

Appendix F

CONSISTENCY CHECK





A. State Policy and Authorization

As a mandated chapter of the Pomona General Plan, the Housing Element must meet all requirements of existing state law. Goals, programs and policies, and quantified objectives within the Housing Element consistent with state law are implemented within a timeline to ensure the City accomplishes the identified actions.

1. Relationship to Other General Plan Elements

The Housing Element is one of many Elements of the City's General Plan. The goals, policies, actions, and programs within the Housing Element relate directly to, and are consistent with, all other elements in the City's General Plan. The City's Housing Element identifies programs and resources required for the preservation, improvement, and development of housing to meet the existing and projected needs of its population.

The Housing Element works in tandem with development policies contained in the Land Use Element. The Land Use Element establishes the location, type, intensity, and distribution of land uses throughout the City, and defines the land use build-out potential. By designating residential development, the Land Use Element places an upper limit on the densities and types of housing units constructed in the City. The Land Use Element also identifies lands designated for a range of other uses, including employment creating uses, open space, and public uses. The presence and potential for jobs affects the current and future demand for housing at the various income levels in the City.

The City's Transportation Element also affects the implementation of the Housing Element. The Transportation Element establishes policies for a balanced circulation system in the City. The Transportation Element aims to reduce the impacts of transportation on the region's environment and provide a variety of options so individuals can choose to travel by car, bicycle, foot, or public transportation. Consequently, the Housing Element must include policies and incentives that consider the types of infrastructure essential for residential housing units in addition to mitigating the effects of growth in the City.

The Housing Element has been reviewed for consistency with the City's other General Plan Chapters, and the policies and programs in this Element are consistent with the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended in the future, the Housing Element will be reviewed to ensure that internal consistency is maintained.

2. State Requirements

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element. State Law requires that local governments review and revise the Housing Element of their comprehensive General Plans once every eight years.

The California Legislature has adopted an overall housing goal for the State to ensure every resident has a decent home and suitable living environment. Section 65580 of the California Government Code states:

- a) The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.



- b) The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.
- c) The provisions of housing affordable to low- and moderate-income households requires the cooperation of all levels of the government.
- d) Local and State governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors and community goals set forth in the general plan and to cooperate with other local governments and the state in addressing regional housing needs.

Table F-1 summarizes the State Housing Element requirements and identifies where these requirements are addressed in this document.

Table F-1: Housing Element Requirements		
Housing Element Requirement(s)	Gov. Code Section	Reference in Housing Element
Analysis of employment trends.	Section 65583.a	Appendix A.1.C.1
Projection and quantification of existing and projected housing needs for all income groups.	Section 65583.a	Appendix C.B.1
Analysis and documentation of the City’s housing characteristics, including cost for housing compared to ability to pay, overcrowding, and housing condition.	Section 65583.a	Appendix A.1.D
An inventory of land suitable for residential development including vacant sites and sites having redevelopment potential.	Section 65583.a	Appendix C.B
Analysis of existing and potential governmental constraints upon the maintenance, improvement, or development of housing for all income levels.	Section 65583.a	Appendix B.C
Analysis of existing and potential nongovernmental (private sector) constraints upon maintenance, improvement, or development of housing for all income levels.	Section 65583.a	Appendix B.B
Analysis concerning the needs of the homeless.	Section 65583.a	Appendix A.1.F.7
Analysis of special housing needs: handicapped, elderly, large families, farm workers, and female-headed households.	Section 65583.a	Appendix A.1.F
Analysis of opportunities for energy conservation with respect to residential development.	Section 65583.a	Appendix C.A.3
Identification of Publicly Assisted Housing Developments.	Section 65583.a	Appendix D.A.3
Identification of Units at Risk of Conversion to Market Rate Housing.	Section 65583.a	Appendix D.A.3
Identification of the City’s goal relative to the maintenance, improvement, and development of housing.	Section 65583.a	Pro Housing Pomona – section 5
Analysis of quantified objectives and policies relative to the maintenance, improvement, and development of housing.	Section 65583.b	Pro Housing Pomona – section 5
Identification of adequate sites that will be made available through appropriate action with required public services and facilities for a variety of housing types for all income levels.	Section 65583.c(1)	Appendix C.B
Identification of strategies to assist in the development of adequate housing to meet the needs of low and moderate-income households.	Section 65583.c(2)	Pro Housing Pomona – section 5



Table F-1: Housing Element Requirements		
Housing Element Requirement(s)	Gov. Code Section	Reference in Housing Element
Description of the Public Participation Program in the formulation of Housing Element Goals, Policies, and Programs.	Section 65583.d	Appendix A.2
Description of the Regional Housing Needs Assessment (RHNA) prepared by the Southern California Association of Governments.	Section 65583.e	Appendix C.B.1
Analysis of Fair Housing, including Affirmatively Furthering Fair Housing.	Section 8899.50	Appendix D.A
Review of the effectiveness of the past Element, including the City’s accomplishments during the previous planning period.	Section 65583.f	Appendix E
Source: State of California, Department of Housing and Community Development.		

3. Regional Housing Needs Assessment (RHNA)

Section 65583 of the California Government Code sets forth the specific content requirements of a jurisdiction’s housing element. Included in these requirements are obligations on the part of local jurisdictions to provide their “fair share” of regional housing needs. Local governments and Councils of Governments (COGs) are required to determine existing and future housing need and the allocation of this need must be approved by the California Department of Housing and Community Development (HCD). Pomona is a member agency of the Southern California Association of Governments (SCAG). SCAG is responsible for preparing the Regional Housing Needs Assessment (RHNA) for all jurisdictions within the SCAG region.

HCD established the planning period for the current 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.

4. City Council Goals & Priorities

On June 21, 2021, the City Council adopted an updated set of Priorities and Goals. These goals are:

1. Fiscal and Operational Responsibility
2. Economic Development
3. Increased Opportunity and Housing Stability
4. Safe and Clean Community
5. Infrastructure

The Pro Housing Pomona Housing Element aligns with multiple sub-goals contained in this document, as follows:

Goal 1B: Improve efficiency and effectiveness of City services to businesses and residents.

Goal 3J: Encourage the development and maintenance of quality housing opportunities for all.

Step 1: Obtain State approval for the City’s 6th Cycle Housing Element by January 2022.



Step 2: Revise the accessory dwelling unit ordinance by June 2021 in order to clarify existing ordinance and close loopholes.

Step 3: Staff will work with Council Ad Hoc Subcommittee on Housing to research and present to City Council options for rental inspection and housing stability programs.

Step 4: Complete a Feasibility Study for best use of Housing Successor Agency Owned Properties

Step 5: Identify innovative affordable housing development approaches to address homelessness and extremely low-income households.

Step 6: Educate stakeholders and facilitate the development of community-driven alternative land and housing ownership models.

Step 7: Develop an incentive program to promote the building of accessory dwelling units and using them to assist those experiencing housing displacement.

Step 8: Identify and act upon opportunities to expand and strengthen the Housing Authority's rental assistance programs.

Step 9: Increase home ownership assistance programs.

Goal 3K: Reduce the unsheltered homeless population by 10% annually and take actions to mitigate the impacts of homelessness on the Community.

5. Public Participation

Section 65583 of the Government Code states that, "The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort." Meaningful community participation is also required in connection with the City's Assessment of Fair Housing (AFH). A discussion of citizen participation is provided below.

As part of the 6th Cycle Housing Element Update process, the City has conducted extensive public outreach activities beginning in Spring 2021. These engagement efforts included virtual community workshops, City Council and Planning Commission study sessions, a community survey, online and social media outreach, tabling at community events, meetings with stakeholders, and digital information through the Housing Element Update webpage.

Outreach for the 6th Cycle Housing Element to the community includes the following actions:

- Housing Element Update webpage with all housing materials, located at:
<https://www.pomonaca.gov/government/departments/development-services/planning-division/general-plan/pro-housing-pomona>.
- Virtual Community Workshop #1 on Wednesday March 31, 2021. The presentation recording is available for viewing by the public on the City's Housing Element Update Webpage.



- Online Community Survey available from April 27, 2021 to June 25, 2021.
- Stakeholder Meetings, available to the public by request for participation, on Thursday April 29 and Thursday May 6, 2021.
- Joint City Council and Planning Commission Study Session, available to the public, on Wednesday May 12, 2021.
- Public Review Draft of the Pro Housing Pomona, 2021-2029 Housing Element, released on September 30, 2021 and available for comment through November 1, 2021.
- Planning Commission Study Session, available to the public, on Wednesday October 13, 2021.
- Virtual Community Workshop #2 on October 20, 2021. The presentation recording is available for viewing by the public on the City's Housing Element Update Webpage.
- Stakeholder meeting #3 on October 21, 2021. Hosted virtually for members of the Housing Leadership Academy.

As required by Government Code Section 65585(b)(2), all written comments regarding the Housing Element made by the public have previously been provided to each member of the City Council.

Appendix A.2 contains a summary of all public comments regarding the Housing Element received by the City during the update process.

6. Data Sources

The data used for the completion of this Housing Element comes from a variety of sources. These include, but are not limited to:

- United States Census, 2010
- American Community Survey (U.S. Census Bureau Survey Program)
- City of Pomona Assessment of Fair Housing
- Point-in-Time Homeless Census by the Regional Task Force on the Homeless, 2020
- Home Mortgage Disclosure Act (HMDA) lending data
- California Department of Economic Development
- California Employment Development Division Occupational Wage data, 2020
- Department of Housing and Urban Development, Comprehensive Housing Affordability Strategy (CHAS), 2013-2017
- SCAG Regional Growth Forecast, RTP/SCS
- California Association of Realtors (CAR)

The data sources represent the best data available at the time this Housing Element Update was prepared. The original source documents contain the assumptions and methods used to compile the data.