



SECTION 1

HOUSING NEEDS ASSESSMENT

This section contains the key findings after conducting a housing needs assessment through both data analysis and community participation and engagement. The findings are the result of analyzing publicly available data for population, employment, housing stock, and affordability trends, and analyzing the results of surveying and outreach conducted by the City on housing needs.

Additional supportive evidence can be found in **Appendix A.1: Housing Needs Assessment** and **A.2 Community Engagement Summary**.



Pomona has unique housing challenges for its population.

The Housing Needs Assessment begins with understanding the makeup of Pomona's population and the population trends observed in publicly available data. From this data, four trends emerge.

Expected population growth in Pomona

Pomona's population is expected to significantly increase over the next 20 years. There are two important points of data that provide insight on Pomona's population trends.

- ▶ **U.S. Census.** The U.S. Census forecasts that the City of Pomona's population will increase from 160,800 residents in 2020 to 190,400 in 2040, an increase of approximately 30,000 residents.
- ▶ **RHNA Allocation.** The State's Regional Housing Needs Assessment (RHNA) allocation to Pomona is 10,558 housing units for the planning period from 2021 to 2028. This allocation is based upon a methodology that considers a City's existing built environment and its ability to grow around public transit stations and public transit priority areas to make the most efficient use of land. While this projection is not for population, it is important to consider against Pomona's average household size to better understand how this allocation may or may not accelerate the population growth projected by the U.S. Census, or create displacement risks for existing households from increased development pressure.

From this baseline population and unit projection data, the City evaluated additional notable population trends.

Aging population, declining youth population

Pomona's population is aging, while its youth population is declining. The number of young adults in Pomona under the age of 19 continues to decline year over year, representing 35.2 percent of the population in 2010 to 29 percent in 2019. Meanwhile, the population over the age of 50 increased from 21 percent in 2010 to 27.1 percent in 2019. The declining youth population is reflected in declining enrollment at Pomona Unified School District schools, which has seen a steady decline in new students. This may be attributable to declining birth rates within certain census tracts of Pomona, though the City has not yet analyzed for a correlation between these two variables. The average age of a City's population is relevant in determining housing type necessities.

Changing Racial Demographics

From 2010 to 2019, Pomona's racial demographics have shifted. The Black or African American population has been steadily decreasing (a 2.6 percent total decrease), while the Asian and American Indian/Alaska Native populations have increased from 7.8 percent to 10.2 percent and 0.7 percent to 2.4 percent, respectively. The White population remained relatively similar from 47.9 percent to 47.5 percent.

High rate of Latino and Hispanic households

The majority of Pomona's population is Hispanic or Latino of any race. More than 7 out of 10 residents in Pomona identify as Hispanic or Latino, which is among the highest rates in Los Angeles County. The City of Pomona has a much greater population of individuals identifying as Hispanic or Latino than Los Angeles County at 71.7 percent compared to the County's 48.5 percent. The high percentage of Hispanic or Latinos in Pomona requires a better understanding of the nuances within the definition of Hispanic or Latino, the unique housing needs facing Hispanic or Latino households, and the risks these households face with increased housing growth in Pomona. As will be discussed, one immediate need within Hispanic or Latino households is supporting multiple generations living together.



Why does this document use the term “Hispanic or Latino?”

The United States Census Bureau uses the term “Hispanic or Latino” to refer to a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race. This term is not a “race” but is used in statistical counts as an aggregate term to include all persons of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish origin. The primary reason to use this term is for ease of data analysis, as a significant amount of publicly available data studied in this document is based on this definition. The use of Hispanic or Latino is not intended to negate or diminish the value of any other gender-neutral, pan-ethnic terminology used as a self-identifier.

High rate of college students and recent graduates

Pomona has a significant population of college students and recent graduates. Pomona is served by multiple local collegiate institutions, including California State Polytechnic University of Pomona (Cal Poly Pomona), Western University of Health Sciences, and institutions in neighboring cities including University of La Verne and the Claremont Colleges. Based on 2019 data, there are approximately 16,183 Pomona residents enrolled in college or graduate school. Students may seek shared housing situations to decrease expenses and can be assisted through roommate referral services offered on and off campus. While college graduates provide a specialized pool of skilled labor that is vital to the economy, a lack of affordable housing may lead to their departure from Pomona post-graduation.

Pomona's households are increasingly female-headed, non-family, large, and multi-generational.

After analyzing population trends, the Housing Needs Assessment analyzed data about Pomona’s households. Four more trends emerged.

Household income levels are low

The median household income in Pomona is \$60,598, which is \$7,446 below Los Angeles County’s median household income of \$68,044. The U.S. Department of Housing and Urban Development (HUD) sets income categories based on Median Family Income, or MFI. Based on these income categories, nearly two out of three households (61.9 percent) in Pomona are considered lower income and depending on housing prices in the City, may not be able to afford housing within the immediate area.



How is Household income defined and used??

According to the U.S. Census, “a **family** consists of two or more people (one of whom is the householder) related by birth, marriage, or adoption residing in the same housing unit. A **household** consists of all people who occupy a housing unit regardless of relationship. A household may consist of a person living alone or multiple unrelated individuals or families living together.”

- ▶ **Median Household Income.** This data is sourced from the American Community Survey of the U.S. Census.
- ▶ **Median Family Income (MFI).** Also known as “HUD Area Median Family Income (HAMFI)” or “Area Median Income (AMI),” this is the median family income calculated by HUD for each jurisdiction, in order to determine Fair Market Rents (FMRs) and income limits for HUD programs. MFI will not necessarily be the same as other calculations of median incomes (such as a simple Census number in the Median Household Income), due to a series of adjustments that are made. This custom data set is known as Comprehensive Housing Affordability Strategy, or CHAS.

High rates of female-headed households

Nearly one out of five households in Pomona (19.2%) are headed by a single female parent. This household type has needs that may not be readily available including access to high quality day care and access to common open space to recreate easily. In addition, female-headed households in particular face income inequalities present in workplaces. Pomona’s single-parent female households face poverty levels twice as high as the Los Angeles County average.

High rates of non-family households

More than one out of five households in Pomona (23.2) percent represent non-family households, which is defined as unrelated people living in one housing unit, such as people living alone, roommates, partners or couples cohabitating. This household type may have an increased need for private open space to enable individual privacy within a shared living arrangement. In single-unit neighborhoods, zoning may further constrain the ability to enable amenities that may otherwise be allowed for multi-unit households to help satisfy higher demand. Non-family households may also face structural constraints in qualifying for financial support as their needs may not be adequately captured by metrics such as Median Family Income or assumptions of non-family households as non-owners.

Large, multi-generational households

The size of Pomona households is also large. 26 percent of Pomona households are considered “large,” which is defined as 5 or more individuals per household. The average household size in 2019 was 3.77, which is almost one person per household more than the Los Angeles County average. Many of these households are also considered “overcrowded,” which is defined as more than one person living per room within a house. 31.3 percent of households are considered overcrowded, compared to 21.8 percent in Los Angeles County. Two out of every three of these overcrowded households are renters as opposed to homeowners. Overcrowding may be attributed to three reasons:

- ▶ **Financial Necessity.** Overcrowding may be the result of a lack of affordability, with an individual family member being unable to seek independent living due to cost burden.
- ▶ **Cultural Preference.** Overcrowding data does not consider the cultural relevance of multi-generational households. A multi-generational household is defined as including two or more adult generations, or including grandparents and grandchildren younger than 25, in the same household.



There is often cultural preference to live multi-generationally, however the City's existing housing stock may not provide units to accommodate these preferences in addition to affordability. Therefore, overcrowding may occur due to multigenerational households.

- ▶ **Zoning Limitations.** Overcrowding may reflect zoning regulations that do not enable the expansion of living area on a property or adding rooms to reduce overcrowding. Recent local and State legislation on accessory dwelling units, or ADUs, have significantly addressed this zoning limitation, though there may be additional zoning constraints that need to be addressed, which are discussed in more detail in **Section 2: Existing Housing Constraints**.

These differing reasons require further analysis by the City in order to determine housing type needs, respective programs, and policy change.

What does “multi-generational” household mean?

A multi-generational household is defined as including two or more adult generations, or including grandparents and grandchildren younger than 25, in the same household.

Housing needs to address disabilities, extreme poverty, and homelessness.

As part of its analysis of special needs groups, the City identified various housing challenges for persons with disabilities, those experiencing extreme poverty, and the homeless.

- ▶ **Physical Disability.** Ambulatory difficulty is the most widespread physical disability in Pomona. Ambulatory difficulties relate to issues with walking and movement. Approximately 52 percent of Pomona's disabled population have ambulatory difficulty. This represents 5.7 percent of the total population of Pomona.
- ▶ **Developmental Disability.** Of the 15,393 individuals with developmental disabilities assisted by San Gabriel/Pomona Regional Center in 2019/2020, the majority were diagnosed with an intellectual disability (43.4 percent).

The design of housing-accessibility modifications, the proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving the needs of this group. Incorporating 'barrier-free' design in all, new multi-family housing (as required by California and Federal Fair Housing laws) is especially important to provide the widest range of choices for residents with disabilities. Special consideration should also be given to the affordability of housing, as people with disabilities may be living on a fixed income.

- ▶ **Extreme Poverty.** Extremely low-income households are those households which earn less than 30 percent of the Median Family Income. There are approximately 8,300 extremely low-income households in Pomona (renters and owners). Of these households, 6,970 are experiencing at least one defined “housing problem,” which includes incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or a cost burden greater than 30%.
- ▶ **Homelessness.** HUD defines persons who are experiencing homelessness as those who are living in a place not meant for human habitation (such as a car), in a shelter, transitional housing or are exiting an institution where they are temporarily residing. Homelessness affected a total of 45,039 persons in the County of Los Angeles in 2018 and rose to 54,291 persons in 2020. Increases in the number of people experiencing homelessness or housing insecurity may increase due to availability of income,



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increase in housing costs, unexpected expenses or external factors which exacerbate such insecurities. In 2020, a total of **722** persons were identified as experiencing homelessness in Pomona.

Additionally, community engagement and community participation revealed that residents saw an increase need to support housing opportunities for special needs groups, low and extremely low-income households, as well as for persons who experience homelessness and housing insecurities. A total of 20 percent of a survey respondent noted that the City should prioritize unhoused persons, followed 18 percent who identified seniors as a priority a 15 percent who identified persons with disabilities.

Employment trends reveal middle-income housing needs.

In addition to household data, the Housing Needs Assessment analyzed employment trends within Pomona and the region and its relationship to housing affordability.

Pomona's workforce has changed significantly over the past decade. The Manufacturing and Retail industry declined from 17.36 percent to 11.9 percent from 2010 to 2019. At the same time, the Professional, Scientific, Management, and Administrative Services industry increased by 34.3 percent, and Arts, Entertainment, Recreation, Accommodation, and Food Services increased from 8.5 percent to 10.7 percent. The largest employment sector currently is Education Services, Health Care, and Social Assistance, representing 18.8 percent of the Pomona workforce. Workforce data is important to study as it correlates to household affordability. The mean salary for jobs in industries that are increasingly represented in Pomona may fall within the range known as "moderate income," which is 80 to 120 percent of median household income. This is also sometimes referred to as "workforce housing" or "missing middle" housing, as it represents individuals and families that earn too much to qualify for traditional affordable housing, but not enough to afford market rate rents in the communities where they work.

The options for housing in Pomona are limited to mostly single detached units on single lots.

The City looked at its housing stock in relationship to changing demographic needs. As of 2019, single unit detached homes made up the majority of the Pomona housing stock (62.9 percent). Single unit attached homes, which include townhomes and condominiums, made up another 6.4 percent. Multi-unit developments, such as apartments, made up 26.5 percent of the housing stock and 4 percent were mobile homes. In comparison to the rest of the County, Pomona has a higher percentage of single unit detached homes and a lower percentage of multi-unit developments.

Survey results support expanding the definition of and options for Pomona's housing stock beyond a single unit detached home on a single lot. In some cases, this means continuing to support the implementation of accessory dwelling units on such lots or incorporating them into new home construction. For seniors, single-level units are in demand. In other cases, the community suggests mixed-use buildings, such as 1-to-3-bedroom apartments with ample common open space or converting older industrial buildings into live-work or mixed-use units with ground-floor retail. Other suggestions were mixed-type developments, that may combine various sizes of housing (micro units, traditional units, large units) on a single site.

Other solutions were focused more explicitly on special needs populations, tying housing stock to population need. Multiple respondents supported transitional and supportive housing, considering the use of shipping containers repurposed for affordable housing, co-living arrangements, and small square footage detached units or smaller lots.

There is also interest in alternative construction methods for housing, such as "modular" housing, which is housing that is built indoors in a factory-like setting, then covered and transported to the site where a



builder assembles them. These are distinct from “mobile homes,” and are the same as traditional construction except for where they’re built. Modular is also referred to as “factory built,” “system built,” or “prefabricated.”

In asking the community where additional housing could be built, respondents cited surplus Pomona Unified School district property, City-owned parking lots, underused houses of worship, empty motels, vacant land, and existing building conversions in Downtown as examples of suitable land for additional housing options.

The community has serious concerns about displacement, unstable rent prices, tenant protections, and housing affordability.

Survey respondents provided specific ideas on how the government could support households in Pomona. On the programmatic side, the community is interested in providing more rental vouchers through the Housing Choice Voucher program, also referred to as “Section 8;” identifying funding sources to subsidize affordable housing development; providing low to no cost loans to finance Accessory Dwelling Units; first-time home buyer options and down payment assistance; and loans or grants for low-income households to restore their homes in a historic district.

On the regulatory side, the community is interested in ordinances for rent control and rent stabilization, limitations on re-selling or “flipping” houses, mandating a percentage of affordable units in new developments, prevailing wage agreements for new housing development, and anti-displacement measures such as eviction moratoriums.

The community is also interested in exploring alternative models of property ownership as a means to prevent displacement in Pomona’s neighborhoods. The most popular alternative cited is a “community land trust.”

What is a “community land trust?”

A community land trust is a method of land ownership. In this model, a trust, which is typically a non-profit or community-based organization, purchases land and maintains ownership of it permanently. Future homeowners enter into long-term renewable leases with the trust, rather than a traditional sale. When the homeowner sells, they earn a portion of the increased property value, and the remainder is kept by the trust. Through this method, affordability for future households can conceivably be maintained, leaving the property to be less vulnerable to changing housing market conditions.

Existing residential uses located within the City’s industrial zones face increased environmental justice concerns and pollution burden.

Pomona is home to a significant amount of industrially zoned land, typically designated as “M” zoning, which is generally the most permissive zoning with respect to allowable land uses. In the City’s Eastern Workplace District, which is generally located east of Reservoir Street to City limits and South of Mission Boulevard, there are a significant number of residential properties that are adjacent to these industrial land uses. Although residential uses are no longer permitted in this zone, these residences were permitted through legacy zoning dating as far back as 1930, when residential uses were permitted in industrial zones, and are now considered legally non-conforming. Today, the CalEnviroScreen health assessment tool identifies these areas as pollution burdened, which requires special attention when establishing housing



policy and establishing land use permissions for industrial uses. Improving quality of life is critical to support Pomona's households and neighborhoods.

The community expressed various needs related to maintaining a high quality of life in their households and neighborhoods.

For households, the rehabilitation and repair of existing homes remains a clear need. 85.9 percent of Pomona's housing stock was built before 1990 is now over 30 years old. Additionally, Comprehensive Housing Affordability Strategy (CHAS) data compiled by HUD identifies existing housing problems in Pomona. According to the data, over half of all households (both owners and renters) experience some type of housing problem. Housing problems are considered a lack of a complete kitchen, lack of complete plumbing facilities, or overcrowding in a unit.

For neighborhoods, the community expressed multiple concerns. First, the community would like to support active transportation and an increase in open space, parks, and recreational resources. Multiple survey responses expressed a desire for walkable neighborhoods that can support healthy choices and lifestyles. To that end, roadway safety and street design was also raised as concerns. This includes designing Pomona's roads to support multiple modes of transportation, such as walking and bicycling, and generally increasing the ability for active transportation, while also improving street lighting for safer streets. These needs are even more pronounced in Pomona's neighborhoods that have higher poverty rates and lower parks per acre in their neighborhoods.

Parking remains a key issue facing neighborhoods. Residents have expressed concern over a lack of adequate parking in certain neighborhoods, which may worsen with increased housing units such as accessory dwelling units. Some residents expressed a desire for more on-site parking solutions, including driveways, to maintain more open neighborhood streets with fewer parked cars. Others expressed a desire for more transit-oriented development to less the burden of needing a car for transportation.



SECTION 2

EXISTING HOUSING CONSTRAINTS

This Section contains the key findings on existing housing constraints that need to be addressed to meaningfully tackle the key findings from the Housing Needs Assessment. The constraints identified in this section are in addition to those identified in the City's fair housing analysis. Those findings can be found in **Section 4: Affirmatively Furthering Fair Housing**.

The evidence to support these findings can be found in **Appendix B: Existing Housing Constraints**.





Pomona's zoning regulations contain outdated development standards that limit housing development.

The Pomona Zoning Ordinance (PZO) contains multiple development standards that constrain the construction of new housing. Four notable standards include:

- ▶ **Lot Coverage.** The various R- zones within the PZO establish lot coverage limitations that are typically no greater than 35 percent. This coverage limitation constrains the ability for both existing house additions and new accessory dwelling units, or household improvements such as patio covers or adding accessory structures.
- ▶ **Parking.** The PZO regulates off-street (private property) vehicular parking requirements. These regulations create constraints to housing. For example, housing additions that increase existing floor space by 50 percent trigger the requirement of a two-car enclosed garage. This does not enable relief for uncovered parking, tandem parking, or reduced parking ratios.
- ▶ **Site Constraints.** Site development standards can often be inflexible and prescriptive in where they can be located on a parcel and how they are defined. For example, common open space on multi-unit developments cannot include side yards or front yards, and have narrow definitions. As a result, the ability to add housing density can be diminished to satisfy site requirements.
- ▶ **Permitting Various Housing Types.** The majority of Pomona's housing stock consists of detached single units on a single lot. This stock is the result of zoning regulations that inherently restrict the supply of new housing in Pomona and can place pressure upon those few neighborhoods in the City that do allow for multi-unit development. This pressure has been alleviated in recent years through the permission of accessory dwelling units, though these units are not second primary units (duplexes), but accessory to the main single unit.

These zoning regulations, when evaluated together, prevent homeowners from expanding their existing living space to accommodate multiple generations living together or to alleviate overcrowding and may prevent individual developers from pursuing higher density housing or multi-unit development across the city's neighborhoods.

Pomona's zoning regulations contain outdated land use definitions on certain types of housing.

The PZO contains dated definitions of "group care facilities." It includes more recently updated definitions of "transitional" and "supportive" housing, though they appear to be inadequate to capture the nuance of such uses. Moreover, the permission level for housing may require a Conditional Use Permit. In other cases, land uses like farmworker housing or low barrier navigation centers are not explicitly called out as "by right" uses.

Lack of universal design and limited reasonable accommodations for persons with disabilities.

While the PZO does contain reasonable accommodation language in its group care facilities section, it otherwise does not have explicit reasonable accommodation language across all housing types and uses. Furthermore, the PZO lacks universal design standards that provide regulations to assist those with a disability.



The housing market poses an economic challenge to households who cannot afford rising house values.

It is estimated that housing price growth will continue in the city and the region for the foreseeable future. Moving into 2020, the economy was growing, and California was seeing a 1.6 percent growth in jobs from 2019 and experiencing all-time lows for unemployment rates. COVID-19 had stalled much of the economy in early 2020; however, as the California economy regains momentum the housing stock and prices in the Pomona community remain stable. A housing market analysis by Redfin in April 2021 reports the median sale price of homes in Pomona is \$510,000 and has increased by 10.3% year-over-year. The median sale price of homes in Pomona was reported at \$462,500 in March 2020. In addition, the median days a home spent on the market is reported to be 31 days – a 29.5% decrease year-over-year.

A 2021 California Association of Realtors (CAR) report found that homes on the market in Los Angeles County experienced a 14.4 percent year-to-year increase and cost a median of \$664,120 in February 2021; approximately \$10,880 lower than the Southern California median home price in the same month (\$675,000). According to the CAR First Time Buyer Housing Affordability Index, for 2020 the median value of a home in Los Angeles County was \$585,360 with monthly payments (including taxes and insurance) of \$2,870 – requiring an average qualifying income of \$86,100.

Some areas of Pomona are at risk of wildland fires, which limits the potential for housing development.

The Noise and Safety Element of the General Plan identifies parts of the City as being susceptible to wildland fires due to hilly terrain, dry weather conditions, and plant cover. Parts of Phillips Ranch and Ganesha Hills are identified as the most at risk of wildland fires, where even a small fire may quickly spread and threaten nearby residential areas. The greatest fire hazard threatening residential neighborhoods are for those located near the wildland/urban interface areas. The prevalence of open space and steep slopes near neighborhoods in Philips Ranch and Ganesha Hills create higher potential risk for wildland fires affecting residential communities.



SECTION 3

EXISTING HOUSING RESOURCES

This section contains the key findings on existing housing and financial resources that can support and mitigate the conclusions of the Housing Needs Assessment. Additionally, this section contains a summary of the adequate sites analysis to accommodate the City's 2021-2029 Regional Housing Needs Assessment (RHNA) allocation.

The complete evidence to support these findings can be found in **Appendix C: Existing Housing Resources & Site Inventory**.





The City has available, suitable land currently zoned to meet its RHNA allocation for all income levels without the risk of housing displacement.

The City of Pomona updated its General Plan in 2014, one year after the start of its fifth RHNA cycle (2013-2021). The 2014 Pomona General Plan coincided with the adoption of the Pomona Corridors Specific Plan, which implemented zoning for new housing density and mixed-used opportunities along Pomona's corridors of Garey and Holt Avenues and Mission and Foothill Boulevards. In 2019, the City updated the Downtown Pomona Specific Plan, which regulates approximately 250 acres in the center of the City, to also implement zoning for housing density and mixed-use called out in the General Plan.

In 2020, in response to Senate Bill 330 (SB 330), the City adopted the "SB 330 Overlay District," an urgency ordinance (Ordinance No. 4306) that implemented General Plan densities across all eligible parcels that had not yet been zoned after the 2014 General Plan. This action enables the City to pursue immediate housing development at densities consistent with the General Plan without the need for rezoning actions.

The City of Pomona has identified sites with sufficient capacity to accommodate the 2021-2029 RHNA and demonstrates additional capacity beyond State requirements.

- ▶ **Pomona Corridors Specific Plan.** The City has identified 91 parcels within the Pomona Corridors Specific Plan (PCSP), which runs along major corridors in Pomona going both east/west and north/south.
- ▶ **Downtown Pomona Specific Plan.** Additionally, the City has identified 38 parcels within the Downtown Pomona Specific Plan (DPSP), which is located at the center of the City and is adjacent to the Downtown Metrolink Station.
- ▶ **SB 330 Overlay District.** The City has identified 63 parcels that are within the SB 330 Overlay District.
- ▶ **Phillips Ranch Specific Plan:** The City has identified 2 parcels that are within the Phillips Ranch Specific Plan.
- ▶ **Accessory Dwelling Units.** The City of Pomona has determined based on past performance that it is appropriate to anticipate the development of 2,184 accessory dwelling units from 2021 to 2029. This projection is based primarily on the huge uptick in permitting that the City has experienced between 2018 and 2021 and the calculation is outlined within **Appendix B**.

As shown in **Table 1**, the identified sites have been evaluated based on surrounding and existing onsite development to determine the extent to which on-site uses are likely to redevelop within the planning period (2021-2029).

To ensure compliance with recent amendments to State law under Senate Bill 330, none of the sites identified for statutory compliance would create a risk of displacement, as they do not currently contain a housing development.



Pro Housing Pomona – Housing Element 2021-2029

Table 1: Summary of RHNA Status and Sites Inventory					
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,799 units	1,339 units	1,510 units	4,910 units	10,558 units
Projected Unit Capacity on Site Inventory					
Unit Capacity on Projects in the Pipeline (In review, on entitled land, issued permits, or in construction since June 30, 2021)	310 units		8 units	2,234 units	2,552 units
Unit Capacity on Existing Residentially Zoned Land	3,459 units		1,759 units	5,855 units	11,073 units
Projected ADU Construction					
Projected ADU Construction	853 units		26 units	373 units	1,253 units
Projected Sites Inventory Total					
Total Units towards RHNA	4,622 units		1,793 units	8,462 units	14,878 units
Total Unit Capacity Over RHNA	484 units		283 units	3,552 units	4,320 units
<i>Pro Housing Pomona Percentage</i>	12%		19%	72%	41%

The City's CEQA streamlining process for housing projects has significantly reduced the time period for discretionary reviews.

The City has made significant strides since 2017 in streamlining the environmental review of discretionary housing projects subject to the California Environmental Quality Act (CEQA). The City has taken advantage of its Certified Final Environmental Impact Report (EIR) of the 2014 Pomona General Plan and Pomona Corridors Specific Plan to rely upon exemptions, such as Section 15182, *Projects Pursuant to a Specific Plan*, and Section 15183, *Projects Consistent with a General Plan, Community Plan, or Zoning*. For housing development projects proposing density consistent with the General Plan or Pomona Corridors Specific Plan, discretionary review is typically reduced from 18 months to 6 months.

The City has taken advantage of State legislation accelerating housing production.

Multiple State laws have been amended to accelerate housing production statewide. The City has leaned into these laws and, where appropriate, tailored them to housing development in Pomona. The most prominent examples of State and local alignment are:

- **Accessory Dwelling Units.** Ordinance No. 4307 of the City of Pomona represents local consistency with the State's current laws on accessory dwelling units. This ordinance has been updated multiple times since 2018 to maintain consistency with changing State law. The City is currently processing approximately 15 to 18 ADUs monthly.



Pro Housing Pomona – Housing Element 2021-2029

- ▶ **SB 330 Overlay District.** The Housing Crisis Act of 2019, also known as Senate Bill 330, went into effect on January 1, 2020. Among other provisions, SB 330 locked in a City's established General Plan density by limiting legislative actions and downzoning efforts, and established a vesting application pathway. As the City's 2014 General Plan established an aggressive threshold of housing density citywide, the City has routinely relied upon SB 330 to streamline the production of housing in zones not yet currently consistent with the General Plan, including the establishment of a formal SB 330 Vesting Application. Most notably, on August 2, 2021, as an urgency measure, the City adopted Ordinance No. 4306, which established an "SB 330 Overlay District," effectively implementing General Plan densities citywide through zoning to create an immediate, formal process for housing multi-unit development applications.
- ▶ **State Density Bonus Law.** The City has taken full advantage of the State mandated "Density Bonus Law" provisions contained in Government Code 65915-65918. The density bonus is a tool typically discussed between the City and prospective applicants and has been used both to lead to the creation of additional affordable units and enable requests for waivers and concessions from development standards.

The City actively provides public subsidies, programs, and education to support affordable and fair housing.

The City and its housing authority, the Pomona Housing Authority (PHA), actively support Pomona residents with a combination of financial subsidies, programs, and education, while also pursuing strategies to ensure affordable, fair, safe, clean, and sanitary housing. These existing efforts fall into the following categories:

- ▶ **Interim, Transitional & Supportive Housing.** The City's Homeless Continuum of Care Strategic Plan assists homeless individuals and families with moving from homelessness to self-sufficiency, permanent housing, and independent living. Existing successful strategies include street outreach, collection of quality data, and homeless prevention. Others, such as coordinated assessment, critical intervention through case management, and increase in access to mainstream benefits have been recently been implemented. This plan also includes management of Hope for Home, the City's own emergency shelter.
- ▶ **Rental & Ownership Assistance.** PHA administers Section 8 Housing Choice vouchers within the City, a Federal government program established by the 1974 Housing and Community Development Act to assist very low-income families, the elderly, and the disabled with rent subsidy payments in privately owned rental housing units. Section 8 participants are able to choose any housing that meets the requirements of the program and are not limited to units located within subsidized housing projects. They typically pay 30 to 40 percent of their income for rent and utilities.



Pro Housing Pomona – Housing Element 2021-2029

Table 2: Pomona Housing Authority Rental Assistance Voucher Allocations

Program	Population	2018	2019	2020	2021	FY 2021-2022 Funding
Housing Choice Voucher	Low-Income Families	905	905	905	905	\$16,348,122
HUD Veterans Affairs Supportive Housing (VASH) Project-Based	Homeless Veterans	30	30	30	30	\$332,312
HUD VASH	Homeless Veterans	30	30	30	30	\$244,978
Mainstream	Non-Elderly Disabled and Homeless Families (Ages 18-62)	17	17	63	63	\$1,823,881
Foster Youth Initiative Tenant Protection	Transitional Aged Youth (Ages 18-24)	--	--	--	4	\$56,399
Emergency Housing Vouchers ¹	Homeless, At-Risk of Homelessness, Victims of Domestic Violence, Households At-Risk of Housing Instability	--	--	--	78	\$1,623,396
TOTALS	--	982	982	1028	1110	\$20,429,088

¹All vouchers represent permanent voucher assistance so long as tenant is within qualifying population.

The City also manages a Family Self-Sufficiency program to foster homeownership, economic independence, and self-sufficiency among Section 8 participants. The City's recent Moving to Work designation will further facilitate flexibility in the City's execution of this program. To facilitate home ownership, the City's First Time Homebuyer Program assists with down payments and closing costs to income-qualifying households.

- **Healthy Homes.** The City funds multiple programs to ensure that existing housing stock is safe, clean, and sanitary. For example, the Lead Education Awareness and Control (LEAC) Program component provides free lead testing and lead reduction to help prevent lead poisoning in homes that may contain lead-based paint hazard. The Healthy Home Program Component will only be provided to properties approved for LEAC assistance. This provides additional funding of up to \$5,000 per unit to address other housing hazards. Additional programs include the Homeowner Rehabilitation Loan Program, the Housing Improvement Program, and accessibility and code correction improvement grants.
- **Affordable Housing Development.** The City provides financial and technical assistance to non-profit housing development organizations. The Community Housing Development Organization set-aside funding program has been successfully used for the development of affordable housing stock. Moreover, the City has received Permanent Local Housing Allocation (PHLA) funding to provide additional "gap" funding support to affordable housing projects, and to support the construction of affordable accessory dwelling units. Beyond these programs, the City's recent Inclusionary Housing Ordinance contains a provision for in-lieu fees to be deposited into the City's Affordable Housing Trust Fund, which can further finance the construction of affordable units. Lastly, the City actively



participates in the San Gabriel Valley Regional Housing Trust Fund, which serves as a significant regional match for affordable housing projects.

- ▶ **Housing Education.** The City provides resources for Pomona residents to understand existing programs and to address fair housing concerns.

The City's Inclusionary Housing ordinance provides a permanent source of affordable housing production.

On February 1, 2021, the City adopted an Inclusionary Housing program under Ordinance No. 4295, which became 100 percent effective on May 3, 2021. Under this regulation, any new residential development that includes three or more dwelling units must meet specified inclusionary housing requirements, which include:

- ▶ **For-Sale Dwelling Units.** Detached units must set aside 7 percent of units for Moderate income or 15% for Low or Very Low Income on-site or off-site; Attached units must set aside 11 percent of units for Moderate income or 15 percent for Low or Very Low Income on-site or off-site.
- ▶ **Rental Dwelling Units.** Rental units must set aside 13 percent of units for moderate income on-site or 15 percent of units for low or very low income.
- ▶ **In-Lieu Fee.** As an alternative to providing affordable for-sale or rental dwelling units on-site, developers may pay an in-lieu fee of \$11.40 per square foot of applicable detached product, or \$9.30 per square foot of applicable attached product, which is deposited into an Affordable Housing Trust Fund managed by the Pomona Housing Authority. Developments proposing more than 30 housing units may only pay an in-lieu fee if approved by City Council.
- ▶ **Deed Restriction.** Units require covenant restrictions ranging from 45 to 55 years.



SECTION 4

AFFIRMATIVELY FURTHERING FAIR HOUSING

This section contains the key findings of fair housing issues and concerns, as well as local contributing factors which were identified in the fair housing analysis. Key findings were derived using local, State and Federal data, as well as include a consideration of public feedback received during the update process.

The complete evidence to support these findings can be found in **Appendix D: Affirmatively Furthering Fair Housing**.





What is Fair Housing and what does it look like in Pomona?

Fair housing is a condition in which individuals of similar income levels in the same housing market have like ranges of choice available to them regardless of race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. Under State law, affirmatively further fair housing means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. These characteristics can include, but are not limited to race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.”

Pomona residents identified some key issues related to fair housing access in the City. When asked about challenges that exist, nine percent of survey participants said that discrimination and prejudice is a primary challenge to housing access. In addition, 12 percent of participants identified mitigating and preventing racism, injustice and discrimination as key avenues to directly support and house community members. Overall, engagement from the community revealed the following key issues related to fair housing in Pomona:

- ▶ Discriminatory housing practices toward residents of color
- ▶ Overall lack of affordable housing for low-income residents
- ▶ Challenges finding housing near economic opportunities
- ▶ Landlord-tenant conflict and unresolved fair housing disputes
- ▶ Unsafe or unsanitary living conditions and housing problems

Housing discrimination based on race and disability persist in Pomona

Residents commented that housing discrimination based on race and disabilities persist in the community. Minority, elderly, and disabled households in Pomona are disproportionately represented in the low-income group, which subsequently leads to a lack of housing choice. While the City has been diligently working to expand the affordable housing inventory, the needs in the community remain unmet due to diminished funding.

Housing Choice Vouchers rejected by landlords as a source of income

In 2020, a total of 1,110 people relied upon the HCV program. The HCV program is in high demand with a long waiting list of applicants. Not only do applicants have to wait a long time to receive a voucher, but once a voucher is available, it often takes a long time to find a landlord who would accept it. Voucher use is primarily concentrated in the City's central and eastern neighborhoods.

Recent State legislation strengthened a tenant's ability to use housing choice vouchers as a source of income. SB 329 redefines source of income to be inclusive of Federal, State or local public assistance, and SB 222 adds to the definition Veterans Affairs Supportive Housing (VASH) vouchers.

Pomona residents may face more barriers to securing mortgages than other communities.

The availability of financing in a community depends on a number of factors, including the type of lending institutions active in a community, lending practices, rates and fees charged, laws and regulations governing financial institutions, and equal access to such loans. Additionally, availability of financing



affects a person's ability to purchase or improve a home. The primary concern in a review of lending activity is to determine whether home financing is available to all residents of a community.

What is the Home Mortgage Disclosure Act (HDMA)?

HDMA is a law passed in 1975 that requires lending institutions to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. Data is available nationwide and provided by "Metropolitan Statistical Area/Metropolitan Division," or MSA/MD. For Pomona, the most relevant MSA/MD is Los Angeles-Long Beach-Glendale.

According to 2019 HDMA data for the Los Angeles-Long Beach-Glendale MSA/MD, applicants in the 120% MSA/MD median income range or more had the highest rates of loans approved. Of that income category, applicants who reported White had the highest percentage of approval and the number of applications. Applicants in the less than 50% MSA/MD median income range experienced higher percentages of denied loans than other income categories. In all income categories, applicants who reported White had the most approvals and applicants who reported Native Hawaiian or other Pacific Islander had the most denials. Encompassing all income levels, about 59% of applicants received a loan and 18.5% had their loan application declined.

Pomona has two census tracts of racial or ethnic concentrations of poverty

- ▶ **Census Tract 4027.02.** This tract, generally located between White Avenue and Dudley Street along Holt Avenue, consists of a median family income of \$38,843, with a population of 6,487 residents, 94.17% of whom are minority. The housing stock consists of 291 owner-occupied units and 968 1-4 family units.
- ▶ **Census Tract 4023.04.** This tract, generally located between East End and Mills Avenues along Holt Avenue, consists of a median family income of \$42,036, with a population of 4,041 residents, 94.06% of whom are minority. The housing stock consists of 277 owner-occupied units and 775 1-4 family units.

Location of residence can have a substantial effect on mental and physical health, education opportunities, and economic opportunities. Urban areas that are more residentially segregated by race and income tend to have lower levels of upward economic mobility than other areas. Research has found that racial inequality is thus amplified by residential segregation.¹ However, these areas may also provide different opportunities, such as ethnic enclaves providing proximity to centers of cultural significance, or business, social networks and communities to help immigrants preserve cultural identity and establish themselves in new places. Overall, it is important to study and identify these areas in order to understand patterns of segregation and poverty in a City.

¹ Schulz, A. J., Williams, D. R., Israel, B. A., & Lempert, L. B. (2002). Racial and spatial relations as fundamental determinants of health in Detroit. *The Milbank quarterly*, 80(4), 677–iv. <https://doi.org/10.1111/1468-0009.00028>



What is a Racially or Ethnically Concentrated Area of Poverty (R/ECAP)?

To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more. Regarding the poverty threshold, extreme poverty is identified as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the country, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40 percent% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower.

Pomona's overall environmental health and quality is considered low.

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). The data tool is made up of 20 indicators and identifies areas with increased pollution burden and areas of vulnerabilities based on health and demographics. The CalEnviro screen map identifies most of Pomona as high scoring, meaning that nearly all of the City experiences *high exposure to harmful pollutants*.

Persons who identify as Native Hawaiian or American Indian or Hispanic experience the highest levels of segregation with persons who identify as White in the City of Pomona.

The Fair Housing Analysis of **Appendix D** identifies levels of segregation in the City of Pomona through a dissimilarity index. The dissimilarity index is the most used measure of segregation between two groups, reflecting their relative distributions across neighborhoods (as defined by census tracts). The index represents the percentage of the minority group that would have to move to new neighborhoods to achieve perfect integration. The race and ethnic groups with the highest scores were the Native Hawaiian Population (53.4) and Hispanic population (44.9). These scores correlate directly with the percentage of people within that racial or ethnic group that would need to move into a predominately White census tract to achieve a more integrated community. For instance, 53.4 percent of the Native Hawaiian population would need to move into predominately White census tract areas to achieve “perfect” integration or 44.9 percent of the Hispanic population would need to move into the predominantly White census tract areas for perfect integration.

The majority of residents in Pomona have a moderate to low level of access to opportunity throughout the City.

The UC Davis Regional Opportunity Index shows that most residents within Pomona have a moderate to low level of access to opportunity throughout the City. Additionally, analysis of the TCAC/HCD opportunity Area Maps show that all census tracts in Pomona are classified with the “Low to Moderate Resource” designation. This indicates that these census tracts may lack essential mobility, retail/food, economic, housing or civic resource that may promote upward mobility and result in healthier neighborhoods.



SECTION 5

THE PLAN FOR PRO HOUSING POMONA

This section describes the City of Pomona's housing strategy and policy plan for the 6th Cycle planning period (2021-2029). The goals policies and programs were developed using key data, community feedback, and a review of the City's past performance. The goals are intended to address the concerns and key findings identified in the Pro Housing Pomona summary above and are supported by the data in **Appendices A through G**.





Introduction

The City of Pomona’s housing policy and strategy plan is organized by goals, supported by policies, and implemented by programs. Goals are aspirational purpose statements that indicate the City’s direction and intention on housing-related opportunities, challenges, and community need. A goal includes several policies; a policy is a statement that describe the City’s preferred course of action to work towards and reach the intended goal. A goal and its related policies also include programs, or specified efforts and actions the City will take to achieve its goals. Each program is associated with actions, which are steps the City will take to implement the program and further the City’s policies and goals.

The following goals, policies, and programs were developed to meet the needs of all segments of the City and are informed by the following:

- ▶ A housing needs assessment that includes a demographic analysis of the Pomona Community and input and feedback gathered throughout the process from community members, local stakeholders, advocacy groups and City decision makers,
- ▶ An analysis and assessment go Governmental and non-governmental constraints,
- ▶ An analysis of existing housing resources and adequate sites analysis to accommodate the City’s RHNA; and
- ▶ A review of the 2014-2021 5th Cycle Housing Element.

Regional Housing Needs Assessment

The Southern California Association of Governments (SCAG) has conducted a Regional Housing Needs Assessment (RHNA) to determine the City’s share of the affordable housing needs for the Los Angeles County region (process shown in **Figure 1** below). The RHNA quantifies Pomona’s local share housing needs for the region by income category. Income categories are based on the most current Median Family Income (MFI) for Los Angeles County. The City’s 2021-2029 RHNA growth need is as follows:

- ▶ 2,799 units – Very low income (0-50% County MFI)
- ▶ 1,339 units – Low income (51-80% of County MFI)
- ▶ 1,510 units – Moderate income (81-120% of County MFI)
- ▶ 4,910 units – Above moderate income (120% or more of County MFI)
- ▶ **10,558 units – TOTAL (All Income Categories)**

Figure 1: RHNA Determination Process, Pomona





Housing Goals

An important component of the Housing Element is an evaluation and reconsideration of the goals and policies that serve as the framework for more detailed implementing actions and programs. The goals and policies described in this plan support the State of California’s overarching goal of providing “decent housing and a suitable living environment for every Californian” (Government Code Section 65580). Consistent with the City of Pomona’s past practices, the housing goals embody the State’s established goals for required local action (Government Code Section 65583).

The City of Pomona has identified the following housing goals as part of this Housing Element Update:

- ▶ **HOUSING GOAL #1:** Pomona’s land use regulations encourage the development and preservation of safe, healthy, affordable housing as well as a variety of housing types, home ownership models, and designs.
- ▶ **HOUSING GOAL #2:** The City and Pomona Housing Authority actively support Pomona residents with financial resources and housing education to secure safe, decent, and sanitary housing.
- ▶ **HOUSING GOAL #3:** Pomona’s households have the resources to improve their property, to continue living in Pomona across multiple generations, to build income and equity, and to be shielded from displacement and rapid changes in affordability.
- ▶ **HOUSING GOAL #4:** Pomona’s households are supported by a strong network of resources and amenities that encourage quality public health outcomes.
- ▶ **HOUSING GOAL #5:** Pomona’s housing policy actively supports fair and equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, family status, physical challenges, or color.



GOAL 1

LAND USE REGULATION

Pomona's land use regulations encourage the development and preservation of safe, healthy, affordable housing as well as a variety of housing types, home ownership models, and designs.

This goal directly addresses the Housing Needs Assessment Findings pertaining to type, design, and location of housing units, the ability to subdivide property to create for sale units and accommodating population growth. It also addresses Existing Housing Constraints related to outdated Pomona Zoning Ordinance regulations and land use definitions. Lastly, it builds upon Existing Housing Resources related to the adequate sites inventory and the 2014 Pomona General Plan.





Policy 1.1: Identify and maintain an inventory of land suitable for housing at all income levels.

Program 1.1A: Adequate Sites Inventory

The City will maintain an inventory of available vacant and underutilized sites and provide this inventory to interested developers. The City will monitor its status of meeting the Regional Housing Needs Allocation (RHNA) annually and ensure that the City has adequate sites available to accommodate its RHNA. The City will promote incentives available for housing, live/work development, and mixed-use development citywide.

Timing: Begin implementation upon adoption, ongoing throughout 6th Cycle

Responsibility Agency: Planning

Funding: General Fund

Program 1.1B: Housing Program Monitoring

The Housing Plan is the planning tool to guide and implement housing programs and strategies for the 6th cycle planning period and the City has identified several monitoring programs and implementation actions. Additionally, HCD requires all jurisdictions to report and submit progress of program implementation through the 2021-2029 planning cycle as well as conducts a mid-cycle review for progress in consideration of SB 35 eligibility. The City will dedicate the appropriate staff and resources to implementing the outline programs in the Housing Plan and submit the Housing Annual Progress Report to HCD.

Timing: Begin implementation upon adoption, evaluate progress Annual Review and Submittal

Responsible Agency: Planning and Housing Division

Funding Source: General Fund

Program 1.1C: Water and Sewer Service Purveyors

Pursuant to SB 1087, Chapter 727, Statutes of 2005, the City of Pomona will transmit its adopted Housing Element and any future amendments to local water and sewer service providers. This legislation enables the coordination between the City and water and sewer purveyors when considering future housing development. Additionally, the City encourages that priority for water and sewer service is granted to projects that include units affordable to lower-income households. The City will submit the adopted Housing Element to local water and sewer purveyors for their review and input.

Timeframe: Upon adoption of the Housing Element

Responsible Agency: Planning

Funding Sources: General Fund



Policy 1.2: Update the Pomona Zoning ordinance to implement the Pomona General Plan, address existing regulatory constraints, and ensure a variety of subdivisions, housing types, designs, and home ownership models.

Program 1.2A: Pomona Zoning Ordinance Update

The City of Pomona updated the City's General Plan in 2014. The 2014 update included strategies for land use to improve and increase housing opportunities, improve the lives of Pomona residents, and create policy consistency of all General Plan Elements for future growth. In order to appropriately implement the goals of both the General Plan update and the Housing Element, the City will comprehensively update the Pomona Zoning Ordinance, the first complete overhaul since its creation in 1951. Actions include the following:

1. Implement the Pomona General Plan, ensuring no net loss of density or downzoning.
2. Implement the goals and policies of the Pomona General Plan, especially land use place type designations.
3. Adopt development standards that meaningfully address housing constraints related to lot coverage, parking, site standards, and unit type requirements so as to not unnecessarily limit the development of housing for reasons other than public health and safety.
4. Adopt subdivision standards to encourage various types of subdivisions and lot splits.
5. Adopt universal design standards and reasonable accommodation language to support individuals with physical and developmental disabilities.
 - a. Revise the Municipal Code for Reasonable Accommodations to remove subjective language from the findings for approval or denial. Specifically revise Zoning Ordinance Section .5809-14, Subsections A-D to remove the language which states "Potential impacts on surrounding uses" when considered for reasonableness of the request.
6. Update regulatory language to comply with provisions for farmworker housing in compliance with the Employee Housing Act (Sections 17000-17062.5 of the California Health and Safety Code).
7. To comply with SB 48, the City of Pomona will adopt policies, procedures, and regulations for processing Low Barrier Navigation Centers to establish a non-discretionary local permit approval process. In the interim, any submitted application for this use type will be processed in accordance with State law (Section 65662).
8. Adopt land use classifications and processes that are consistent with Federal and State fair housing definitions, including definitions for group care facilities, Farmworker Housing, and transitional and supportive housing.
9. Adopt by-right land use permissions for low-barrier navigation centers and supportive housing pursuant to and compliant with State law.
10. Review and revise section Appendix I. Part III. Section .5809-14 (Group Care Facilities) and Section .580 (Conditional Use Permits) to remove subjectivity and increase certainty in approval of request, and in turn, increase accessible housing opportunity.

Timing: Initiate Updates Within 12 Months of Adoption, Complete by July 2023

Responsibility Agency: Planning

Funding: Grant Sources



Policy 1.3: Regulate housing that is consistent with the Pomona General Plan through a by-right process with a streamlined, predictable, and transparent development process.

Program 1.3A: By-Right Housing Entitlement Analysis

The City will implement the following in the Pomona Zoning Ordinance Update:

1. Allow by right housing for housing developments with 20 percent or more affordable to lower income households on nonvacant sites identified in the Fifth Cycle (per Government Code Section 65583.2(l)) and identified in **Appendix C**.
2. Consider removing Conditional Use Permit requirements for all housing land uses citywide. Update any specific plans as necessary as a clean-up action as part of this action.
3. Implement objective design standards for housing development projects in the Pomona Zoning Ordinance.
4. Establish a Development Plan Review, or DPR, with a public hearing process, similar to mechanisms used in the Pomona Corridors Specific Plan and Downtown Pomona Specific Plan.
5. Establish thresholds for housing projects to enable ministerial review without public hearing, even for design review (Development Plan Review), for qualifying affordable housing projects, while maintaining discretionary authority and environmental review for housing development exceeding such thresholds.

Timing: Initiate Within 12 Months of Adoption and Finalize Within 24 Months of Adoption

Responsibility Agency: Planning

Funding: Grant Sources

Program 1.3B: Housing Permit Streamlining and SB 35 Provisions

The City will undertake the following actions to streamline the housing development review process to help provide predictable and transparent outcomes for housing projects:

1. The City will develop streamlining procedures and objective standards for qualified projects, under SB 35, to be approved ministerially. The City will make the procedures available to the public on the City's webpage and at the public counter.
2. Establish a one-stop permit center that allows easier access to all Departments within the development review process at City Hall.
3. Upgrade technology to expand City's existing permit system (Energy) to allow for online permit application submittal and the ability to for applicants to track project status online.
4. Upgrade technology to allow for a 100% electronic permit review and routing system.
5. Fast track permit process for Accessory Dwelling Units (ADUs) and other housing permits.
6. Explore and implement, if funding permits, an online cloud-based application to provide location based permit guides with all development standards and permit process aggregated into one guide sheet.

Timing: Begin Implementation within 6 Months of Adoption. Complete SB 35 procedures with 18 months. Complete Upgrades with 24 months.

Responsibility Agency: Development Services

Funding: Grant Sources



Policy 1.4: Encourage affordable housing through both regulatory mandates and incentive programs.

Program 1.4A: Inclusionary Housing

On February 1, 2021, the City adopted an Inclusionary Housing program under Ordinance No. 4295, which became 100 percent effective on May 3, 2021. Under this regulation, any new residential development that includes three or more dwelling units must meet specified inclusionary housing requirements. The Inclusionary Ordinance also includes an In-lieu fee which developers may pay as an alternative to providing on-site units; the in-lieu fee is directed to an Affordable Housing Fund to support a variety of affordable housing programs and projects. The City will enforce and manage the recently adopted Inclusionary Housing Ordinance through an Inclusionary Housing Program. Actions include the following:

1. Track number of developments providing on-site units against ones utilizing the in-lieu fee.
2. Coordinate acceptance and use of in-lieu funds into Affordable Housing Trust Fund with Neighborhood Services and Economic Development Departments.
3. Policy review for effectiveness, which may include interviews of developers to better understand how inclusionary requirements affect financial feasibility of projects, including proforma analysis.
4. Provide a report to City Council on status of Inclusionary Housing Ordinance program.
5. Align regulations with local density bonus ordinance adoption (See Program 1.4B).

Timing: Initiate Within 12 Months of Adoption, implement all monitoring annually and complete evaluation by 2024

Responsibility Agency: Planning / Neighborhood Services / Economic Development

Funding: General Fund

Program 1.4B: Affordable Housing Incentives

The City currently defers to State Density Bonus Law for projects seeking to take advantage of the development of additional housing density or seeking waivers and concessions from development standards. The City will pursue local alignment of density bonus laws and evaluate additional “bonus” and incentive programs to encourage affordable housing production. Actions include the following:

1. Implement a local density bonus incentive program and additional bonus/incentive programs based upon economic analysis.
2. Ensure incentives also target moderate income rental projects that do not currently have incentives in the State Density Bonus Law, assuming market feasibility.
3. Educate prospective applications about density bonus and other incentives through informational campaigns, web content, and meetings.

Timing: Complete ordinance within 24 Months of Adoption of Pomona Zoning Ordinance (July 2025), provide information annually.

Responsibility Agency: Planning

Funding: General Fund

Program 1.4C: Development of Housing for Extremely Low and Lower-Income Housing

The City recognizes the importance of supporting the development of housing for low and extremely low-income households. While the City does not build housing, it is a primary goal of the Housing Element to support developers and increase the feasibility of development of housing for extremely low- and low-income households. Actions for this program include the following:



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4. When funding is available, the City shall subsidize up to 100 percent of the City's application processing fees for qualifying developments where all units affordable to 80% AMI or lower.
5. Providing support and assist with funding or funding applications for affordable housing developments.
6. Promote the benefits of this program to the development community by posting information on the City's webpage and creating a handout to be distributed with land development applications.
7. Proactive and annual outreach with developers, both market rate and affordable.
8. Provide information about fee subsidies for projects that include units affordable to low and extremely low-income households at City Hall and the planning counter.
9. Investigate new funding opportunities and administer funds as they become available.

Timing: Explore funding sources upon adoption of Housing Element, Implement annually on a case by case basis throughout the 6th Cycle.

Responsibility Agency: Planning

Funding: General Fund



GOAL 2

PARTNERSHIPS, GOVERNMENT FUNDING & EDUCATION

The City and Pomona Housing Authority actively support Pomona residents with financial resources and housing education to secure safe, decent, and sanitary housing.

This goal directly addresses the Housing Needs Assessment Findings pertaining to financial assistance to secure housing, first time homebuyer support, rental assistance, and other government support. It also builds upon the Existing Housing Resources of the City and its Pomona Housing Authority (PHA) to support Pomona's households. The outbreak of novel coronavirus disease has led to unprecedented challenges that directly impact Pomona's households. Now, more than ever, the City and PHA are needed to support residents seeking to navigate the housing uncertainty of a post-COVID reality. Additionally, the City has partners with local and regional organizations to support housing, and as part of this goal the intends to continue and deepen collaboration with community-based organizations to increase the City's capacity and resources to address resident housing needs.





Policy 2.1: Continue implementing strategic plan on homelessness and deepen resource allocation to at-risk homelessness services, including interim, transitional, and permanent supportive housing.

Program 2.1A: Strategic Plan to Combat Homelessness

The City will continue to implement the Homeless Continuum of Care Strategic Plan to assist homeless individuals and families with moving from homelessness to self-sufficiency, permanent housing, and independent living. Actions include the following:

1. Street outreach, collection of quality data, and homeless prevention.
2. Coordinated assessment, critical intervention through case management, and increase in access to mainstream benefits.
3. Support for individuals with high barriers to housing or that don't readily meet definitions for care.
4. Evaluate effectiveness of Plan.

Timing: Begin implementation upon adoption, implement outreach and coordination annually.

Support residents on a case-by-case basis and complete program evaluation by 2025.

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.1B: Interim and Transitional Rental Assistance

The Pomona Housing Authority currently allocates 215 rental assistance vouchers for homeless veterans, non-elderly disabled and homeless families, transitional aged youth, and the homeless, at-risk of homelessness, victims of domestic violence, and households at-risk of housing instability. Actions include the following:

1. Continue allocating HUD vouchers to special needs and vulnerable populations to support transitional and permanent supportive housing needs.
2. Continue funding homeless households with permanent disabilities, non-elder disabled, and homeless families ages 18-62 through the Continuum of Care Permanent Supportive Housing Program and Mainstream vouchers.
3. Support Pomona families with PUSD students with interim housing resources.
4. Support Project RoomKey and other efforts at interim housing.

Timing: Begin implementation upon adoption, implement annually on an ongoing case-by-case basis

Responsibility Agency: Housing Services

Funding: Pomona Housing Authority

Program 2.1C: Housing for Persons with Physical and Developmental Disabilities

The City will implement and enforce reasonable accommodation requests as appropriate and will support development of a variety of housing types specifically to meet the needs of persons with physical and developmental disabilities. The housing needs of persons with disabilities, in addition to affordability, range from slightly modifying existing units to requiring a range of supportive housing facilities. Actions include the following:

1. To accommodate the needs of these residents the City will seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities, including developmental disabilities.



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Timing: Begin implementation upon adoption, implement annually on a case-by-case basis per requests. Seek funding annually.

Responsibility Agency: Planning

Funding Source: Grant Sources

Policy 2.2: Provide financial resources to low-income and moderate-income Pomona households seeking rental or ownership.

Program 2.2A: Housing Choice Vouchers

The City currently allocates 905 Housing Choice Vouchers for low-income families. The City of Pomona was recently designated as a “Moving to Work” demonstration program city by HUD. As part of this designation, Pomona’s Housing Authority can pursue flexible approaches to its housing choice voucher program that achieves the following three goals: streamlining the implementation of the Federal program; initiatives that promote self-sufficiency among program participants; and initiatives that increase affordable housing development. Actions include the following:

Housing Choice Vouchers:

1. Continue implementing the Housing Choice Voucher program.
2. Maintain information on the City’s website and prepare written communication for tenants and other interested parties about HCV Section 8 housing opportunities.
3. Assist tenants and prospective tenants to acquire additional understanding of housing law and related policy issues.
4. Monitor Section 8 waiting list and housing opportunities managed through the Housing Division to ensure information provided on the City website is up to date. As the Section 8 waiting list is opened, promote the availability of the program through marketing materials made available to the public.
5. Continue allowing the direct dispersal of the U.S. Department of Housing and Urban Development (HUD) Housing Choice Voucher Program rental certificates and vouchers.

Moving to Work:

1. Implement Moving to Work designation to ensure program streamlining, initiatives that increase self-sufficiency and economic independence of program participants, and initiative that increase affordable housing opportunities.
2. Increase the percentage of project-based vouchers.

Timing: Begin implementation upon adoption, Ongoing throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Pomona Housing Authority



Program 2.2B: Family Self-Sufficiency Program

The City will continue the Family Self-Sufficiency Program which fosters homeownership among Section 8 recipients. The program assists Family Self-Sufficiency participants with achieving economic independence and self-sufficiency. Actions include the following:

1. Advertise the program at community outreach events, on the city's webpage, and other public avenues.

Timing: Begin implementation upon adoption, Ongoing case-by-case basis

Responsibility Agency: Neighborhood Services

Funding: Grant Sources

Program 2.2C: First-Time Homebuyers

The City will continue promoting the City's First Time Homebuyer Program which assists with down payments and closing costs. Actions include the following:

1. Provide down payment and closing cost assistance to approximately six low and or moderate-income buyers per year.
2. Advertise the program on City website, at Planning and Housing counters at City Hall, and at public outreach and community events.

Timing: Begin implementation upon adoption, Throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Grant Sources

Policy 2.3: Support the rehabilitation and maintenance of healthy homes that are safe, decent, and sanitary through financial assistance.

Program 2.3A: Lead Education Awareness & Healthy Homes

The City will continue managing the Lead Education Awareness and Control (LEAC) Program, which provides free lead testing and lead reduction to help prevent lead poisoning in homes that may contain lead-based paint hazard. Actions include the following:

1. Provide free lead testing and lead reduction services to help prevent lead poisoning in homes that may contain lead-based paint hazard.
2. Provide additional funding of \$5,000 per unit to address other housing hazards for qualifying households under the Healthy Home program component.

Timing: Begin implementation upon adoption, implement annually

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.3B: Housing Improvement Program

The City will continue managing the Housing Improvement Program, which provides financial assistance to residents seeking accessibility and disability access improvements to their home, to conduct roof repair work, and to address code enforcement corrections. Actions include the following and are implemented annually:



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1. Provide financial assistance to residents seeking accessibility and disability access improvements to their home.
2. Provide financial assistance to residents seeking to conduct roof repair work on their home.
3. Provide financial assistance to residents seeking to resolve code enforcement corrections on their home.

Timing: Begin implementation upon adoption, implement annually to residents on a case-by-case request basis.

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.3C: Homeowner Rehabilitation Loan Program

Through the various HUD funded programs (CDBG and NSP) and other capital improvement programs, the City identifies areas of greatest needs on an annual basis and provides funds for appropriate programs to upgrade the substandard conditions of neighborhoods according to funding availability. For eligible properties, owners are referred to the City's rehab loan and grant assistance programs, and once properties are cited, they are given sufficient time for compliance. Actions include the following:

1. The City will fund capital improvements, establish partnerships with community groups and businesses when funding is available.
2. The City will review existing policy and revise to improve substandard neighborhoods.
3. Subject to need and funding availability, the City will continue to provide CDBG funds for the construction of capital improvement projects within CDBG eligible areas.

Timing: Begin implementation upon adoption. Funding will be provided on a case-by case, the program will be implemented annually. Review of existing policy and subsequent updates to be completed by 2024.

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.3D: Maintenance and Rehabilitation of Individual Mobile Home Units

The City will continue implementing the CalHome Mobile Home Program and work with selected individual mobile homes units to correct health and safety problems related to infrastructure, upkeep, illegal/inferior construction, and aesthetics. Actions include the following:

1. Provide 10 deferred, low-interest rehabilitation loans annually to individual extremely low and low-income mobile home units to correct health and safety problems related to infrastructure, upkeep, illegal or inferior construction, and aesthetics.

Timing: Begin implementation upon adoption, Throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.3E: Conserve and Improve Existing Housing Stock

Properly maintained, safe and sustainable housing supports a household's ability to age in place and promotes high quality housing options for future homebuyers. The City of Pomona is committed to monitoring the safety and quality of existing housing through its Code Enforcement department. Currently, the City has identified 134 units which may be in need of rehabilitation through the City's Rehabilitation, emergency grant and façade rehabilitation program. If a property requires significant repairs or maintenance, the City will inform property owners of available assistance, such as rehabilitation



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loans or grants available to address such issues. The City will actively maintain the quality of the existing housing stock and annually monitor the progress of the Rehabilitation, emergency grant and façade rehabilitation program.

Timing: Begin implementation upon adoption, annual monitoring throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Grant Sources

Policy 2.4: Encourage cooperative and alternative housing models rooted in community equity sharing, partner with local community-based organizations, and explore innovative re-use of public assembly land and City-owned land for affordable housing.

Program 2.4A: Community Land Trust

The City embarked on extensive community outreach efforts as a part of the 2021-2029 Housing Element update process. Through outreach and market analysis, the City identified a community land trust as a potential tool in increasing opportunity and development of affordable housing. Actions include the following:

1. Conduct feasibility study of creating and implementing a community land trust to serve as an avenue to increase affordable housing units. This includes identifying potential sites and studying challenges of property acquisition.
2. Partner with non-profit organizations and community stakeholders to refine the goals and implementation of a community land trust in Pomona.
3. Identify and apply for grants or other funding sources to support the creation of a community land trust.

Timing: Initiate Within 24 Months of Adoption, complete feasibility study by 2025. Annually partner with local organizations and seek funding.

Responsibility Agency: Planning / Housing Services / Economic Development

Funding: Pomona Housing Authority

Program 2.4B: Reuse, Repurpose and Redevelopment of Public Assembly Sites

As part of the sites analysis for the 2021-2029 Housing Element, the City of Pomona identified public assembly properties, particularly houses of worship, within the Housing Element but believes these partnerships with the organizations that serve Pomona could be an important component of the overall process of creating more affordable housing in the community. Actions include the following:

1. Create an inventory and map of faith-based organizations in the City of Pomona.
2. Create an informational packet outlining land use and zoning opportunities to convert congregational and public assembly land uses into residential development.
3. Establish contacts with faith-based organizations and connect them to affordable housing development resources.

Timing: Initiate and establish contacts within 6 months of adoption, complete inventory by within 24 months of initiation. Complete informational materials by December 2023.



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Responsibility Agency: Planning / Housing Services / Economic Development

Funding: Grant Sources

Program 2.4C: Housing Development on City-Owned Parcels

The City will pursue the development of housing on City-owned parcels Downtown and along commercial corridors. The City will also work to create transitional housing for people moving out of homeless shelters and work with local organizations that serve the homeless to determine the level of need for this program, possible components, and cost. Actions include the following:

1. Perform a housing land suitability and infrastructure study of City-owned parcels in order to identify:
2. Sites with potential for housing (to include housing types that could potentially be constructed on site and maximum density).
3. Review housing potential against Surplus Land Act requirements, including options to sell off land or retain land and sell only air rights.
4. Determine barriers to development and estimate when sites could reasonably be developed given current constraints, such as land use policies, lack of available infrastructure.
5. Study all potential housing development scenarios, including 100 percent affordable housing, transitional and permanent supportive housing, and mixed-use developments.
6. Rank the top three locations to focus upon and provide information that would allow City to Issue a Request for Proposals to prospective developers for one or more these City-owned sites for affordable housing re-development. The goal is to identify readily developable sites that can provide diverse, affordable housing within the next 0-5 years.
7. Describe any opportunities to modify public policies to support increased expansion/supply of affordable housing, including mixed-income rental housing and residential investment.
8. Describe possible recommendations for future housing programs and incentives to provide for private developers, to include best practices evidenced in other areas.
9. An infrastructure capacity analysis that should include: site conditions, site development, constraints, sewer and water utilities, stormwater, natural resources, among other factors to inform housing readiness.
10. Identify opportunities for a large-scale catalytic project.
11. Identify possible recommendations for future housing programs and incentives to provide for private developers, to include best practices evidenced in other areas.
12. When applicable, reconcile Vehicle Parking District requirements against redevelopment potential and provide plan on which lot should be retained or consolidated.
13. Provide recommendations to consolidate parking lots to reduce heat island effects and reduce water runoff.
14. Upon findings, revise and amend relevant zoning ordinance to allow for by-right, ministerial processing of affordable housing projects on city-owned parcels.

Timing: Initiate within 18 months of adoption, complete program by 2025. Implement actions annually.

Responsibility Agency: Planning / Housing Services / Economic Development

Funding: Grant Sources

Policy 2.5: Invest in affordable housing developments and initiatives to deepen affordability across all neighborhoods.

Program 2.5A: Community Housing Development Organization Assistance



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The City will continue to assist in finance and technical assistance to nonprofit housing development organizations through the Community Housing Development Organization (CHDO) program. Actions include the following:

1. Work with Certified CHDOs to review proposed projects and provide gap funding for the development of approximately eight affordable housing units.
2. Provide technical assistance to approximately five interested non-profit organizations, including information on HOME program requirements, eligible use of funds, monitoring, and CHDO capacity building.
3. Author Requests for Proposals for rental housing development that includes criteria to prioritize projects that incorporate housing for extremely low-income households.

Timing: Begin implementation upon adoption. Review projects on a case-by-case basis and provide technical assistance on a case-by-case basis. Complete proposal requests by 2023.

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.5B: Affordable Housing Trust Funds & Targeted Investments

The Pomona Housing Authority is a member and partner of the San Gabriel Valley Regional Housing Trust, and recently established its own Pomona Affordable Housing Trust Fund as part of adopting an Inclusionary Housing in-lieu fee program. Taken together, the two trust funds provide a key financial opportunity to deepen investments in both small and large-scale affordable housing developments.

Actions include the following:

Pomona Affordable Housing Trust Fund

1. Establish an eight-year financial projection and strategic plan for potential Inclusionary Housing in-lieu fees to be deposited into Pomona Affordable Housing Trust Fund.
2. Pursue small-scale investments in affordable housing opportunities to complement larger-scale investments from regional housing trust and CHDO sources. Examples include affordable ADU development, support for pensioned senior population for home ownership assistance, and interim, transitional, and permanent supportive housing.

San Gabriel Valley Regional Housing Trust

1. Continue membership in SGVRHT and regularly partner with other member cities on identifying best practices, resource sharing, and opportunities for affordable housing development regionally.
2. Identify large-scale affordable housing development projects in need of gap funding and seek Trust support for matched funding on grant applications and CHDO initiatives.

Other Targeted Affordable Housing Investments

2. Through sources like the Permanent Local Housing Allocation, supplement Trust Fund investments with additional targeted investments in affordable housing production.

Timing: Initiate upon adoption. Complete actions for Pomona Affordable Housing Trust Fund by 2024. Implement actions for San Gabriel Valley Regional Housing Trust annually. Supplement investments in affordable housing production annually, on a case-by-case basis.

Responsibility Agency: Housing Services

Funding: Grant Sources



Policy 2.6: Monitor affordable units at risk of conversion, pursue strategies to protect affordable units, and provide education to tenants and homeowners to increase their knowledge of local housing actions and protect their housing status and investments.

Program 2.6A: Preserve and Monitor At-Risk Housing & All Affordable Units

The City of Pomona currently has 15 affordable housing complexes consisting of both rental and ownership units. These 15 projects contain 1,079 deed-restricted units, 466 of which are at risk of conversion to market rate during the 10-year period commencing on October 15, 2021. The City will monitor these affordable units to ensure that housing costs are consistent with levels appropriate for the identified income category. The City will post an AB 987 Affordable Housing Database on its website and will continue to track affordable housing units citywide through the annual certification process. In addition, as new affordable units are developed, these properties will be added to the table and will be monitored annually to ensure they meet affordability requirements. Actions include the following:

1. Monitor publicly assisted and deed-restricted units to ensure housing costs are consistent with levels appropriate for identified income category.
2. Work with developers to maintain existing affordable housing stock in City.
3. Create an AB 987 Affordable Housing Database on publicly accessible website and continue tracking affordable housing units through annual certification process.
4. Explore methods to continue affordability of units beyond deed restriction expiration, such as project-based vouchers, re-financing, and 99-year affordability covenants.
5. Require property owners to notify tenants and local governments of the impending loss of affordability 12 and 6 months prior.
6. Proactively outreach to property owners at least three (3) years prior to expiration of covenant.
7. Identify organizations qualified to preserve at-risk units and coordinate with them annually.
8. Assists with funding applications and provided support to tenants when funding is available on a case-by-case basis.
9. Create, and keep up to date, a fact sheet with education and information on available affordable housing opportunities.

Timing: Within Six Months of Adoption, implement annually.

Responsibility Agency: Planning / Housing Services

Funding: Grant Sources

Program 2.6B: Public-Facing Online Housing Resources Dashboard

In an effort to transparently share information on housing resources and opportunities with all Pomona households, and to increase the community's knowledge on housing actions and policies and investments, the City will establish a public-facing website that will function as a "dashboard" of housing resources. Actions include:

1. The dashboard will list the addresses and building management contact information of affordable housing units on the City website and distribute the list to community and housing organizations annually.
2. The dashboard will display AB 987 affordability tracking (per Program 2.6A) and status of existing housing covenants and deed restricted units.
3. The dashboard will list existing, new, and substantially rehabilitated income-restricted units.



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4. The dashboard will make a list of units acquired and substantially rehabilitated under the Neighborhood Stabilization Program.
5. The dashboard will share the investments being made from the Pomona Affordable Housing Trust Fund and any leveraged funds invested in Pomona from the San Gabriel Valley Regional Housing Trust.
6. The dashboard will also be translated in Spanish and a paper-based version will be available at the Housing Services counter along with reliable contact information and phone numbers to aid any households with limited or no internet access.

Timing: Initiated upon adoption of Housing Element, Ongoing throughout 6th Cycle

Responsibility Agency: Housing Services, Planning

Funding: Grant Sources

Program 2.6C: Fair Housing Assistance Program

The City will continue provided fair housing assistance resources to the general public, as required by fair housing law. Actions include the following:

1. Partner with local non-profit organizations.
2. Provide legal and information resources on fair housing to Pomona residents.
3. Provide fair housing educational information and outreach.

Timing: Implement upon adoption, Ongoing support and coordination throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 2.6D: Housing Leadership Academy

The City established a Housing Leadership Academy in February 2021 consisting of 30 housing stakeholders in Pomona. The academy participated in a six-week intensive housing policy workshop. The purpose of the academy is to empower and encourage local residents to actively participate in housing outcomes in their City. Actions include the following:

1. Continue involvement of Academy participants in Sixth Cycle Housing Element and development of goals, policies, and programs.
2. Increase City's capacity to engage Pomona residents by empowering Academy participants to share information and resources on various housing programs offered by the City.

Timing: Continue effort. Implementation upon adoption, Throughout 6th Cycle

Responsibility Agency: Housing Services

Funding: Grant Sources



GOAL 3

HOUSEHOLD RESOURCES

Pomona's households have the resources to improve their property, to continue living in Pomona across multiple generations, to build income and equity, and to be shielded from displacement and rapid changes in affordability.

This goal directly addresses issues of displacement. It also addresses the ability of current residents to remain in the City of Pomona, to build generational equity and to be afforded the ability to age comfortably in place. Lastly, it builds upon the community feedback and concerns received during community engagement and aims to address the potential displacement issues that may existing residents and future residents of the City.





Policy 3.1: Enable Pomona households to accommodate multiple generations living together.

Program 3.1A: Express Permitting for Additional Units

Since the adoption of State and local laws pertaining to accessory dwelling units, or ADUs, the City has seen a significant increase in the number of ADU permit applications. The majority of these applications represent conversions of existing interior garage spaces. More recently, the City adopted an SB 330 Overlay, which enables the creation of additional primary units on single-family zoned parcels. Collectively, ADU laws and the SB 330 Overlay provide a local opportunity to enable Pomona households to accommodate multi-generational living. Actions include the following:

1. Implementation of a permit ready ADU and Duplex program to reduce time and costs associated with designing an ADU or second primary unit.
2. Creating permit ready plans for special needs populations, such as large households, seniors, and residents with physical or developmental disabilities.
3. Creating an expedited plan check review process to shorten the time to issue a permit.
4. Explore potential State and Regional funding sources for affordable ADUs and provide financing support for affordable ADUs with available funding.
5. Train and designate specific counter staff to answer questions about the ADU process and provide information to interested property owners.
6. Create a monitoring program to track ADU and JADU creation and affordability levels throughout the planning period. This will allow the City to monitor the development of accessory units at all income levels. The monitoring program will track progress annually and will implement additional incentives within 2 years of the above incentives, and every 2 years subsequent, if ADUs are not approved and permitted at the rate anticipated in **Appendix C** and the above incentives do not increase ADU development. Additional incentives may include:
 - Reduced or waived fees for affordable ADUS
 - Additional streaming of permit ready plans
 - Provide financial support to develop lower income ADUS if funding is available

Timing: Develop program Implementation Strategy within 6 months of adoption, Complete implementation and updates within 24 months. Monitor annually throughout 6th Cycle.

Responsibility Agency: Planning / Housing Services

Funding: Grant Sources

Policy 3.2: Encourage Pomona households to improve upon their land in a manner that is aligned with their cultural norms and practices.

Program 3.2A: Land Use in Practice

The majority of single-family zoned parcels in the City require deep front and rear yards, and additional property development standards that may prohibit certain uses of property. The City will evaluate potential constraints and limitations these development standards may have on residential development. Actions include the following:

1. As part of Pomona Zoning Ordinance Update, assess the use of front yards, rear yards, and entire sites to determine appropriate property development standards.



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2. Study historical patterns of applications for relief, such as requests to increase lot coverage, increases in height of fencing, hedges, and walls, and other relief requests, to identify any common needs not being met by existing zoning.

Timing: Initiate Within 12 Months of Adoption, Determine Strategy Within 24 Months

Responsibility Agency: Planning

Funding: Grant Sources

Policy 3.3: Provide households with tools to pursue pathways to equity building through subdivision of land.

Program 3.3A: Lot Splits

Over the last five years, the City has approved multiple small-lot subdivisions of land citywide. This includes a code amendment permitting small lots in the Pomona Zoning Ordinance, and the creation of small lots within the Pomona Corridors Specific Plan. Lot splits in single-unit neighborhoods have the potential to provide a new and low-cost pathway to build equity among Pomona's households, and to provide an alternative, affordable for-sale housing solution. Actions include the following:

1. Adopt standards in the Pomona Zoning Ordinance for lot splits in all residential zones that consider public health and safety impacts and Los Angeles County Fire code requirements.
2. Identify parcels with access to public rights-of-way, inclusive of public alleys, and study potential for sub-lots, access easements, and flag lots.
3. Reconcile the creation of fee simple small lots with ADU law. Explore potential for airspace subdivision / condominium as an alternative for-sale model.
4. Assess feasibility of incentivizing lot splits with provisions of ensuring family connection or use as multi-generational equity building tool.

Timing: Within 18 Months of Adoption

Responsibility Agency: Planning

Funding: Grant Sources

Policy 3.4: Shield Pomona households from displacement and rapid changes in affordability brought on by the acceleration of private equity in the housing market.

Program 3.4A: Rent Stabilization Feasibility Study

The City embarked on extensive community outreach efforts as a part of the 2021-2029 Housing Element update process. Through outreach and available data analysis, the City identified rent stabilization as a potential tool to preserve and increase affordable housing opportunities. The City will initiate a market study to assess the feasibility of rent stabilization policies in the City of Pomona.

Timing: Explore Feasibility Within 18 Months of Adoption, Designate Approach Within 36 Months of Adoption

Responsibility Agency: Planning

Funding: General Fund



Program 3.4B: Local Tenant Protection Regulation Study

AB 1482, also known as the Tenant Protection Act of 2019, requires a landlord to have a “just cause” in order to terminate a tenancy, limits annual rent increases, and provides other tenant protections. This law expires on January 1, 2030. The City does not have a local regulatory tool that aligns with AB 1482 or other tenant protection laws. In an effort to understand potential benefits of a local tenant protection ordinance, the City will initiate a feasibility study.

Timing: Explore Feasibility Within 18 Months of Adoption, Designate Approach Within 36 Months of Adoption

Responsibility Agency: Planning

Funding: General Fund

Policy 3.5: Encourage Pomona households to pursue entrepreneurial activities like home-based businesses.

Program 3.5A: Home-Based Businesses

The City allows home-based businesses to conduct activity on private residential property through a Home Occupation Permit. After launching Activate Pomona during COVID-19 measures, the City saw an increase in creative and innovative home-based business requests that are limited by existing Home Occupation language. Actions include the following:

1. Update Home Occupation language in Pomona Zoning Ordinance update to reflect a wider breadth of home-based businesses.
2. Study the potential for introducing commercial uses in residential neighborhoods, such as through an Accessory Commercial Unit, or limited Mixed-Use properties.

Timing: Within 18 Months of Adoption

Responsibility Agency: Planning

Funding: General Fund



GOAL

4

NEIGHBORHOOD RESOURCES

Pomona's households are supported by a strong network of resources and amenities that encourage quality public health outcomes.

This goal directly addresses issues of smart growth and healthy, safe, and equitable neighborhoods. It focuses on the amenities and resources which are essential to creating housing opportunities which are both available to a variety of income levels and households, as well as are connected to necessary resources. Lastly, it builds upon the community feedback and concerns received during community engagement about quality of life, the impact of future population growth, and access to transportation, retail, commercial and economic opportunities.





Policy 4.1: Define and design Pomona's rights-of-way to accommodate multi-modal transportation, pedestrian and disability access, climate change resilience, and recreation and amenity space to the benefit of all residents

Program 4.1A: Citywide Complete Streets Initiative

The City of Pomona recognizes the importance of safe roads and sidewalks for all modes of transportation. Complete streets provide important and adequate transit for pedestrians, cyclists and motor vehicles alike. As a part of the Citywide Complete Streets Initiative, the City aims to focus on improved walkability, access to public transit for special needs groups and lower income neighborhoods, safe and shared roads for cyclists and motor vehicles, and overall improvement in transit connectivity. The City was recently awarded a grant from the Southern California Association of Governments to establish a citywide “complete streets” ordinance that enables the City to regulate and zone the streets.

Actions include the following:

1. Preparation of a Complete Streets Ordinance
2. Data collection and existing conditions report for First-Last Mile connectivity at Future Metro L (Gold) Line station and existing Downtown Metrolink station, including:
 - station area pedestrian, bicycle, and micro-mobility improvements.
 - 15-minute pedestrian radius around key academic, cultural, and public health institutions and K-12 schools.
 - enhancing Foothill Transit and Omnitrans routes and stops with high-frequency service.
 - at-risk neighborhoods with higher percentage of vulnerable populations.
3. Model complete street network segment needs based on both quantitative and qualitative metrics, balancing active transportation goals against socioeconomic indicators of social and environmental justice.
4. Host 12 monthly pop-up workshops throughout community and community walks and bike rides to collect specific community input; establish a technical advisory committee.
5. Establish legal proportionality nexus between proposed development impacts to active transportation.
6. Adopt Ordinance that codifies Complete Streets into the Pomona Zoning Ordinance as a “Streets” module.
7. Implement “quick build” demonstration projects to test Complete Streets regulations in coordination with SCAG and Go Human Campaign.

Timing: Implement Within 24 Months of Adoption

Responsibility Agency: Planning, Public Works

Funding: Grant Sources

Program 4.1B: Transit Education

The City conducted an assessment of fair housing issues within the Housing Element and identified the following key themes:

- ▶ 96.2 percent of all jobs in Pomona are located within ½ mile of transit
- ▶ There are 48,717 customer households within a 30-minute transit commute of local businesses



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- ▶ 2.21 percent of workers in Pomona walk to work
- ▶ 0.86 percent of workers in Pomona bike to work

On average, households in Pomona have the following:

- ▶ 1,316 transit trips per week within ½ mile
- ▶ 5 transit routes within ½ mile
- ▶ 77,858 jobs accessible in a 30-minute transit trip
- ▶ 2.67 percent of all commuters use transit

The City has developed a robust and resourceful transit system, however the community, specifically those in the workforce either choose not to use transit for various convenience reasons or have limited education about the City's transit system and therefore have limited access. To increase ridership the city will explore the feasibility of developing an educational outreach program to empower the community to take advantage of existing and affordable transportation options. Actions include the following:

1. Identify areas of the City where public transit is not used.
2. Explore feasibility of targeted outreach to increase ridership.
3. If necessary, create a strategy for an outreach program to promote public transit ridership and increase access to and knowledge of the City's transportation system.

Timing: Explore Feasibility Within 18 Months of Adoption, Designate Approach Within 36 Months of Adoption

Responsible Agency: City of Pomona Planning Division and Transit Authority

Funding Source: General Fund

Policy 4.2: Strengthen Pomona's network of parks, trails, and recreational facilities.

Program 4.2A: Citywide Parks Improvement

The City of Pomona recognizes the social, health and welfare benefits of a strong parks network and park access for Residents. The Park improvement program will focus on analyzing existing conditions and needs at each of its 28 parks, including the condition of the facilities, community centers, and programming at each of the parks. This program will also assist the City in prioritizing and addressing the needs at each park, identifying appropriate and necessary improvements and focus on increasing the quality of and access of the parks system for residents.

Actions include the following:

1. Preparation of a Parks Master Plan.
2. Several community meetings to provide residents with an opportunity to share valuable input into the needs of the community.
3. The Master Plan may include an analysis of needs, a financial strategy analysis, and an analysis of the feasibility of new park development, a level of service cost analysis, and the identification of alternative funding sources for park development, maintenance, and administration.

Timing: Within 24 Months of Adoption

Responsibility Agency: Public Works

Funding: General Fund



Policy 4.3: Strengthen Pomona's preservation and protection of historic structures and sites for the benefit of all residents.

Program 4.3A: Preservation and Rehabilitation of Historic Building Stock

The City will continue to support resident efforts at preserving historical districts and landmarks throughout the City of Pomona. Actions include:

1. The City will assist residents living in historic districts on the requirements of the Historic Preservation ordinance.
2. The City will establish updated Design Guidelines that provide predictable, clear guidance on historical architectural styles to ensure that new additions and improvements on historic properties preserve historic significance.
3. The City will develop a context statement and study potentially historically significant structures and neighborhoods citywide.
4. The City will refine its historic regulations to ensure the protection of potentially historic resources that are 50 years or older.
5. The City will provide one-on-one assistance at the public counter for the Mills Act Program, which enables tax-based savings to homeowners seeking to improve historic properties.
6. The City will continue maintaining a website dedicated to Historic Preservation information.

Timing: Continued effort, Implementation upon adoption

Responsibility Agency: Planning

Funding: General Fund

Policy 4.4: Integrate the cultural arts into housing design and development across all neighborhoods.

Program 4.4A: Art in Public Places Program

The Art in Public Places Program was established in 2012 to promote the creation of public art citywide. Included in this program is the Public Art Fund, which established an in-lieu fee for new qualifying development towards public art. Public art improves quality of life in neighborhoods and can provide a vehicle for residents to express themselves creatively. Actions include:

1. Encourage applicants of new housing projects to integrate public art into projects and rely upon local artists to execute public art.
2. Work with the Cultural Arts Commission and Citizen's Advisory Committee to engage the public on ideas for public art at a neighborhood scale, and release Calls for Artists to fund such ideas.

Timing: Continued effort, Implementation upon adoption

Responsibility Agency: Planning

Funding: Public Art Fund



Policy 4.5: Ensure that housing growth coincides with the protection of local-serving commercial amenities and employment centers and encourage pathways for mutual aid.

Program 4.5A: Local Serving Resources

The purpose of this program is to create legal pathways for households to pursue mutual aid and community-driven efforts at providing neighborhood resources. In addition, it's intended to study the potential to protect commercially zoned neighborhood retail from full redevelopment without replacement. Actions include the following:

1. Establish regulations in the Pomona Zoning Ordinance for local-serving retail, community gardens and urban agriculture, and other local serving resources.

Timing: Within 36 months of adoption

Responsibility Agency: Planning

Funding: General Fund



GOAL

5

FAIR HOUSING

Pomona's housing policy actively supports fair and equal housing opportunity for all persons regardless of race, religion, sex, marital status, ancestry, national origin, family status, physical challenges, or color.

This goal directly addresses the fair housing issues and local contributing factors to fair housing concerns identified in **Appendix D** of this document. It focuses on increasing awareness about fair housing laws and rights, improving equity in the community and in housing opportunities. Lastly, it aims to mitigate past practices and policies which have exacerbated fair housing issues in Pomona and builds upon the community input received about key fair housing challenges related to housing access.





Policy 5.1: Foster Diversity, Equity and Inclusion in housing by addressing barriers to accessing housing based on protected characteristics such as race, color, sex and more through Affirmatively Furthering Fair Housing (AFFH) policies.

Program 5.1A: Fair Housing in Land Use Regulations

The AFFH analysis made several conclusions with respect to fair housing that have land use regulatory implications. In order to meaningfully address these concerns, the City will take the following actions:

Racially/Ethnically-Concentrated Areas of Poverty (R/ECAP Areas):

R/ECAP areas are census tracts where more than half the population is non-White and 40% or more of the population is in poverty or where the poverty rate is greater than three times the average poverty rate in the area. Pomona's analysis identified two census tracts that are considered racially or ethnically concentrated, which means that the non-white population is greater than 50 percent and the poverty rates exceed 40 percent. Moreover, no concentrated census tracts of "affluence," defined as a census tract in which 80 percent or more of the population is White and has a median income of at least \$125,000, exist in Pomona.

Actions include the following:

1. As part of the Pomona Zoning Ordinance update, analyze and identify regulations that may have historically contributed to the disparities in access to housing and propose innovative solutions such lot configuration, affordability covenants and land splits to encourage diversified development and support opportunities for wealth building through home ownership.
2. Explore and implement anti-gentrification policies and regulations to combat displacement, which especially effect low-income residents and communities of color.
3. Engage community health workers to conduct ground level site visits and meetings within R/ECAP census tracts to better understand resident and business barriers, resources, and needs.

Environmental Justice:

The analysis also identified environmental health and exposure to harmful pollutants using the CalEnviro Screen mapping tool (using a scale of 0-100 percent) and accompanying data (2018). The analysis demonstrated that a majority of Pomona is classified as high to very high (81-100 percent), signifying high exposure to harmful pollutants. These environmental justice concerns overlap with other realms, including public health, income, safety, climate resilience, and transformative justice. The City is need of a singular new Element of the Pomona General Plan that meaningfully studies and defines policies around these interdependent subjects.

Actions include the following:

1. Initiate and adopt a new Element of the Pomona General Plan that directly addresses environmental justice through clear policy language that supports outcomes that reduce pollution burden and exposure to harmful pollutants for all Pomona households.
2. Integrate the disciplines of transformative justice, climate resilience, emergency preparedness and safety, and public health into the new Element, to establish a more holistic and interdisciplinary approach to connecting fair housing challenges with public health outcomes.
3. Establish health Indicators to meaningfully measure progress towards equity.



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Timing: Begin within 12 Months of Adoption and complete Zoning Code Review and update by July 2023. Complete program actions related to Racially/Ethnically Concentrated Areas of Poverty (R/ECAP Areas) by 2025. Complete program actions related to Environmental Justice by 2026.

Responsibility Agency: Planning

Funding: Grant Sources

Program 5.1B: Fair Housing in Government and Non-Government Financing

The AFFH analysis identified discrimination in lending within the non-government finance industry, and a reluctance among landlords to accept housing assistance vouchers. Barriers to housing resources continue to persist in the realm of both government and non-government financing. Actions include the following:

1. SB 329 redefines source of income to be inclusive of Federal, State or local public assistance, and SB 222 adds to the definition Veterans Affairs Supportive Housing (VASH) vouchers. The City will assess whether a local ordinance is necessary to further protect use of vouchers as a source of income and implement upon findings.
2. The Pomona Housing Authority and City will work with financial institutional partners, including banks, credit unions, and alternative banking models, to identify ways to discourage discrimination in underwriting and lending to Pomona households. This include studying cooperative models like community land trusts as a means to prevent fair housing discrimination.

Timing: Begin within 12 Months of Adoption and complete assessment by 2024. Work with financial institutional partners annually, implement programmatic results of analysis and coordination by 2026.

Responsibility Agency: Housing Services

Funding: Grant Sources

Program 5.1C: Fair Housing in Economic Opportunity

The AFFH analysis summarized findings from the UC Davis Regional Opportunity Index, which concludes that the majority of residents within Pomona have a moderate to low level of access to opportunity throughout the City. Additionally, analysis of the TCAC/HCD opportunity Area Maps show that all census tracts in Pomona are classified with the “Low to Moderate Resource” designation. This indicates that these census tracts may lack essential mobility, retail/food, economic, housing or civic resource that may promote upward mobility and result in healthier neighborhoods. Actions include the following:

1. The City will study trends in home-based businesses and home occupations and explore programs to encourage the establishment of businesses based on household demand that can facilitate entrepreneurship without the need for new brick-and-mortar leases or property purchase.
2. As part of the Pomona Zoning Ordinance update, the City will analyze ways to preserve neighborhood-serving retail and incentive the redevelopment of parcels for housing that can retain critical amenities and resources for neighborhoods.
3. As part of the Citywide Complete Streets Ordinance, the City will explore how to activate the public rights-of-way to be more inclusive of mutual aid and urban agriculture and other legal pathways to encourage the sharing of resources within neighborhoods to increase economic opportunity.

Timing: Begin within 6 Months of Adoption and complete by 2024

Responsibility Agency: Planning, Economic Development

Funding: Grant Sources



Quantified Goals and Objectives

California Housing Element Law requires jurisdictions to estimate the number of affordable housing opportunities that will be created over the planning period. The quantified objectives for the 2029-2029 Housing Element presents the anticipated and potential affordable housing development for the planning period starting on June 30, 2021.

Table 3 presents the City's quantified objectives in four categories:

- ▶ Construction of units as projected by the Regional Housing Needs Assessment allocations
- ▶ Construction of accessory dwelling units
- ▶ Preservation of exiting deed restricted units at risk of conversion to market rate
- ▶ Rehabilitation of units with various issues impeding health, safety and livability

Table 3: Summary of Quantified Objectives						
Income Group	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA)	1,399 units*	1,400 units	1,339 units	1,510 units	4,910 units	10,558 units
Accessory Units	1,486 units			5 units	650 units	2,181 units
Preservation	466 units			0 units	0 units	466 units
Rehabilitation ¹	134 units			0 units	0 units	134 units
*Extremely Low Units are defined by HCD as half of the City’s Very-Low Income need.						
1. * Based on data from the City of Pomona rehabilitation, emergency grant and facade rehabilitation programs						