

Planning and Development Fees

State law limits fees charged for development permit processing to the reasonable cost of providing the service for which the fee is charged. Various fees and assessments are charged by the City and other public agencies to cover the costs of processing permit applications and providing services and facilities such as schools, parks, and infrastructure. Almost all of these fees are assessed through a pro rata share system, based on the magnitude of the project's impact or on the extent of the benefit that will be derived.

Table 40 shows the planning fees for the City of Culver City compared to other Westside cities. As shown, Culver City's fees are most similar to the City of Beverly Hills; however, all the cities shown are generally comparable. Per state law, these fees may not exceed the city's cost to review and process the permit. The City periodically evaluates the actual cost of processing development permits when revising its fee schedule. The last fee schedule update was adopted in 2013.

While the planning fees such as General Plan Amendment (GPA), Zone Change, and Conditional Use Permit (CUP) appear high, these fees are charged on a per-project basis, not per unit. Extensive consultation took place for the development of the land use policy, which offers high levels of flexibility for development and reflects current and projected trends of development in the City. Therefore, upon the completion of the General Plan and Zoning Code update, the need for developers to pursue GPA, Zone Change, and CUP would be minimized, reducing the impact of fees as a constraint on development. Furthermore, the City encourages the development of high-density residential projects. The new Zoning Code will include appropriate development standards to facilitate the achievement of maximum allowable density for the respective zones. Therefore, economies of scale can be achieved on a per-unit basis, encouraging the development of high-density residential projects and maximizing the number of units. To facilitate affordable housing, the City will waive/reduce/defer city planning fees.

Furthermore, the City conducted a nexus study in July 2020 to establish a Commercial Linkage Fee program. The Nexus Study also researched the impact fees as a percentage of development value among neighboring jurisdictions. The study concluded that the City's overall impact fee level is around the median value compared to other jurisdictions and therefore not considered a constraint to development.

- C. **Shared Housing.** Through the Los Angeles County Measure H Rapid Rehousing Program, assist persons experiencing homelessness by placing them in existing units with up to 18 months of rent subsidies and supportive services.
- D. **Existing Covenanted Buildings.** Monitor existing covenanted buildings for compliance with affordability restrictions, and with occupancy and maintenance covenants to upgrade and maintain the character and condition of the neighborhoods while preserving affordability to residents. Housing units covered in the monitoring program include: ownership units assisted under the Mortgage Assistance Program (MAP), affordable rent-restricted units, mobile home park units, and group homes for persons with disabilities.
- E. **Preserve At-Risk Affordable Housing Units.** There are a total of 231 affordable units at risk between 2021 and 2031. Pursuant to new State law, the Housing Division will contact property owners at least three years in advance to inquire about their interest in extending their covenants. In exchange for extending covenants the City will offer property owners funding assistance for rehabilitation to address deferred maintenance through the Neighborhood Preservation Program (NPP) and rental assistance to qualified households through the Rental Assistance Program should funding becomes available. In addition, the City will contact non-profit organizations with the capacity to assist in preserving the at-risk units.
- F. **Affordable Housing Development Assistance.** Provide financial support and technical assistance to organizations that acquire/rehabilitate and/or develop housing for lower and moderate income households (including extremely low income) and populations with special needs (including persons experiencing homelessness, seniors, persons with developmental or other disabilities). To encourage the inclusion of affordable housing units in new housing development, the City will undertake the following actions:
- Partnership between the Housing Division and the Current Planning Division to offer density bonuses and financial assistance (as funding permits) to developers. Through the City's Housing Funds programming, the City will provide funding to assist in affordable housing development with the goal of assisting 250 housing units. For FY 2021-FY 2024, the City has already allocated funding to four projects with an anticipated 113 affordable units.
 - Inform developers when they first contact Current Planning that the City may be able to provide some financial assistance to their project in exchange for affordability commitments.
 - Current Planning will continue to inform developers about the benefits of density bonus when projects are submitted for review.
 - Establish criteria for receiving waived/reduced/deferred City fees for affordable housing projects.
 - Exempt multi-family housing from the Mobility Improvement fee.

- Provide priority processing for affordable housing projects.

- G. **Inclusionary Housing.** The City amended its Mixed Use Ordinance (§17.400.065) in February 2021 to incentivize inclusion of affordable units in mixed use development projects with a community benefit density bonus. The City will review the ordinance to ensure consistency with 2045 General Plan.
- H. **Linkage Fee.** In July 2021, the City Council adopted the Affordable Housing Commercial Development Impact Fee Ordinance to fund affordable housing projects. This Ordinance will apply a “linkage” fee to new non-residential development. Beginning in January 2022, the fee will be applied to new non-residential development at \$5 per net leasable square foot. The City completed a nexus study to ensure the appropriateness of the fee.

Measure 2. Programs to Address Special Housing Needs

- A. **Homeless and Special Needs Housing.** The City identified several Successor Agency owned properties for affordable housing (including extremely low income) and special needs housing (including for persons experiencing homelessness, seniors, persons with developmental or other disabilities). The City will continue to evaluate other agency-owned properties or opportunity sites available on the market for affordable and special needs housing.
- B. **Zoning Code Amendments to Address Special Needs Housing.** Various bills were passed in the last few years to address the housing choices available to special needs groups. The City will revise the Zoning Code to address the provision for emergency shelters, supportive housing, low barrier navigation center, employee housing, and residential care facilities in residential zones. Specifically, the City will address the provisions for large residential care facilities by removing the five-acre minimum lot size and by establishing objective criteria for project approval. The Zoning Code will also be revised to remove required findings for reasonable accommodations that may be considered subjective. Specifically, one finding requires that the requested accommodation to not impact surrounding uses and properties negatively. This finding is subjective and may serve to impede the request for accommodation.
- C. **Homeless Service Referrals.** Through a contract with Saint Joseph Center, the City provides homeless outreach, data collection, service referral, and emergency motel vouchers. Homeless outreach was expanded to include evenings until 10 pm and Saturdays.
- D. **Emergency Shelters.** Upward Bound House (UBH) Family Shelter provides 18 emergency housing beds for families with children experiencing homelessness. Through a contract with UBH, the City provides case management and supportive services to children and their families experiencing homelessness and to children experiencing homelessness and attending Culver City Unified School District.
- E. **Group Homes.** A total of six group homes for persons with developmental disabilities provide affordable housing and supportive services to 26 low to moderate income individuals annually. Monitor group homes and housing for

persons with special needs to ensure compliance with the Federal Housing Quality Standards (HQS), and City Health and Safety Codes.

Measure 3. Programs to Improve Housing and Neighborhood Conditions

- A. **The Neighborhood Preservation Program (NPP).** The NPP provides Deferred Maintenance Grants of up to \$5,000 are provided to multi-family property owners who will lease to a Section 8 household or household experiencing homelessness.
- B. **Healthy and Safe Grant.** The program also offers Healthy and Safe Senior Grants of up to \$1,500 to low income seniors to address life safety and code enforcement violations.
- C. **Graffiti Removal.** Work with property owners to remove graffiti through the Public Works Department and encouraging local monitoring by owners. Continue to help community groups to organize volunteer graffiti removal activities.

Measure 4. Programs to Facilitate Additional Housing

- A. **Adequate Sites for RHNA and Monitoring of No Net Loss (SB 166).** The current Culver City General Plan does not offer adequate capacity and housing choices to meet the community's housing needs or the State mandated RHNA of 3,341 units for the 6th cycle Housing Element. Based on the current General Plan and objective criteria and local knowledge used to identify available sites with near-term development potential, the City has an overall shortfall of 165 lower income units.

Based on direction from the Culver City City Council, the 2045 General Plan provides for significantly higher density and capacity above the City's RHNA requirements. The City anticipates adopting the 2045 General Plan by Fall 2022. Pursuant to State law, land use designations and implementing zoning to accommodate RHNA shortfall of 165 lower income units, plus a buffer to accommodate no net loss requirements. For lower income RHNA and buffer, the sites will provide maximum density of at least 30 du/ac and minimum density of at least 20 du/ac on sites that can accommodate at least 16 units on site.

Because the City will be fulfilling the RHNA shortfall on sites identified for mixed use zoning in General Plan 2045, these zoning districts must allow 100 percent standalone residential uses and for mixed use projects must not require the nonresidential component to be more than 50 percent of the floor area. To fulfill the 165-unit shortfall, the City will redesignate a minimum of seven acres at a maximum density of at least 30 du/ac (assuming an average density of 25 du/ac). Ownership and rental housing will be permitted by right if the project includes 20 percent of the units as housing affordable to lower income households (see also Measure 4B).

The City will complete the Zoning Code Update to implement 2045 General Plan by the end of 2023. The Zoning Code update will establish appropriate

development standards to facilitate the achievement of maximum allowable density for the respective zones.

As part of the Zoning Code update, ensure that Incremental Infill lots over 4,950 square feet apply the following protections that are consistent with SB 9:

- Anti-displacement protections for renters
- Environmental site constraints
- Protection of historical houses
- Allowed unit size shall be consistent with SB 9

The City is in the process of developing procedures for implementing SB 9, and anticipates having the procedures in place by the end of 2023 (see Measure 4J).

The City will develop a monitoring procedure to ensure adequate capacity remains to accommodate the City's remaining RHNA for all income groups, as sites are being developed for residential, nonresidential, or mixed use developments. The City will also conduct a midterm review of the effectiveness of the new land use policies and development standards to ensure the City is on track with its housing production goals.

- B. **By-Right Approval.** Pursuant to AB 1397, RHNA sites that require rezoning to accommodate the lower income RHNA shortfall are subject to by-right approval if the project includes 20% affordable (see Measure 4A). To avoid inconsistent application of this incentive, the City will extend the by-right approval to all projects that include 20% affordable to lower income households.
- C. **Density Bonus Program.** Provide information on the various density bonus incentives to housing and mixed use development applicants. These include:
- Mixed Use Ordinance – Inclusionary Incentive with Community Benefit Program
 - Micro Units Bonus
 - State Density Bonus
- D. **Accessory Dwelling Units (ADU) Ordinance.** This program has two components:
- ADU Ordinance Amendment: Amend the ADU Ordinance to implement the Incremental Infill designation of 2045 General Plan, which allows up to three units on lots over 4,950 square feet, or up to four units if one of the units is dedicated as affordable housing, inclusive of the ADU and JADU units. The designation would also reimagine the hierarchy of unit size and allow for all units to be of equal size, or whatever breakdown desired by project.
 - Monitor ADU Trend: The Housing Element projects 400 ADUs to be constructed over eight years. Monitor the trend of ADU construction to evaluate the effectiveness of Incremental Infill and ADU construction in other residential zones, especially regarding occupancy and affordability. If necessary, adjust the ADU Ordinance to provide additional incentives or remove constraints to ADU construction.

- E. **Affordable ADU Incentive Program.** Provide information on the various incentives the City offers to facilitate affordable ADUs:
- Tier 1: Workforce. Provide grants of \$25,000 in exchange for affordability covenants.
 - Tier 2: Low/Moderate Income. Through an Amnesty Program, provide grants of \$50,000 to legalize illegally converted ADUs in exchange for affordability covenants.
 - Tier 3: Homeless. One year trial for the creation of homeless units through the provision of \$50,000 rehabilitation grants with a ten-year affordability covenant. ADU owners will also receive additional landlord incentives through the Homeless Incentive Program, and tenants will be paired with a Culver City HCV.
 - Develop pre-approved ADU plans.
 - Pursue funding from the State to assist homeowners in ADU construction.
 - **Establish lower fees for ADUs.**
- F. **Affordable Housing Tools and Best Practices:** The City will explore additional tools and best practices by other communities to facilitate affordable housing. These may include, but are not limited to:
- 100% Affordable Housing Overlay
 - Transit-Oriented Communities concept
 - Affordable housing partnership funding opportunities
 - Enhanced Density Bonus
 - Lobby for Article 34 Authority to permit the City to be directly engaged in the development and ownership of affordable housing
 - ADU pre-approved standard plans program
 - Right to Return program
 - HCD Prohousing Designation
 - Livable Communities Initiative in the transformation of commercial corridors
- The City created a part-time staff position in the fall of 2021 to study these tools. Staff began studying these concepts in 2021 and will continue to do so through 2022. After completing the study in 2022, City staff will present the findings and recommendations to City Council for direction on how to implement them. City staff will also apply for HCD's Prohousing Designation Program for additional support. The City will engage the participation of the community in developing the various affordable housing tools, including the Livable Communities Initiative.
- G. **Hotel/Motel Conversion.** The City conducted a hotel/motel conversion study and identified potential properties for conversion into affordable housing. The City will continue to pursue properties for acquisition and adaptive reuse or redevelopment as affordable and special needs housing.
- H. **Objective Design Standards.** Develop objective design standards to comply with SB 330.

- I. **Permit Streamlining and Monitoring.** The Current Planning Division is drafting a proposal that will increase the unit threshold that triggers discretionary site plan review. As part of its annual Planning Commission Work Plan review, the Current Planning Division will continue to evaluate processing time improvements to streamline the process. This will include establishing a method to monitor and periodically report on processing times. The Current Planning Division will also continue to recommend adjusting to facilitate housing production when needed.
- J. **Zoning Code Review and Amendments to Address Constraints to Housing Production.** As part of the City's comprehensive Zoning Code update to implement the General Plan, the City will review and amend the Code to remove potential constraints to housing production. These include:
- Considering expanding areas (beyond as part of mixed use projects only) where SRO housing may be permitted, including as a standalone residential use.
 - Establishing appropriate development standards (such as setbacks, parking, and height) to ensure that development projects could achieve the maximum allowable density in the respective designation. This includes reassessing the definition, minimum unit sizes, and parking requirements of live/work units. Specifically, the City is in the process of eliminating parking minimums in the majority of the City. This process is expected to complete by 2023. Also in 2023, the City will initiate a study on the referendum on height limits as a constraint to development and develop strategies to mitigate this constraint.
 - Completing the comprehensive parking code update to ensure appropriate parking standards are established to facilitate the achievement of allowable densities under the General Plan Update, including parking standards for studio/one-bedroom units and live/work units.
 - Conducting an outreach and education program regarding the impact of height limit on development potential and develop mitigating strategies to address this constraint.
 - Considering setting minimum density requirements for development in multi-family neighborhoods.
 - Establishing tools and incentives to encourage lot consolidation. These may include: additional density bonus, reduction in setbacks or other development standards, ministerial review of lot line adjustments, and assistance in identifying potential parcels appropriate for consolidation.
 - Amending the required findings for project approval to ensure findings are based on objective criteria that can be implemented to promote certainty in outcomes.

- **Developing implementation procedures for SB 9 (anticipated to be available by the end of 2023).**

During this Zoning Code Update process and any subsequent amendments to the Zoning Code, the City will ensure that it complies with applicable State laws. For example, the State recently passed SB 9, 10, and 478, which set guidelines regarding zoning standards and CEQA requirements for residential projects.

Measure 5. Programs to Affirmatively Furthering Fair Housing

Fair Housing Outreach and Enforcement

- A. **Fair Housing Outreach and Counseling.** The City participates in the CDBG program under the LACDA CDBG Urban County program. Through the County's program, the Housing Rights Center (HRC) is retained as the fair housing service provider for the participating jurisdictions. The City will continue to refer fair housing inquiries to the HRC.

Housing Mobility and New Housing Opportunities in High Resource Areas

- B. **Source of Income Protection.** SB 329 and SB 222 require rental property owners to accept Housing Choice Voucher (HCV) and other public assistance as legitimate sources of income for housing payments. Property owners no longer have the ability to reject HCV, Veterans Affairs Supporting Housing (VASH), or other rental assistance. The City will develop outreach and education materials regarding the use of HCVs. Focus outreach to the Incremental Infill areas and other high opportunity areas to encourage property owners to accept HCVs.
- C. **Landlord Roundtable.** The Housing Division will continue to hold joint roundtable discussions between the Landlord Tenant Mediation Board (LTMB) and the Advisory Committee on Housing and Homelessness (ACOH) with local property owners. The discussions cover landlord incentives and owner concerns about renting to low income households and persons experiencing homelessness.
- D. **Community Conversation on Affordable Housing.** The Housing Division will continue to work with the Advisory Committee on Housing and Homelessness and the Parks, Recreation and Community Services Commission to talk with the community about affordable housing and how to expand housing opportunities and accessibility for all residents. These conversations focus on addressing issues of homelessness and examining methods to broad housing access and affordable housing opportunities.
- E. **Landlord Fair.** The Housing Office will host annual Landlord Fairs to attract and retain property owners to participate in the various housing programs. Property owners will be informed of the incentives offered to lease to households that receive rental assistance and those exiting homelessness. This is an opportunity for property owners to meet with various City departments, such as Sanitation, Police, and Fire, as well as community organizations. The Housing Rights Center

and Bet Tzedek¹⁹ will also attend the fair to inform property owners about Fair Housing Law.

F. Inter-Agency Agreement with the Housing Authority of the City of Los Angeles (HACLA). To extend housing choices and to deconcentrate poverty, the Housing Office is currently negotiating with HACLA to overlap with their jurisdiction by up to one mile. This will allow Culver City Section 8 voucher holders to expand housing options and remain in the westside area of Los Angeles.

G. Accessory Commercial Uses in Residential Neighborhoods: The proposed Land Use Element contains policies to promote accessory commercial uses that can support vibrant neighborhoods. The City will initiate study to integrate such uses in single-family neighborhoods.

See also Affordable ADU Incentive Program under Measure 4.E.

Anti-Displacement and Tenant Protections

H. Permanent Rent Control Ordinance. The Culver City Permanent Rent Control Ordinance sets restrictions on rent increases. Its intention is to respond to rising real estate costs, which have resulted in the decreased affordability and stability of the housing stock, and data that demonstrates that renter households are more likely to be cost-burdened (see Tables 8, 21, and 30, for examples). Overall, a permanent Rent Control Ordinance is meant to alleviate the housing cost burden on households, particularly lower-income households, and includes the following provisions:

- Landlords may not impose more than one Rent increase for a Covered Rental Unit in any 12- month period.
- The maximum permissible annual rent increase is based on the average annual change in the consumer price index ("CPI change").
- If CPI change is less than 2%, maximum allowable annual rent increase is 2%.
- If CPI change is more than 5%, maximum allowable annual rent increase is 5%.
- A Landlord may impose a Rent increase that takes effect sooner than twelve (12) months following the date of the latest permitted Rent increase under the Interim Rent Control Ordinance, but the prior increase under Interim Rent Control Ordinance in combination with a rent increase under permanent ordinance may not exceed the maximum allowable annual rent increase under the permanent ordinance.

Exemptions to the Ordinance include:

- Dwelling units expressly exempt from rent control per state or federal law.
- Dwelling units occupied after February 1, 1995.
- Single-family homes, condominiums and townhomes.
- Subdivided interest in a subdivision.

¹⁹ Bet Tzedek attorneys and advocates provide free legal services to low-income Los Angeles County residents.

- Government subsidized dwelling units.
- I. **Landlord-Tenant Mediation Board.** The City's bylaws on the Landlord-Tenant Mediation Board (LTMB) were expanded to include mediation for habitability issues and to require property owners to include a lease addendum for all tenants informing them about the LTMB and mediation services.
- J. **Landlord Incentives.** The City instituted the Landlord Incentives program to house persons experiencing homelessness. Culver City Housing Division contracted with the Los Angeles County Development Authority to administer the Homeless Incentives Program (HIP). This program's aim is to increase the number of landlords participating in the City's Section 8 program by providing incentives to landlords who rent to a family or individual experiencing homelessness. Incentives include:
- Holding Fee - one month's free rent
 - Security Deposit - (up to double the rent) and Utility assistance
 - Damage mitigation up to \$2,000
- Culver City Housing Division also administers an internal Landlord Incentive Program to attract and retain property owners. Incentives include:
- Neighborhood Preservation Grant - \$5,000 grant to renovate rental unit in exchange for two years of participation in the Culver City Section 8 program.
 - Security Deposit - (up to double the rent) and Utility assistance
 - Housing Locator / Liaison - assistance with landlord and tenant mediation.
- K. **Plan to Prevent and Combat Homelessness.** The Housing Division will regularly update the Plan to Prevent and Combat Homeless by setting seven goals over three-year periods to address homeless and expand housing access. The next update will be in 2023.
- L. **Housing Replacement.** This program has two components:
- AB 1397 Replacement Requirement: Development on nonvacant sites with existing residential units is subject to replacement requirement, pursuant to AB 1397. The City will amend the Zoning Code to require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site consistent with those requirements set forth in State Density Bonus Law.
 - Replacement of Units Lost due to Successor Agency Actions: Use financial resources, if available, to help replace residential units lost as a result of Successor Agency actions.
- M. **Promotion of Housing Programs.** Market the availability of various housing programs with brochures, flyers, and other public information materials.

Specifically, focus promotion of housing programs to neighborhoods with concentrated areas of housing issues.

Measure 6. Programs to be Initiated or Reinstated with Additional Funding

With the elimination of redevelopment, the City has limited funding to implement housing programs and services. During the 2021-2029 Housing Element planning period, the City will actively pursue funding to reinstate or initiate the following programs:

- A. **Temporary Emergency Rental and Relocation Assistance Program.** Provide funds for security deposit for individuals forced to relocate due to government action such as code enforcement actions or changes in land use.
- B. **Property Acquisition and Rehabilitation Program.** Provide opportunities to create affordable housing through the Property Acquisition and Rehabilitation program. The program may consider strategies such as providing loan assistance, for example through establishing a trust fund. It may also consider identifying funding for nonprofit affordable housing providers and allowing such providers the right of first offer to acquire existing multi-unit residential properties as they come to market.
- C. **West Culver City Residential Rehabilitation Program.** Offer rehabilitation grants to eligible property owners in West Culver City and provide grants to affordable housing developers who wish to acquire and rehabilitate units to provide low income rental housing.
- D. **Surcharge Fee for New Construction.** Offset the New Construction Surcharge fee for affordable units assisted by LMIHAF.
- E. **Homebuyer Assistance.** Explore resources, financing mechanisms, and/or partnership with nonprofits and lenders to facilitate affordable homeownership opportunities for first-time buyers.
- F. **Community Land Trust.** Explore the feasibility of establishing a Community Land Trust that can be used for various affordable housing activities.

Table 45: Program Implementation Summary - 2021-2029

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
Measure 1. Programs to Enhance Housing Affordability				
A. Section 8 Housing Choice Voucher Program	Housing Authority	HUD	215 households	Annually reviewed with Housing Authority Budget and Work Plan approval
B. Rental Assistance Program	Housing Authority	LMIHAF	16 households	Annually reviewed with Housing Authority Budget and Work Plan approval

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
C. Shared Housing	Housing Authority	Measure H Rapid Rehousing Program	5 households	Annually reviewed with Housing Authority Budget and Work Plan approval
D. Existing Covenanted Buildings	Housing Authority	Housing Authority	Compliance with affordability agreement, Housing Quality Standard, and occupancy requirements.	Annually reviewed with Housing Authority Budget and Work Plan approval
E. Preserve At-Risk Affordable Housing Units	Housing Authority	Housing Authority	<ul style="list-style-type: none"> • Monitor the at-risk status of 231 affordable units that are potentially at risk of converting to market-rate housing. • Pursuant to new State law, contact property owners at least three years prior to covenant expiration dates for at-risk projects. If owners intend to file a Notice of Intent to opt out of affordable housing, ensure their compliance with the three-year, one-year, and six-month noticing requirements. • Contact nonprofit developers with the capacity and interest in assisting in the preservation of at-risk units. • Pursue funding to assist in the preservation of at-risk units. • Provide information on rental assistance available to affected tenants. 	Annually reviewed with Housing Authority Budget and Work Plan approval
F. Affordable Housing	Housing Authority	<ul style="list-style-type: none"> • LMIHAF • Apply for 	<ul style="list-style-type: none"> • <u>Facilitate the development of 250</u> 	Housing Authority staff will

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
Development Assistance		Project Homekey funding	<p><u>affordable units over eight years.</u></p> <ul style="list-style-type: none"> • Pursue additional funding for Project Homekey with the goal of completing a total of four additional projects (two under Round 2 funding and two under future rounds). • Projects with allocated resources for FY 2021-FY 2024 include: <ul style="list-style-type: none"> ○ Venice Parking Lot – 10 modular housing units for persons experiencing homeless ○ Virginia Parking Lot – 12 modular housing units for persons experiencing homeless ○ Community Garden – 6 modular units as permanent supportive housing ○ United Methodist Church – 95 affordable units 	coordinate with other Community Development Department staff to actively identify sufficient development opportunity sites for persons experience homelessness.
G. Inclusionary Housing	Current Planning Division	Current Planning Division Budget	<ul style="list-style-type: none"> • Review and revise the Mixed Use Ordinance as appropriate to ensure consistency with 2045 General Plan. • Monitor to ensure the Mixed Use Ordinance effectively supports affordable housing production. 	<ul style="list-style-type: none"> • By 2023 • Ongoing
H. Linkage Fee	Economic Developme	Economic Development	<ul style="list-style-type: none"> • Review and revise the Affordable Housing 	<ul style="list-style-type: none"> • By 2023

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
	nt Division	Division Budget	<p>Commercial Development Impact Fee Ordinance as appropriate to ensure consistency with 2045 General Plan.</p> <ul style="list-style-type: none"> • Monitor to ensure the Affordable Housing Commercial Development Impact Fee Ordinance effectively supports affordable housing production. 	<ul style="list-style-type: none"> • Ongoing
Measure 2. Programs to Address Special Housing Needs				
A. Housing for Homeless and Special Needs	Housing Authority	Housing Authority	<ul style="list-style-type: none"> • Venice Parking Lot – 10 modular housing units for persons experiencing homelessness and 70-bed sprung shelter on balance of lot • Virginia Parking Lot – 12 modular housing units for persons experiencing homelessness and 100-unit supportive housing or mixed income housing on balance of lot • Community Garden – 6 modular units as permanent supportive housing • Annually identify other agency-owned properties for affordable and special needs housing. 	<p>Complete site plan for Venice Parking Lot in 2021 and begin construction in 2022</p> <p>Pursue supportive housing at Virginia Parking lot by 2022</p> <p>Pursue housing at Community Garden by 2022</p> <p>Estimated entitlement to construction for all three projects: 12-18 months.</p>
B. Zoning Code Amendments to Address Special Needs Housing	Planning Division	Planning Division Budget	<ul style="list-style-type: none"> • Supportive Housing (AB 2162) - Supportive housing projects of 50 units or less (for cities with a population of less than 200,000) to be permitted by right 	By the end of 2023, as part of the comprehensive Zoning Code update to implement 2045

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p>in zones where multi-family and mixed-use developments are permitted. The supportive housing project must meet certain criteria, such as providing a specified amount of floor area for supportive services. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop.</p> <ul style="list-style-type: none"> • Emergency Shelter (AB 139) – Parking standards be established solely based on staffing level. • <u>Low Barrier Navigation Center (AB 101) – Requires cities to permit a Low Barrier Navigation Center development by right in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as a “Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals</u> 	<p>General Plan</p>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p><i>experiencing homelessness to income, public benefits, health services, shelter, and housing."</i> CGC §65660</p> <ul style="list-style-type: none"> Employee Housing (California Health and Safety Code Section 17021.5) – Requires that housing for fix or fewer employees be considered a single-family residential use. <u>Residential Care Facilities for Seven or More Persons in Residential Zones – to remove the 5-acre requirement and to establish objective criteria for project review to ensure certainty in outcomes.</u> <u>Reasonable Accommodation – Remove findings that are subjective (such as negatively impacting surrounding uses or properties).</u> Co-housing – establish development standards to facilitate co-housing and other alternative housing arrangements. 	
C. Homeless Service Referrals	Housing Authority	Housing Authority	<ul style="list-style-type: none"> Continue to work with St. Joseph and/or another homeless service provider to conduct homeless outreach and connect individuals experiencing homelessness to services. 	<ul style="list-style-type: none"> Ongoing Annually reviewed with Housing Authority Budget and Work Plan approval

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<ul style="list-style-type: none"> Continue to provide up to 50 hotel/motel vouchers as needed 	
D. Emergency Shelters	Housing Authority	Housing Authority	Provide 18 year-round beds for women with dependent children through Upward Bound House Family Shelter.	Ongoing
E. Group Homes	Housing Authority	Housing Authority	Monitor six group homes for persons with developmental disabilities annually.	Ongoing
Measure 3. Programs to Improve Housing and Neighborhood Conditions				
A. Neighborhood Preservation Program	Housing Authority	LMIHAF	Provide 10 NPP Deferred Maintenance Grants.	Annually reviewed with Housing Authority Budget and Work Plan approval
B. Healthy and Safe Grant	Housing Authority	LMIHAF	Provide 5 Safe and Healthy Senior and Disabled Rehabilitation Grants.	Annually reviewed with Housing Authority Budget and Work Plan approval
C. Graffiti Removal	Public Works	Public Works Budget	Remove graffiti within 48 hours.	Ongoing
Measure 4. Programs To Facilitate Additional Housing				
A. Adequate Sites for RHNA	Advance Planning Division	Advance Planning Division Budget	<ul style="list-style-type: none"> Adopt 2045 General Plan to provide adequate capacity for RHNA. Develop a procedure to monitor for No Net Loss (SB 166) to ensure the City continue to have adequate sites for its RHNA for all income groups. Complete Zoning Code Update to implement 2045 General Plan. Update the sites inventory to determine adequate capacity for remaining RHNA. If the City is not 	<ul style="list-style-type: none"> <u>General Plan adoption</u> By Fall 2022 <u>AB 166 monitoring procedure by the end of 2022</u> <u>Sites inventory update at least semi-annually</u> <u>Zoning Code update by the end of 2023</u>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			meeting its housing production goals, review and revise the Land Use policy and development standards as appropriate to facilitate housing, especially affordable housing for lower income households and those with special needs.	
B. By-Right Approval	Advance Planning Division	Advance Planning Division Budget	As part of the Comprehensive Zoning Code Update to implement 2045 General Plan, amend the Zoning Code to provide by-right approval of projects that set aside 20% affordable units for lower income households.	<u>By the end of 2023</u>
C. Density Bonus Program	Current Planning Division	Current Planning Division Budget	Continue to promote the various density bonus incentives to residential and mixed use development applicants.	Ongoing
	Housing Authority	Housing Authority	As funding permits, provide financial assistance to affordable housing approved with a Density Bonus.	Ongoing
D. Accessory Dwelling Units Ordinance	Current Planning Division	Current Planning Division Budget	Amend ADU Ordinance to implement the Incremental Infill designation of 2045 General Plan, assuming the Preferred Land Use Map is adopted, with the goal of achieving 400 ADUs through conversion/expansion of existing properties and 135 ADUs/multiplexes through the demolition/reconstruction of properties. <u>Update to the</u>	Upon adoption of General Plan 2045 and <u>by the end of 2023</u>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p><u>ADU Ordinance will implement Incremental Infill and ensure consistency with SB 9 requirements.</u></p>	
E. Affordable ADU Incentive Program	Housing Authority	Housing Authority	<ul style="list-style-type: none"> • Monitor the construction trend of ADUs. • If ADU construction falls below projection, amend the ADU Ordinance to provide additional incentives or to remove constraints to development. <p>Assist homeowners to pursue affordable ADUs: Tier 1: Workforce – 43 Affordable ADUs Tier 2: Low/Mod – 20 Amnesty Properties Tier 3: Homeless – 4 Affordable ADUs</p> <p>Develop pre-approved ADU plans to expedite ADU review and approval timelines per City Council direction</p> <p>Pursue funding to assist homeowners in construction ADUs</p> <p>Add information regarding funding resources for homeowners (e.g., the California Housing Finance Agency, CalHFA, ADU Grant Program)</p> <p>Create fee waiver for development projects that include an affordable ADU</p>	<p>Ongoing</p> <p>Develop pre-approved plans by 2023</p> <p>Pursue funding in 2023 and as needed thereafter</p> <p>Regularly update the ADU page on the City website with funding resources such as the CalHFA ADU Grant Program</p> <p>Develop affordable ADU fee waiver program during comprehensive fee update process</p>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<u>Establish lower fees for ADUs</u>	
F. Affordable Housing Tools and Best Practices	Advance Planning Division	Advance Planning Division Budget	Study and prioritize the various affordable housing tools for research and analysis, such as Affordable Housing Overlay Zones, Transit Oriented Communities (TOCs) programs, affordable housing funding opportunities, <u>and Livable Communities Initiative.</u>	Complete study with summary of findings and recommendations by 2022 Update City Council on the research progress by 2022 Pursue affordable housing funding opportunities by 2022 Apply for HCD Prohousing Designation by 2022
G. Hotel/Motel Conversion	Housing Authority	Housing Authority	Continue to identify properties and negotiate for acquisition and adaptive reuse or redevelopment as affordable and special needs housing. Submit Project Homekey application for 2022 funding cycle. Submit Homekey Round 2 application to acquire and rehabilitate two motels that will serve persons experiencing chronic homelessness. If awarded Homekey funds, convert the motels to 35 units of interim housing and 38 units of Permanent Supportive Housing (PSH).	Ongoing Obtain \$2.84M earmarked as matching grant funds from LA County Begin pursuing Homekey funding in 2022 State grant funding decision Q1: 2023 City study motel conversion feasibility Q2 and Q3 2022 Submit Round 2 application by early 2022 <u>for two additional</u>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			Continue to apply for future rounds of Project Homekey funding as available to pursue the conversion of two additional motels.	<u>motels.</u> If funded, complete projects and have units occupied by end of 2022
H. Objective Design Standards	Advance Planning Division	Advance Planning Division Budget	Develop Objective Design Standards to comply with SB 330.	By 2023
I. Permit Streamlining and Monitoring	Current Planning Division	Current Planning Division Budget	Establish a permit processing time tracking, monitoring, and reporting system.	By 2023
J. Zoning Code Review and Amendment to Address Constraints to Housing Production	Advance Planning Division	Advance Planning Division Budget	<ul style="list-style-type: none"> Consider expanding areas when SRO may be permitted, including as a standalone residential use Establish appropriate development standards to allow achieving the maximum allowable density Conduct an outreach and education program and develop mitigating strategies to address the 56-foot height limit Establish appropriate parking standards (eliminating parking minimums and studying parking maximums) to facilitate the achievement of allowable densities Initiate study on height limits as a constraint to 	By 2023

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p>development and establish appropriate standards to mitigate constraints.</p> <ul style="list-style-type: none"> Establish procedures to implement SB 9. 	
Measure 5. Programs to Affirmatively Furthering Fair Housing				
A. Fair Housing Counseling	LACDA/HRC	Urban County CDBG	<ul style="list-style-type: none"> Continue to refer fair housing inquiries to the HRC. Advocate to LACDA to provide separate reporting of fair housing service records specific to Culver City to better understand the nature/extent of fair housing issues in Culver City. Continue to consistently update the City website and expand fair housing information and resources. 	Ongoing Expand website by 2022
B. Source of Income Protection	Housing Authority	Housing Authority	<p>Develop outreach and education materials and implement an outreach campaign.</p> <p><u>Include a fair housing factsheet in ADU, Incremental Infill, and SB9 application packets.</u></p>	Conduct source of income protection outreach by 2023
C. Landlord Roundtable	Housing Authority	Housing Authority	Hold joint roundtable discussions with LTMB and ACOHH	Annually
D. Community Conversation on Affordable Housing	Housing Authority	Housing Authority	Conduct community meetings on affordable housing issues	Annually
E. Landlord Fair	Housing Authority	Housing Authority	Host landlord fairs	Annually
F. Inter-Agency Agreement	Housing Authority	Housing Authority	Establish agreement with LACLA to allow use of	Present to City Council in Winter

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
with HACLA			City vouchers within one mile from city limits	2021/early 2022 By 2022 to allow 20 vouchers to be used in City of LA
G. Accessory Commercial Uses	Current Planning Division	Current Planning Division Budget	Initiate study to integrate accessory commercial uses in single-family neighborhoods	In 2024
H. Permanent Rent Control Ordinance	Housing Authority	Housing Authority	Continue to implement the Rent Control Ordinance.	Ongoing
I. Landlord-Tenant Mediation Board	Housing Authority	Housing Authority	Provide services as requested throughout the planning period	Ongoing
J. Landlord Incentive	Housing Authority	Housing Authority	Continue to implement program	Increase landlord participation by 15 landlords annually (5 at the County level, 10 at the local level)
K. Plan to Prevent and Combat Homelessness	Housing Authority	Housing Authority	Update plan to address homelessness	By 2023
L. Replacement Housing	Current Planning Division	Current Planning Division Budget	Amend Zoning Code to comply with AB 1397, requiring replacement housing as a condition of project approval on nonvacant sites with existing units.	By 2022
	Housing Authority	Housing Authority	Continue to use financial resources of the Redevelopment Agency to help replace residential units lost as a result of Successor Agency actions as applicable.	Ongoing
M. Promotion of Housing Programs	Housing Authority	Housing Authority		By 2023

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
Measure 6. Programs to be Initiated or Reinstated with Additional Funding				
A. Temporary Emergency Rental and Relocation Assistance Program	Housing Authority	Not Available	Explore available funding from County, State, and Federal programs.	Annually reviewed with Housing Authority Budget and Work Plan approval
B. Property Acquisition and Rehabilitation Program	Housing Authority	Not Available	Explore available funding from County, State, and Federal programs.	Annually reviewed with Housing Authority Budget and Work Plan approval
C. West Culver City Residential Rehabilitation Program	Housing Authority	Not Available	Explore available funding from County, State, and Federal programs.	Annually reviewed with Housing Authority Budget and Work Plan approval
D. Reduced Surcharge Fee for New Construction/ Other Fees	Current Planning Division	Not Available	Explore available funding from County, State, and Federal programs.	Annually reviewed with Housing Authority Budget and Work Plan approval
E. Homebuyer Assistance	Housing Division	Not Available	<p><u>Pursue funding sources available from HCD and HUD and to seek partnership with nonprofits and lenders to provide homebuyer assistance.</u></p> <p>Evaluate financial feasibility of reinstating program with additional funding sources.</p> <p><u>Facilitate affordable homeownership for 40 households over eight years.</u></p>	Annually reviewed with Housing Authority Budget and Work Plan approval
F. Community Land Trust	Housing Division	Not Available	Explore resources, financing mechanisms, and/or partnership with nonprofits and lenders	Annually reviewed with Housing Authority Budget and Work Plan approval

Table 46: AFFH Actions Matrix

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
<u>Fair Housing Outreach and Education</u>				
Measure 5A: Fair Housing Outreach and Counseling	Continue to refer fair housing inquiries to the Housing Rights Center	Ongoing	Citywide	Increase fair housing inquiries by 20 percent over eight years (Current LACDA contract with HRC does not provide separate fair housing records for individual cities. City will petition to LACDA for specific City data in 2023 as baseline data)
	Advocate LACDA to provide fair housing service records specific to Culver City			
	Update City website to provide information of fair housing rights and resources	Expand website by 2022 and update annually		
Measure 5B: Source of Income Protection	Develop outreach and education materials and implement an outreach campaign Include a fair housing factsheet in ADU, Incremental Infill, and SB9 application packets	Develop outreach materials by 2023	Citywide with emphasis in Higher Resource tracts	At least 20 percent of new vouchers in Higher Resource areas over eight years
<u>Housing Mobility</u>				
Measure 1A: Housing Choice Vouchers	Conduct outreach to attract new property owners	Annually	Citywide with emphasis on Higher Resource tracts	Increase landlord participation by 15 landlords annually (5 at the County level, 10 at the local level)
Measure 5C: Landlord Roundtable	Hold joint roundtable discussions with LTMB and ACOHH	Annually		
Measure 5E: Landlord Fair	Host landlord fairs	Annually		
Measure 2A: Homeless and Special Needs Housing	Facilitate the development of housing for special needs populations	2021-2029	Citywide	28 modular units at Venice/Virginia lots and community garden 70-bed sprung shelter at Venice lot

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
				<u>100 supportive housing units at Virginia lot</u>
<u>Measure 2B: Zoning Code Amendments to Address Special Needs Housing</u>	<u>Zoning Code amendments to address:</u> - <u>Supportive Housing</u> - <u>Emergency Shelter</u> - <u>Low Barrier Navigation Center</u> - <u>Employee Housing</u> - <u>Residential Care Facilities for seven or more persons</u> - <u>Reasonable Accommodation</u>	<u>2023</u>	<u>Citywide</u>	<u>Facilitate special needs housing for 200 households or persons over eight years</u>
<u>Measure 4G: Hotel/Motel Conversion</u>	<u>Identify properties and negotiate for acquisition and adaptive reuse or redevelopment as affordable and special needs housing</u>	<u>2021-2029</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>Pursue four hotel/motel conversion as special needs housing over eight years</u>
<u>Measure 5F: Inter-Agency Agreement with HACLA</u>	<u>Establish agreement with LACLA to allow use of City vouchers within one mile from city limits</u>	<u>Annually</u>	<u>One mile from City limits</u>	<u>20 vouchers to be used in the City of Los Angeles annually</u>
<u>Measure 5L: Promotion of Housing Programs</u>	<u>Develop multi-media informational materials to promote the various housing programs</u>	<u>By 2023</u>	<u>Citywide with emphasis in West Culver City tracts (7028.01 and 7028.03)</u>	<u>Participate in two community events annually to promote housing programs</u>
<u>Measure 6E: Homebuyer Assistance</u>	<u>Pursue funding sources available from HCD and HUD and to seek partnership with nonprofits and lenders to provide homebuyer assistance</u>	<u>Annually</u>	<u>Citywide with emphasis in West Culver City tracts (7028.01 and 7028.03)</u>	<u>Reinstate homebuyer assistance program and assist 20 lower income households achieve homeownership</u>
<u>New Opportunities in High Resource Areas</u>				
<u>Measure 1F: Affordable Housing Development Assistance</u>	<u>Use a variety of incentives, including funding and expedited review to facilitate the development of affordable units</u>	<u>2021-2029</u>	<u>Citywide with emphasis on Higher Resource tracts</u>	<u>Facilitate the development of 250 affordable units over eight years</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
<u>Measure 6D: Surcharge Fee for New Construction</u>	<u>Pursue funding to offset the New Construction Surcharge fee for affordable units assisted by LMIHAF</u>	<u>Annually</u>		
<u>Measure 1G: Inclusionary Housing</u>	<u>Facilitate the development of affordable housing in mixed income developments</u>	<u>2021-2029</u>		
<u>Measure 4F: Affordable Housing Tools and Best Practices</u>	<u>Study and prioritize the various affordable housing tools for research and analysis, such as Affordable Housing Overlay Zones, Transit Oriented Communities (TOCs) programs, and affordable housing funding opportunities</u>	<u>2022-2024</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>Target at least 50 percent of affordable units in Higher Resource tracts over eight years</u>
<u>Measure 5D: Community Conversation on Affordable Housing</u>	<u>Talk with the community about affordable housing and how to expand housing opportunities and accessibility for all residents</u>	<u>Ongoing</u>		
<u>Measure 6E: Community Land Trust</u>	<u>Explore resources, financing mechanisms, and/or partnership with nonprofits and lenders</u>	<u>Annually</u>		
<u>Measure 4A: Adequate Sits for RHNA</u>	<u>Create new opportunities for housing especially through new Mixed Use designations and Incremental Infill</u>	<u>2021-2029</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>Fully accommodate the RHNA of 3,341 units for all income groups</u>
<u>Measure 4D: Accessory Dwelling Units Ordinance</u>	<u>Amend ADU Ordinance to implement the Incremental Infill designation of 2045 General Plan</u>	<u>By October 2024</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>Achieve 400 ADUs through conversion/ expansion of existing properties and 135 ADUs/multiplexes through the demolition/ reconstruction of</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
				<u>properties over eight years</u>
<u>Measure 4E: Affordable ADU Incentive</u>	<u>Assist homeowners to pursue affordable ADUs</u>	<u>2021-2029</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>Tier 1: Workforce – 43 Affordable ADUs</u> <u>Tier 2: Low/Mod – 20 Amnesty Properties</u> <u>Tier 3: Homeless – 4 Affordable ADUs</u>
<u>Place-Based Strategies for Neighborhood Improvements</u>				
<u>Measure 3A: Neighborhood Preservation</u>	<u>Provide Neighborhood Preservation Program (NPP) Deferred Maintenance Grants to multi-family property owners who will lease to a Section 8 household or household experiencing homelessness</u>	<u>Annually</u>	<u>Citywide with emphasis in West Culver City tracts (7028.01 and 7028.03)</u>	<u>Provide 10 NPP Deferred Maintenance Grants annually</u>
<u>Measure 3B: Healthy and Safe Grant</u>	<u>Offer Healthy and Safe Senior Grants to low income seniors to address life safety and code enforcement violations.</u>	<u>Annually</u>	<u>Citywide with emphasis in West Culver City tracts (7028.01 and 7028.03)</u>	<u>Provide 5 Safe and Healthy Senior and Disabled Rehabilitation Grants annually</u>
<u>Measure 3C: Graffiti Removal</u>	<u>Work with property owners to remove graffiti through the Public Works Department and encouraging local monitoring by owners</u>	<u>2021-2029</u>	<u>Citywide with emphasis in West Culver City tracts (7028.01 and 7028.03)</u>	<u>Remove all reported graffiti</u>
<u>Measure 6C: West Culver City Residential Rehabilitation</u>	<u>Explore available funding from County, State, and Federal programs.</u>	<u>Annually</u>	<u>West Culver City tracts (7028.01 and 7028.03)</u>	<u>Reinstate program and assist 50 lower income households with rehabilitation over eight years</u>
<u>Measure 6B: Property Acquisition and Relocation</u>	<u>Explore available funding from County, State, and Federal programs.</u>	<u>Annually</u>	<u>West Culver City tracts (7028.01 and 7028.03)</u>	<u>Reinstate program and pursue two acquisition projects over eight years</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
Tenant Protection and Anti-Displacement				
<u>Measure 1B: Rental Assistance</u>	<u>Provide rental assistance to lower and moderate income households</u>	<u>Annually</u>	<u>Citywide</u>	<u>Assist 5 households annually</u>
<u>Measure 1C: Shared Housing</u>	<u>Provide rapid rehousing for persons experiencing homelessness</u>	<u>Annually</u>	<u>Citywide</u>	<u>Assist 5 households annually</u>
<u>Measure 1D: Preserve at-Risk Affordable Units</u>	<u>Preserve affordable units at risk of converting to market-rate housing</u>	<u>2021-2029</u>	<u>Citywide</u>	<u>Preserve 231 units</u>
<u>Measure 5G: Permanent Rent Control Ordinance</u>	<u>Continue to implement the Rent Control Ordinance</u>	<u>2021-2029</u>	<u>Citywide</u>	<u>Reduce complaints regarding unlawful evictions by 20 percent over eight years</u> <u>(Current LACDA contract with HRC does not provide separate fair housing records for individual cities. City will petition to LACDA for specific City data in 2023 as baseline data)</u>
<u>Measure 5H: Landlord-Tenant Mediation Board</u>	<u>Provide services as requested throughout the planning period</u>	<u>Ongoing</u>	<u>Citywide</u>	<u>Successful mediation of all requests for services</u>
<u>Measure 5L: Landlord Incentives</u>	<u>Increase the number of landlords participating in the City's Section 8 program by providing incentives to landlords who rent to a family or individual experiencing homelessness</u>	<u>Ongoing</u>	<u>Citywide</u>	<u>Increase landlord participation by 15 landlords annually (5 at the County level, 10 at the local level)</u>
<u>Measure 5K: Housing Replacement</u>	<u>Amend Zoning Code to comply with AB 1397, requiring replacement housing as a condition of project approval on nonvacant sites with existing units</u>	<u>By 2022</u>	<u>Citywide</u>	<u>Zero net loss of units affordable to lower income households due to redevelopment</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
<u>Measure 6A: Temporary Emergency Rental and Relocation Assistance</u>	<u>Explore available funding from County, State, and Federal programs</u>	<u>Annually</u>	<u>Citywide</u>	<u>Reinstate program and assist 50 households over eight years</u>

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Appendix B: Residential Sites Inventory

Overview

This appendix details the residential sites inventory for accommodating the RHNA. The City of Culver City is in the process of updating the General Plan. This Housing Element is consistent with the Preferred Land Use Map for 2045 General Plan. The sites identified represent a subset of sites made available through the General Plan update and meeting certain criteria for being considered with development or redevelopment potential at the time of writing this Housing Element. These criteria include existing uses, existing FAR, age of structures (year structure built), improvement-to-land ratio, lot size, adjacency to parcels with redevelopment potential and lot consolidation potential, and expressed interest of developers or property owners, among others. It should be noted that sites properly designated for residential and mixed use development, but do not meet these objective criteria are not included in the sites inventory. However, not making the sites inventory list in the Housing Element does not preclude properties from being able to develop according to their General Plan designation and zoning.

Progress Toward RHNA

While the 6th cycle Housing Element planning period covers from October 15, 2021, through October 15, 2029, the RHNA projection period begins June 30, 2021. Table B- 1 shows the progress towards meeting the RHNA. Housing projects that have been proposed, approved, or entitled for construction during the projection period can be credited against the 6th cycle RHNA. Pipeline projects are those with development application forthcoming. Income distribution of the units is based on project applications, proposals, or discussions with project developers/property owners. In addition, funding has already been allocated for select City-owned sites with conceptual plans underway. The status of pipeline projects was updated as of August 2022.

The number and affordability of units identified in Table B- 1 is determined by specific project applications and funding:

- 3725 Robertson – two affordable units (one low and one moderate income) as inclusionary units in exchange for developer incentives
- Triangle Site 12717 Washington – 17 affordable units (5 very low, 11 moderate, and one workforce) as inclusionary units in exchange for density incentives
- 11111 Jefferson – 19 very low income units as inclusionary units in exchange for density incentives
- Community Garden 10808-10860 Culver Blvd – City owned site with funding set aside for the development of six low income units, with funding identified in the City's housing funds for FY 2021-FY 2024
- 7th Day Adventist 11828 Washington Blvd – Church proposing to develop housing on site and income distribution (4 very low and 8 moderate income units) as proposed by applicant

- 4646 Sepulveda Blvd - United Methodist Church project - City is providing a \$2 million permanent loan to help construct 95 low income affordable units at the rear of the Church parking area – project is currently in plan check
- Virginia lot - The City is currently developing site plans to provide 24 modular (or other type of) low-income housing units on City owned property, with funding identified in the City's housing funds for FY 2021-FY 2024
- Venice Lot – The City is currently developing site plans to provide 12 low-income modular housing units on City owned property, with funding identified in the City's housing funds for FY 2021-FY 2024
- Culver Center (see APNs below) – This 1.4-acre site is currently a shopping center and is comprised of 32 small parcels. Existing uses include Best Buy, Ralphs, Bank of America, Rite Aid, LA Fitness, and other uses. The shopping center also has large areas dedicated to surface parking. The developer has approached the City regarding site redevelopment for a mixed use commercial and residential project. A preliminary project envisions a 1,200-unit project with 420 low income and 180 workforce units (up to 129% AMI). Culver Center APNs:

4208-016-001	4208-016-018	4208-017-025	4208-017-045
4208-016-010	4208-016-024	4208-017-026	4208-017-046
4208-016-011	4208-016-025	4208-017-027	4208-017-048
4208-016-012	4208-016-026	4208-017-028	4208-017-049
4208-016-013	4208-017-003	4208-017-030	4208-017-029
4208-016-015	4208-017-021	4208-017-032	4208-016-009
4208-016-016	4208-017-022	4208-017-039	4208-016-020
<u>4208-016-017</u>	4208-017-024	4208-017-044	4208-016-023

The City has held meetings with the developer to confirm interest in redeveloping the plaza during the Housing Element planning period.

- Venice and Sepulveda, 11166 Venice Blvd., 3816, 3838, and 3848 Sepulveda Blvd – This site is comprised of four parcels, totaling 3.14 acres, is being proposed by the project developer for a mixed use project of 347 units. Specifically, the developer is proposing 17 very low income units along with 35 workforce units. Existing uses include a car wash, a fast food restaurant, and a plant nursery.
- 5915 Blackwelder – The property owner is proposing to convert existing industrial/creative office space into 10 live/work units.

All of these projects can and are expected to be permitted within the eight-year timeframe of the 6th cycle Housing Element. Specifically, the City conducted an Opportunity Sites Development meeting on July 18, 2022, with attendance by the owners and/or developers of many of the pipeline and opportunity sites and confirmed the interest in redeveloping the sites within the timeframe of this Housing Element. One project – United Methodist Church – has already submitted its project application, which is currently in plan

check. The Housing Element timeframe was communicated to the developers/property owners who participated in the Opportunity Sites Development meeting or through follow-up conversations. All remained interested in being included in the sites inventory as opportunity sites.

Table B- 1: Progress Toward RHNA

Project	Type	Extremely Low/ Very Low (50 AMI)	Low (80 AMI)	Moderate (120 AMI)	Workforce (129 AMI)	Above Moderate	Total
Plan Check							
3725 Robertson	Mixed Use	1	0	1	1	9	12
<u>United Methodist - 4464 Sepulveda</u>	<u>Residential</u>	<u>0</u>	<u>95</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>95</u>
Entitled							
Jackson Condos - 4051 and 4055 Jackson	Residential	0	0	0	0	9	9
Proposed							
Triangle Site - 12717 Washington	Mixed Use	5	0	11	1	<u>87</u>	<u>104</u>
11111 Jefferson	Mixed Use	19	0	0	0	211	230
Community Garden (City-Owned) - 10808-10860 Culver Blvd	Mixed Use	0	6	0	0	0	6
7th Day Adventist - 11828 Washington	Residential	4	0	8	0	0	12
Pipeline Projects							
Virginia Lot Modular <u>(or Other Type) of Low Income units</u> - 10555 Virginia	Residential	0	24	0	0	0	24
Venice Lot	Residential	0	12	0	0	0	12
Culver Center Regency (see APNs in list above)	Mixed Use	0	420	0	180	600	1,200
Venice and Sepulveda - 11166 Venice Blvd., 3816, 3838, and 3848 Sepulveda Blvd	Mixed Use	17	0	0	35	295	347
5915 Blackwelder	Residential	0	0	0	0	10	10
Total		<u>46</u>	<u>557</u>	20	217	<u>1,221</u>	<u>2,061</u>

Opportunity Sites

City staff identified several opportunity sites for future residential housing (see Table B- 2):

Virginia Lot - 10555 Virginia: This City-owned site is being planned for residential uses. A portion of this site is being planned for 24 modular units (or other type of units) (see Pipeline Projects above). The balance of the site (about 2.37 acre) has a parking lease that is set to

expire in 2025. The City plans to pursue either permanent supportive housing or a mixed income affordable housing project upon expiration of the parking lease. Funding identified in the City's housing funds for FY 2021-FY 2024.

This site has a Neighborhood/Corridor MU2 designation under 2045 General Plan, with a base density of 50 units per acre. Given the lot site the City anticipates 100 mixed income units can be achieved.

Westfield Culver City (JC Penney) – APN 4134-003-011: Based on the City's discussions with the property owner and prospective buyer/developer, future plans for the shopping center include adding residential units to the back of the shopping center. An estimated 193 market rate units have previously been proposed by the property owner.

Entrance Parcels to West Los Angeles Community College (WLAC), APNs 4296-001-902 and 4296-001-903: The Los Angeles Community College District owns two vacant parcels (totaling 7.87 acres) toward the entrance to the WLAC. The College District has expressed interest in making the parcels available for residential development. Current zoning for these parcels is IG but will become Neighborhood/Corridor MU2 under 2045 General Plan. An estimated 300 market rate units can be accommodated on these vacant parcels.

Table B- 2: Opportunity Sites

Site	Current Status	2045 General Plan Preferred Land Use	Allowable Density (du/ac)	Size (ac)	Potential Units	RHNA Income Level
Virginia Lot 10555 Virginia APN: 4209030901	Remaining piece of property, excluding modular units <u>(or other unit type)</u> site Current parking lease expires in 2025 Target for supportive housing or affordable housing	Neighborhood/Corridor MU 2	50	2.37	100	40% Very Low 20% Low 40% Moderate
Westfield Culver City APN: 4134003011	Westfield is for sale and developer in discussion with City regarding acquisition and development of housing to the back of the mall	Mixed Use High	100	3.57	193	Market rate housing

Parcel at entrance to WLAC APN: 4296001902 4296001903	Site owned by College District	Neighborhood/ Corridor MU 2	50	3.93 3.94	300	Market rate housing
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Incremental Infill

Infilling Single-Family Neighborhoods

The Culver City 2045 General Plan preferred land use map introduces a new concept – Incremental Infill – into the City’s existing low density residential neighborhoods, allowing for more than just detached single-family units, ADUs, and JADUs, in these neighborhoods. See Figure B- 1 for illustrations of incremental infill. Lots over 4,950 square feet will allow up to four units, if the fourth one is dedicated as affordable housing to lower income households, inclusive of an ADU and JADU. Specifically:

Proposed development standard changes:

- Modification (relaxation) of ADU standards
- Allowance of up to 3 market-rate and 1 additional affordable unit (4 total), effectively increasing the density to 35 units per acre, compared to the existing 8.7 units per acre
- No size limitation for individual units, i.e. all units could be the same size and type
- Current standards are 1,200 square feet for a two-bedroom detached ADU, 800 square feet for a one-bedroom ADU, and 500 square feet for a JADU
- Maintain all existing R1 height and setback standards

Development options:

Infilling the single-family neighborhood can occur under two different scenarios:

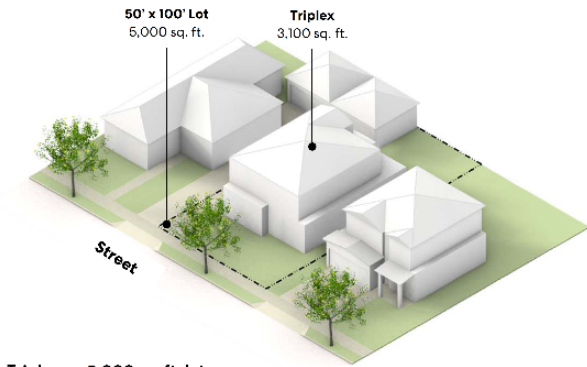
- **Conversion and/or addition:** An owner can convert and add to an existing single-family home for a total of up to four units on the property, inclusive of ADU/JADU. The total square footage is intended to match what is currently allowed in the associated zoning district.
- **Redevelopment:** New construction of up to four new units, inclusive of ADU/JADU, with the total square footage intended to match what is currently allowed in the associated zoning district.

Figure B- 1: Incremental Infill Illustrative Exhibits

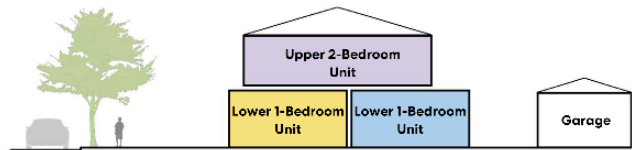
Single-Family Land Use Map Options

Incremental Infill 1: Triplex (3-Unit Development)

- Three-unit triplex can be accommodated within existing single-family R1 standards
 - Meets all setback and height standards
 - Meets floor area allowances under current standards
- Provides option to create “equal” units, i.e. up to three units of the same configuration
- Avoids “back yard” or “pool house” units
 - Units can have entry with clear access from street
- Requires modification of ADU Ordinance



Triplex on 5,000 sq. ft. lot

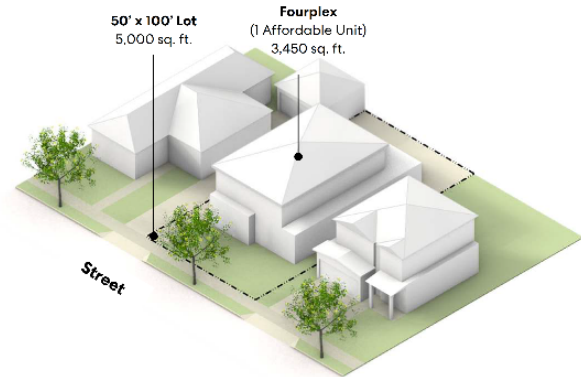


Unit diagram: up to three units allowed

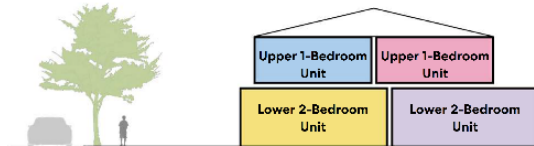
Single-Family Land Use Map Options

Incremental Infill 1: Fourplex (3-Unit + 1 Affordable Unit)

- Fourplex can generally be accommodated within existing R1 standards
 - Meets all setback and height standards
 - May slightly exceed floor area allowances on small lots
- Creates opportunity for dedicated affordable units
- Provides option to create “equal” units, i.e., four units of the same configuration
- Avoids “back yard” or “pool house” units
 - Units can have entry with clear access from street
- Requires modification of ADU Ordinance



Fourplex on 5,000 sq. ft. lot



Unit diagram: up to four units allowed, with one designated affordable

Estimating Capacity for RHNA

The estimate of development potential in the single-family neighborhoods separately account for these two scenarios. Both development scenarios are estimated based on different development trends and are not duplicated.

Conversion/Addition Scenario

Under the conversion/addition scenario, units will be added primarily as ADUs or JADUs. These units may be added anywhere in the city where ADUs/JADUs are permitted, not limiting to the Incremental Infill areas. Where permitted, a property owner can take advantage of the flexible ADU standards and develop two to three additional units on site. Pursuant to State law, estimate of ADU capacity for RHNA purposes can only be based on trend and not on eligible lots. The City updated its ADU Ordinance in August 2020 and implementation has contributed to the following trends:

- The production of more, smaller housing units - Since the adoption of the ordinance, no existing single-family residential homes have been completely demolished without being rebuilt with an ADU. The average rebuild (including the ADU floor area) totaled 3,370 square feet, approximately 300 square feet less than the average in preceding years when less than 10% were rebuilt with an ADU.
- A higher percentage of overall single-family residential building permits that resulted in renovation/remodel with an ADU as opposed to full demo/rebuild.
- A higher ratio of new units produced per building permit issued because when individuals are choosing to invest in their properties, they are opting to add units as opposed to just demolition/rebuild or remodel their existing home.

Using August 14, 2020, as the cutoff date for establishing trend, the City's ADU production trend from conversion/expansion is as follows:

- August 14, 2017 – August 13, 2018: 29 ADUs
- August 14, 2018 – August 13, 2019: 50 ADUs
- August 14, 2019 – August 13, 2020: 52 ADUs
- August 14, 2020 – August 13, 2021: 49 ADUs (projected)

Data is based on building permit records and units finalized in 2019 and 2020.

Based on the ADU production trend, it would be conservative to assume 50 ADUs per year from conversion/expansion, assuming a stable trend similar to the past three year. Housing Element law requires that the City facilitate the development of ADUs. The income distribution of the 400 ADUs shown in Table B- 3 over eight years is based on SCAG's survey and recommended distribution, which have been received and approved by the State HCD for use in the Housing Element. This Housing Element also includes Implementation Measures 4.D, 4.E, and 4.F to facilitate ADU production.

Table B- 3: ADU Income Distribution Per SCAG Affordability Study

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
SCAG Affordability Study	15.0%	2.0%	43.0%	6.0%	34.0%	100.0%
Projected ADUs	60	8	172	24	136	400

Note: SCAG Affordability Study takes into consideration that a portion of the ADUs/JADUs are being available to family and extended family members at no or reduced rents.

Redevelopment scenario

Based on the Assessor's data on estimated lot size, about 5,000 parcels within the Incremental Infill designation are over 4,950 square feet and therefore eligible to use the flexibility offered by this designation. However, many factors can affect the overall yield, most critically the condition and placement of the existing units on site and the property owners' interest in redevelopment or infill development.

Within the Incremental Infill designation, a property owner can choose to redevelop the site into any configuration, including a fourplex (inclusive of the ADU and JADU), and not restricted to single-family detached/attached units with ADUs. As mentioned before, about 5,000 parcels designated Incremental Infill meet the lot size requirement of 4,950 square feet or larger. However, it is unrealistic to anticipate that all the eligible properties will be redeveloped. The following criteria are used to exclude the less likely properties:

- Sites currently occupied by public uses such as parks and utility easements
- Sites with existing structure built within the last 50 years
- Sites with Improvement-to-Land Value Ratio more than 0.50 (i.e., improvements on site worth 50% of land value and less are more likely to be demolished)
- Existing FAR more than 0.25 (and therefore redevelopment is less likely to yield significant net increase in square footage above the allowable FAR of 0.45 plus 1,200 square feet)
- Net increase (subtracting existing units on site) is not more than two units

Application of these criteria would remove about 75% of the parcels as potential redevelopment sites, with 1,346 parcels remaining. Assuming each parcel would redevelop to maximize the potential on site (four units), the net increase would be 4,038 units or an average yield of just above three units per parcel. However, property owners' interest in redevelopment, which is not measurable, is the most critical factor in determining the realistic yield in the Incremental Infill area. The list of potential properties is further reduced based on comments submitted by specific property owners who had expressed intent to be excluded from the list. Overall, 100 parcels have been removed by requests from property owners, leaving a remaining list of 1,246 parcels.¹

According to data collected for a study conducted by UCLA, which examines the trend of recycling in single-family neighborhoods², Culver City could potentially expect 109 market feasible units per 1,000 eligible parcels for recycling. Therefore, the 1,246 eligible parcels could be expected to generate 135 market feasible units. While the City's Incremental Infill concept encourages the inclusion of affordable units in recycling activities, this Housing Element conservatively assumes about 1/3 of the net new units as moderate income units and the remaining as above moderate income units.

¹ While more than 200 property owners requested to be removed from the eligible properties, only 100 of the identified properties are actually on the list. It should be noted that being removed from the list of potential properties based on lot size, age of structure, improvement to land value, and existing FAR does not change the Proposed Land Use Map designation as incremental infill.

² "One to Four: The Market Potential of Fourplexes in California's Single-Family Neighborhoods" by Paavo Monkkonen, Ian Carlton, and Kate Macfarlane, June 2020.

Inventory of Sites

Conditions of Existing Nonresidential Uses

As part of the General Plan Update, the City conducted a Socio-Economic Profile and Market Analysis of Culver City's baseline conditions as of 2019. However, the report does not account for the potential impacts of the pandemic.

The report states that national trends for big box and shopping center retail could impact retail performance in Culver City and the City's long-term financial sustainability. Already, the City's commercial corridors and regional shopping centers are showing some weakness, evidenced by mainly stagnating shopping center rents since the 2008 recession. For example, both the Westfield Culver City and Regency Culver Center have expressed interest from property owners and developers to reconfigure the mall sites to include residential uses.

About 31% of the office uses in Culver City is Class A (desirable) and is concentrated in Downtown and Fox Hills. About 53% of the office space is Class B (utilitarian space with no special attractions) and 16% is Class C (below average quality). Rent differentials between Class A and Class B/C spaces are significant (about 20-25% lower for Class B/C). Class C office space is spread out across the main commercial corridors of Venice and Sepulveda Boulevards. The majority of mixed use sites identified in the sites inventory are located along Sepulveda.

As of 2018, Culver City had a total of 4.6M SF of retail, per CoStar estimates. Retail uses are primarily located along east-west Venice Boulevard and north-south Sepulveda Boulevard, with a large concentration of square feet in Fox Hills due to the Westfield shopping mall. Westfield Culver City alone makes up one of the largest portions (29%) of Culver City's overall retail footprint. Half of Culver City's retail was built between 1950 and 1980, with relatively less retail built after 1980.

Culver City shopping center rents have dipped by 18% since 2010, from \$41.30 to \$33.90 in 2018 (NNN³). Shopping center rents have not recovered to pre-Recession levels, which is a common trend across mall-type developments and community shopping centers in Southern California. The trends in Culver City reflect the market weakness of Fox Hills and strip shopping centers. The sites inventory includes strip commercial and shopping centers, with the objective of repurposing a portion of the retail and parking space by adding residential uses. As shown in Table B-4, recycling nonresidential uses has resulted in recent mixed use development. Table B-1 also identifies a number of pipeline projects that demonstrate the strong trend of redeveloping commercial uses along major corridors for residential and mixed use development. For example, the 357-unit project at the corner of Venice and Sepulveda is consolidating four parcels that include a car wash, Carl's Junior, and a plant nursery.

Based on the Socio-Economic Profile and Market Analysis mentioned above and discussions with property owners and developers, the City identified trends of development and demonstrated substantial evidence that the existing site uses are not

³ NNN refers to a Triple Net Lease, which are those where "the tenant is responsible for all expenses associated with their proportional share of occupancy in the building." Source: <https://www.costar.com/about/costar-glossary>

an impediment to housing development. An important note is that several property owners approached the City to be included as opportunity sites. The feasibility of redeveloping existing nonresidential uses into residential or mixed use development is significantly improved with the Proposed Land Use Plan, which would allow standalone residential uses in mixed use areas, and the overall density throughout the majority of the City has been increased.

Development Interest for Commercial and Industrial Sites

City staff are actively reaching out to property owners at these identified “Potential Opportunity Sites” to learn of their interest in re-developing to provide housing and advance the City’s housing goals. Staff sent 30 letters to some of these property owners at the end of 2021 inquiring about their interest and explaining the City’s housing goals and the potential for development incentives if the sites are redeveloped as housing. At the beginning of 2022, staff sent 183 letters to all the property owners of the identified “Potential Opportunity Sites,” including the 30 property owners contacted at the end of 2021. The 183 letters referenced a total of 290 parcels letters to all property owners. City staff will continue to reach out to the property owners through 2022. As of the writing of this Housing Element, no nonresidential property owners have voiced concerns over being included in the sites inventory and about a dozen property owners replied, expressing interest.

On July 18, 2022, Culver City hosted an Opportunity Sites Development meeting. Panelists included the City Manager, Community Development Director, and Advance Planning Manager. There were 13 attendees representing property owners and developers for generally larger commercial sites, but also included representatives from smaller parcels. The property owners/developers expressed interest in redeveloping the sites within the timeframe of the Housing Element. Based on discussions during the meeting or follow-up phone conversations:

- Pavilions – 16-acre site, with a potential to redevelop 20% (3.2 acres) of the site.
- Raintree Plaza – 6.8-acre site, with a potential to redevelop 20% (1.3 acres) of the site
- Ross/Target/Bed Bath and Beyond – 16.5-acre site, with a potential to redevelop 20% (3.3 acres)
- Culver Center (including Regency Center, Bank of America, and Rite Aid) – 11.4-acre site with the plan to redevelop 1,200 units
- Marshall’s – 7.16-acre site, with the potential to redevelop the entire site
- 5645 & 5670 Sepulveda Blvd (office and Del Taco) -1.14-acre site with the potential to redevelop the entire site
- 3562 Eastham Drive – 1.38-acre site with the potential to redevelop the entire site
- 5844 Perry Drive (industrial park) – 0.09-acre site with the interest to redevelop the entire site into a five-story building
- 8660 Hayden Place (industrial park) – 2.57-acre site with the potential to redevelop the entire site
- 5942 Washington Blvd (industrial park) – 0.86-acre site with the potential to redevelop the entire site
- 3525 Eastham Drive – 1.2-acre site with potential to redevelop the entire site

Many of these sites are included in the inventory as pipeline/opportunity sites. Also, because of the positive response from property owners and developers, new sites are added to the sites inventory (e.g., the Marshall's site and industrial properties).

Average Development Density

Residential recycling in Culver City primarily occurs on small lots zoned for R2, R3, RLD and RMD. Given the high cost of land and small lots, the average yield is about 14 du/ac at R2 and RLD lots (about 83% of the allowable density). See [Table B- 4](#) for more information on the density of recent residential and mixed use projects. Average yield is about 25 du/ac at R3, RMD, and RHD lots (about 85% of the allowable density). For this sites inventory analysis, an average yield of 80% is used for recycling residential properties.

However, the majority of the residential construction in recent years has occurred as part of a mixed use development within the City's various commercial districts. Underused commercial uses are being redeveloped into multi-story mixed use projects, often involving the consolidation of at least two to three parcels. Under the current General Plan, standalone residential projects are not allowed in these commercial districts but would be permitted under the 2045 General Plan Preferred Land Use Map. Under current General Plan and zoning, base density for mixed use development is 35 du/ac but increases to 50-65 du/ac if located within the Transit-Oriented District. Due to the community benefit program for mixed use projects with 15% inclusionary housing, virtually all mixed use projects exceed 65 du/ac with State density bonus. As shown in Table B- 4, all five mixed use projects exceed 100% of allowable density and three projects more than doubled the allowable density. Additional mixed use projects that exceed 100% of allowable density (up to 65 du/ac) include:

- 9763 Culver Blvd – achieved 226.7 du/ac
- 12803 Washington Blvd – achieved 67.2 du/ac
- 12727 Washington Blvd – achieved 288.9 du/ac
- 4464 Sepulveda Blvd – achieved 67.4 du/ac

These projects are located primarily in the CC and CG zones which under the proposed General Plan will become Neighborhood/Corridor MU 2. Therefore, for mixed use development or residential projects in mixed use areas, the sites inventory reasonably assumes an average yield at 90% of the allowable density, excluding State density bonus.

Most selected parcels meet all three criteria (old structures, low existing FAR, and low improvement-to-land ratio) and exclude existing uses that are not likely to recycle. Such uses include existing public uses or uses that are associated with national or regional chains where redevelopment potential involves the strategic planning of a larger than local context. However, some parcels that do not meet all three criteria are included because the parcels are located within a block of primarily underused properties, or high vacancies render the properties feasible for redevelopment even if the structures may be somewhat valuable.

Table B- 4: Density of Recent Residential and Mixed Use Projects

Project	Type	Site Size (ac)	Units	Zone	Allowed Density (du/ac) ¹	Actual Density In du/ac	# Consolidated Parcels	Prior Uses	Affordable Units
Residential									
4044-4068 Globe	For-Sale	0.74	10	R2	17.4	13.5	5	Caltrans surplus property	8 L 1 M 1 WF
4219-4229 Ince	For-sale	0.42	6	R2	17.4	14.4	3	Residential	6 AM
4112-4118 Wade	For-Sale	0.27	4	RLD	15	14.8	1	Residential	4 AM
3906-3910 Sawtelle	Rental	0.16	4	RMD	29	25.0	2	Residential	4 AM
4032-4038 La Salle	For-Sale	0.16	4	RMD	29	25.0	1	Residential	4 AM
4180 Duquesne	For-Sale	0.16	4	RMD	29	25.0	1	Residential	4 AM
4051-4055 Jackson*	For-Sale	0.31	9	RMD	29	29.0	2	Residential	3 VL 3 L 3 M
Mixed Use									
3725 Robertson	Rental	0.14	12	IG	35	85.7	1	City-owned parking Underused Industrial	1 L 1 M 9 AM
11141 Washington	Assisted Living Units	0.88	116	CG	35	131.8	4	Underused Commercial	116 AM
11111 Jefferson	Rental	1.93	230	CG	35	119.2	4	Surface Parking, USPS, Restaurant, Auto Repair	19 VL 211 AM
12821 Washington	Rental	0.28	37	CG	35	132.1	2	Motel	3 VL 31 AM
11048 Washington Blvd*	Rental	0.74	33	CG	35	44.6	1	Underused commercial	14 VL 6 L 13 M

Project	Type	Site Size (ac)	Units	Zone	Allowed Density (du/ac) ¹	Actual Density In du/ac	# Consolidated Parcels	Prior Uses	Affordable Units
Notes:									
1. Based on applicable minimum development standards (excluding density bonus)									
Acronyms:									
VL = Very Low Income									
L = Low Income									
M = Moderate Income									
WF = Workforce									
AM = Above Moderate									
*100% affordable housing development									
R2 = Residential Two Family									
RLD = Residential Low Density Multiple									
RMD = Residential Medium Density Multiple									
IG = Industrial General									
CG = Commercial General									

Intensifying Existing Multi-Family Neighborhoods

Under the current General Plan, the existing multi-family residential neighborhoods offer densities between 15 and 29 du/ac. The majority of the residential recycling activities have resulted in small condo/townhome developments that do not provide opportunity for affordable housing. The 2045 General Plan Preferred Land Use Map provides two multi-family residential designations: Corridor Multi-Family (30 du/ac) and Neighborhood Multi-Family (50 du/ac). Within the Corridor Multi-Family area, recycling opportunities are limited despite the increase to 30 du/ac, given the lot sizes and existing uses. Therefore, this analysis of recycling opportunities focuses on the Neighborhood Multi-Family designation, which offers a density of up to 50 du/ac, significantly above the current allowable densities. To identify potential properties for recycling, the following criteria were applied:

- Existing lot is vacant
- For nonvacant lots:
 - Existing use is not condos, townhomes, apartments, or civic uses (i.e., schools)
 - Existing structure is at least 50 years old
 - Existing Improvement-to-Land Ratio (ILR) is less than 1.0 (i.e., the land is more valuable than the structure)
 - Net increase in housing units if redeveloped under 2045 General Plan at 40 du/ac (80% of allowable density) is at least four times the existing number of units on site

A total of 161 parcels met these criteria all containing only a single-family home or duplex units on site. The current General Plan designates these parcels primarily as Low Density Two Family and Medium Density Multi-Family and would yield only 220 net new units. Given the small lot sizes and density ranging from 17 to 29 du/ac, these parcels could facilitate moderate income housing only.

With a significantly increased density to 50 du/ac, these properties present potential for intensification to yield a total of 657 net new units under 2045 General Plan Preferred Land Use Map. Without lot consolidation, however, these parcels are too small individually to

facilitate affordable housing pursuant to the state law threshold of 0.5 acre as minimum size. For the purpose of RHNA estimates, these sites are assigned to the moderate income category.

Integrating Residential Uses in Commercial and Industrial Areas

Under the current General Plan, mixed use development is permitted in CN, CD, and CG zones at a base density of 35 du/ac. However, the City amended the Mixed Use Ordinance in 2021, incentivizing 15% of the units to be affordable from low to workforce income levels in a mixed use development if a developer takes advantage of the community benefit density bonus, and increasing the base density to 50-65 du/ac. 2045 General Plan provides for several mixed use designations.

Consistent with the findings of the Market Analysis discussed above and as demonstrated by the expressed interest of property owners and developers during the Opportunity Sites Development meeting, redevelopment of commercial and industrial uses in Culver City is the current and future trend. Owners/developers in the meeting represent properties that are currently developed with a range of commercial and industrial uses, such as shopping centers, retail, banks, offices, restaurants, warehouses, and industrial park uses, etc. Existing structures are at least 30 years old, with existing FARs ranging from 0.16 and 1.09, and improvement to land ratio ranging from 0.01 to 1.65. These thresholds are consistent with the criteria used to select parcels to be included in the inventory. Parcel-level data provided includes how each parcel meets these criteria (with just a few minor exceptions explained in the following sections).

To identify potential properties for redevelopment, the following criteria were applied:

- Existing lot is vacant
- For nonvacant lots:
 - Existing structure is at least 30 years old
 - Existing ILR is less than 1.0 (i.e., the land is more valuable than the structure)
 - Existing FAR is less than 1.0

These thresholds are generally more stringent than the characteristics of properties being recycled. Occasionally, parcels that do not meet the ILR or existing FAR thresholds are also included in the sites inventory based on known conditions on site or expressed development interests. For example, while some buildings may have high improvement values, weak sales or business revenues due to the changing structure of the economy would render the existing uses of the properties irrelevant or less than competitive in the market. These are particularly true for shopping centers, strip retail uses, or restaurant uses with large parking lots. As demonstrated by the responses from the property owners and developers at the Opportunity Sites Development meeting, these types of properties have potential for redevelopment due to declining traditional formats of retail/office uses.

Based on community input, specific parcels that may not meet these objective criteria, but have been identified by local residents, architects, and developers as being ripe for redevelopment, have been added to the inventory. Similarly, parcels that have been identified by the community as unlikely to redevelop over the next eight years due to long-term leases and other factors have been removed from the inventory.

Aerial photos were reviewed to examine the exterior condition, lot dimensions, and physical configuration of structures on site to determine if there are obvious constraints to redevelopment. A few small parcels, while not meeting the above criteria, are included in the inventory because they are located adjacent to groups of contiguous underutilized parcels.

Neighborhood/Corridor Mixed Use and Industrial Mixed Use

Many areas proposed to be designated as Neighborhood/Corridor Mixed Use 1 have been identified by local architects and developers as exhibiting signs of disrepair and decline. The challenge in these areas is small lot sizes. A total of 25 parcels were identified to have near-term potential due to existing conditions and uses. These parcels total 3.42 acres and can accommodate 92 units. Based on existing conditions, these parcels have an average FAR of only 0.73 and ILR of 0.84. Most existing structures were constructed more than 50 years ago. However, due to their small sizes, these parcels are assigned as moderate income RHNA sites.

Several blocks of commercial strip businesses within the Neighborhood/Corridor Mixed Use 2 area have been identified with redevelopment potential. Average existing FAR among these is 0.40 with an average ILR of 0.54. The majority of these structures were built during the 1950s and 1960s. These areas are currently zoned CG that allows mixed use development at 50 du/ac. Under 2045 General Plan Preferred Land Use Map, the Neighborhood/Corridor Mixed Use designation would also allow standalone residential development at 50 du/ac and up to four stories. Based on existing conditions, these areas (total 41.2 acres) present potential for redevelopment and can facilitate the development of lower and moderate income housing. An estimated 1,667 units can be accommodated at 90% of the allowable density. Most parcels are over 0.5 acre. These blocks of contiguous parcels can be developed as large-scale developments or by consolidating three to four parcels into moderately sized projects. Consolidating three to four parcels for mixed use and multi-family development is a typical trend in Culver City. However, as a conservative assumption, parcels less than 0.5 acre are assigned as moderate income RHNA sites.

Another area with redevelopment potential as identified by the community is the triangular site that currently is developed with two small office buildings and one restaurant (Del Taco). The office buildings show vacancies and the restaurant has small footprint with significant surface parking lot. Owners of this area attended the Opportunity Sites Development meeting and expressed interest in redeveloping the site. The proposed Venice and Sepulveda project located at 11166 Venice Blvd., 3816, 3838, and 3848 Sepulveda Blvd demonstrates that redevelopment of restaurant use is feasible. Furthermore, new development may not necessarily involve removing the existing restaurant uses on site. For much of the larger shopping center sites, capacity is based conservatively on portions of the parking areas (20 percent of site area). Actual development potential can be much higher. Culver Center and Marshall sites for example, expressed interests in redeveloping the entire site. Redevelopment of site also does not require complete demolition and displacement of existing uses. Housing units can be accommodated on site by a combination of building on/over parking areas, demolishing only outdated/underutilized structures, and reconfiguring existing buildings. Similar examples are South Bay Galleria in Redondo Beach and Pacific Coast Commons in El

Segundo. Both commercial centers are being re-imagined without complete demolition and redevelopment would add hundreds of units on site.

Input from the community also identifies three areas that have in recent years been transitioning from industrial and commercial uses to creative office spaces. These are the Smiley Blackwelder, Hayden Tract, and Jefferson corridor areas. Under the current General Plan, these areas are zoned IG (Industrial – General). Under the 2045 General Plan Preferred Land Use Map, these areas are zoned Neighborhood/Corridor Mixed Use 2 or Industrial Mixed Use. There have been expressed interest in providing live/work housing in these areas to complement the creative office uses. One such project is currently being proposed at 5915 Blackwelder for ten units on a 0.36-acre site (28 units per acre), converting existing low intensity industrial uses to housing.

Because of the current trend of converting these areas into creative office uses, with an emerging trend of providing live/work housing, the near-term potential for housing in this area is anticipated to be experimental and limited. These three areas encompass 163 parcels (excluding Ballona Creek). Among these, 51 parcels are occupied by low intensity industrial and commercial storage/warehousing uses and have ILR of 0.50 or less and buildings are older than 30 years. The low ILR may mean that these properties have not been reassessed or improved for many years. Using a more conservative density of 25 units per acre (lower than 5915 Blackwelder), only 18 parcels are large enough to yield at least 10 units, with an estimated potential of 338 live/work units in these industrial areas (158 units in Industrial Mixed Use and 180 units in Neighborhood/Corridor Mixed Use 2). In addition, eight parcels are included due to owner interest to redevelop into high density residential uses. Therefore, capacity at these additional parcels is estimated at 90% of the allowable density, with the potential to add 341 units.

Mixed Use Medium

A total of 30 parcels of existing underutilized commercial and industrial uses offer potential for redevelopment, including two shopping centers with single-story structures and significant areas designated for surface parking. Currently, these areas are designated CRR, CG, CN, and IG, and are developed with single-story and mostly antiquated commercial and industrial uses. Average existing FAR among these properties is only 0.57 and an average ILR of 0.38.

Two shopping centers with potential for residential development similar to the scenario presented by the Westfield Culver City and Culver Center (see “Opportunity Sites” and Pipeline Projects discussions) are included in the inventory:

- Target Site (with uses as Target, 99 Cents, Pet Smart, Toys R US, which went out of business) – only 20% of this site (primarily the parking area) is used to estimate potential for residential units.
- Trader Joe’s site – Trader Joe’s and a fast food restaurant are the primary tenants. Only 20% of this site (primarily the parking area) is used to estimate potential for residential units.

Development of the surface parking areas at the shopping center sites is expected to most likely yield mixed income projects.

Mixed use development is permitted in the CG and CN properties at a base density of 50 du/ac. An estimated 215 units can be accommodated on the parcels currently zoned CG and CN. The other CRR and IG properties have no potential for new housing based on current development regulations.

Under 2045 General Plan Preferred Land Use Map, these areas are designated for Mixed Use Medium with a density of 65 du/ac and allow up to four stories. Overall, these areas blocks can potentially accommodate 893 units. Parcels larger than 0.5 acre can potentially facilitate the development of 421 lower income units based on density.

Mixed Use High

Mixed Use High area is currently developed with hotels, office parks, commercial/retail uses, and public institutional uses; most may not have near-term redevelopment potential. However, four parcels designated for Regional Center under the current General Plan are developed with older single-story office use. Structures were constructed more than 30 years ago. Average existing FAR is about 0.30. 2045 General Plan Preferred Land Use Map designation of Mixed Use High would allow this area to intensify ten-folds and up to five stories. This designation includes 21.2 acres of potentially re-developable parcels and can accommodate 1,382 units at 100 du/ac. Based on density, Mixed Use High can facilitate lower income housing. Parcels can potentially be developed separately or jointly, with each parcel exceeding 0.5 acre in size.

included in this designation are Raintree Plaza and Marshall's. Raintree Plaza is located adjacent to existing medium density residential uses. This shopping center was built in 1974 with a low use of the land. Tenants at this single-story shopping center include small restaurants, grocery store, and a UPS store. Only 20% of this site (primarily the parking area) is used to estimate potential for 130 residential units. A mixed income project is assumed in this sites inventory. The Marshalls site has also been added to the inventory based on owner interest.

Summary

Table B- 5 summarizes the capacity of the sites selected following the above methodology. These sites offer limited residential potential under the current General Plan. With 2045 General Plan Preferred Land Use Map, the same sites offer a buffer of 223% above the RHNA. In general, larger sites are conservatively assumed to be mixed income sites although all mixed use and multi-family sites meet the State default density for facilitating lower income housing. Figure B-2 provides a visual summary of the sites inventory.

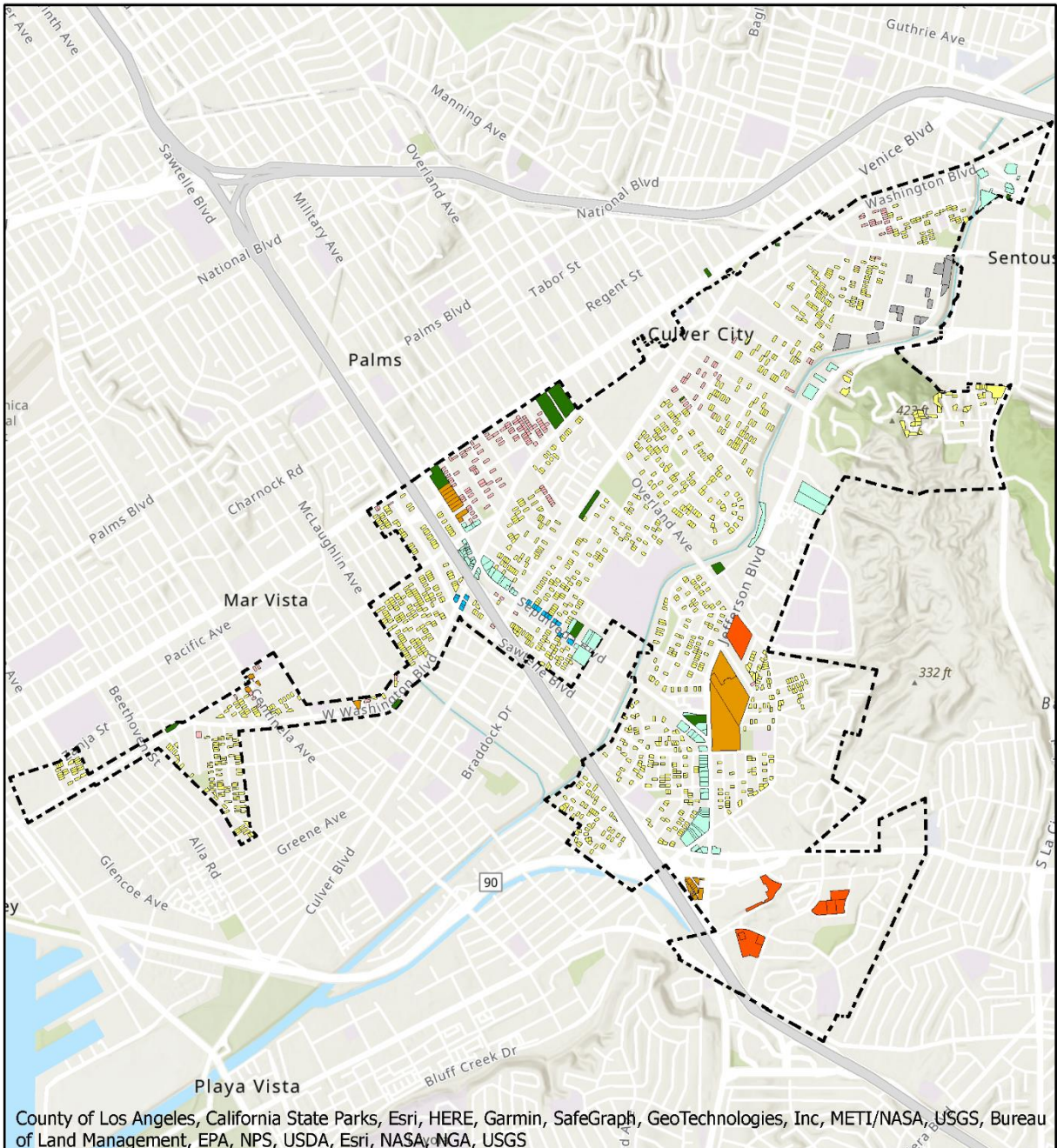
The City recognizes that not all mixed use sites will be redeveloped as mixed use or standalone residential uses. However, under the current General Plan, the City does not have any mixed use zoning, but mixed use projects are allowed in commercial zones. With the adoption of General Plan 2045, which allows standalone residential, future redevelopment of mixed use sites is more likely to include a residential component. Furthermore, just among the properties with expressed owner/developer interest to redevelop as housing/mixed use projects, the City would be able to accommodate an estimated 1,559 units (306 lower income, 336 moderate income, and 917 above moderate income units), representing 28 percent of the remaining lower income RHNA

and 62 percent of the remaining moderate income RHNA. Furthermore, the sites inventory offers a significant buffer (139 percent for lower income and 256 percent for moderate income). This buffer is estimated based on conservative assumptions of 85 percent yield on residential properties and 90 percent yield on mixed use properties. The City is in the process of removing minimum parking requirements. This significant policy change will allow property owners to maximum unit yield on site. With such a generous buffer, this sites inventory will be more than adequate to compensate for the potential loss of sites due to commercial development.

Table B- 5: Capacity for RHNA Under Current General Plan and 2045 General Plan Preferred Land Use Map

<u>RHNA Strategy</u>	<u>Lower</u>	<u>Moderate</u>	<u>Above Moderate</u>	<u>Total</u>
RHNA	1,712	560	1,069	3,341
Approved/Entitled/Proposed/Pipeline Projects	<u>603</u>	20	<u>1,438</u>	<u>2,061</u>
<u>Remaining RHNA</u>	<u>1,109</u>	<u>540</u>	<u>0</u>	<u>1,280</u>
Capacity under Current General Plan				
Projected ADUs (Conversion/Expansion)	240	24	136	400
Low Density Two-Family/Medium Density Multi-Family	0	190	6	196
CG/CN	<u>704</u>	545	0	<u>1,249</u>
Capacity (Projects + ADUs + Sites)	<u>1,547</u>	779	<u>1,580</u>	<u>3,906</u>
Surplus/(Shortfall) <u>over Total RHNA</u>	<u>(165)</u>	219	551	<u>(165)</u>
Capacity under 2045 General Plan Preferred Land Use Map				
Incremental Infill				
<u>Projected ADUs (Conversion/Expansion Scenario)</u>	240	24	136	400
Redevelopment Scenario	0	45	90	135
Opportunity Sites	60	40	493	593
Neighborhood Multi-Family (50 du/ac)	0	657	0	667
Mixed Use Medium (65 du/ac)	<u>421</u>	<u>236</u>	<u>236</u>	893
Mixed Use High (100 du/ac)	<u>973</u>	<u>152</u>	<u>457</u>	<u>1,382</u>
Neighborhood/Corridor MU1	0	92	0	92
Neighborhood/Corridor MU2	<u>852</u>	<u>591</u>	<u>224</u>	<u>1,667</u>
Industrial Mixed Use	<u>92</u>	<u>91</u>	<u>274</u>	<u>457</u>
Capacity (Projects + ADUs + Sites)	<u>3,481</u>	<u>1,972</u>	<u>3,484</u>	<u>8,747</u>
Surplus/(Shortfall) <u>over Total RHNA</u>	<u>2,372</u>	<u>1,432</u>	<u>3,484</u>	<u>7,467</u>
% Buffer <u>over Total RHNA</u>	<u>139%</u>	<u>256%</u>	<u>326%</u>	<u>223%</u>

Figure B- 2: Summary of Sites Inventory



County of Los Angeles, California State Parks, Esri, HERE, Garmin, SafeGraph, GeoTechnologies, Inc, METI/NASA, USGS, Bureau of Land Management, EPA, NPS, USDA, Esri, NASA, NGA, USGS

Culver City Housing Element Sites Inventory

Sites Inventory

Proposed General Plan (GP) Designation










- Incremental Infill
- Neighborhood Multi-Family

- Neighborhood/Corridor MU 1
- Neighborhood/Corridor MU 2
- Mixed Use Medium
- Mixed Use High

- Industrial Mixed Use
- Approved/Entitled/Pipeline Projects
- Opportunity Sites
- City Boundary



The parcel level sites inventory is presented on the following pages.

	Approved/Entitled/Pipeline Projects
	Incremental Infill
	Opportunity Sites
	Neighborhood Multi-Family
	Neighborhood/Corridor MU1
	Neighborhood/Corridor MU2
	Mixed Use Medium
	Mixed Use High
	Industrial Mixed Use

Environmental Constraints

The sites identified in the inventory are all within urbanized neighborhoods and have been previously developed. There are no environmental constraints that would preclude redeveloping these sites.

Availability of Infrastructure and Water and Sewer Services

The City receives its water service from the GSWC, which purchases water from the West Basin Municipal Water District (WBMWD). According to WBMWD's Urban Water Management Plan, water supply is projected to be 195,760 acre-feet per year (AFY), while water demand is expected to reach 165,660 AFY in 2040. Supply would thus exceed demand. In addition, since the RHNA allocation for the region has been included in SCAG's Connect SoCal growth forecast for the years 2020-2030, the projected population growth has also been captured in the WBMWD's 2020 Urban Water Management Plan. Therefore, adequate water supply is available to accommodate the city's housing needs through 2040, well beyond the current RHNA planning period.

The Culver City Department of Public Works maintains the existing sewer lines within the city. The City's wastewater treatment and conveyance system includes four wastewater treatment and water reclamation plants that LA Sanitation (LASAN) operates. LASAN provides service within two service areas: the Terminal Island Service Area and the Hyperion Service Area. The Hyperion Wastewater Treatment Plant, which has a design capacity of 450 million gallons per day (mgd), serves the city. It is currently functioning at about 275 mgd which is about 61 percent of its capacity. Therefore, the plant has a remaining daily capacity of approximately 175 mgd, which would be enough to serve future development facilitated by the plan.

Dry utilities for the city include gas, electricity, cable, Internet, and telephone services that are provided by Southern California Gas Company, Southern California Edison, AT&T, Spectrum, and Verizon Communications. All systems are adequate and are upgraded as demand increases. Parcels identified for future development in the land inventory process for the 2021-2029 Draft Housing Element are within an urbanized area and are currently served by existing wet and dry utilities. These utilities include water, wastewater, solid waste removal systems, natural gas, electricity, telephone and/or cellular service, cable or satellite television systems, and Internet or Wi-Fi services. The 2021-2029 Draft Housing Element provides a framework for meeting the housing needs of existing and future residents.

The City is not the water or sewer service provider for its residents and businesses. Pursuant to SB 1087, the City will provide a copy of the adopted Housing Element to its water (GSWC) and sewer (LASAN) service providers.

while the tract on the eastern side is a mix of R1, OS (Open Space), and IG (Industrial General).

Racial/Ethnic Minority Population Trends. According to City staff, the Blair Hills and Fox Hills neighborhoods contain tracts where Black residents comprise the largest non-White group. Both neighborhoods are located on the eastern side of the City, adjacent to the Los Angeles County/City of Los Angeles neighborhoods of Baldwin Hills and Ladera Heights, both of which also have larger Black populations. From the 1920s to 1940s, Black populations were pushed out of westside cities and into unincorporated county areas such as Ladera Heights/View Park-Windsor Hills, as the unincorporated county did not have racial covenants like cities.

In the tract encompassing the Blair Hills neighborhood, 58.8% of the population is non-White including a Black population of 29.6%. The median household income in this tract is \$150,000, the second largest amongst Culver City tracts. Three tracts encompass the Fox Hills neighborhood, each with a Black population of 28%, 23%, and 31%, respectively. Median incomes for these tracts range from \$60,000 to \$90,000; \$60,000 is the third lowest median income amongst Culver City tracts. The Fox Hills neighborhood is characterized by a larger proportion of condos serving middle class populations than single-family homes. In general, the Black population in Culver City does not experience poverty at a high rate. Only 2.9% of the Black population citywide is below the poverty level (Table E- 12).

On the western side of the city there is a larger population of Hispanic/Latino residents (Figure E- 17). The Hispanic/Latino population in this area of the city is consistent with adjacent Los Angeles City tracts. This area has the highest concentration of block groups with median incomes below the Statewide average (see Figure E- 20). This neighborhood is characterized by older multi-family developments adjacent to Washington Boulevard, a large, heavily trafficked road, making it less desirable. Nearly 10% of the Hispanic/Latino population in Culver City is below the poverty level, significantly higher than the 6.1% citywide average (Table E- 12). These tracts are bordering the City of Los Angeles and the housing characteristics and demographics in these neighborhoods are more similar to Los Angeles. ~~The City will continue to work toward improving the quality of life conditions in these areas.~~

Table E- 12 shows poverty status by race, ethnicity, and disability status. Culver City has a significantly smaller population of persons below the poverty level than the County. In the city, 13% of persons of a different race not listed, 9.8% of the Hispanic/Latino population, and 6.8% of the Asian population is below the poverty level compared to only 6.1% of the population citywide.

In general, racially/ethnically concentrated areas of poverty are far less prevalent in Culver City compared to the County. Concentrations of LMI households (see Figure E- 14) and persons below the poverty level (Figure E- 16) are largely due to the types of housing available in those areas. Staff noted that many of the Culver City neighborhoods along the city border have higher percentages of minority populations and multi-family housing that is similar to that of neighboring Los Angeles City. Importantly, a higher percentage of a minority population is not always correlated with income and does not always mean a neighborhood is lower income. For example, the tract encompassing the Blair Hills neighborhood has 58.8% minority population and a median income level of \$150,000. Through actions outlined in this Housing Element, the ~~City will continue to work toward~~

improving the quality of life conditions in these areas and encourage affordable housing developments citywide.

Table E- 12: Poverty Status by Race/Ethnicity and Disability Status

	Culver City		Los Angeles County	
	Total Population	% Below Poverty Level	Total Population	% Below Poverty Level
Black/African American	3,360	2.9%	799,551	20.8%
American Indian/Alaska Native	123	0.0%	71,877	18.1%
Asian	6,369	6.8%	1,449,582	11.1%
Native Hawaiian/Pacific Islander	43	0.0%	27,126	11.5%
Some other race	2,460	13.0%	2,097,544	19.2%
Two or more races	2,653	4.5%	393,536	11.7%
Hispanic/Latino	9,212	9.8%	4,835,446	18.1%
White alone, not Hispanic	17,833	4.6%	2,593,271	9.6%
With a disability	--	--	936,003	21.2%
Total	38,868	6.1%	9,928,773	14.9%

-- = Data not available.

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

The block group with the smallest non-White population (26.9%) has the 5th highest median income amongst Culver City block groups and neighborhoods the Park West neighborhood. The same amenities described above are accessible to households residing in the block group.

As of July 2022, HCD has released an RCAA map as part of the HCD AFFH Data Viewer. Consistent with the median income trend shown in Figure E- 20, Figure E- 21 shows that there are two RCAA tracts in Culver City located in the central area of the City. These tracts contain block groups with racial/ethnic minority populations consistent with a majority of the City. Most block groups with racial/ethnic minority populations exceeding 60 percent are not located within RCAA tracts. Similarly, LMI populations for block groups within the RCAA tracts are consistent with populations Citywide. There are a handful of LMI area block groups in the City, none of which are within the RCAA tracts.

The tract containing the Blair Hills neighborhood has not been identified as an RCAA, likely due to the large non-White population (58.8%). However, the block group with the largest White population is also not located in an RCAA. The Culver Crest and Park West neighborhoods are located in an RCAA.

According to the HCD AFFH Data Viewer, there are eight subsidized housing projects in the City. While subsidized housing projects are generally distributed throughout Culver City, there is only one within an RCAA tract. There are also three mobile home parks in the City: Culver City Terrace (117 units), Grandview Mobilehome Park (24 units), and Palms Mobile Lodge (20 units). Lower income households are more likely to reside in mobile homes than higher income households. There are no mobile home parks located within either of the RCAA tracts.

Tracts 7026 and 7027 have been identified as RCAAs. As presented in Figure E- 22, a majority of households residing in these tracts are owner-occupied households. A larger proportion of housing units in these tracts are also single-family homes compared to other tracts in the City (Figure E- 23). Single-family homes are typically more affordable to higher income households. This is consistent with zoning patterns in the City. The RCAA tracts are largely zoned R1 (Residential Single Family), whereas other areas of Culver City tend to have a larger mix of residential zoning designations (R2 (Residential Two Family), R3 (Residential Three Family), RLD (Residential Low Density Multiple), RMD (Residential Medium Density Multiple), and RHD (Residential High Density Multiple).

Comparison Between Higher and Lower Income Areas. The higher income areas were found to consist of more single-family residences, with private amenities such as views, privacy, and pools. However, community amenities associated with affordable fair housing, such as quality government services, schools, libraries, and parks were found to be accessible to both higher and lower income areas in the city.

Sites Inventory. Furthermore, the Housing Element is updated along with the comprehensive update to the General Plan, which took a progressive approach to increasing density throughout the community, including in the City's more affluent neighborhoods (single-family areas) through the land use policy of incremental infills. More than 5,000 parcels will be redesignated as incremental infill through the General Plan update. Table E- 13 shows the distribution of RHNA units by median income by block group. There are 628 RHNA units (5.4%) located in block groups where the median income is less

than \$60,000. Over half of all units are in block groups with median incomes exceeding the State average but below \$125,000. The City's RHNA strategy does not disproportionately place lower income units in block groups with lower median incomes. Approximately 26% of above moderate income units and 37% of moderate income units are in block groups with median incomes below the Statewide average compared to only 24% of very low income units and 18% of low income units. In fact, the majority of the lower income units are located in areas with median incomes higher than \$87,100. Less than 20% of the lower income units are located in the lower income areas.

Table E- 13: Distribution of RHNA Units by Median Income

Median Income (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
\$44,000-\$60,000	90	98	255	185	628
\$60,000-\$87,100	203	169	888	1,276	2,536
\$87,100-\$125,000	684	1,083	1,296	3,105	6,168
>\$125,000	266	176	654	1,143	2,239
Total	1,243	1,526	3,093	5,709	11,571
Median Income (Block Group)	Very Low Income	Low Income	Moderate Income	Above Moderate Income	All RHNA Units
\$44,000-\$60,000	7.2%	6.4%	8.2%	3.2%	5.4%
\$60,000-\$87,100	16.3%	11.1%	28.7%	22.4%	21.9%
\$87,100-\$125,000	55.0%	71.0%	41.9%	54.4%	53.3%
>\$125,000	21.4%	11.5%	21.1%	20.0%	19.4%
Total	1,243	1,526	3,093	5,709	11,571