

Appendix C

HOUSING AND FINANCIAL RESOURCES





A. Financial Resources

Providing an adequate supply of decent and affordable housing requires funding from various sources, the City has access to the following finding sources.

1. Section 8 Housing Choice Voucher

The Section 8 Housing Choice Voucher program is 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. The Pomona Housing Authority (PHA) administers Section 8 Housing Choice vouchers within the City. Between Fiscal Year 2018 and 2021, the City has allocated 4,102 housing vouchers to assist low-income families, persons experiencing homelessness, veterans, and disabled families in the community.

2. Grants and Programs

The City receives a variety of financial resources to go towards expanding economic opportunities of the Pomona community. According to the Pomona Consolidated Plan for 2018 to 2023, entitlement allocations and reallocated funds for the 2018 to 2019 Fiscal Year include the following listed in **Table C-1**.

Table C-1: 2018-2019 FY Resources	
Fund	Amount
Community Development Block Grant (CDBG)	\$2,167,226
HOME Investment Partnerships	\$803,709
Emergency Solutions Grant (ESG) Programs	\$181,281
Entitlement Allocations Total	\$3,152,216
FY 2017-18 CDBG Anticipated Program Income	\$108,129
FY 2017-18 HOME Anticipated Program Income	\$423,728
FY 2017-18 HOME Carryover/Reprogrammed Funds	\$1,044,158
FY 2017-18 ESG Carryover/Reprogrammed Funds	\$131,040
Total	\$4,859,271

Source: City of Pomona 2018-2023 Consolidated Plan

Community Development Block Grants (CDBG)

The Community Development Block Grant (CDBG) program provides annual grants on a formula basis to cities to develop viable urban communities by providing a suitable living environment and by expanding economic opportunities, principally for low- and moderate-income persons (up to 80 percent AMI).

CDBG funds can be used for a wide array of activities, including:

- Housing rehabilitation;
- Lead-based paint screening and abatement;
- Acquisition of buildings and land;
- Construction or rehabilitation of public facilities and infrastructure, and;
- Public services for low-income households and those with special needs.



HOME Investment Partnership Program (HOME)

The HOME program provides federal funds for the development and rehabilitation of affordable rental and ownership housing for households with incomes not exceeding 80 percent of area median income. The program gives local governments the flexibility to fund a wide range of affordable housing activities through housing partnerships with private industry and non-profit organizations. HOME funds can be used for activities that promote affordable rental housing and homeownership by low-income households.

3. Energy Conservation

The primary uses of energy in urban areas are for transportation lighting, water heating, and space heating and cooling. The high cost of energy demands that efforts be taken to reduce or minimize the overall level of urban energy consumption. Energy conservation is important in preserving non-renewable fuels to ensure that these resources are available for use by future generations. There are also a number of benefits associated with energy conservation including improved air quality and lower energy costs.

Title 24

The City abides to Title 24 standards as mandated by the State. Title 24 establishes energy efficiency standards for residential and nonresidential buildings (new structures and additions) to reduce energy consumption. The standards are updated every three years to achieve greater efficiency and reach for new goals.

Energy Use and Supply

The City's General Plan identifies the following programs to promote the reduction of energy demand throughout the City:

- Encouraging or requiring “green building” techniques (see General Plan Section 7-F Community Design) “Green Building” techniques reduce a building’s energy use through efficient lighting, heating, and cooling.
- Promoting energy efficient patterns of development (see General Plan Section 6. Pomona Tomorrow). Compact, clustered, high density development reduces energy demand by reducing vehicle trips/ trip length and by more efficiently utilizing energy for lighting, heating, and cooling.

In addition, Distributed Energy Generation is electricity produced on site or close to load centers. Significant energy losses occur due to transport along long distance transmission lines. Supplementing large regional power plants with locally distributed energy generation sources both increases energy supply and energy generation efficiency, according to the Pomona General Plan. The most efficient and cost-effective form of distributed energy generation is cogeneration, or combined heat and power. By recycling waste heat, these systems are much more efficient than systems that separately serve thermal and electric loads. Cogeneration systems are typically effective at neighborhood or district scales up to a quarter mile which makes them good candidates for transit-oriented districts, especially those with large institutions such as the PVHMC. Other forms of distributed energy that are also renewable and plentiful in southern California are wind and solar power. The City's General Plan notes that encouraging new construction and retrofits to utilize solar and wind power will contribute to improved air quality, reduced reliance on fossil fuels, and reduced energy costs.



B. Adequate Sites Analysis

This section contains a description of the candidate sites identification to meet Pomona’s RHNA need at all income levels. The full list of these sites is presented in **Table C-11**.

1. Regional Housing Needs Allocation

The Housing Element is required to identify potential candidate housing sites by income category to meet the City’s RHNA Allocation. The sites identified within the Housing Element represent the City of Pomona’s ability to plan for housing at the designated income levels within the 6th housing cycle planning period (2021-2029). The identified sites are either residentially zoned or within a specific plan area or general plan land use that permit residential uses. The development capacity for each site depends on its permitted density, consistency with surrounding uses, the City’s past performance and development trends and the site’s location as well as known development factors.

Future Housing Needs

Future housing need refers to the share of the regional housing need that has been allocated to the City. The State Department of Housing and Community Development (HCD) has supplied a regional housing goal to the Southern California Association of Governments (SCAG). SCAG was then required to allocate the housing goal to each jurisdiction within the region through a RHNA Plan, which was adopted in March 2021. In allocating the region’s future housing needs to jurisdictions, SCAG is required to take the following factors into consideration pursuant to Section 65584 of the State Government Code:

- Market demand for housing
- Employment opportunities
- Availability of suitable sites and public facilities
- Commuting patterns
- Type and tenure of housing
- Loss of units in assisted housing developments
- Over-concentration of lower income households
- Geological and topographical constraints

This RHNA covers an 8-year planning period (2021-2029) and addresses housing issues that are related to future growth in the region. The RHNA allocates to each city and county a “fair share” of the region’s projected housing needs by household income group. The major goal of the RHNA is to assure a fair distribution of housing among cities and counties within the SCAG region, so that every community provides an opportunity for a mix of housing for all economic segments.

Pomona’s share of the SCAG regional growth allocation is **10,558** new units for the current planning period (2021-2029). **Table C-2** indicates the City’s RHNA need for the stated planning period.



Income Category	Percent of Median Family Income (MFI)	RHNA Allocation
Very Low Income	0-50% MFI	2,799 units
Low Income	51-80% MFI	1,339 units
Moderate Income	81-120% MFI	1,510 units
Above Moderate Income	>120% MFI	4,910 units
TOTAL		10,558 units

2. Selection of Sites

The City of Pomona has identified sites with capacity to accommodate the 2021-2029 RHNA. **Table C-3** shows the City’s 2021-2029 RHNA need by income category as well as a summary of the sites identified to meet that need. The analysis within this appendix shows that the City of Pomona has the capacity to meet their 2021-2029 RHNA allocation through a variety of methods, including:

- Identification of redevelopment capacity on sites which permit development of residential uses at or above 30 dwelling units per acre, within infill areas of the City, as appropriate for mixed income housing
- Identification of development capacity on sites which permit the development of residential uses at 20 dwelling units per acre, under the SB 330 Overlay, as appropriate for moderate and above moderate-income housing
- Identification of development
- Identification of City owned properties suitable for the development of housing
- Future development of accessory dwelling units (ADUs)

The City has identified 89 parcels within the Pomona Corridor Specific Plan (PCSP), which runs along major corridors in Pomona going both east/west and north/south. 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. City has identified 63 parcels within the SB300 overlay, which permits housing in exiting residential neighborhoods, commercial centers, in peripheral regions of the City’s major corridors. The City has also identified to parcels in the Phillips Ranch Specific Plan and 96 parcels which are considered “in the pipeline” as they are currently in review for a building permit (detailed in **Table C-10**). The identified sites are shown in **Figure C-3**, and they 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). Many of the uses are in multi-tenant commercial centers with single ownership and show little to no evidence of recent investment or redevelopment.

The City of Pomona is generally built out in nature, the sites within the inventory are currently connected to the City’s infrastructure systems and upon further review would not require additional on and off sites improvements. Additionally, as many of the sites are not vacancy or within developed areas, all sites are served by water, sewer and dry utility providers. The City does not have access to most leasing information as these are generally private documents but has conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period. The City has had



City of Pomona – 2021-2029 Housing Element Update

discussions with property owners at the Planning Division counter to determine interest in redevelopment for residential uses, and on occasion received formal requests for Zoning Information Letters.

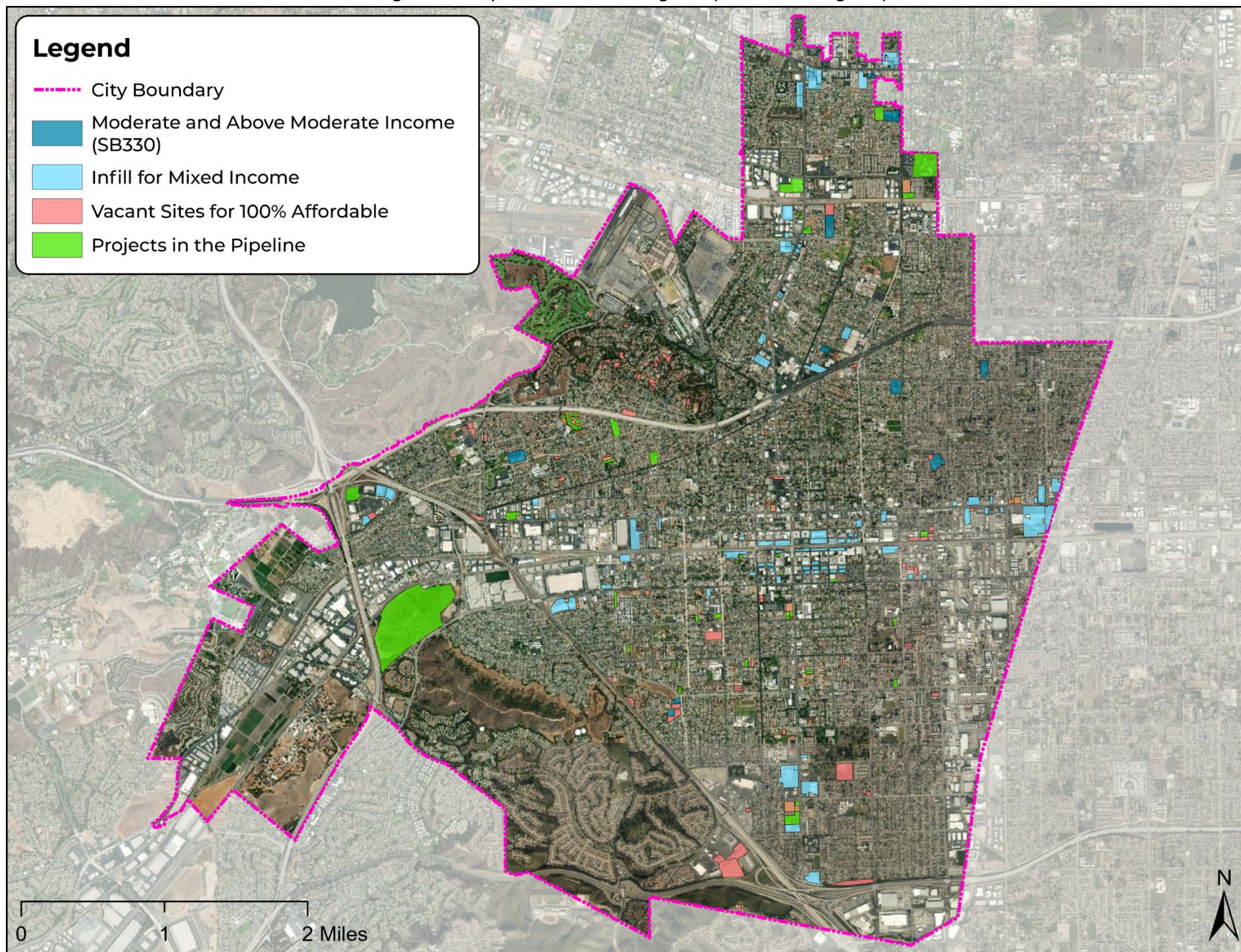
This appendix contains **Table C-7**, which identifies each candidate housing site within Pomona’s sites inventory. The sites are identified by assessor parcel number (APN) as well as a unique identifier used to track sites within the inventory. Additionally, the following information is provided for each parcel.

- Address
- Ownership
- Zoning (including Specific Plan areas, Urban Plans, and Overlays, if applicable)
- Size (Net developable acres removing known development constraints)
- Density
- Vacancy status
- Previous Housing Element identification
- Potential Development Capacity (Dwelling Units) by income category
- Description of existing us

Table C-3: Summary of RHNA Status and Sites Inventory					
	Very Low Income	Low Income	Moderate Income	Above Moderate Income	Total
RHNA (2021-2029)	2,799	1,339	1,510	4,910	10,558
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)	950		8	2,057	3,015
Unit Capacity on Existing Residentially Zoned Land	3,459		1,759	5,855	11,073
Projected ADU Construction					
Projected ADU Construction	331		10	141	482
Sites Inventory Total					
Total Units towards RHNA	4,740		1,777	8,053	14570
Total Unit Capacity Over RHNA	602		267	3,143	4,012
<i>Pro Housing Pomona Percentage</i>	15%		17%	64%	38%



Figure C-1: Map of Candidate Housing Sites (All Income Categories)





3. Mixed Use Zones for Residential Development

Most of the sites to accommodate the City’s RHNA are within zones or general plan designations that permit mixed use. Majority of the sites are within the Corridor Specific Plan or Downtown Pomona Specific Plan and all permit housing consistent with the regulations of the transect zones identified in the Pomona General Plan. The City’s transect zones permit residential as a sole use which was established to increase capacity and opportunity for development/redevelopment on infill sites. From 2013 to 2021 the City permitted 8 projects in mixed-use zones, the breakdown of project type is shown in **Table C-4**. The data in **Table C-4** represents the entirety of build out in zones that allow both residential and commercial, with the exception of work live conversions downtown. Overall, 100 percent of recent projects in these zones are fully residential or have a primarily residential component.

Address	Mixed-Use Zone	Year Built	Residential %	Units	Non-Residential %	Comments
1445 E HOLT AVE	Pomona Corridors Specific Plan	2018	100.0%	50	0.0%	--
1680 SOUTH GAREY AVENUE	Pomona Corridors Specific Plan	2018	100.0%	46	0.0%	--
2771 NORTH GAREY	Pomona Corridors Specific Plan	2021	99.5%	312	0.5%	1,200 SF ground floor retail only.
1982 SOUTH GAREY	Pomona Corridors Specific Plan	2020	100.0%	20	0%	--
2160 SOUTH GAREY	Pomona Corridors Specific Plan	2019	100.0%	31	0%	--
424 WEST COMMERCIAL STREET	Downtown Pomona Specific Plan	2021	100.0%	61	0%	--
120 E MONTEREY	Downtown Pomona Specific Plan	2013	100.0%	349	0%	--
615 E THIRD	Downtown Pomona Specific Plan	2013	100.0%	202	0%	--

4. Redevelopment of Nonvacant Sites for Residential Use

The City of Pomona has analyzed the use of non-vacant sites to ensure the accommodation at least 50-percent of its lower income RHNA housing need. When accommodating projects in the pipeline with current entitlements and the existing inventory of vacant land, there is a surplus of vacant lands to



accommodate more than 50% of the city lower income need on vacant lands identified in the inventory. To accommodate the need at all income levels, the City has conducted an analysis of sites that permit residential development through the Pomona Corridors Specific Plan and the Downtown Pomona Specific Plan. As shown in Table C-5, a description of each use and the factors supporting its likelihood to redevelop in the planning period is provided. . State law requires that the City analyze the following six conditions:

1. The extent to which existing uses may constitute an impediment to the future residential development within the planning period,
2. The City’s past experience with converting existing uses to higher density residential uses,
3. Analysis of leases that would prevent redevelopment of the site,
4. Development trends,
5. Market conditions, and
6. Regulatory or other incentives to encourage redevelopment.

Condition #1: Existing Use Analysis

Table C-5 shows the existing uses on each of the non-vacant candidate sites identified to meet Pomona’s RHNA need. These sites are largely commercial in nature, majority of the nonvacant sites identified are underutilized or are considered non vacant per HCD’s standards, however, have viable capacity for redevelopment. Each site was analyzed based on viability for redevelopment, sites were evaluated based on:

- Parcel acreage
- Availability of land for residential development
- Existing use
- Max buildout opportunity through FAR or Density
- Percentage of max buildout opportunity in use, and
- Accessibility to resources and transit proximity

Table C-5 provides an analysis of existing use on non-vacant sites. The table shows the square footage of existing buildings or use, the total permitted density or floor area ratio (FAR), and the percent of maximum density/FAR permitted that is in use. The analysis shows that nearly all of the sites are not currently built to full capacity compared to what is permitted. For these sites, combined with market appetite for housing (outlined in “Market Trends and Demand Analysis”), there is opportunity for the land to be purchased and redeveloped to utilize all space to full capacity. Additionally, there are multiple sites which have surface parking lots. Many of these are zoned for mixed-use or residential in downtown corridors of the City and many are owned by the City. These sites have the most potential for redevelopment, according to **Table C-5** they are not built to max capacity.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8323027031	35,846.6	3.37	0.5	49%	Religious center with accessory buildings and large surface parking lot. Good candidate as YIGBY site. There is more opportunity and unrealized potential on this site. The existing use was removed from total capacity calculations and the site could be subdivided for housing.
8348008062	50,643.0	8.24	0.7	20%	Existing Church, 2 acres in rear is vacant and unused, density assumed on these acres only at 80% development potential. There is more opportunity and unrealized potential on this site as a majority of the site is undeveloped. The existing use was removed from total capacity calculations and the site could be subdivided for housing.
8344033900	--	3.56	0.6	0%	This parcel is an athletic field with a large surface parking lot. This lot represents partial or full redevelopment opportunity. This is Goals soccer facility, which is relatively stable, but it is on a lease w/ PUSD so once lease is up could be redeveloped. There is more opportunity and unrealized potential on this site.
8341008024	16,975.2	1.04	0.75	50%	This parcel contains older office buildings with a large surface parking lot. the City has received a hard inquiry on this site and they're proposing well over 100+ acre, it's a good candidate site for housing redevelopment.
8326025013	9,987.7	0.76	0.5	60%	There is a carwash on this site, it is not recently developed. Although there is no lease information for this site, the carwash appears older, and the site is adjacent to surface parking lots. The site is a good candidate as it is not built to its maximum capacity therefore there is more opportunity and unrealized potential on this site.
8337018021	18,314.1	1.73	0.5	49%	This parcel is a store in an aging strip mall with a large surface parking lot. There is more opportunity and unrealized potential on this site as there are many vacant store fronts, the site is not yielding its full potential
8344023034	6,402.4	0.64	0.6	38%	Convenience store with a large surface parking lot. Good candidate site. The City has received some inquiries about commercial redevelopment, but it is possible for residential redevelopment, particularly as there's more pressure for redevelopment of neighboring Cardenas, which may lead to an assemblage scenario.
8348020902	21,879.9	1.31	0.7	55%	Vocational education center with a large surface parking lot. Unclear on status of vocational site, but as PUSD has surplus/sold land for housing recently, this is fair to include as an opportunity site w



City of Pomona – 2021-2029 Housing Element Update

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AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8328022122	5,531.0	0.72	0.6	29%	Auto repair shop and carwash with surface parking lot. There is more opportunity and unrealized potential on this site a large portion is undeveloped, it is near essential resources and could fully redevelop in the 8-year cycle.
8326009018	2,079.5	0.74	0.7	9%	Retail store with surface parking lot, adjacent to additional large surface parking lots and a mini market. Good candidate site. Received several inquiries about this parcel and adjacent lots to assemble a larger multi-unit project.
8323025023	15,412.6	0.56	0.5	126%	Retail and office with surface parking lot. Developer interest. Located immediately adjacent to commercial shopping center and other recently entitled mixed-use housing projects. Along Holt Corridor, streamlined CEQA review already enabled, existing infrastructure and public improvements can accommodate housing density. Along West Valley Holt Connector Bus Transit (OmniTrans) under development.
8323011022	11,588.0	0.62	0.5	86%	Laundromat and office with surface parking in rear. The site can be subdivided, but there is also opportunity for full redevelopment. The site is not vacated but appears older. Developer interest. Located immediately adjacent to commercial shopping center and other recently entitled mixed-use housing projects. Along Holt Corridor, streamlined CEQA review already enabled, existing infrastructure and public improvements can accommodate housing density. Along West Valley Holt Connector Bus Transit (OmniTrans) under development.
8342018018	11,375.7	1.01	0.7	37%	Office building with large surface parking lot adjacent to vacant lot. The site can be subdivided or consolidated with the adjacent vacant lot for housing opportunities.
8359007029	21,783.1	2.18	0.5	46%	Religious center with large surface parking lot adjacent to residential development.
8362001024	5,466.9	0.57	0.5	44%	Religious center with surface parking adjacent to retail and residential development.
8365015044	4,151.8	0.58	0.5	33%	Existing standalone restaurant adjacent to additional restaurant and a vacant lot. The site can be subdivided or consolidated with the adjacent vacant lot for housing opportunities.
8326025029	4,628.7	0.59	0.5	36%	Restaurant with surface parking lot. The site can be subdivided, but there is also opportunity for full redevelopment. The site is not vacated but appears older.
8362001023	2,118.2	0.54	0.5	18%	Restaurant with surface parking lot adjacent to vacant lot. The site can be subdivided or consolidated with the adjacent vacant lot for housing opportunities.
8349001035	41,886.3	2.8	0.5	69%	Strip mall and LA County Probation building adjacent to additional retail opportunities. good candidate for redevelopment, and swathe City saw recently entitled projects just to



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
					the east. Developer interest. Located immediately adjacent to Highway 71 and other recently entitled mixed-use housing projects. Along Mission Corridor, streamlined CEQA review already enabled, existing infrastructure and public improvements can accommodate housing density.
8355017005	7,979.3	0.72	0.7	36%	Strip mall with surface parking lot. Good candidate site, though somewhat stable auto uses, but the City has seen interest in the area.
8371015042	37,257.4	2.48	0.5	69%	Strip mall containing vacant tenant spaces and surface parking lot, adjacent to residential development. Good candidate along w/ adjacent parcel also identified. Majority of in-line tenant spaces are empty. Ownership is actively seeking conceptual re-design into mixed-use housing near Future Metro L Line Station. Within First/Last Mile.
8371015041	27,570.4	2.27	0.5	56%	Strip mall containing vacant tenant spaces and surface parking lot, adjacent to residential development. Good candidate, few active tenant spaces, and adjacent to future Gold Line Station, part of first mile/last mile area at Garey and Arrow. Should include a second parcel.
8370009038	29,982.8	2.88	0.5	48%	Strip mall containing vacant tenant spaces and surface parking lot, adjacent to residential development. Good candidate. Receiving regular inquiries as tenant spaces are not as occupied.
8365015052	1,947.2	0.6	0.5	15%	Retail shop with surface parking adjacent to vacant lot.
8304001030	23,133.1	1.84	0.5	58%	Vacant building, previously a fitness facility, with surface parking. Good candidate. Along with adjacent parcel.
8348009036	8,220.0	1.05	0.7	26%	Vacant warehouse building with large portion of the lot vacant.
8326011007	2,787.1	0.58	0.7	16%	Vacant office/warehouse building with surface parking lot.
8367001088	3,711.9	0.67	0.5	25%	Fast-food restaurant with surface parking lot. It may need assemblage with the neighboring two parcels (former Chase Bank at 110 Foothill, and empty restaurant at 3272 N Garey)
8367001087	5,910.2	0.7	0.5	39%	Vacant building with surface parking.
8367001062	5,074.4	0.59	0.5	39%	The CHASE is no longer there - vacant building with surface parking. May need assemblage opportunity with 140 Foothill and 3272 N Garey
8371016039	13,017.8	0.73	0.7	58%	Warehouse and industrial buildings with surface parking lot. There is more opportunity and unrealized potential on this site.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8355017024	10,346.5	0.63	0.7	54%	Warehouse and industrial buildings with surface parking lot. Along Holt Corridor, streamlined CEQA review already enabled, existing infrastructure and public improvements can accommodate housing density. Adjacent to recently approved 200-unit multi-unit development.
8336028034	68,777.0	3.9	100	0%	Strip mall with office and retail stores within one block of Metrolink station and high-density residential development. Received several inquiries about redeveloping it.
8342001804	1,752.2	2.71	70	0%	Relatively stable trucking facility on train depot land, but still good redevelopment potential as nearby parcels are developed within Downtown. There is more opportunity and unrealized potential on this site due to the small percentage that is currently developed and that the site permits 70 du/acre under current zoning and more under the Transect Land Use.
8336028035	32,667.8	2.77	100	0%	Large warehouse style building with surface parking and open space directly adjacent to Metrolink station. There is more opportunity and unrealized potential on this site due to the small percentage that is currently developed and that the site permits 100 du/acre.
8336031900	8,946.6	2.44	100	0%	Metrolink station with surface parking lot and bus-turnaround. Opportunity for stacked development above transit center. There is more opportunity and unrealized potential on this site due to the small percentage that is currently developed and that the site permits 100 du/acre.
8336034010	47,920.6	2.14	100	1%	Large warehouse with surface parking directly adjacent to Metrolink station. There is more opportunity and unrealized potential on this site due to the small percentage that is currently developed and that the site permits 100 du/acre
8335005903	-	1.8	80	0%	No building or structure on site. Good candidate Western U is looking into this for air space development rights. There is more opportunity and unrealized potential on this site due to the small percentage that is currently developed and that the site permits 80 du/acre.
8337024020	16,942.3	1.24	70	0%	Religious center with surface parking lot occupying majority of parcel.
8335009903	-	1.24	70	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70du/acre through zoning and more through the Transect Land Use designation.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8335008902	-	1.22	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8337029001	8,770.2	0.95	70	0%	Surface parking lot servicing a warehouse. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation
8335014918	-	0.78	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8335014045	-	0.72	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8335014044	-	0.72	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8335013903	-	0.73	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8335013900	-	0.72	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8341004902	-	0.72	70	0%	No building or structure on site. Surface parking lot. Formerly proposed for Maya cinemas, deal fell through, now aggressively pursuing housing development/mixed-use.
8335007904	-	0.72	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.
8335011901	-	0.72	80	0%	No building or structure on site. Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8341003901	-	0.71	70	0%	No building or structure on site. Surface parking lot. Formerly proposed for Maya cinemas, now aggressively pursuing housing development/mixed-use.
8341002803	-	0.63	70	0%	No building or structure on site. The site is a train and truck storage yard for adjacent to Metrolink station. There is more opportunity and unrealized potential on this site since it is a surface parking storage yard and permits 70 du/acre through zoning and more through the Transect Land Use designation.
8340035010	-	0.62	70	0%	No building or structure on site. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation.
8337022004	11,983.8	0.6	70	1%	Portion of commercial office building with surface parking lot. There is more opportunity and unrealized potential on this site since it is mostly surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation.
8337023030	3,913.0	0.6	70	0%	There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation.
8337029002	23,725.6	0.59	70	1%	Warehouse building, the site is not currently used to full potential and there is more opportunity for high density housing on this site.
8337022002	8,771.2	0.58	70	0%	Commercial/industrial service yard.
8341001902	-	0.54	70	0%	Surface parking lot. There is more opportunity and unrealized potential on this site since it is all surface parking.
8341005904	605.8	0.55	70	0%	There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation.
8335011800	-	0.54	80	0%	No building or structure on site. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation
8335013800	-	0.53	80	0%	No building or structure on site. There is more opportunity and unrealized potential on this site since it is all surface parking and permits 80 du/acre through zoning and more through the Transect Land Use designation
8326026905	286,245.8	19.41	0.7	48%	Large multi-use building with large surface parking.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8326026029	82,418.3	5.17	0.7	52%	Existing indoor swap meet with large surface parking.
8304001038	47,747.1	4.86	0.5	45%	Convenience store with surface parking lot and.
8362008037	452.4	4.03	70	0%	There is more opportunity and unrealized potential on this site since it is all surface parking and permits 70 du/acre through zoning and more through the Transect Land Use designation
8359014016	54,708.4	4.01	0.5	63%	Religious center with surface parking lot. Streamlined CEQA Enabled along Garey Corridor, enabling 70 units per acre with sufficient existing infrastructure and public improvements; adjacent to Pomona Valley Hospital for potential workforce housing connection. 1.5 miles south of Future L Line.
8323016021	49,570.0	3.1	0.5	73%	Strip mall with surface parking lot. Streamlined CEQA Enabled along Holt Corridor. Potential for mixed-use development and consolidation of surface parking spaces into structured lot. Sufficient existing infrastructure and public improvements. Along West Valley Holt Connector Bus Transit (OmniTrans) under development.
8323017019	4,692.2	0.63	0.5	34%	Auto glass repair shop with surface parking lot.
8344023043	120,511.2	12.08	0.6	38%	Large surface parking area, about 4.9 acres of buildable area for mixed use
8370010016	31,482.1	2.66	0.5	54%	Currently a strip mall center with large surface parking. Several vacant in-line tenant spaces. Active developer inquiry interest in mixed-use redevelopment. Along Garey Corridor, First-Last Mile of Future Metro L Line to the South; Streamlined CEQA Enabled with sufficient infrastructure and public improvements to accommodate density.
8367001085	64,182.5	5.38	0.5	55%	This parcel is currently a strip mall and large surface parking lot with same ownership (085 and 086). This represents an opportunity for the redevelopment of the entire parking space. Streamlined CEQA Enabled along Garey Corridor. Potential for mixed-use development and consolidation of surface parking spaces into structured lot. Sufficient existing infrastructure and public improvements. First-Last Mile of Future Metro L Line to the South.
8367001086	51,952.3	2.89	0.5	83%	This parcel is currently a strip mall and large surface parking lot with same ownership (085 and 086). This represents an opportunity for the redevelopment of the entire parking space. Streamlined CEQA Enabled along Garey Corridor. Potential for mixed-use development and consolidation of surface parking spaces into structured lot. Sufficient



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
					existing infrastructure and public improvements. First-Last Mile of Future Metro L Line to the South.
8355017028	28,988.6	1.32	0.7	72%	Currently warehousing but opportunity to be redeveloped. CEQA Streamlined enabled along rear of Holt Corridors, enabling 70 units per acre. Sufficient existing infrastructure and public improvements to accommodate housing density.
8341006024	11,531.8	0.7	70	1%	Currently an older office building, the building is partially vacant and for lease. Good opportunity for redevelopment.
8323025025	60,494.6	3.79	0.5	73%	This parcel is currently a strip mall with a large surface parking, opportunity for wholesale redevelopment or mixed-use.
8331019033	101,500.5	4.76	0.6	82%	Storage facility with surface parking lot. Streamlined CEQA enabled in Garey Corridors, accommodating 70 units per acre with sufficient infrastructure and public improvements.
8331002057	87,274.4	6.56	0.5	61%	a portion of this site is the DMV, however, most of the site is surface parking connected to two other parcels with fully surface parking, there is opportunity for shared/joint parking structure and housing development.
8349001034	115,881.0	5.84	0.5	91%	Existing commercial use with potential for redevelopment of existing parking lot and adjacent vacant lot. Streamlined CEQA Enabled within Mission Corridors, allowing for 70 units per acre density with sufficient existing infrastructure and public improvements to support housing. Potential for structured parking to consolidate surface spaces.
8367002016	83,545.2	3.95	0.5	97%	Self-storage facility; located within Foothill Corridors, CEQA streamline enabled to support 40+ units per acre mixed-use development, sufficient infrastructure and public improvements to support housing density.
8371012032	103,676.4	4.8	0.7	71%	Industrial facility adjacent to Gold Line. High redevelopment potential given proximity to TOD and past industrial redevelopment at 2771 N. Garey, and recently entitled 137 units/acre at 2501 N. Garey.
8362006024	24,316.7	2.8	70	0%	YIGBY site. This site has been on the market before. As the site has been on the market before there is opportunity for full redevelopment of the church site for housing.
8707001016	32,054.0	1.9	70	0%	Developer/owner interest in converting to housing. Recent housing development project in pipeline within same business park.
8707001034	29,610.7	3.2	70	0%	Developer/owner interest in converting to housing. Recent housing development project in pipeline within same business park.



City of Pomona – 2021-2029 Housing Element Update

Table C-5: Existing Uses on Candidate Sites for Low and Very Low-Income Housing

AIN	Existing Building Square Footage	Gross Acres	Permitted FAR or Density	Percentage of Max Permitted Buildout Used	Analysis
8326024042	111,684.5	2.9	70	1%	YIGBY. Adjacent to vacant parcel identified in inventory. Consolidation/assemblage potential.
8335002036	64,612.7	3.3	70	1%	For sale industrial building, redevelopment interest. For sale on Loop Net.
8348020021	32,398.2	2.3	70	0%	For sale industrial building, redevelopment interest. For sale on Loop Net.
8707001010	14,747.2	3.4	70	0%	Developer/owner interest in converting to housing. Recent housing development project in pipeline within same business park. For sale on Loop Net.



Condition #2: Experience Developing Non-Vacant Sites for Residential Use

As part of the candidate housing sites analysis, the City has evaluated recent projects that have redeveloped to include residential units. Those projects, including the zoning, use prior to redevelopment, and a project analysis of the approved development plan, are shown in **Table C-6**.

The City has also conducted a parcel specific analysis of existing uses for each of the identified sites. This analysis of existing uses, including indicators of a likelihood that the existing use will redevelop within the next eight years, are provided in **Table C-5**. This analysis is based on information readily available to the City and existing use data or other information that can be found through online research. The City does not always have access to private lease information but has included information that property owners have shared regarding individual sites.

The following residential development projects have been constructed on parcels that were either non-residentially zoned or had an existing non-residential use on-site within Pomona.

Project Address/ APN	Dwelling Units	Zoning	Use Prior to Redevelopment	Project Analysis
2771 North Garey Avenue / 8371-011-053	312	Transit-Oriented District Core Pomona Corridors Specific Plan	Industrial/Office Building	This site was previously developed with an industrial office facility that was no longer in operation. The developer purchased the property, demolished the existing structure, and took advantage of the Pomona Corridors Specific Plan zoning and General Plan transect, which allows housing density up to 100 units per acre. The proposed project represents approximately 70 units per acre, is mid-construction, and will be completed by January 2022. A second phase, representing 23 units per acre, on the adjacent parcel to the west, also formerly an industrial/commercial property, was recently entitled and expected to start construction in 2022.
1901 South White Avenue / 8344-024-935	110	Small Lot Residential	Commercially-Zoned	This site was previously zoned for commercial uses only, and was historically a car dealership, and then demolished and vacant. The developer purchased the property and pursued a code amendment to establish a “small lot ordinance” to enable the development of 110 fee simple, small lot houses with shared access. This code amendment was



City of Pomona – 2021-2029 Housing Element Update

Table C-6: Example Development of Non-Vacant Sites for Residential Uses

Project Address/ APN	Dwelling Units	Zoning	Use Prior to Redevelopment	Project Analysis
				adopted as it was consistent with the General Plan land use designation for the area, which enables mixed-use development. The project will be completed by January 2022, with several units already sold.
2075 and 2093 North Garey Avenue	33	Workplace Gateway Segment Pomona Corridors Specific Plan	Commercially Zoned	This site was previously zoned as a commercial only zone. It was developed with a commercial use that ultimately was demolished and left the land vacant. In 2014, the Pomona Corridors Specific Plan as adopted, enabling mixed-use development on the property. The developer purchased the property and pursued an entitlement for 33 for-sale units on the site, which was completed in 2018.
875 West Orange Grove Avenue / 8358-009-006	32	R-1-6,000	Public Assembly (House of Worship)	This site was previously developed with a public assembly use (Church of the Brethren house of worship). The developer purchased the property and obtained an entitlement, relying upon SB 330 to build to density permitted under the Pomona General Plan, to develop 32 for-sale condominium units. The project is under construction.

Source: City of Pomona, 2021

Condition #3: Lease Analysis

Existing lease agreements on infill and non-vacant properties present a potential impediment that may prevent residential development within the planning period. State law requires the City to consider lease terms in evaluating the use of non-vacant sites, however the City does not have access to private party lease agreements or other contractual agreements amongst parties because they are private documents. Therefore, the City has conducted an analysis to identify sites that show characteristics indicating they are likely to redevelop within the planning period, including past performance, an on-the ground existing use analysis and a market analysis to understand cost of land, construction, and development trends in Pomona.

Condition #4: Market Trends and Demand Analysis

In addition to an on-the-ground existing use analysis, the City of Pomona has market conditions to facilitate the redevelopment of non-vacant sites for residential. **Table C-6** above shows that a total of 487 dwelling units have been constructed through redevelopment in the City. Additionally, a California Association of



City of Pomona – 2021-2029 Housing Element Update

Realtors report for Historic Housing trends shows that the average time a unit spends on the market in Los Angeles is just 18.9 days in the last four years (2017-2021) and just 13.6 days in the last two years.¹ Additionally, the according to the CAR Current Sales and Price Statistical Survey, the average cost of a home for sale in Los Angeles County increased by 22 percent from 2020-2021 (\$624,811 in 2020 to \$726,306 in 2021).² Both indicators signify an increased market demand for new housing.

In addition to market appetite, the median cost of land per square foot in the City of Pomona is higher than neighboring jurisdictions. A current market survey of land listed for sale shows that the cost per square footage per land in Pomona is greater than Ontario, Chino, and Diamond Bar. High cost of land can signify high interest or increased market demand for land in the city. Paired with increased demand for housing, particularly affordable units, assumed redevelopment in downtown region of the City (most resource rich area) is reasonable.

Jurisdiction	Median Lot Size	Median Land Cost	Median Cost per SF
Pomona	0.85 ac	\$1,299,900	\$35.11
Ontario	0.96 ac	\$999,500	\$25.94
Chino	2.81 ac	\$1,580,000	\$15.78
Diamond Bar	1.3 ac	\$990,000	\$18.51

*Source: Zillow.com market search, Accessed November 10, 2021.
Kimley horn estimates of at least 10 properties, greater than ¼ acre, in each jurisdiction.*

Condition #5: Redevelopment Opportunity by Site Type

There are a total of 80 nonvacant sites identified to accommodate low and very low-income housing. The City of Pomona cannot accommodate 50 percent of lower income housing on vacant sites and therefore provides the additional analysis below to display the feasibility of residential development of the nonvacant sites identified.

Existing Commercial Uses

There are 36 parcels with existing commercial uses. The commercial uses on these sites include strip malls, office buildings, single uses retail and dining, as well as multi-use business and commercial offices. Each of the sites has been evaluated on an individual basis to shows existing use, potential for buildout based on floor-area-ration or density, and percent of total capacity in use (Table C-5). Most of the sites identified include aging strips malls with vacant buildings or expiring leases and small single retail spaces with majority surface parking on the lot. Market trends show that consumers have generally shifted online commercial uses and business have vacated in office leases to continue working from home due to the COVID-19 Pandemic.³ A Forbes Report of a Business insider study notes that in the United States over 12,000 stores

¹ Median time on Market of Existing Detached Homes, Historical Data, California Association of Realtors (CAR), Accessed online: November 8, 2021. <https://www.car.org/marketdata/data>

² Current Sales and Price Statistics, California Association of Realtors (CAR), Accessed online: November 8, 2021. <https://www.car.org/marketdata/data>

³ Forbes, *This Is the Future Of Remote Work In 2021*, Caroline Castrillon, December 2020. Accessed online: December 22, 2021. <https://www.forbes.com/sites/carolinecastrillon/2021/12/27/this-is-the-future-of-remote-work-in-2021/?sh=db35cfb1e1de>



closed in 2020 not including small businesses like restaurants which may amount to many times this number. This follows record store closings in 2019 of more than 9,300, which follows previous record closures about 8,000 in 2017, long before COVID-19 as on-line retail progressed over the last five years.⁴ The changing demographics of commercial retail and business uses in cities create ripe opportunity for development for housing, which is highly needed and in high development demand in Southern California.

Additionally, projects on 1901 South White Avenue and 2075 and 2093 North Garey Avenue (shown in **Table C-4** above) are the most recent example of redevelopment of commercial retail sites. The project analysis shows that through the use of city programs and the updated general plan land uses (transect zones), redevelopment for residential on previously nonresidential sites is feasible and there are multiple avenues to pursue this type of redevelopment.

Existing House of Worship

There are six parcels with existing houses of worship and religious centers. The religious centers on these sites have been evaluated on an individual basis to show existing use, potential for buildout based on floor-area-ratio or density, and percent of total capacity in use (**Table C-5**). As religious centers shifted to virtual meetings during the COVID-19 Pandemic, mega-churches with increased resources drew attendees and churchgoers away from smaller institutions⁵. In the City of Pomona, Pomona Fellowship Church of the Brethren is the most recent example of a shrinking church which sold its property to a housing developer. The 3-acre property sold in May of 2021 and was approved for an estimated 32 single family homes⁶.

Additionally, other houses of worship have large sites with minor buildout compared to overall capacity potential. The City looks to work with The City has also developed **Program 2.4B: Reuse, Repurpose and Redevelopment of Public Assembly Sites** to encourage re-use of house of workshops sites for housing.

Existing Industrial/Warehousing Uses

There are 14 parcels with existing warehousing and storage uses. The sites have been evaluated on an individual basis to show existing use, potential for buildout based on floor-area-ratio or density, and percent of total capacity in use (**Table C-5**). The analysis shows that majority of the sites are primarily surface parking and truck storage with a few sites that contain a warehouse building. The project located on 2771 North Garey Avenue is the City's most recent example of industrial redevelopment for residential use. Industrial uses require few on or off-site improvements and are generally connected to the City's transportation grid.

Existing Surface Parking

There are 24 parcels with existing surface parking uses. Each of the sites has been evaluated on an individual basis to show existing use, potential for buildout based on floor-area-ratio or density, and percent of total capacity in use (**Table C-5**). Surface parking in commercial districts where retail demands are slowing

⁴ Forbes, *The Coronavirus Accelerates Online's Destruction Of Brick & Mortar Shopping*, James Conca. August 2020, Access online: December 22, 2021. <https://www.forbes.com/sites/jamesconca/2020/08/21/the-coronavirus-accelerates-onlines-destruction-of-brick--mortar-shopping/?sh=52ed245d4734>

⁵ Megachurch 2020, Warren Bird, Ph.D. and Scott Thumma, Ph.D, Accessed online: December 22, 2021. https://faithcommunitiestoday.org/wp-content/uploads/2020/10/Megachurch-Survey-Report_HIRR_FACT-2020.pdf

⁶ Daily Bulletin, *Shrinking Pomona church sells its property for housing*, April 18, 2021. Accessed online: December 22, 2021. <https://www.dailybulletin.com/2021/04/18/shrinking-pomona-church-sells-its-property-for-housing/>



are prime opportunities for redevelopment. Additionally, as the City continues to invest in smart growth practice, investment into various types on transportation will lessen the reliance on cars. Additionally, through redevelopment, parking can be replaced in varying forms to create more efficient and practical use on existing sites.

Condition #6: Replacement Analysis

Of all the nonvacant sites (identified to accommodate the lower income RHNA), none have existing residential units. **Table C-5** contains a detailed description of their uses. Therefore, there are no existing residential units that would not be displaced by the City's capacity assumptions and no replacement program or analysis is required.

5. Development of Small and Large Site Parcels

The City of Pomona has **not** identified candidate housing sites that are smaller than half an acre or larger than 10 acres in size, in alignment with statutory requirements. Assembly Bill 1397 identifies general size requirements for candidate housing sites of greater than half an acre and less than 10 acres in size. However, the City has a past performance of lot consolidation and development of sites smaller than half an acre.

In line with the Pomona's Pro Housing goal, the City will continue to work with developers to utilize lot consolidation programs to streamline the permitting of residential projects on combined parcels.

6. City-Owned Parcels

The City identified 13 city-owned parcels in the sites inventory as appropriate for housing. **Table C-12** below provides the APN, the existing use for each of the city-owned sites. The City owned sites identified are currently used as surface parking lots that are part of the City's "Vehicle Parking District (VPD)." The VPD enables shared parking within the Downtown Pomona Specific Plan. The existing impediment to redevelopment of these parking lots is for the City to reconcile the supply and demand of these VPD parking stalls while still accommodating new development. The City has been awarded a \$225,000 Regional Early Action Planning (REAP) grant through Southern California Association of Governments (SCAG) to explicitly study housing development potential and existing parking demand on these VPD lots. This analysis will include feasible development scenarios, a comprehensive parking supply and demand analysis in the context of VPD rights, and an analysis of the Surplus Land Act Article 8 to determine full compliance as redevelopment and disposition of these lots occurs. This effort is formally identified as Program 2.4C in Policy 2.4.

The City will conduct a comprehensive analysis of city owned parcels, commensurate with Program Action 2.4c. The 13 parcels identified by the City's site inventory existing surface parking lots and there are no know conditions, restrictions or preclusions for the development of residential on these sites. Because of the nature of the existing use, there is very minimal site preparation, acquisition or modifications to the sites because they are surface parking lots. Through Program Action 2.4c and in compliance with the Surplus Land Act, the city will make sites available through an RFP process.



7. Accessory Dwelling Units

Accessory dwelling units, or (ADUs) are housing units which may be developed in addition to an existing single- or multi-family residential use. These housing units can be free-standing or attached to a primary structure and are intended to provide additional housing on an existing residential lot. Often ADUs provide housing for family members or are rented to members of the community.

As a result of new legislation and an increased effort by the City to promote ADUs, the City has seen an increase in applications. In 2018, the City received 80 ADU permit requests, followed by 107 in 2019 and 108 in 2020 – a total increase of 35% between 2018 and 2020. In 2021, the City received 159 ADU permit requests for ADU development. Each year, the total number of permit applications does not always equal the total number of permits issued, this can be due in part to timing of request (year to year approval), securing financing to pull permit, securing financing being construction, or other external factors. Additionally, some ADU applications are withdrawn, or the time of the approved application expires, and a permit cannot be issued without a renewed application. Between 2018 and 2021, the City had an average permit withdrawal and expiration rate of 14 percent. **Table C-8** below displays the City’s application rate and the permits issued for 2018 to 2021 2022 existing and projected ADU permits are also indicated.

The City Pomona is committed to easing the barriers to developing accessory units as they are a readily viable options for housing and affordable housing in the City. In accordance with State law, ADUs are allowed in all zones that allow single dwelling unit or multiple dwelling unit development. Junior Accessory Dwelling Units (JrADUs) are permitted only in single dwelling unit zones.

The City has utilized the “safe harbor” approach by estimating 2018-2021 average of 59 ADUs per year. This has been amortized over the 8-year planning cycle for a total of 472 ADUs. The City of Pomona has determined based on past performance that it is appropriate to anticipate the development of 472 accessory dwelling units from 2022 to 2029. In 2022, the City is projecting 122 permits issued, which represents accomplishment of 25.8% of the total during the first year of the 8-year planning period. The City believes the ADU production is a conservative estimate throughout the planning period. **Table C-8** below displays the calculation and estimated projection for the 8-year planning period. This estimation is based off the following calculations:

- 2018-2021 annual average permits issued
- 2022 ADU permits issued and projected
- Amortization of remaining ADUs over 2023-2029

Table C-8 Accessory Dwelling Unit Assumptions		
Year	ADU Applications	ADU Permits Issued
Projection Period Total:	1,253 units	50**
<i>2029 (projected)</i>	137 units	50**
<i>2028 (projected)</i>	137 units	50**
<i>2027 (projected)</i>	137 units	50**
<i>2026 (projected)</i>	137 units	50**



City of Pomona – 2021-2029 Housing Element Update

Year	ADU Applications	ADU Permits Issued
2025 (projected)	137 units	50**
2024 (projected)	137 units	50**
2023 (projected)	137 units	50**
2022 (actual and projected)	137 units*	4122nits**
2021 (actual)	159 units	92 units
2020 (actual)	108 units	56 units
2019 (actual)	107 units	71 units
2018 (actual)	80 units	17 units

* Projected ADUs based on mid-year permits issued total of 61 units
 **Actual ADUs permitted between January and May 2022 is 61 ADUs. Projection is for 2022 year total.

 Source: City of Pomona, Annual Progress Report, 2018, 2019, 2020, 2021.

Additionally, to facilitate the development of ADUs available for lower income households, the City has developed relevant policies and programs (see Pro Housing Pomona **Section 5**). The programs are focused on bridging the gap between applications and permits received. Overall, the application rates show high property owner interest and high land use capability to increase development of ADUs over the planning cycle. However, the City noticed that barriers to secure financing increase the likelihood of withdrawal or expiration. Therefore, the City’s programs focus on decreasing costs to securing permits, streamlining the process between approval and permit to reduce costs, and identifying appropriate entities to support financing affordable ADUs. For the purposes of this projection exercise, the City assumes a percentage of ADUs develop affordably based on ADU Affordability Assumptions produced by the Southern California Association of Governments (SCAG). The SCAG conducted analysis consists of the following steps:

- Calculating maximum rent limits for RHNA income categories for one-person and two person households by county
- Conduct survey of rents for ADUs in the SCAG region
- Use survey data to determine proportion of ADUs within each income category
- Create assumption of how many persons will occupy each ADU, finalize proportions

Using the proportions SCAG created for Los Angeles County (LA County II), the City can allocate the 482 ADUs for each income category:

Income Category	Units
Very Low income (23.5%)	111 units
Low Income (44.6%)	210units
Moderate Income (2.1%%)	10 units
Above Moderate Income (29.8%)	141 units
Total	482 units

To assist in reaching the City’s ADU development projections, Pomona has included **Program 3.1A**, which explores actions the City will take to promote and incentivize the development of ADUs during the planning period. As outlined in the program, these actions may include:



- Implementation of a permit ready ADU program
- Waiving specific permitting fees to make ADU development more feasible
- Creating an expedited plan check review process to ease the process for homeowners
- Explore potential State and Regional funding sources for affordable ADUs

8. Development of Vacant Sites for Affordable Housing

While Pomona is a generally built out City and majority parcels are developed with existing commercial or residential, the City has a few vacant parcels. Vacant parcels are optimal for affordable housing sites since the lack of cost associated with redevelopment increase feasibility for fully affordable housing projects. Therefore, the City has identified 20 vacant parcels, which meet state legislation criteria for sites, to accommodate 100 percent of units affordable to the low and very low-income categories (excepting those parcels which have already been identified as Projects in the Pipeline, covered in the following section). The City is able to accommodate 1,153 very low and low income units on vacant sites, excluding pipeline projects and projected ADUs. The City has identified programs and policies and programs to facilitate full affordable housing projects on this site. **Figure C-2** below displays the identified vacant sites in Pomona.

Table C-10 below identifies the current project in the City which are 100 percent affordable. The City will use available resources and work to facilitate full affordable housing projects on vacant sites. Additionally, the City intends to continue to meet and coordinate on affordable housing opportunities with affordable housing developers, including but not limited to the following:

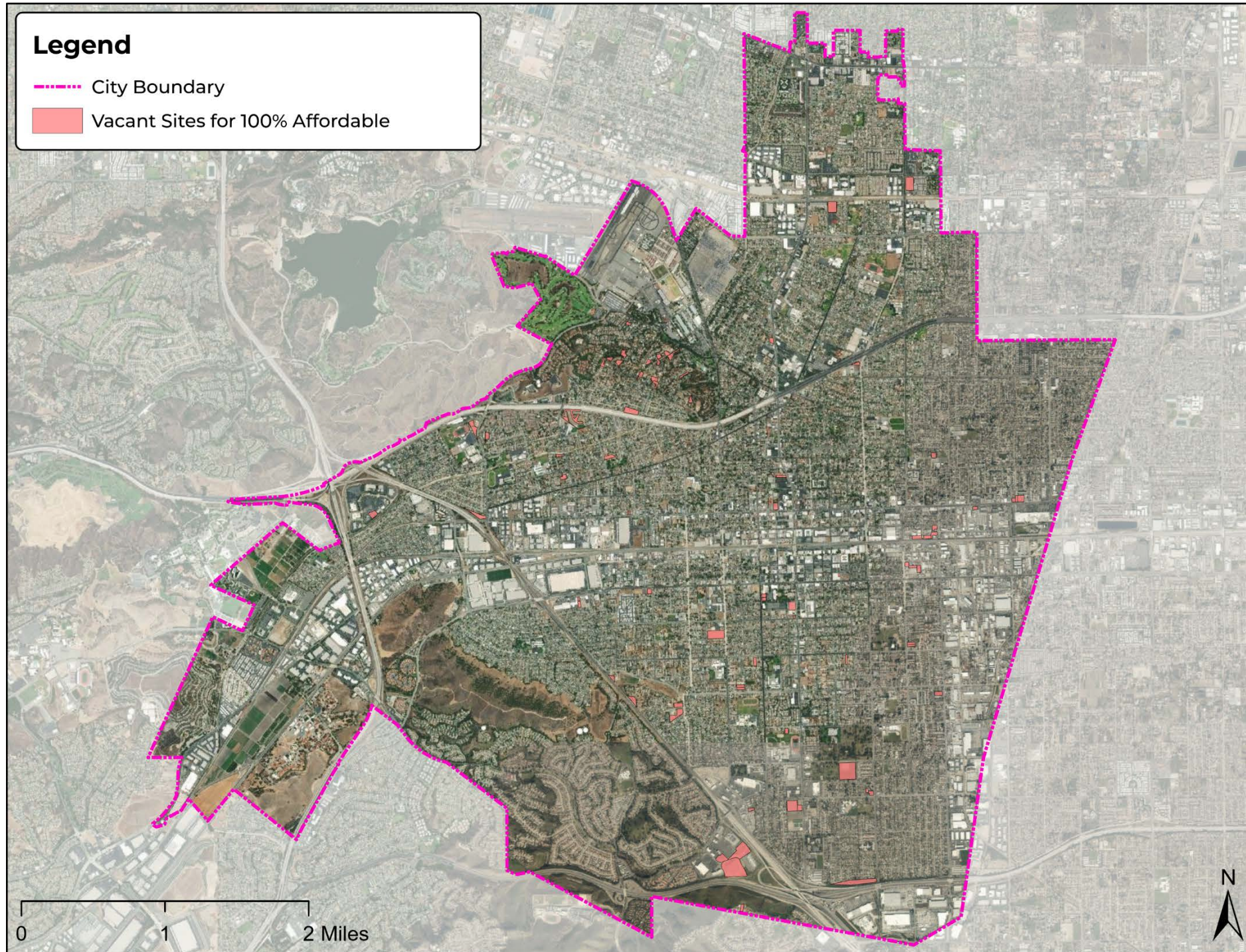
- Jamboree Housing
- AMCAL
- National CORE
- Cesar Chavez Foundation
- LINC Housing

Project Name	Project Address	Project Type	Total Affordable Units	Year Constructed or Status
Holt Family Apartments LLC	1445 East Holt Avenue	100% Affordable. Low-Income. Supportive Housing for Families/Individuals w/ Disability, mental illness or Special Needs	50	Opened in 2018
LINC Mosaic Gardens	1680 South Garey Avenue	100% affordable. 23 for low-income supportive housing. 23 for housing for homeless individuals and households.	46	Opened in 2018
Jamboree	508 West Mission Boulevard	100% Affordable. 10 Extremely Low. 9 Very Low. 37 Moderate.	56	Mid-Construction, Expected 2023.
AMCAL Veterans	424 West Commercial Street	100% affordable. Supportive housing for veterans and their families.	61	Mid-Construction, Expected 2022
National CORE	501 East Mission Boulevard	100% affordable. 74 affordable to low income.	74	Entitled, Expected 2023
Cesar Chavez Foundation	1321 East Holt Avenue	100% affordable to low income.	125	Entitled, Expected 2023

Source: City of Pomona, 2021



Figure C-2: Vacant Sites Identified for 100 Percent Affordable Units





9. Projects in the Pipeline

The City has identified a number of projects currently in, or that have completed the entitlement process which are likely to be developed and/or first occupied during the planning period and count as credit towards the 2021-2029 RHNA allocation. The City has currently identified 41 projects with a planned development of an estimated 2,463 units. **Figure C-3** below displays the projects in the pipeline, and the data each project is listed in **Table C-11** below.

APN(s)	Project Address	Very Low/Low Income units	Moderate Income Units	Above Moderate-Income units	Funding Source	Total Units	Max Density Permitted	Built Density	Rental/ Ownership
8333031013	961 E PHILLIPS BLVD	0	0	12	--	12	30	13.45	R
8333004010	952 E NINTH ST	0	0	11	--	11	20	16.27	O
8342020017	1065 W NINTH ST	0	0	10	--	10	20	14.93	R
8333020012, 8333020013	1379 S GIBBS ST	0	0	9	--	9	20	9.81	O
8343012015, 8343012016	1137 W PHILLIPS BLVD	0	0	12	--	12	30	14.07	O
8342017009 8342017906 8342017904 8342017905	811 S WHITE AVE	12	0	35	Private Financing. Affordability will be deed restricted for 55 years.	41	30	27.48	R
8340029023	401 W MONTEREY AVE	0	0	6	--	6	80	55.47	R
8344033901 8344033903 8344033904 8344033902	2115 S GAREY AVE	0	0	156	--	156	70	17.41	O
8348016044	1225 W MISSION BLVD	2	0	14	Private Financing. Affordability will be deed restricted for 55 years.	15	70	76.17	R
8357015034 8357015035	1255 W HOLT AVE	0	0	8	--	8	40	24.48	R



City of Pomona – 2021-2029 Housing Element Update

Table C-11: Projects in the Pipeline

APN(s)	Project Address	Very Low/Low Income units	Moderate Income Units	Above Moderate-Income units	Funding Source	Total Units	Max Density Permitted	Built Density	Rental/ Ownership
8335018009	968 E MISSION BLVD	0	1	3	Private Financing. Affordability will be deed restricted for 55 years.	4	30	28.09	R
8323022900 8323023902 8323023903	1321 E HOLT AVE	125	0	0	Low Income Housing Tax Credits, Affordable Housing Sustainable Communities Program, Pomona Housing Authority, Non-Profit Affordable Housing Developer. Affordability will be deed-restricted for 55 years.	125	30	52.97	R
8355016017	1925 W HOLT AVE	0	0	200	--	200	70	70.13	O
8358023017 8358019008	990 WEBER ST	0	0	11	--	11	20	8.46	O
8349011047	1300 W MISSION BLVD	0	0	33	--	33	40	53.94	O
8358009006	875 W ORANGE GROVE AVE	0	0	33	--	33	20	10.56	O
8313001238 8313001002	2710 N TOWNE AVE	0	0	210	--	210	70	41.21	O
8336014027	221 W HOLT	80	0		Low Income Housing Tax Credits, Affordable Housing Sustainable Communities Program. Affordability will be deed-	80	80	79.10	R



City of Pomona – 2021-2029 Housing Element Update

Table C-11: Projects in the Pipeline

APN(s)	Project Address	Very Low/Low Income units	Moderate Income Units	Above Moderate-Income units	Funding Source	Total Units	Max Density Permitted	Built Density	Rental/ Ownership
					restricted for 55 years.				
8341013030 8341016056 8341016055 8341016054 8341016053 8341016050	701 S GAREY	0	0	63	--	63	70	22.11	R
8707020008	2889 W MISSION	0	0	229	--	229	20	1.91	O
8335014919 8335014920 8335014921 8335014910	501 E MISSION	75	0		Low Income Housing Tax Credits, Affordable Housing Sustainable Communities Program, Non-Profit Affordable Housing Developer. Affordability will be deed-restricted for 55 years.	75	80	51.72	R
8311021003	900 E HARRISON	0	0	53	--	53	30	25.58	R
8326004019	236 N MOUNTAIN VIEW	0	4	26	--	30	70	22.65	R
8371011052	2771 N GAREY	0	0	73	--	73	100	23.55	O
8367011007	528 E GROVE	0	0	38	--	38	20	10.79	O
8358035908 8358035908 8358035909 8358035910 8358035911 8358035912 8358035913 8358035914 8358035915 8358035917 8358035918 8358035922	1442 MURCHISON	0	0	152	--	152	70	20.35	O



City of Pomona – 2021-2029 Housing Element Update

Table C-11: Projects in the Pipeline

APN(s)	Project Address	Very Low/Low Income units	Moderate Income Units	Above Moderate-Income units	Funding Source	Total Units	Max Density Permitted	Built Density	Rental/ Ownership
8358035923 8358035925 8358035926 8358035928 8358035929 8358035935 8358035936 8358035937 8358035938 8358035939 8358035941									
8340027027	543 W CENTER	0	0	4	--	4	80	25.97	R
8359007033	1833 N GAREY	0	0	35	--	35	70	53.81	O
8366014031 8366014032 8366014033 8366014036	2380 N GAREY	0	0	67	--	67	70	37.85	R
8342006010	247 REBECCA	0	0	12	--	12	70	67.02	R
8341002019	667 SECOND	0	0	18	--	18	70	50.67	R
8349003057 8349002902 8349002901	1626 W MISSION	0	0	24	--	24	70	29.78	O
8358015029	1170 MURCHISON	0	0	8	--	8	20	15.44	R
8343013043	1174 W GRAND	8	0	0	--	8	20	18.54	R
8349026059	1438 W ELEVENTH	0	0	5	--	5	20	6.81	R
8343005019	650 W GRAND	0	0	8	--	8	20	10.31	R
8707001040	851 CORPORATE CENTER	602	0	0	--	602	70	42	R
8357013040	929 Holt Ave	39	0	0	--	39	TBD	TBD	R
8341001013 8341001012 8341001031 8341001032	295 W SECOND	0	0	303	--	303	100	98.74	R
8341005014	395 S THOMAS	0	0	30	--	30	100	107	R



City of Pomona – 2021-2029 Housing Element Update

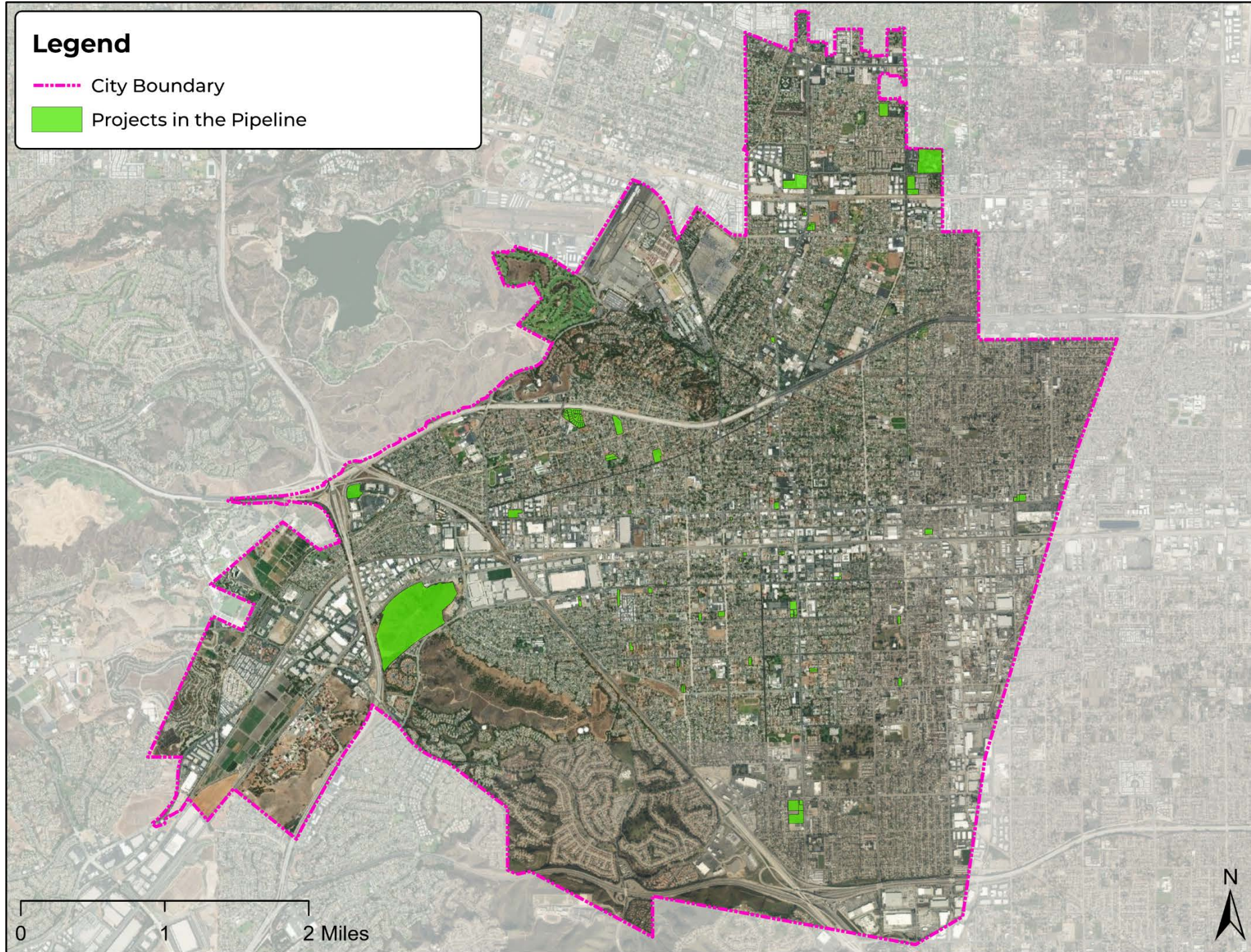
Table C-11: Projects in the Pipeline

APN(s)	Project Address	Very Low/Low Income units	Moderate Income Units	Above Moderate-Income units	Funding Source	Total Units	Max Density Permitted	Built Density	Rental/ Ownership
8349010033	1490 MISSION BLVD	3	0	25	--	28	30	35	NA
8371014040 8371014042 8371014043 8371014041 8371014900 8371014901	2501 N GAREY	30	0	121	Low Income Housing Tax Credits, Affordable Housing Sustainable Communities Program. Affordability will be deed-restricted for 55 years.	136	100	158	NA
Average of Max Density (in Percentage)								66%	--

Source: City of Pomona, 2021



Figure C-3: Projects in the Pipeline





10. Water, Sewer and Dry Utility Availability

Water and Sewer

The City of Pomona has water, sewer, and dry utilities (gas and electric) that exist or are planned to accommodate residential development in the community. The City has the infrastructure in place which is designed and located to accommodate potential for additional housing identified for the 6th Cycle Housing Element.

The City of Pomona's Urban water Management Plan (2015) identifies the water services and sewer system distribution throughout the community. The City provides water services to all residential, commercial, and industrial customers and for environmental and fire protection within the City, with the exception of three areas, including:

- An irregular area of approximately 40 acres south of Foothill Boulevard and west of Towne Avenue served by Golden State Water Company (GSWC)
- An area of about 20 acres north of Foothill Boulevard and west of Garey Avenue served by the Golden State Water Company (GSWC); and
- A small portion of the City located north of Valley Boulevard and west of Temple Avenue served by the Walnut Valley Water District (WVWD).

None of the identified sites are within the areas identified above. According to the UWMP, Pomona was on target to meet its water supply goals and capacity for 2020. The reliability analysis shows that with the implementation of additional supplies from recycled water and treated groundwater, more water efficient equipment, and conservation measures, supplies will exceed demands under all hydrologic scenarios. Therefore, Pomona will be able to place groundwater in storage for future hydrologic conditions, which will increase supply reliability by ensuring that supplies are available in times of higher demands.

The City provides sewer service throughout the City, approximately 14,680 acres, and to a limited area outside the City limits, approximately 6 acres. Approximately 2,000 acres in the City drain to other serving entities or currently produce no sewage.⁷ Additionally, the City's sewer system consists of approximately 300 miles of gravity sewer, four pump stations, 1.4 miles of force mains, and 4,600 manholes. The capacity analysis performed in the 2005 Master Plan applied to major sewers, primarily those 10-inches in diameter and greater, which is approximately 45 miles of the gravity sewer, plus the pump stations and force mains. The pump stations conveying flow from the southern portion of the City are owned, maintained, and operated by the LACSD.

All sites identified in the sites inventory have existing sewer system capacity and a sewer system capacity assurance plan is provided as part of the Management Plan to ensure the availability of future capacity citywide. The City conducts regular monitoring of the water system in the community and provides for system upgrades via capital improvement programs. The City updates the Capital Improvement Plan every five years to ensure continued adequate water availability and service to existing and future planned

⁷ City of Pomona, Urban Water Management Plan, 2015.



residential development. The City also updated the UWMP every five years to ensure all systems are up to state regulation and capacity requirements.

Utility Services

Utility services for gas and electric are provided by Southern California Edison (SCE). In accordance with the California Public Utilities Commission and in compliance with SCE’s “Rules for the sale of electric energy” all electric and gas service will be provided for future development in the City of Pomona as requested. SCE may partner with the City to provide services and obtain authorization to construct any required facilities. The City has a mature energy distribution system that will be able to add additional service connections for future residential land uses.

Due to infill nature of the identified sites, as a part of the Housing Element, each site has been evaluated to ensure there is adequate access to water and sewer connections as well as dry utilities. Each site is situated with a direct connection to a public street that has the appropriate water and sewer mains and other infrastructure to service the candidate site. The City has identified Program 1.1C which will provide priority water and utility services to low and very low-income housing developments.

C. Calculation of Unit Capacity

1. Capacity Calculations

Total Unit Calculation

Total unit capacity for the sites identified was calculated on a per-parcel basis. Net unit capacity per parcel was calculated by evaluating for buildable acreage, multiplying by an assumed buildout density based on zoning, and subtracting any land that is undevelopable due to environmental constraints, health and environmental justice concerns, existing structures with no redevelopment capacity (but opportunity for on-site mixed use). An example calculation is detailed below:

- **APN:** 8366015029
- **Acres:** 6 ac
- **Existing Use:** First Assembly of God Pomona – Place of worship
- **Buildable Acres:** 3 ac (opportunity for residential development on surface parking lot adjacent to existing structure)
- **Zoning:** R-1-7,200
- **GPLU Transect:** T3
- **Maximum Density:** 20 du/acre
- **Assumed Density:** 13 du/acre
- **Total Net Units:** 39
 - *Total Low/very Low-Income units:* 0
 - *Total Moderate-Income units:* 5
 - *Total Above Moderate-Income units:* 34



HCD recommends that sites identified in the inventory to accommodate the RHNA do not assume build at maximum density. While there is feasible opportunity for maximum density in different areas of the city, land constraints, costs, development regulations and other construction or market constraints make maximum density a challenge for redevelopment. Therefore, the City of Pomona assumes a density of 66 percent of maximum permitted; this was calculated using the following steps:

- A review of all pipeline projects for 2021, including projects with applications, in review, entitled, and permitted or in construction.
- Projects were filtered by those proposed in the TOD, TOD Neighborhood, and Urban Neighborhood
- Then, to create a conservative assumption, the projects were filtered by acreage or those only larger than 1.2 acre.
- Finally, the average of proposed density was taken, total about 66% of maximum density.

Potential constraints, to the extent they are known, such as environmentally sensitive areas and steep slopes were considered, and deductions were made where those factors decreased the net buildable area of a parcel.

Affordability Calculation

Pomona's 2021-2029 Housing Element sites analysis assumed that each identified candidate housing site will develop at a range of income levels. Primarily it is assumed that sites identified within **Table C-12** will redevelop with the following affordability characteristics:

Identified sites which are nonvacant and are consistent with state legislation:

- 30% of units available to residents in the low and very low-income categories
- 13% of units available to residents in the moderate-income category
- 57% of units available to residents in the above moderate-income category

Identified sites which are vacant and are consistent with state legislation:

- 100% of units available to residents in the low and very low-income categories

Pomona recognizes that not all sites within the inventory will develop such that they meet the exact affordability assumptions identified, for example, some sites may develop at higher density or affordability levels through the use of density bonus incentives, and some may develop with majority market rate units (units affordable to the moderate and above moderate-income households). For this reason, the City has included a total buffer of 36% on the total number of units to assist in accommodating potential differences in future housing development.

The City has established goals, policies, and programs within the Housing Element (Pro Housing Pomona Section 5) aimed at identifying funding opportunities and partnering with the development community to increase the amount of affordable housing built in future developments. Additionally, in April 2021 the City adopted a local Inclusionary Housing Ordinance focused on increase on site affordable units or backing an affordable housing fund which will support various affordable housing programs.



The City has also identified vacant sites as having the highest opportunity for 100 percent affordable housing developments, and will therefore, continually work to promote and increase fully affordable projects on these sites. If the City is able to identify partnerships leading to fully affordable projects, that would also help to cover any potential shortfall in capacity in any of the four income categories. The City of Pomona recognizes that should a “No Net Loss” situation occur, they will be required to identify additional sites and has analyzed additional potential housing sites within the Housing Element’s environmental clearance document.

2. Specific Plans, Zoning and General Plan Designations

In 2014 the City of Pomona updated the Pomona General Plan and with that the Land Use Element to include housing forward land uses and zoning regulations. The City can accommodate the RHNA allocation using existing general plan and land use designations on parcels throughout the Corridor Specific Plan. The City has identified the following Land Uses and Specific Plans as appropriate for accommodate the RHNA allocation for 2021-2029:

- **Downtown Specific Plan:** The DPSP update was adopted in 2019 and reconciles overlapping development standards, land uses, and boundary conditions with the Pomona Corridors Specific Plan and implements the Pomona General Plan update which were both adopted in 2014. Funded by a Transit Oriented Development (TOD) Planning Grant, this specific plan creates a regulatory environment supportive of TOD and will allow for the greatest building heights and densities in Pomona. The DPSP contains the following zoning designations allowing residential:
 - Mixed Use-Central Business District (40 – 70 du/ac)
 - Mixed Use-Institutional (40 – 80 du/ac)
 - Mixed Use-High Density Residential (40 – 100 du/ac)
 - Residential-Multifamily (40 – 70 du/ac)
- **Pomona Corridors Specific Plan:** The PCSP was adopted in 2014 during the Fifth Cycle and encourages higher density residential development and workplaces to create a more well-connected and transit-oriented Downtown and surrounding environs. The PCSP implements density/intensity standards by transect zone, as established in the 2014 General Plan update. The transect system is based on an open-source model development code and uses the concept of place types that range from rural (T1) to urban (T6). The PCSP currently implements the following transect zones allowing residential development throughout the City:
 - T3 (max 20 du/ac)
 - T4-A (max 70 du/ac)
 - T4-B (max 40 du/ac)
 - T5 (max 80 du/ac)
 - T6-A (50 – 100 du/ac)
 - T6-B (20 – 100 du/ac)
- **SB 330 Overlay:** The City of Pomona created and adopted Ordinance No. 4306, the “SB 330 Overlay Zoning District.” The SB 330 overlay creates consistency between the General Plan Land Uses designations of the Transect Zones throughout the City. For example, a parcel may have a current



zoning designation of R-1-6,000 which requires a minimum lot areas of 6,000 square, therefore permitting about 7 dwelling units per acre. However, under the General Plan Land Use designation, the same parcel may be identified as T3, which permits up to 20 dwelling units per acre. The SB 330 enables a developer to implement the T3 designation, increasing permitted densities in all single-family residential neighborhoods. To avoid displacement, the City has selected either vacant parcels or parcel with a non-residential existing use for redevelopment in the SB 330 overlay. In total, the City identified 64 parcels under the SB 300 overlay with opportunity for residential development.

3. Adequate Sites Table

Please see **Table C-12** for a complete list of sites identified to accommodate the 2021-2029 RHNA allocation.