

**General
Plan 2045**
Culver CITY

HOUSING ELEMENT

October 2021-2029



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Introduction

Incorporated in 1917, Culver City is centrally located between Venice Beach and Marina Del Rey to the west and downtown Los Angeles. Culver City is a community of just under 40,000 residents and measures approximately five square miles in area. According to the City's 2019-2020 Comprehensive Annual Financial Report, Culver City's top employers include Sony Pictures Entertainment, the Westfield Shopping Mall, Southern California Hospital at Culver City, Culver City Unified School District, City of Culver City, Target, and West Los Angeles College. Once their development projects are complete, Apple, Amazon Studios, and HBO will likely join that list.

Today, Culver City is a destination filled with outdoor cafes, unique shops and galleries opening onto pedestrian-friendly boulevards, nationally recognized historic buildings, media facilities, creative offices, transit-oriented development, and the Hayden Tract, which serves as a creative industries hub. Throughout its history, Culver City has maintained a small-town atmosphere for its community members, preserved single- and two-family neighborhoods, and nurtured medium-density multiple-family apartments and condominiums.

Purpose of the Housing Element

The Housing Element's purpose is to identify the City's housing needs and outline goals, policies, and programs to address them. The Housing Element is an eight-year plan, extending from October 15, 2021, through October 15, 2029. The Housing Element will primarily address these issues: 1) preserving and improving the existing housing stock, 2) providing housing for special needs populations, 3) supplying enough new housing to meet the City's fair share of the region's need, and 4) affirmatively furthering fair housing.

Overview

State law requires that jurisdictions prepare a Housing Element as part of its General Plan, which the State also requires (*Government Code §65302(c)*). Since a General Plan serves as a jurisdiction's blueprint for future development and growth, the Housing Element plays a critical role in the overall Plan. A Housing Element is the primary planning guide for local jurisdictions to identify and prioritize the housing needs of the City and determine ways to best meet these needs while balancing community objectives and resources.

The 2021-2029 Housing Element has five chapters: 1) Introduction, 2) Housing Needs Assessment, 3) Resources and Opportunities, 4) Constraints, 5) Housing Plan, and Appendices. Appendix A evaluates the 2013-2021 Housing Element and Appendix B contains background information on the City's inventory of sites for housing development. Appendix C identifies affordable housing units that are at risk of converting to market rate during the next ten years and outlines potential resources and methods that could be used to preserve their affordability. Appendix D summarizes

the public participation program and Appendix E lists the Acronyms used throughout the Housing Element.

Importantly, the Housing Element quantifies how many new housing units the city needs to accommodate growth in the region as part of the Regional Housing Needs Assessment (RHNA). The State and Southern California Association of Governments (SCAG) (our metropolitan planning organization) carry out this process and allocates to each jurisdiction a share of California's new housing need based on the community's demographic trends, proximity to transit and employment, and other characteristics. As part of the Housing Element, the City must identify adequate land with appropriate zoning and development standards to accommodate the City's RHNA allocation.

When preparing the Housing Element, jurisdictions must consider California Department of Housing and Community Development's Guidelines (*Government Code §65585*). Jurisdictions must periodically review the Housing Element to evaluate (1) the appropriateness of its goals, objectives and policies in meeting the state's housing goals, (2) its effectiveness in attaining the City's housing goals and objectives and (3) the progress of its implementation (*Government Code §65588*).

Public Participation

The 2021-2029 Housing Element update (6th cycle) is being prepared as part of the comprehensive update to the Culver City 2045 General Plan. Outreach and public participation materials are available on the dedicated website: www.pictureculvercity.com, which will be summarized in Appendix D. Throughout the General Plan update process, numerous opportunities were afforded the public to discuss housing-related issues. These included:

- Interactive Project Website
- Educational Forum Video Series that includes a video on existing housing conditions and a related microsurvey (<https://www.pictureculvercity.com/latest-news/ecr-housing>)
- Online public input for the draft Housing Element (<https://www.pictureculvercity.com/housing-element>)
- Stakeholder and Community Leader Meetings
- General Plan Advisory Committee (GPAC) Meetings
- Housing Technical Advisory Committee (TAC) Meetings
- Advisory Committee on Housing and Homelessness Meeting
- Community Workshops + Festivals
- Pop-Up Workshops + Community Events
- Online Engagement + Surveys

Key public participation events and comments received related to the Housing Element are summarized in Appendix D. The Draft Housing Element was made available for public review between July 19 and October 1, 2021. In response to public comments, changes made to the Draft Housing Element included:

- Expanded the needs assessment with additional technical information, including providing a regional comparison

- Expanded the sites inventory to include additional opportunities in mixed use areas and multi-family areas
- Refined the estimated potential in the Incremental Infill areas based on a study of the recycling trend in single-family neighborhoods
- Removed neighborhoods that currently prohibit accessory dwelling units due to high fire hazards and topological constraints from the Incremental Infill designation
- Increased commitments to quantified objectives for constructing new housing
- Expanded City efforts to explore affordable housing tools and best practices, including:
 - ADU pre-approved standard plans
 - Right to Return program
- Included the Permit Streamlining and Monitoring program that will increase the unit threshold that triggers discretionary site plan review
- Expanded the Property Acquisition and Rehabilitation Program
- Included a program to explore the feasibility of establishing a Community Land Trust

Housing Element Requirements

All Housing Elements must comply with several State laws. The preparation of the Housing Element is guided by California *Government Code*, Article 10.6. The law governing the contents of Housing Elements is among the most detailed of all elements of the General Plan. According to Section 65583 of the *Government Code*:

The Housing Element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The Housing Element shall identify adequate sites for housing, including rental housing, factory-built housing, mobile homes, and emergency shelters, and shall make adequate provision for the existing and projected needs of all economic segments of the community.

Consistency with Other Elements of the General Plan

Housing is considered in other General Plan elements, such as land use, mobility, and environmental justice. For example, this Housing Element relies on the Preferred Land Use Map of the General Plan update to provide adequate sites for RHNA. As portions of the General Plan are amended in the future, the General Plan (including the Housing Element) will be reviewed to ensure internal consistency is maintained. The objectives and measures of the 2021 – 2029 Housing Element will not conflict with any of the objectives found in other elements of the City's General Plan. Some examples of how the Housing Element is consistent with other Elements of the General Plan are discussed below.

A new requirement enacted since the fifth Housing Element cycle is Senate Bill 1000 (SB 1000). SB 1000 requires policies to ensure healthy and safe housing, such as addressing

the presence of lead-based building materials, which has shown to be a factor in Culver City's SB 1000 priority neighborhoods (portions of Clarkdale and Culver/West). This will be addressed in the General Plan's Equity, Community Health, and Environmental Justice Element and be consistent with Objective 1 in the Housing Element. Similarly, ensuring low-income and senior housing are sufficiently upgraded to protect those residents from climate and hazard impacts is considered in the Safety Element. This helps advance Objective 1 in the Housing Element.

Other sections in the General Plan include goals and actions related to Objectives 1 and 5 in the Housing Element. For example, the Safety Element discusses how housing units damaged during natural disasters will be repaired or replaced during rebuilding and recovery efforts such that they advance the General Plan's policies, objectives. It also states that the City will prioritize retrofitting more vulnerable structures to seismic activity, including lower-income housing. These goals in the Safety Element align with Objective 1 in the Housing Element. The Equity, Community Health, and Environmental Justice Element also discusses the need to reduce economic uncertainty by protecting vulnerable households from economic and housing displacement. This aligns with Objective 5 in the Housing Element.

The Arts and Culture and the Economic Development Elements in the General Plan include goals, policies, and actions related to Objectives 3, 4, and 6 in the Housing Element. The Arts and Culture Element considers the high and rising costs of space and housing for the creative sector and how to ensure that Culver City offers affordable live/work spaces for artists and creatives. This aligns with Objective 4 in the Housing Element. The Economic Development Element discusses the community's job and housing imbalance, consistent with Objective 6 in the Housing Element, and considers how community benefit agreements can support the City's housing planning and development strategies. It also includes a goal to streamline the development process to increase the potential for housing and mixed-uses. Part of that strategy includes adaptive re-use development, which is aligned with Objective 3 in the Housing Element. These considerations related to development in the Economic Development Element align with Objective 4 in the Housing Element.

Objective 2 in the Housing Element is considered in other sections in the General Plan. The Mobility Element includes a goal around creating transit-oriented communities in which residents and workers have equitable and affordable access to transit and other mobility services through mobility planning in travel demand management and transit-oriented districts, and transit-oriented development. Additionally, the Infrastructure Element discusses maintaining, upgrading, and expanding the community's utility and infrastructure networks to support new development and growth. The Noise Element considers how to protect existing and future residents from noise impacts from development. These considerations relate to Objective 2 in the Housing Element.

Senate Bill (SB) 1087 of 2005 (*Government Code* §65589.7) requires Cities to provide a copy of the adopted Housing Element to local water and sewer providers, and also requires that these agencies provide priority hookups for developments with lower-income housing. The Housing Element will be provided to these agencies immediately upon adoption.

City Council Guiding Principles

On April 12, 2021, the City of Culver City City Council adopted a set of Housing Element Guiding Principles, with the intention to aim higher than the State requirements and guidelines, to inform the adoption and implementation of this Housing Element. Resolution No. 2021-R034 established these Guiding Principles and is included in Appendix D. This draft Housing Element is informed by the Guiding Principles and has been revised based on public comment received as of this drafting related to the Principles.

Adoption Hearings

The City of Culver City conducted four public meetings to consider adoption of the 2021-2029 Housing Element, which was revised to address HCD and public comments. The City conducted two study sessions on the Revised Draft Housing Element before the Planning Commission (November 30, 2021) and the City Council (December 10, 2021). The Revised Draft Housing Element was available for public review on November 24, 2021 prior to the Planning Commission meeting and on December 7, prior to the December 10, 2021 City Council meeting.

On January 6, 2022, the City conducted a public hearing before the Planning Commission to consider recommending the Housing Element for City Council adoption. On January 24, 2022, the City Council conducted a public hearing and adopted the 2021-2029 Housing Element. The Final Draft Housing Element was available for public review on December 29, 2021 prior to the Planning Commission hearing and on January 20, 2022 prior to the City Council hearing. Emails notifying all commenters were sent pursuant to AB 215.

Housing Needs Assessment

This chapter examines the City's general population and household characteristics and trends, such as age, employment, household composition and size, household income, and special needs. Characteristics of the existing housing stock (e.g., number of units and type, tenure, age and condition, and costs) are also addressed. Finally, the City's projected housing growth needs based on the 2021 RHNA are examined. The Housing Needs Assessment uses the most recent data from the U.S. Census Bureau's American Community Survey (ACS), data compiled by SCAG, Department of Finance (DOF) Housing and Population data, and other sources such as the Westside Regional Center (WRC) which serves persons with developmental disabilities.

Many of the data sets in this chapter rely on ACS rather than Decennial Census data. Most data produced from the Decennial Census result from a "short form" questionnaire mailed to all known residential addresses. The short form asks for limited information. Most of the data needed to provide a profile of the City's characteristics are found in the ACS which is released annually. The data are extrapolated from a "long form" questionnaire which is mailed out to a random cross-section of the population. It provides a more detailed picture of the City's population, housing, income, economic, and employment characteristics. This detailed information cannot always be found in the Decennial Census data sets.

Population Trends & Characteristics

Growth Trends

Following its incorporation in 1917, Culver City's population grew rapidly. Culver City had its most dramatic population increase in the decade after it incorporated when the City's population grew from 503 to 5,669 (1,027% increase). The following decades saw continued rapid population growth and the City's population was about 32,000 in 1960.

However, the population growth rate began declining after 1960. Between 1970 and 1980, the population growth rate decreased to 7.1% and has remained below 2% since the 1990s. The DOF estimates that as of April 2020, Culver City's population was 39,075, representing a 0.7% growth since 2000 (see Table 1). This trend contrasts with other Westside cities and Los Angeles County, which grew by 5.0% and 6.9% between 2000 and 2020, respectively. As an essentially built-out community, there have been few opportunities for growth during the last 30 years, except through redevelopment and urban infill.

Table 1: Population Trends in Culver City, Westside Cities, and Los Angeles County

Jurisdiction	Population by Year			% Change		
	2000	2010	2020	2000-2010	2010-2020	2000-2020
Culver City	38,816	38,883	39,075	0.2	0.5	0.7
Westside Cities*	192,400	197,127	202,040	2.5	2.5	5.0
Los Angeles County	9,519,338	9,818,605	10,172,951	3.1	3.6	6.9

Sources: BOC, 2000 & 2010 Census; DOF, Table E-1, 2020

*Note: Westside Cities includes Culver City, Santa Monica, Beverly Hills, and West Hollywood.

Table 2 shows population, household, and employment projections for Culver City for the years 2020, 2035, and 2045 based on data compiled and analyzed by SCAG using 2016 as the base year for the projections. According to SCAG, the City's estimated population in 2020 would be 40,257, which is slightly higher than HCD's certified 2020 estimates shown in Table 2. The population's growth rate is expected to increase over the next 25 years to 3.3%. With a low expected population growth rate, the number of households is also not expected to increase by a significant amount (868 households, or 5.1%). However, the projected increase in new jobs over the same period is 3,759 jobs or 6.2%.

Table 2: Culver City Projected Population, Household, and Employment Trends

Jurisdiction	2020	2035	2045	Growth (%) 2020-2045
Population	40,257	41,011	41,573	3.3
Households	17,146	17,675	18,014	5.1
Employment	60,312	62,303	64,071	6.2

Source: SCAG, 2020 Regional Transportation Plan/Sustainable Communities Strategy Data/Map Book, 2017.

However, 2045 General Plan reexamines the City's land use distribution and intensity of uses. The Preferred Land Use Map provides increased opportunities for residential growth – estimated 11,500 net new units (about 67% increase) between 2019 baseline and planning horizon of the General Plan by 2045.

Age Composition

The age characteristics of residents partially influence Culver City's housing needs. Persons of different ages often have different lifestyles, family structures, and income levels that affect their housing preferences and ability to afford housing. Typically, young adult households may occupy apartments, condominiums, and smaller single-family homes because of size and affordability. Middle-aged adults, those between the ages of 45 and 64, may prefer larger homes as they begin to raise their families. In contrast, seniors (aged 65 and older) may prefer apartments, condominiums, mobile homes, or smaller single-family homes that have lower costs and less extensive maintenance needs. Moreover, housing needs also change over time as people age. As a result, evaluating changes in the age groups in a community can provide insight into changing housing needs in Culver City.

Table 3 shows that the median age of residents in Culver City increased notably from 40.5 to 42.3 from 2010 to 2019. While the median age of Los Angeles County residents is

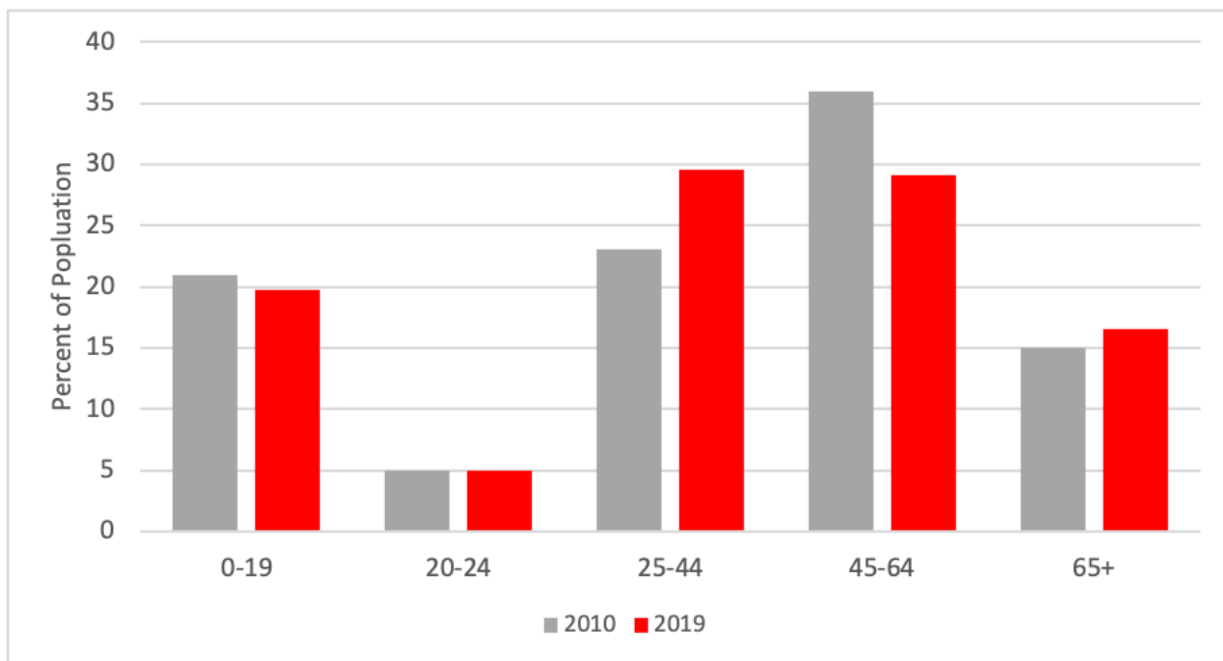
significantly lower than Culver City, it has also increased over the same period. The City's population between the ages of 25 and 44 is the fastest-growing age group, having increased by 28% from 2010 to 2019. In contrast, the population of middle-aged adults decreased significantly by 18% while the senior population (age 65 and older) increased by 12%. Table 3 shows the changes in the population shares by age and that the share of adults increased most notably, and the share of middle-aged adults decreased. These changes reflect a community that is attracting young adults but not families as the share of children aged 18 and under decreased. In contrast, seniors were the fastest growing population group in the County and there was a very slight decrease in the young adult population County-wide.

Table 3: Culver City Age Characteristics and Trends

Age	2010 Estimates			2019 Estimates			2010-2019 % Change	
	#	%	LA County %	#	%	LA County %	Culver City	LA County
0-19 (children)	8,023	21	28	7,745	20	25	-3.5	-13.1
20-24 (college)	2,000	5	8	1,936	5	7	-3.2	-5.3
25-44 (adults)	9,056	23	30	11,586	30	30	27.9	-1.3
45-64 (middle age)	13,998	36	24	11,426	29	25	-18.4	6.8
65+ (seniors)	5,806	15	11	6,476	17	13	11.5	26.7
Total	38,883	100	100	39,169	100	100	0.7	3.3
Median Age	40.5	-	34.3	42.3	-	36.5	-	-

Sources: BOC, Census, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table S0101

Figure 1. Culver City Population Share by Age



Sources: BOC, Census, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table S0101

Race and Ethnicity

Cultural practices sometimes influence housing needs and preferences and the nation's demographics are becoming increasingly diverse by race and ethnicity. Culver City also reflected these trends, with 39% of the population identifying as non-White (Table 4). However, Culver City is somewhat less diverse than Los Angeles County as a whole, where 49% of the population is non-White. Further, 24% of Culver City residents identified as Hispanic or Latino, compared with 49% of Los Angeles County residents.

As shown in Table 4, White residents made up the largest racial group in Culver City at 61% in 2019. Asians made up 16% of the population and Black residents comprised 9% of the population. The population of Black residents and residents categorized as "All Others" declined by 18% and 28%, respectively. Similarly, the population of Black residents and residents categorized as "All Others" declined in the County as a whole (by 4% and 3%, respectively). Meanwhile, the population of Asian residents and residents indicating two or more races increased by 12% and 24%, respectively. Countywide, the population of Asian residents and residents indicated two or more races also increased (by 10% and 30.1%, respectively). The population of Hispanic or Latino origin increased by 2% between 2010 and 2019. Countywide, the population of Hispanic or Latino origin residents increased by 6%.

Table 4: Culver City Demographic Breakdown and Trends by Race and Ethnicity

Racial and Ethnic Category	2010			2019			2010-2019 % Change	
	#	%	LA County %	#	%	LA County %	Culver City	LA County
Race								
White	23,033	59	51	23,981	61	51	4.1	4.2
Asian	5,736	15	14	6,396	16	15	11.5	9.9
Black or African American	4,173	11	9	3,429	9	8	-17.8	-3.8
Two or more races	2,185	6	3	2,707	7	4	23.9	30.1
All Others ¹	3,700	10	24	2,656	7	22	-28.2	-3.4
Total	38,827	100	100	39,169	100	100	0.9	3.3
Ethnic Identity								
Hispanic or Latino (of any race)	9,118	23	47	9,291	24	49	1.9	6.3
Not Hispanic or Latino	29,709	77	53	29,878	76	52	0.6	0.7
White	18,314	47	28	17,937	46	26	-2.1	-4.7
Asian	5,680	15	14	6,329	16	14	11.4	9.9
Black or African American	4,043	10	9	3,403	9	8	-15.8	-4.4
All Others ¹	288	1	1	312	1	1	8.3	9.5
Two or more races	1,384	4	2	1,897	5	2	37.1	38.9

Sources: BOC, 2006-2010 & 2015-2019 American Community Survey, 5-Year Estimates, Table DP05

Note: 1. All Others includes residents that identified as American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, and "Some other race."

Employment

Employment is an important factor affecting housing needs within a community. The jobs available in each employment sector and the wages for these jobs affect the type and size of housing residents can afford.

Current Employment

Current employment has a significant influence on the housing needs of the City's residents. Factors which may influence housing needs include the income earned for various jobs, where jobs are located, and whether employees are able to afford to live within a reasonable distance of their workplace. According to the 2015-2019 ACS, the City had an employed population (or workforce) of 22,132 persons. Four of the top five industries in Culver City match those in the County, except that for the City, information is the top sector, with 19% of the job share. Four of the top five industries in Culver City match those in the County, except that for the City, Information is the top sector, with 19% of the job share.

Table 5 shows that the two industries with the largest number of employed Culver City residents were educational services and health care and social assistance (23% of total) and professional, scientific, and management, and administrative and waste management services (21% of total).

While the majority of Culver City's employed residents (54%) are employed in the top three industries, the jobs available within Culver City are more evenly spread out among industries ([Table 5](#)). Educational services, healthcare, and social service jobs constitute only 15% of the jobs in Culver City (compared to 23% of the workforce). Most notably, the largest job sector in Culver City is information (19% of total jobs), but only 9% of the City's population work in this industry. The top city employers are also generally consistent with the most prevalent industries within Culver City: Sony (Arts and Entertainment), Culver City Unified School District and West LA College (Education), Southern California Hospital at Culver City (Healthcare services), and Westfield Shopping Mall (Retail).

Culver City's employment industry patterns are similar to those in Los Angeles County. Four of the top five industries in Culver City match those in the County, except that for the City, Information is the top sector, with 19% of the job share.

Table 5: Employment by Sector in Culver City and LA County

Sector	Culver City (%)		LA County (%)
	Workforce ¹	Jobs ²	Jobs ³
Educational services, and health care and social assistance	23	15	18
Professional, scientific, and management, and administrative and waste management services	21	18	16
Information	9	19	7
Service-related			
Arts, entertainment, recreation, and accommodation/food services	10	11	14
Retail trade	7	12	11
Other services, except public administration	4	5	4
Technical skilled and unskilled			
Finance and insurance, and real estate and rental and leasing	9	4	6
Manufacturing	6	6	9
Transportation and warehousing, and utilities	3	2	5
Construction	2	4	3
Public administration	3	2	N/A
Wholesale trade	2	2	7
Agriculture, forestry, fishing and hunting, and mining	0.2	0.3	0.12
Total	22,132	49,935	3,871,716

Sources: 1. BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table S2405; 2. Census Transportation Planning Products 2012-2016; 3. Los Angeles County Business Patterns, 2016

Jobs-Housing Balance

A regional balance of jobs-to-housing helps to ensure that the demand for housing is reasonably related to supply. When the number of jobs significantly exceeds the housing supply, the rental and for-sale housing markets may become overheated, requiring households to pay a larger share of their income on housing and resulting in overcrowding and longer commutes as workers seek more affordable housing in outlying areas.

Jobs to housing ratios related the spatial match between jobs and housing and are often used as indicators of economic vitality and quality of life. High ratios of more jobs than housing may lead to issues of housing unaffordability and traffic congestion from commutes, as there is not enough housing to accommodate all the workers in the area. However, there is no standard jobs-housing ratio that would be considered optimum. It is often used as a point of reference compared to regional averages. [Table 6](#) shows that the jobs-to-housing ratio in Culver City was 2.8 in 2016. This is much higher than the balance of the County as a whole, which was about 1.3.¹ Based on the SCAG housing and employment growth estimates, the jobs to housing ratio is also predicted to increase over the next 25 years. However, these statistics do not reflect the fact that

¹ SCAG, Profile of Los Angeles County, Local Profiles Report 2019, May 2019. <http://www.scag.ca.gov/Documents/LosAngelesCountyLP.pdf>

many people who work in Culver City live in nearby Westside locations and commute relatively short distances to Culver City jobs. This could mean the workforce living nearby could offset the imbalanced jobs-to-housing ratio. However, various studies have found that over 65% of the Westside's workforce commutes from outside the Westside.^{2,3} These reports indicate a need for more housing in Culver City and the Westside region. To address the impact of employment-generating development on housing demand, the City has adopted a linkage fee on nonresidential development. This fee will take effect in January 2022.

Table 6: Culver City Jobs to Housing Ratio

	2016	2020	2035	2045
Total Jobs	49,935	60,312	62,303	64,071
Housing Units	17,528	17,146	17,675	18,014
Jobs to Housing Ratio	2.8	3.5	3.5	3.6

Sources: American Community Survey 2012-2016; Census Transportation Planning Products 2012-2016; 2020 Regional Transportation Plan/Sustainable Communities Strategy Data/Map Book, SCAG 2017.

The General Plan Preferred Land Use Map projects a total of 29,300 (11,500 net new) housing units and 83,000 (23,000 net new) jobs by 2045 – a jobs-to-housing ratio of 2.83. The goal of 2045 General Plan is to facilitate the increase in housing production to reverse the trend of jobs-to-housing imbalance as projected by SCAG.

Household Characteristics

Household characteristics indicate the type and size of housing needed in a city. The Census defines a “household” as all persons occupying a housing unit, which may include single persons living alone, families related through marriage or blood, or unrelated persons that share a single unit. Persons in group quarters such as dormitories, retirement or convalescent homes, group homes, or other similar living situations are included in population totals but are not considered households.

Household Types

According to the 2015-2019 ACS, there were a total of 16,796 households living in Culver City. The city's average household size of 2.31 persons is small compared to the County as a whole (2.99 persons per household). The overall share of household types has shifted little over the past ten years, with family households making up about 57% of the total households and non-family households making up 43% (see [Table 7](#)).

² Southern California Association of Governments (February 2009). “Westside Cities Workforce Housing Study.” https://www.scag.ca.gov/Documents/WestsideWorkforceHousingStudy_PPT.pdf

³ Los Angeles County Metropolitan Transportation Authority (March 2015). “Subregional Mobility Matrix Westside Cities Final Report.” Prepared by Fehr & Peers. https://media.metro.net/projects_studies/lrtp/images/report_mobility_westside.pdf

Table 7: Number of Households by Type in Culver City

Household Type	2010		2019		2010-2019
	#	%	#	%	% Change
All Households	16,779	100	16,796	100	0.1
Family Households	9,344	56	9,529	57	2.0
Married-Couple	6,826	41	7,272	43	6.5
Other Families	2,518	15	2,257	13	-10.4
Non-Family Households	7,435	44	7,267	43	-2.3
Single	5,649	34	5,940	35	5.2
Other Non-Families	1,786	11	1,327	8	-25.7
Persons Living in group quarters	311		311		--
Average Household Size	2.30		2.31		--

Sources: BOC, Census, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Tables S2501 and S1101; DOF, Table E-1, 2020

Tenure

Tenure in the housing industry typically refers to a housing unit's occupancy status – whether the unit is owner- or renter-occupied. Tenure preferences are primarily related to the household's income, composition, and ages of the householders. A household is cost-burdened if it spends more than 30% of its gross income on housing-related expenses, and renters tend to be more cost-burdened than owners. However, the high costs of homeownership in Southern California also result in a housing cost burden for many homeowners. The tenure distribution (owner versus renter) of a community's housing stock influences several aspects of the local housing market. Tenure influences residential mobility, or turnover, as rental units experience a higher turnover rate than owner-occupied units.

[Table 8](#) compares the number of owner- and renter-occupied units in the City to the County in 2000, 2010, and 2019. On average, the homeownership rate in Culver City between 2000 and 2019 was about 6% higher than in the County. The homeownership rate for Culver City and the County declined consistently from 2000 to 2019.

Table 8: Occupied Units by Tenure in Culver City and LA County

Jurisdiction	Tenure	2000		2010		2019	
		#	%	#	%	#	%
Culver City	Owner	9,034	54	9,111	54	8,768	52
	Renter	7,577	46	7,668	46	8,028	48
	TOTAL	16,611	100	16,779	100	16,796	100
LA County	Owner	1,499,744	48	1,544,749	48	1,519,516	46
	Renter	1,634,030	52	1,696,455	52	1,797,279	54
	TOTAL	3,133,774	100	3,241,204	100	3,316,795	100

Sources: BOC, Census, 2000, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table S2504

Household Income

Household income is a primary factor affecting housing needs in a community. Except for households that own a home with little or no mortgage, residents' ability to afford housing is directly related to household income. [Table 9](#) shows median household income in Culver City, LA County, and other Westside cities in 2000, 2010, and 2019. The

City's median household income in 2019 (\$95,044) was substantially higher than that reported in LA County (\$68,044), as had been the case in 2010 and 2000. Income growth in Culver City also outpaced growth in LA County from 2010 to 2017. When compared to other cities in the Westside region, Culver City is most similar in median household income to Santa Monica, while the median household income of Beverly Hills is significantly higher. Although West Hollywood has seen the largest growth in median household income, it still has the lowest median income of the Westside cities.

Table 9: Median Household Income in Culver City and LA County

Jurisdiction	2000 (\$)	2010 (\$)	2019 (\$)	2010-2019 (% Change)
Culver City	52,065	72,199	95,044	32
LA County	42,030	55,476	68,044	23
Santa Monica	50,714	68,842	96,570	40
Beverly Hills	70,945	83,463	106,936	28
West Hollywood	38,914	52,009	74,044	42

Sources: BOC, Census, 2000.; 2006-2010 & 2015-2019 American Community Survey, 5-Year Estimates, Table S1903

Housing needs and assistance programs are based on income categories established in state and federal law. For the Housing Element, the State Department of Housing and Community Development (HCD) has established five income groups based on area median income (AMI), as shown in [Table 10](#).⁴

Table 10: HCD Income Categories

Income Category	% of AMI
Extremely Low ¹	Up to 30% of AMI
Very Low ¹	31-50% of AMI
Low ¹	51-80% of AMI
Moderate	81-120%
Above Moderate	Greater than 120% of AMI

Source: California Dept. of Housing and Community Development

Notes: Extremely Low, Very Low and Low categories together are referred to as "Lower Income."

Under state and federal regulations, the AMI refers to the median income for a metropolitan statistical area; in this case, Los Angeles County.⁵ The AMI for Los Angeles County, as determined by HCD, was \$77,300 in 2020. According to HCD, county median income must be used to establish income groups for the Housing Element. About 27% of Culver City households are Lower Income (Table 11). 73% of Culver City households were within the moderate/above moderate income categories (greater than 80% AMI), a higher proportion of households compared to the county as a whole (59%).

⁴ State income definitions are different compared to federal definitions. For federal housing programs, eligibility is established for households with incomes up to only 80% of the AMI. Under the federal definition these households are considered moderate income. For housing plans that are required by federal regulations, such as the Consolidated Plan and Analysis of Impediments to Fair Housing Choice, the federal income definitions are used.

⁵ A metropolitan statistical area refers to a core area with a substantial population and the adjacent communities that are economically and socially connected to that core.

Table 11: Household Distribution by Income Category in Culver City and LA County

Income Category	Income Category (% of AMI)	Culver City (%)	LA County (%)
Extremely Low	up to 30	11.7	20.6
Very Low	31 to 50	4.9	5.5
Low	51 to 80	10.4	15.2
Moderate	81 to 120	15.0	16.1
Above Moderate	>120	58.0	42.6
Total		100	100

Source: SCAG, RHNA Final Allocation Calculator, March 2021⁶

Housing Stock Characteristics

This section evaluates the characteristics of the community's housing stock, such as the number and type of housing units, recent growth trends, age and condition, tenure, and vacancy, and helps identify and prioritize needs. A housing unit is defined as a house, apartment, mobile home, or group of rooms, occupied as separate living quarters, or if vacant, intended for occupancy as separate living quarters.

Housing Type and Growth Trends

Housing Growth

Between 2000 and 2020, the rate of housing stock growth in Culver City (4.0%) trailed that of the neighboring cities of Santa Monica (10%) and West Hollywood (7.2%) and was comparable to Beverly Hills (3.7%) (see [Table 12](#)). Over the last seven years since the 2013-2021 Housing Element was adopted, Culver City added a total of 333 net new housing units to its housing stock, representing a growth rate of 1.9%. Much of the City's residential development activities involve the demolition of existing units and recycling into high density development. This growth rate is consistently lower than those in the neighboring cities of Santa Monica (2.8%) and West Hollywood (4.7%) and LA County (3.7%) from 2013 to 2020. Beverly Hills was the only neighboring city with a rate lower than Culver City (less than 0.1%) from 2013 to 2020.

Table 12: Westside Cities Housing Growth

Jurisdiction	# Units			% Change	
	2000	2013	2020	2013-2020	2000-2020
Culver City	17,130	17,486	17,819	1.9	4.0
Santa Monica	47,863	51,210	52,629	2.8	10.0
Beverly Hills	15,856	16,436	16,443	<0.1	3.7
West Hollywood	24,110	24,698	25,853	4.7	7.2
LA County	3,270,909	3,463,492	3,590,574	3.7	9.8

Sources: BOC, Census, 2010; DOF, Table E-1, 2013, 2020

⁶ SCAG's RHNA methodology does not include the "extremely low" income category defined by HCD as up to 30% AMI. Instead, SCAG combines both the "extremely low" and "very low" income HCD categories into the "very low" income category defined as households below 50% AMI. According to HUD's Comprehensive Housing Affordability Strategy data, 11.7% of households are extremely low income (less than 30% AMI). However, the precise methodology for developing income distribution by these two sources may be different.

Unit Type and Size

[Table 13](#) provides the DOF estimates for housing types for 2013 and 2020. As shown, the proportional breakdown of various housing types within the city has changed very little over the previous planning period, reflecting the city's slow growth rate and limited home construction. In 2020, the city was almost evenly divided between single-family units (48%) and multi-family units (51%). Single-family detached homes and larger multi-family complexes (5+ units) make up most of the city's housing stock at approximately 39% each. Smaller multi-family complexes (with 2-4 units) comprise approximately 12% of the city's units. About 9% of units were reported as single-family attached units (i.e., condominiums or townhomes), while mobile homes comprised the remaining 1%.

Table 13: Number of Housing Units by Type in Culver City

Housing Type	2013		2020		2013-2020 Change	
	#	%	#	%	#	%
Single-Family Homes	8,507	49	8,564	48	57	0.7
Single-Family Detached	6,920	40	6,963	39	43	0.6
Single-Family Attached	1,587	9	1,601	9	14	0.9
Multi-Family Homes	8,783	51	9,039	51	256	2.9
Multi-Family (2-4 units)	2,086	12	2,089	12	3	0.1
Multi-Family (5+ units)	6,697	38	6,950	39	253	3.8
Mobile Homes	196	1	216	1	20	10.2
TOTAL	17,486	100	17,819	100	333	1.9

Source: DOF, Table E-5, 2013, 2020

According to the 2015-2019 ACS, about two-thirds of housing units had two- to three-bedrooms (see [Table 14](#)). Studio and one-bedroom units made up 25% of the city's housing stock. The city's larger housing units (four or more bedrooms) only made up 11% of the housing stock.

Table 14: Number of Housing Units by Size in Culver City

Unit Size	2019	
	#	%
Studio	720	4
1 bedroom	3,480	21
2 or 3 bedrooms	10,754	64
4 or more bedrooms	1,842	11
TOTAL	16,796	100

Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table S2504

Vacancy Rates

A certain number of vacant units are needed to moderate the cost of housing, allow sufficient choice for residents, and provide an incentive for unit upkeep and repair. Vacancy rates are generally higher among rental properties, as rental units have greater attrition rates than owner-occupied units. A healthy vacancy rate — one which

permits sufficient choice and mobility among a variety of housing units — is considered to be 2-3% for ownership units and 5-6% for rental units.

Housing tenure changed slightly from 2000 to 2019, with the rate of homeownership declining slightly from 54% in 2000 to 52% in 2019 (see Table 8). Similarly, the share of renter-households increased from 46% to 48% during the same period. In Culver City, the vacancy rates increased from 3% to 5.1% between 2000 and 2019 (see Table 15). This rise can be attributed to an increase in vacant for-rent units (which accounted for 32% of vacancies in 2000 versus 55% in 2019). Units categorized as “other vacant” also made up a sizeable portion of vacant units in all the years indicated (28% in 2000 and 2010 and 26% in 2019). Short-term rentals fall into this category; therefore, this number may indicate the extent of short-term rentals in the city. During the same period, the proportion of for-sale vacant units dropped to 0% from 22% in 2000. While the city’s rental vacancy rate is within the healthy range, the ownership vacancy rate is well below optimum providing homebuyers with virtually no choice when seeking to purchase a home within the city.

Table 15: Culver City Vacancy Statuses

Vacancy Status	2000		2010		2019	
	#	%	#	%	#	%
Vacancy by Tenure						
Owner-occupied	112	1.2	65	0.7	0	0
Renter-occupied	164	2.1	333	4.1	495	5.7
Overall vacancy rate		3.0		4.1		5.1
Vacancy by Type						
For rent	164	32	333	47	495	55
Rented, not occupied	58	11	31	4	165	18
For sale only	112	22	65	9	0	0
Sold, not occupied	0	0	23	3	0	0
For seasonal, recreational, or occasional use	42	8	62	9	11	1
Other vacant	143	28	198	28	236	26
Total Number of Vacant Units	519	100	712	100	907	100

Sources: BOC, Census, 2000, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table B25004

Note: “Other Vacant” as defined by the Census is a housing unit that does not fit into any year-round vacant category. This may indicate the extent of short-term rentals in the City.

Housing Conditions

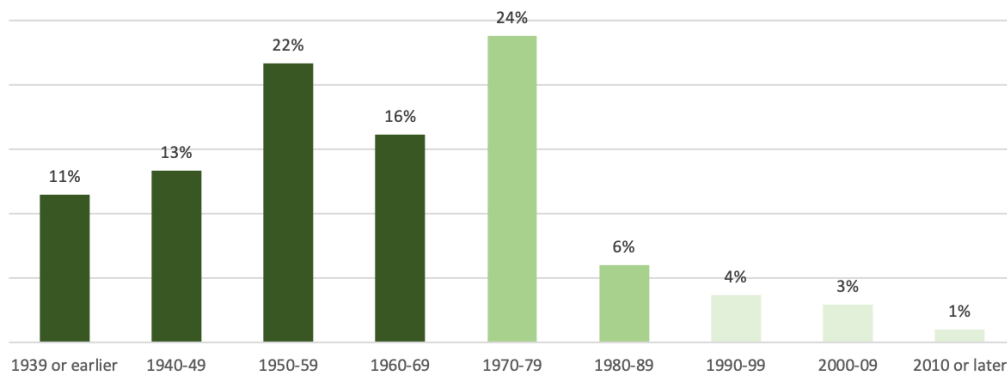
Age of Housing Stock

Housing age is often an important indicator of housing condition. Housing units built before stringent limits on the amount of lead in the paint were imposed in 1978, may have interior or exterior building components coated with lead-based paint. Housing units built before 1970 most likely need rehabilitation and have lead-based paint in deteriorated condition. Lead-based paint becomes hazardous to children under age six and pregnant women when it peels off walls, windows, and doors. In general, housing that is 30 years or older may exhibit a need for repairs based on the useful life of materials (such as the roof). Housing over 50 years old is considered aged and is more likely to exhibit a need for major repairs (such as electrical and plumbing systems).

Figure 2 provides the age composition of Culver City's housing stock. About 63% of the city's housing units were built at least 50 years ago (the dark green bars). The vast majority of the City's housing stock, approximately 92%, are at least 30 years old (the dark green and medium green bars). These findings indicate that much of the city's housing possibly needs some maintenance and rehabilitation, including remediation of lead-based paint.

Culver City's housing stock is somewhat older when compared to the County as a whole. In LA County, approximately 86% of units are older than 30 years. While it is typical for housing units to remain in use for much longer than 30 years, it is important to note that older homes need more frequent maintenance and rehabilitation to maintain a good condition.

Figure 2: Age Composition of Culver City's Housing Stock



Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table B25034

HOUSING CONDITIONS

Housing is considered substandard when the living conditions do not meet the minimum standards defined in Section 1001 of the Uniform Housing Code. Households living in substandard conditions are considered to require housing assistance due to the threat to health and safety, even if they are not seeking alternative housing arrangements.

In addition to structural deficiencies and standards, the lack of infrastructure and utilities often indicates substandard conditions. [Table 16](#) identifies the number of Culver City owner- and renter-occupied housing units lacking complete kitchen or plumbing facilities. Units lacking complete facilities are rare in Culver City. According to the 2015-2019 ACS, no owner-occupied units and just 0.1% of renter occupied units lacked complete plumbing facilities. Further, only 0.1% of owner-occupied housing units and 2.8% of renter occupied units lacked complete kitchens. These numbers indicate that complete kitchen facilities are a greater need than plumbing facilities and that renter-occupied units have a greater need for rehabilitation.

Table 16: Occupied Housing Units Lacking Complete Kitchen and Plumbing Facilities

	Owner				Renter			
	2009		2019		2009		2019	
	#	%	#	%	#	%	#	%
Occupied housing units	9,579		8,768		6,699		8,028	
Lacking complete plumbing facilities	19	0.2	0	0.0	13	0.2	11	0.1
Lacking complete kitchen facilities	38	0.4	8	0.1	134	2.0	226	2.8

Source: BOC, 2005-2009 & 2015-2019 American Community Survey, 5-Year Estimates, Table S2504

Compared to the housing conditions reported in the 2013-2021 Housing Element, housing conditions have improved overall since 2009. However, the number of rental units lacking complete kitchen facilities has increased since 2009. It is also important to note that the ACS typically undercounts substandard housing conditions as it is not able to report on other subtler housing problems, such as inadequate wiring, leaks, or inadequate or lack of heating⁷. Despite the increase in units lacking kitchen facilities, Culver City's housing stock is in relatively good condition with basic facilities present for most of its occupied units.

Assessing code enforcement activities provides additional insight on the overall condition of the city's housing stock. The City's Code Enforcement Services Division responds to an average of 886 complaints and requests for service each year. While Code Enforcement responds to these requests, many do not result in an open case. If Code Enforcement opens a case, it issues a Notice of Violation or a fine. The total number of cases, not complaints, that Code Enforcement has had since it began tracking them in 2010 is 4,715. Typically, Code Enforcement has about 470 cases per year and currently (June 2021) has 660 unresolved or ongoing cases.

Code enforcement cases are generally initiated when the Division receives a complaint of a violation, which is then confirmed by staff. Code enforcement focuses on violations of the municipal code in a variety of areas, including animal regulations, business licenses, graffiti, building code violations, property maintenance, and substandard housing. Of the City's average of 470 cases per year, an average of nine are related to significant property maintenance issues, substandard housing, or hoarding. The most common issues reported were related to mold, leaks (roof or plumbing), and lack of heat. It is estimated that about half of these properties with violations need substantial rehabilitation while the other half need more minor repairs. Since code enforcement activity is primarily complaint-driven, it is difficult to make accurate assumptions about the overall condition of the City's housing stock based upon this data. However, if just nine of the city's 16,796 occupied housing units have significant property maintenance issues, this represents less than 0.01% of the City's housing stock. Even assuming only one in 10 cases would be reported to the City, the

⁷ While the ACS also reports on the lack of telephone services, in today's mobile world, landline telephone services are no longer a required service. However, the ACS does not measure Internet access, which is a more important utility for communications.

extent of substandard housing in the City is limited (or generally estimated at 100 units) with no units requiring replacement.

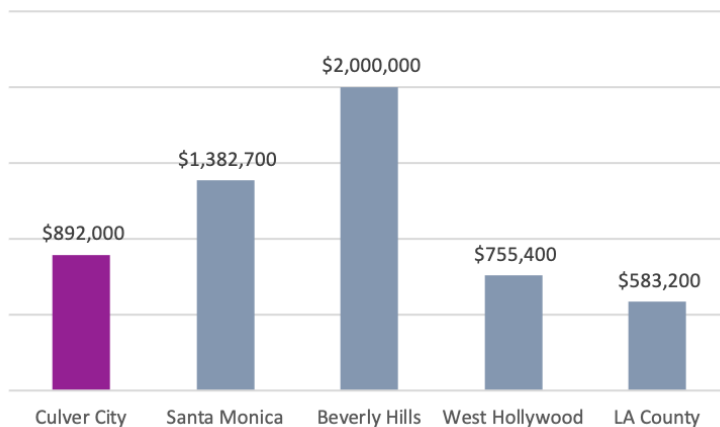
Housing Costs & Affordability Gap Analysis

Comparing the costs of homeownership and renting to a household's ability to pay for housing can help determine how affordable a community is. This section provides information on the homeownership costs and rental costs in Culver City and compares this to an affordability analysis for households at various income levels.

Home Values

Figure 3 compares median home values in the Westside cities and LA County as a whole, based on estimates from the 2015-2019 American Community Survey. As shown, home values in the Westside are significantly higher than the County. Typical home values in Beverly Hills and Santa Monica are higher than in Culver City, while home values in West Hollywood are lower.

Figure 3: Westside Cities Median Home Values (2019)



Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table B25077

Since the most recent data available from the American Community Survey is from 2019, home values based on the Zillow Home Value Index (ZHVI) are included below to provide more recent data. The ZHVI is a smoothed seasonally adjusted measure of the typical home value for homes in the 35th to 65th percentile range within a specific geography. According to the ZHVI, the typical home in Culver City was valued at \$1,295,775 in December 2020. As shown in [Table 17](#), home values have increased drastically since 2013 (69% increase overall). The value of single-family homes increased at a greater rate than condominiums (67% and 57%, respectively).

Table 17: Change in Typical Home Values in Culver City

	December 2013 (\$)	December 2020 (\$)	% Change
Typical Home Value	766,110	1,295,775	69
Single-family homes	888,187	1,486,379	67
Condominiums	410,233	642,220	57

Source: Zillow Home Value Index, accessed March 2021.

Rental Housing

Information on current rental rates in the city was obtained by reviewing advertisements posted on Zillow during June 2021. [Table 18](#) summarizes median multi-family (apartment, condo, townhouses) and single-family home rents by unit size. A total of 192 units were listed for rent on Zillow in June 2021, with the majority of the listings for multi-family units (95%). Just nine single-family homes were listed for rent, with median monthly rents ranging from \$2,775 for a one-bedroom unit to \$5,200 for a three-bedroom unit. The median monthly rent for multi-family units ranged from \$3,120 for a studio unit to \$3,798 for a three-bedroom unit. It should be noted that the median monthly rent for a one-bedroom apartment (\$3,480) was higher than the rent for a two-bedroom apartment (\$3,125). The median rent for studio apartments and two-bedroom apartments were nearly the same. This is likely because many studio and one-bedroom apartments located in newly constructed buildings were listed for rent.

Table 18: Median Rent by Unit Size in Culver City (June 2021)

Unit Type	# Available	Median Rent by Unit Size (\$)			
		Studio	1-Bedroom	2-Bedrooms	3+ Bedrooms
Multi-Family Unit	183	3,120	3,480	3,125	3,798
Single-Family Unit	9	N/A	2,775	4,250	5,200
All Units	192	3,120	3,475	3,150	4,990

Source: Zillow rental listings, www.zillow.com, accessed June 2, 2021

[Table 19](#) compares median rents for Westside cities, based on data from the 2015-2019 American Community Survey. As shown, rents in the Westside cities were higher than for LA County as a whole. Rents within the Westside cities were generally comparable; however, rents in Beverly Hills tended to be the highest.

Table 19: Comparison of Median Rent by Unit Size for Westside Cities (2019)

Jurisdiction	Studio	1-Bedroom	2-Bedrooms	3-Bedrooms	4-Bedrooms	5+ Bedrooms
Culver City	1,281	1,678	2,119	2,795	1,878	-1
Santa Monica	1,540	1,703	2,122	2,039	2,647	2,127
Beverly Hills	1,378	1,895	2,745	2,965	3,500+	-1
West Hollywood	1,157	1,606	2,080	2,964	2,850	3,500+
LA County	1,085	1,234	1,605	1,909	2,110	2,165

Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table B25077

Note: 1. Data unavailable, likely due to limited number of units of this size available.

Housing Affordability Gap Analysis

Housing affordability is defined as paying no more than 30 to 35% of the gross household income (depending on tenure and income level) on housing expenses (including utilities, taxes, and insurance).

[Table 20](#) provides general estimates on affordable rents and home purchase prices by income category based on the 2020 HCD median household income of \$77,300 for LA County and general cost assumptions for utilities, taxes, and property insurance.⁸ Given the high costs of homeownership, lower income households are usually confined to rental housing, but the affordability problem also persists in the ownership market. The situation is exacerbated for seniors with their fixed incomes and for large households with lower and moderate incomes given the limited supply of large rental units.

Based on the estimated affordable purchase prices shown in [Table 19](#) and the typical home values presented in [Table 17](#), lower income and moderate income households are unable to afford to purchase a single-family home or condominium in Culver City. This data illustrates that public subsidies are generally required to reduce sales prices to a level that is affordable to low and moderate income buyers. With a typical condominium within the city valued at \$642,000, there is an approximately \$300,000 “gap” between the market value and the price a moderate income household can afford to pay, depending on household size. For low income households, this gap ranges from \$300,000 to over \$410,000, depending on household size.

Rental housing that does not impose a cost burden is also difficult to obtain for the city’s lower income and moderate income households. Median rents in the city ranged from \$3,120 for a studio apartment to \$4,990 for a three-bedroom unit ([Table 18](#)). As shown in [Table 20](#), affordable monthly rents for lower income and moderate income households range from \$442 to \$2,240, depending on income category and household size. Therefore, a lower income or moderate income renter-household would not be able to afford a median priced rental unit without being cost burdened. More specifically, there is a \$2,500 gap between what an extremely low income four-person household can afford to pay and the median monthly rent for a two-bedroom apartment. For a moderate income four-person household, there is an affordability gap of about \$1,030 between what the household can afford and the median market rent for a two-bedroom unit.

⁸ State and federal income limits differ. For the Housing Element, State income limits are used, which are usually higher than the federal levels used in the City’s Consolidated Plan and other related documents.

Table 20: Housing Affordability Matrix - LA County (2020)

Household	Annual Income (\$)	Monthly Affordable Housing Costs (\$)	Utilities (\$)	Taxes and Insurance (\$)	Affordable Monthly Rent (\$)	Affordable Home Purchase Price (\$)
Extremely Low Income (under 30% MFI)						
1-Person	23,700	593	151	207	442	61,790
2-Person	27,050	676	166	237	510	72,096
3-Person	30,450	761	190	266	571	80,244
4-Person	33,800	845	223	296	622	86,069
5-Person	36,550	914	264	320	650	86,953
Very Low Income (31 to 50% MFI)						
1-Person	39,450	986	151	345	836	129,241
2-Person	45,050	1,126	166	394	960	149,182
3-Person	50,700	1,268	190	444	1,077	166,966
4-Person	56,300	1,408	223	493	1,185	182,427
5-Person	60,850	1,521	264	532	1,257	191,020
Low Income (51 to 80% MFI)						
1-Person	63,100	1,578	151	552	1,427	230,524
2-Person	72,100	1,803	166	631	1,637	265,026
3-Person	81,100	2,028	190	710	1,837	297,157
4-Person	90,100	2,253	223	788	2,030	327,179
5-Person	97,350	2,434	264	852	2,170	347,334
Moderate Income (81 to 120% MFI)						
1-Person	64,900	1,623	151	568	1,472	238,233
2-Person	74,200	1,855	166	649	1,689	274,020
3-Person	83,500	2,088	190	731	1,897	307,435
4-Person	92,750	2,319	223	812	2,096	338,527
5-Person	100,150	2,504	264	876	2,240	359,325

Sources: HCD Income Limits (2020), and Veronica Tam and Associates (2020)

Assumptions:

1. CA Dept. of Housing and Community Development (HCD) Income Limits, 2020.
2. Affordable housing costs are 30 percent of gross household income.
3. Utility costs based on Los Angeles County Development Authority (LACDA) Utility Allowance Schedule, 2020.
4. Taxes, insurance, PMI (private mortgage insurance), and HOA (homeowners association) are calculated at 35% of monthly affordable cost.
5. Affordable home purchase price is the total purchase price, assuming a 30-year fixed mortgage with a 3% interest rate and 10% down payment.
6. Taxes and insurance costs applies to owners only; renters do not usually pay taxes or insurance.

Housing Assistance Needs

This section outlines Culver City's existing housing needs, including those resulting from being housing cost-burdened or living in overcrowding situations. It also evaluates the housing needs for special needs groups such as seniors; persons with disabilities or those experiencing homelessness; and female-headed, large, and/or extremely low-income households.

Housing Cost Burden

Housing cost burden is generally defined as households paying more than 30% of their gross income on housing-related expenses. For renters, housing costs include rent and utilities. For owners, housing costs include the mortgage payment, taxes, insurance, and utilities. High housing costs can cause households to spend a disproportionate percentage of their income on housing. This may result in payment problems, deferred maintenance, or overcrowding. Households paying more than 50% of their income on housing are experiencing a *severe housing cost burden*. These households may be at risk of homelessness in the event of illness/disability or a sudden loss of income.

This section uses data from the Comprehensive Housing Affordability Strategy (CHAS) published by the U.S. Department of Housing and Urban Development (HUD). The CHAS provides information related to households with housing problems, including cost burden and overcrowding.⁹ The most recent estimates posted by HUD were derived from the 2013-2017 ACS.

As shown in [Table 21](#), nearly half of renter-households in Culver City experienced one or more housing problem, and 43% paid more than 30% of their incomes towards housing costs in 2017 compared to about one-third of homeowners. Extremely low-income households are the most vulnerable group. With limited income, 80% of the households in this income group experienced one or more housing problems, compared to 73% of very low-income households, 69% of low-income households, and 42% of households citywide. Severe housing cost burden impacted 72% of the extremely low-income households, compared to 45% of very low-income households, 26% of low-income households, and 18% of households citywide.

[Table 22](#) provides information on housing problems and cost burden in Los Angeles County, as a point of comparison. Overall, the instance of cost burden and housing problems in general is lower in Culver City when compared to the County. However, the proportion of lower income households (HH) with a cost burden greater than 50% tends to be higher within Culver City.

⁹ The CHAS collects data on four housing issues: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost-burdened.

Table 21: Housing Problems and Cost Burden in Culver City by Income and Tenure

Household by Type, Income & Housing Problem	Renters (#)	Renters (%)	Owners (#)	Owners (%)	Total HHs (#)	Total HHs (%)
Extremely Low (0-30% AMI)	1,280	66	660	34	1,940	12
with any housing problems	1,045	82	510	77	1,555	80
with cost burden > 30%	1,020	80	515	78	1,535	79
with cost burden > 50%	925	72	475	72	1400	72
Very Low (31-50% AMI)	750	55	625	45	1,375	8
with any housing problems	695	93	315	50	1,010	73
with cost burden > 30%	680	91	305	49	980	71
with cost burden > 50%	495	66	135	22	625	45
Low (51-80% AMI)	1,015	50	1,025	50	2,040	12
with any housing problems	845	83	570	56	1,415	69
with cost burden > 30%	805	79	570	56	1,370	67
with cost burden > 50%	225	22	310	30	535	26
Moderate/Above Moderate (>80% AMI)	4,660	42	6,530	58	11,190	68
with any housing problems	1,200	26	1,750	27	2,950	26
with cost burden > 30%	770	17	1,565	24	2,330	21
with cost burden > 50%	30	1	335	5	365	3
Total Households	7,705	47	8,840	53	16,545	100
with any housing problems	3,780	49	3,145	36	6,925	42
with cost burden > 30%	3,275	43	2,955	33	6,215	38
with cost burden > 50%	1675	22	1,255	14	2,930	18

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) dataset, based on 2013-2017 ACS

Table 22: Housing Problems and Cost Burden in Los Angeles County by Income and Tenure

Household by Type, Income & Housing Problem	Renters (%)	Owners (%)	Total HHs (%)
Extremely Low (0-30% AMI)	79	21	19
With any housing problems	84	76	83
With cost burden > 30%	82	75	81
With cost burden > 50%	70	63	68
Very Low (31-50% AMI)	68	32	15
With any housing problems	91	68	83
With cost burden > 30%	84	65	78
With cost burden > 50%	38	44	40
Low (51-80% AMI)	59	41	18
With any housing problems	68	60	65
With cost burden > 30%	53	54	53
With cost burden > 50%	11	23	16
Moderate/Above Moderate (>80% AMI)	38	62	48
With any housing problems	25	24	25
With cost burden > 30%	15	20	18
With cost burden > 50%	1	4	3
Total Households	54	46	100
With any housing problems	62	39	52
With cost burden > 30%	54	35	45
With cost burden > 50%	29	16	23

Source: HUD Comprehensive Housing Affordability Strategy (CHAS) dataset, based on 2013-2017 ACS

Overcrowding

HCD defines overcrowding as more than one person per room, including the living room and dining room, but excluding the kitchen and bathroom. Overcrowding occurs when some households cannot accommodate high-cost burdens and instead accept smaller housing or share housing with other individuals or families. The following situations may result in overcrowding:

- A family living in a home that is too small;
- A family that houses extended family members; or
- Unrelated individuals or families doubling up to afford housing.

However, cultural differences may also contribute to the overcrowded conditions. Some cultures may prefer to share living quarters with extended family members, increasing their household sizes and creating a need for appropriately sized, affordable units.

Due to the additional stress imposed by more people living within a unit, overcrowding can strain physical facilities and the delivery of public services, reduce the quality of

the physical environment, contribute to a shortage of parking in a neighborhood, and accelerate the deterioration of homes.

According to the 2015-2019 ACS, about 5% of Culver City households are living in overcrowded conditions (786 households) (Table 23). Overcrowding was significantly more common among renter-households when compared to owner-households. About 82% of overcrowded households are of renter households. Culver City residents live in relatively less crowded housing conditions than the rest of Los Angeles County, according to the ACS. The overall rate of overcrowding in the County is more than double that of Culver City at 11%, compared to 5% in the city.

Table 23: Overcrowding by Tenure in Culver City (2019)

	Renters		Owners		Total	
	#	%	#	%	#	%
Overcrowded Households (1.01-1.5 persons per room)	363	4.5	116	1.3	479	2.9
Severely Overcrowded (1.5+ persons per room)	283	3.5	24	0.3	307	1.8
All Overcrowded Households	646	82.2	140	17.8	786	4.7
All Households	8,028	47.8	8,768	53	16,796	100.0

Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table DP04

Special Needs

Certain groups in a community may have greater difficulty finding decent, affordable housing due to special circumstances, such as those related to one's age, family characteristics, disability, or employment. As a result, some Culver City residents are at a greater risk of experiencing a cost burden, overcrowding, or other housing problems.

State Housing Element law considers persons with disabilities (including those with developmental disabilities), seniors, large households, female-headed households with children, persons experiencing homelessness, farmworkers, and extremely low-income persons and households to be "special needs" groups. These groups are not mutually exclusive, as a person or household may fall into more than one category. For example, a senior living alone may have a disability and live below the poverty level; or a large household may be female-headed and include a senior. Table 24 summarizes the population and households within these groups in Culver City.

Table 24: Culver City's Special Needs Populations/Households (2019)

Special Needs Group ¹	# of Persons/ Households	% of Population/ Households
Households with Seniors ²	4,779	28
Senior-Headed Households	4,136	25
Persons with a Disability	3,638	9
Persons with a Developmental Disability	485	1
Single Female-Headed Households with Children	577	3
Large Family Households (5+ persons)	658	4
Farmworkers (persons) ³	29	<0.1
Persons Experiencing Homelessness	216	1
Extremely Low-Income Households	1,940	12

Sources: BOC, 2015-2019 American Community Survey, 5-Year Estimates; CA Dept. Developmental Services, 2019; Los Angeles Housing Services Authority (LAHSA), Greater Los Angeles Homeless Count, 2020; HUD Comprehensive Housing Affordability Strategy (CHAS) dataset, based on 2013-2017 ACS

Notes:

1. All data is from the 2015-2019 ACS, except for Persons with Developmental Disabilities (CA DDS), Persons Experiencing Homelessness (LAHSA), and Extremely Low-Income Households (CHAS).
2. Includes all households with one or more person age 65 and over.
3. Includes all members of the civilian population over 16 employed in farming, fishing, and forestry occupations.

Persons with Disabilities

Federal laws define a person with a disability as "any person who has a physical or mental impairment that substantially limits one or more major life activities; has a record of such impairment; or is regarded as having such an impairment." In general, a physical or mental impairment includes hearing, mobility and visual impairments, chronic alcoholism, chronic mental illness, AIDS, AIDS Related Complex, and mental retardation that substantially limits one or more major life activities. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself.

According to the 2015-2019 ACS, about 9% (3,638 persons) of the population reported one or more disabilities. Disabilities are more common among the senior population, with 63% of the population with disabilities being 65 years or older (see [Table 25](#)). Disability type also varies by age. Most seniors with disabilities have ambulatory difficulties and independent living difficulties, while cognitive difficulties are most common among children (see [Table 26](#)).

Table 25: Population with Disabilities in Culver City (2019)

Age (Years)	# Persons with a Disability	% of Population with a Disability	% of Total Population
Under 5	0	0	0
5 - 17	232	6	4
18 - 64	1,128	31	4
65 years and over	2,278	63	36
Total	3,638	100	9

Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table S1810

Table 26: Disability Type by Age in Culver City (2019)

Disability Type ¹	% of Population with a Disability			
	Under 18	18 to 64	65+	Total
With a hearing difficulty	25	21	34	30
With a vision difficulty	16	23	26	24
With a cognitive difficulty	71	46	33	39
With an ambulatory difficulty	14	39	57	49
With a self-care difficulty	58	14	29	26
With an independent living difficulty	–	41	60	50
Total Disabled Persons	232	1,128	2,278	3,638

Source: BOC, 2015-2019 American Community Survey, 5-Year Estimates, Table S1810

Note: 1. A person may have more than one disability type.

Because a disability may prevent a person from working, restrict mobility, or make independent living and self-care difficult, persons with disabilities often have special housing needs. These needs may be related to limited income, accessibility, and location near public transportation and other services. Additionally, some persons with disabilities may need to reside in supportive housing or an institutional setting. State and federal legislation, including the Americans with Disabilities Act (ADA) mandate that a percentage of units in new or substantially rehabilitated multi-family projects be made accessible to individuals with limited physical mobility. However, given the age of Culver City's housing stock, there are limited accessible units within the city. The City's Zoning Code allows for reasonable accommodations following state and federal requirements to allow exceptions to zoning regulations to better accommodate a person with a disability. Reasonable accommodations are discussed in further detail in the Housing Constraints section of the Housing Element.

Persons with Developmental Disabilities

State law considers an individual's "developmental disability" to be severe and chronic if it:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Manifests before the individual attains age 18;¹⁰
- Is likely to continue indefinitely;
- Substantially limits a person's ability to function in three or more of the following major life activity areas: self-care, receptive and expressive language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency; and
- Requires a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The Census does not record developmental disabilities. However, according to the California Department of Developmental Services, there are an estimated 485 persons

¹⁰ The State of California defines developmental disabilities slightly differently than federal law. The main difference is the manifestation age, which is established at 22 under the federal definition.

with developmental disabilities living in Culver City. About 52% of these residents with developmental disabilities were 18 years or older. About 75% of the residents with developmental disabilities were living with parents or guardians while 15% were living independently.

While many persons with developmental disabilities can live and work independently, some may require a group living environment with supervision and support. Individuals with more severe disabilities may require an institutional setting where regular medical care and physical therapy can be provided.

According to the State Community Care Licensing Division, there are two facilities with a total capacity for 10 individuals providing 24-hour non-medical care for adults ages 18-59 who need assistance with their daily needs. Additionally, there are seven facilities within the City providing residential care for persons over 60, with a total capacity of 324 persons. Residential care facilities for six or fewer persons are permitted by-right in Culver City in all residential zones and all commercial zones allowing residential development. Larger facilities are generally permitted with a conditional use permit. These requirements are discussed in more detail in the Housing Constraints section of the Housing Element.

Elderly

Seniors (persons age 65 and above) are gradually becoming a more substantial segment of the population. Americans are living longer and having fuller lives than ever before in our history and are expected to continue to do so. Elderly households are vulnerable to housing problems due to limited income, the prevalence of physical or mental disabilities, limited mobility, and high healthcare costs. The elderly, particularly those with disabilities, may face increased difficulty in finding housing accommodations.

According to the 2015-2019 ACS, about 17% of the city's population was seniors ([Table 27](#)). Between 2010 and 2017, the proportion of elderly persons increased slightly from 15 to 17% (an increase of 670 persons) and senior-headed households increased from 23 to 25% (an increase of 260 households). In Culver City, there is a higher percentage of senior homeowners (73%) than countywide (65%). Senior renter-households comprised 27% of all households in the City.

Many seniors depend on fixed incomes and many have some type of disability. According to the 2015-2019 ACS, 36% of the total senior population has a disability ([Table 25](#)). Senior homeowners may be physically unable to maintain their homes or cope with living alone. The housing needs of this group can be addressed through smaller units, second units on lots with existing homes, shared living arrangements, congregate housing, and housing assistance programs.

Table 27: Senior Population and Household Shares in Culver City

Year	Population over 65		Senior-Headed Households	
	#	% of total	#	% of total
2010	5,806	15	3,876	23
2019	6,476	17	4,136	25

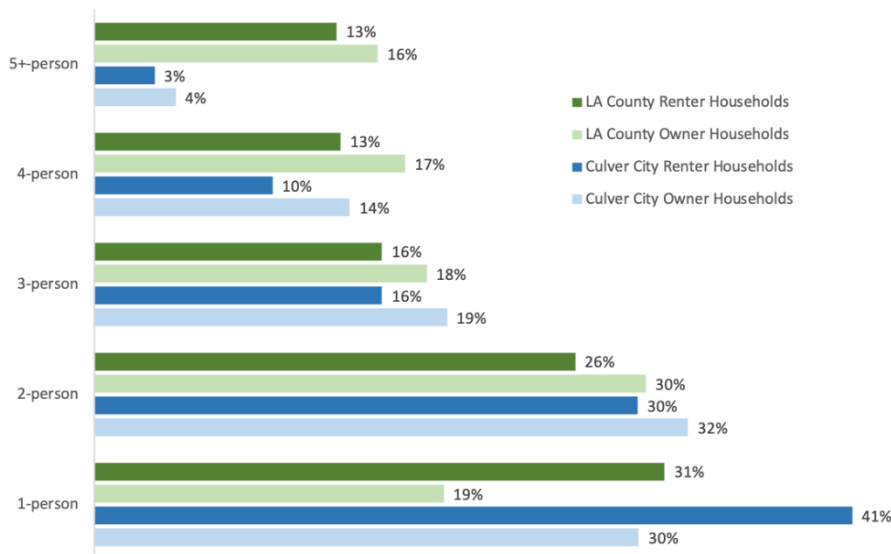
Source: BOC, Census, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table S1810

Large Households

Large households are defined as those with five or more members. These households are usually families with two or more children or families living with extended family members such as in-laws or grandparents. It can also include multiple families living in one housing unit to save on housing costs. Large households are a special needs group because the availability of adequately-sized, affordable housing units to serve their needs is often limited. To save for necessities such as food, clothing, and medical care, lower- and moderate-income large households may live in smaller units, resulting in overcrowding.

As shown in Figure 4, households with five or more members comprise the smallest proportion of households in Culver City, at just 4% of owner households and 3% of renter households. While this is generally consistent with the size composition of the city's housing stock (see [Table 14](#)), it may also suggest that high housing costs for larger units deter large families from moving into the community. When compared to LA County, Culver City has a significantly higher proportion of one person households. Culver City's proportion of larger households, including four person households and households with five or more people, is lower than the County's.

Figure 4: Household Size in Culver City and LA County by Tenure



Source: BOC, Census, 2010; 2015-2019 American Community Survey, 5-Year Estimates, Table B25009

Single-Parent and Female-Headed Households

Single-parent households, particularly female-headed households, often require special consideration and assistance because they tend to have a greater need for affordable housing, accessible daycare, healthcare, and other supportive services. Due to their relatively lower per-capita income and higher living expenses, including daycare,

single-parent households have limited opportunities to find affordable, decent, and safe housing.

The number of households that are families with children has not changed greatly in the past decade (see [Table 28](#)). In 2019, 27% of households had children, compared with 25% of households in 2010. According to the 2015-2019 ACS, about 825 single-parent households lived within Culver City, representing 5% of the city's households. The majority (70%) of these single-parent households were female-headed. The number of single-parent households, including female-headed, single-parent households, has declined slightly since 2010. While these households make up a small proportion of the population, their needs may be particularly acute due to the factors listed above. Additionally, families with children still make up a quarter of the households in Culver City and may require special assistance.

Table 28: Households with Children in Culver City

Household Type	2010		2019	
	#	%	#	%
Households with children under 18	4,266	25	4,464	27
Single-parent households	1,050	6	825	5
Female-headed households with children	722	4	577	3
All Culver City households	16,870	100	16,796	100

Source: BOC, 2006-2010 and 2015-2019 American Community Survey, 5-Year Estimates, Table S1101

Farm Workers

Farmworker households tend to have high rates of poverty, disproportionately live in housing that is in poor condition, have high rates of overcrowding, have low homeownership rates, and are predominately members of minority groups. Migrant farmworkers generally live near agricultural areas. Although agriculture produces a total annual gross value of about \$136 million per year in LA County, no agricultural activities are found in Culver City or the surrounding communities.¹¹ Further, the city does not have any areas zoned for agriculture. The 2019 ACS identified only 29 persons (0.1% of the civilian employed population 16 years over) working in farming, fishing, and forestry occupations in Culver City. Based on the above, farm workers are not considered to be a special needs group in Culver City.

No information is available on the number of seasonal and migrant farm workers in Culver City. Given the city's distance from any significant farming activities, it is unlikely the City has migrant and seasonal farm workers. Regionally, 413 farms are located in Los Angeles County, employing 3,266 farm workers, according to the USDA Census of farm labor in 2017. Among the 413 farms, 238 farms employed 1,517 workers seasonally (working less than 150 days a year). Furthermore, 22 farms employed 395 migrant workers in 2017.

¹¹ 2017 Crop and Livestock Report, Los Angeles County Agricultural Commission.

Persons Experiencing Homelessness

HUD considers a person to be living in a state of homelessness if the person lacks a fixed, regular, and adequate night-time residence, or if:

- The person is living in a place not meant for human habitation, in emergency shelter, transitional housing, or is exiting an institution where they temporarily resided;
- The person may lose their primary nighttime residence, which may include a motel or hotel, or a doubled-up situation, within 14 days;
- A family with children or unaccompanied youth is unstably housed; or
- The person is fleeing or attempting to flee domestic violence.

Shelter and service needs of the homeless population are significantly different depending on the population subgroup. A Continuum of Care (CoC) is a program designed to assist a community in its effort to end homelessness by funding nonprofit providers, helping State and local governments quickly rehouse individuals and families experiencing homelessness; improve access to homeless services; and help individuals and families experiencing homelessness become self-sufficient. Los Angeles County's CoC approach to homelessness is a coordinated and systematic local approach to meet the needs of individuals and families experiencing homelessness within these subgroups: chronic persons experiencing homelessness, episodic persons experiencing homelessness, and persons at risk of becoming homeless.

Homeless Count

While HUD mandates a homeless count every two years for all communities that receive federal funds for homeless programs, the Los Angeles Housing Services Authority (LAHSA), the lead agency for the Los Angeles CoC, conducts a homeless count yearly (see [Table 29](#)). The Point-in-Time Count provides a snapshot of the number of people without a permanent, habitable place to live.

The Count revealed a 68% increase in the number of men, women, and children experiencing homelessness in the Los Angeles CoC between 2016 and 2020. There were 66,436 persons experiencing homelessness in 2020, compared to 39,587 in 2016. There were notable increases in the number of unsheltered individuals (56%).

For Culver City, the Count showed a 67% increase in the total number of persons experiencing homelessness. The number of unsheltered persons increased dramatically by 109%, and the largest increase was for those living in tents and encampments (142% increase). While the number of persons experiencing homelessness has increased significantly in recent years, the City's population of persons experiencing homelessness accounts for just 0.3% of the total County homeless population.

Table 29: Point-in-Time Homeless Population Counts in Culver City and LA County

	Culver City			Los Angeles County		
	2016 #	2020 #	% Change	2016 #	2020 #	% Change
All	129	216	67	39,587	66,436	68
Unsheltered	80	167	109	30,753	48,041	56
On the Street	28	62	121	10,850	17,059	57
In Cars/Vans/Campers	40	76	90	12,166	18,904	55
In Makeshift Shelters/Tents	12	29	142	7,737	12,078	56
Sheltered	49	49	0	8,847	18,395	108
In Emergency Shelters	49	49	0	4,387	14,077	221
In Transitional Housing	0	0	0	4,445	4,234	-5
In Safe Havens	0	0	0	15	84	460

Source: LAHSA, Homeless Counts by Community/City Dashboard, 2016, 2020

Emergency Shelter Facilities

Senate Bill 2 of 2007 (Government Code §65583) strengthened the planning requirements for local governments in emergency and transitional housing. Cities must estimate the number of persons in need of emergency shelter and determine whether adequate capacity currently exists to serve the need. If there is insufficient capacity, cities are required to identify zones where emergency shelters may be established “by-right” (i.e., without a conditional use permit).

There is one full-time emergency shelter within Culver City, Upward Bound House, located at the intersection of Washington Boulevard and Beethoven Street. This facility was approved for conversion from a motel to an 18-room emergency shelter in 2008. A maximum of 60 persons can be accommodated at the facility. The Housing Division handles the majority of housing referrals for persons experiencing homelessness. The Culver City Senior Center (4095 Overland Avenue) also offers housing referral program materials. The Upward Bound House only focuses on families experiencing homelessness and not on single men or women; it does not meet the need of the entire Culver City homeless population. To minimize constraints to providing additional shelter facilities as SB 2 requires, the Zoning Code allows Emergency Shelters by-right in portions of the Industrial General (IG) zone and the East Washington Boulevard Overlay zone, an area which includes about 24 acres (119 parcels). These parcels are located along transportation corridors and therefore have access to services.

Additionally, on March 22, 2021, the City Council directed staff to move forward with the Venice Parking Lot site (9415-25 Venice Blvd.) to build 10 modular units for temporary shelter, affordable housing, or permanent supportive housing. A budget of \$3 million has been allocated to this project. Another \$6.8 million has been allocated to construct and operate a 70-bed sprung shelter on the Venice Parking Lot site.

Extremely Low-Income Households

State law requires that cities analyze the existing and projected housing needs for extremely low income (ELI) households. ELI households have incomes that are 30% or less of the AMI, adjusted for household size. The 2020 AMI for LA County was \$77,300

(see [Table 20](#)), meaning that a four-person household considered to be ELI has an income of \$33,800 or less.¹²

ELI households have various housing problems and needs. The relatively high cost of housing on the Westside often results in cost burden or overcrowding when ELI households “double-up” with more than one family sharing living space. Such conditions may lead to overtaxed utilities and infrastructure, stress, and adverse health effects. According to the 2013-2017 CHAS, there are 1,940 ELI households in Culver City. ELI impacts renter households and senior households disproportionately. Among the ELI households, 66% are renters and 34% are owners. Senior households make up 39% of ELI renters and 64% of ELI owners.

However, ELI renter and owner households are similarly affected by housing problems and cost burdens (see [Table 30](#)). About 80% of ELI households have at least one housing problem,¹³ and 79% are cost-burdened, paying more than 30% of their monthly income on housing.

Table 30: ELI Households by Type and Tenure in Culver City (2017)

	Renter				Owner				Total
	Senior	Large ¹	All	All (%)	Senior	Large	All	All (%)	
ELI households (#)	495	40	1,280	66	420	0	660	34	1,940
Any housing problem (%)	76	100	82		80	0	77		80
Cost-burdened (%)	77	100	80		80	0	78		79

Sources: HUD Comprehensive Housing Affordability Strategy (CHAS) dataset, based on 2013-2017 ACS

Note: 1. Large households are households containing five or more members.

Though RHNA does not specifically call out ELI households as a category, meeting the housing needs of these persons is an issue for all municipalities. The Culver City Zoning Code allows the development of single room occupancy (SRO) housing as part of mixed use developments. The Zoning Code requires each SRO unit to include bathroom and kitchen facilities and must be a minimum of 200 square feet. SROs help to meet the needs of extremely-low- and very-low-income individuals.

¹² HCD publishes annual household income limits for each county in California. The published income limits for extremely low, very low and low income households are used to determine eligibility for some assistance programs and are adjusted upward in high housing cost areas like Southern California. Therefore, the income limits published by HCD for Los Angeles County are higher than the calculated income categories that would result from the applicable percentages of AMI.

¹³ There are four housing problems in the CHAS data: 1) housing unit lacks complete kitchen facilities; 2) housing unit lacks complete plumbing facilities; 3) household is overcrowded; and 4) household is cost-burdened.

Assisted Housing at Risk of Conversion

Overview of Assisted and At Risk Units

As part of the Housing Element, jurisdictions are required to identify lower income multi-family rental units with affordability covenants that could expire during the coming 10-year period (2021-2031). Appendix C lists affordable units that either participate in a federal, state, or local assistance program, or are income-restricted through some other control measure like a density bonus. The list specifically identifies those projects that may be at risk of converting to market rate housing. This information is used to establish quantified objectives for units that can be conserved during this planning period.

As noted in Appendix C, Table C-1, 310 assisted rental housing units were identified in Culver City. Assisted affordable units that are at-risk of conversion during 2021-2031 are listed in Table C-1. As shown in the table, there are a total of 231 units that are at risk during this period: 59 very low income units, 134 low income units, and 38 moderate income units.

At Risk Status

California Housing Element Law requires Housing Elements to include a study of all lower income rental housing units that may be lost from the affordable inventory through the expiration of affordability restrictions during the next ten-year period. For this Housing Element, the at-risk analysis covers the period from October 15, 2021, through October 15, 2031.

The premise of the Redevelopment Agency Housing Set-Aside Fund was to increase, improve, and preserve the community's supply of affordable housing for families of very-low, low- and moderate-incomes (*Health and Safety Code §33334.2(a)*). Eligible activities included acquisition, rehabilitation, rental assistance, and assistance to first-time home buyers. In exchange for the use of Housing Set-Aside Funds, income and affordability restrictions were placed on the property in the form of covenants. These covenants are for 45 years for ownership projects and 55 years for rental projects. Covenants are still in effect despite of the elimination of the Redevelopment Agency. The Culver City Housing Authority oversees existing covenants. In Culver City, over the next 10 years, affordability covenants on 231 units have the potential to expire. These include three senior housing projects (190 units), one family rental housing project (20 units), and three group homes serving 21 persons experiencing homelessness and persons with developmental and physical disabilities. To estimate costs, the 21 persons being accommodated at the group homes are treated as separate "households" as they each can be relocated to different housing arrangements as a preservation option.

The majority of these projects were made available using the former Redevelopment Agency's Housing Set-Aside funds. One project was funded with tax exempt financing. While the projects may technically be eligible to convert to market rate housing, projects that are nonprofit-owned (such as 5100 Overland, 5166 Sepulveda, and the

various group homes for persons with disabilities), are not likely to convert to market rate, as these organizations' mission is to provide affordable housing.

Cost Analysis

Preservation Costs

Preservation of at-risk units can be achieved by providing project-based rental assistance program. This type of assistance largely depends on the income of the household, the housing costs of the unit, and the number of years the assistance is provided. Given that most of the units at risk are either senior units or for persons with disabilities, and both groups tend to have smaller household size and lower incomes, the amount of subsidies required can be extensive. For a very low income two-person household in LA County, affordable rent is about \$960 (2020 level). The difference between what this household can afford and the median rent for a one-bedroom unit (\$3,480) is \$2,520 per month, resulting in an estimated \$30,240 in subsidy per unit per year and \$6.38 million per year for the 211 units for seniors and persons with disabilities.

For the other 20 rental units not dedicated to a target population, an estimated subsidy of \$1,768 per month per unit would be required based on the affordable rent of \$2,030 for a four-person low income household and the median rent of \$3,798 for a three-bedroom unit. Overall, \$424,320 would be required annually to subsidize the 20 rental units.

New Construction/Replacement

New construction implies construction of a new property with the same number of units and similar amenities as the one removed from the affordable housing stock. The cost of constructing new housing units can vary greatly depending on factors such as location, density, unit sizes, construction materials, and on- and off-site improvements. The cost to construct a new unit in the City can easily exceed \$600,000.¹⁴ To replace the 231 at-risk units would require more than \$138 million.

Cost Comparison

In general, the costs to maintain affordability by providing subsidized rents are lower than new construction. This is particularly the case in Culver City as available land is limited and expensive. The City will actively seek out funding sources, including federal preservation dollars, to preserve these at-risk units.

¹⁴ *Demystifying the High Cost of Multifamily Housing Construction in Southern California, February 2020, UC Riverside, School of Business.*

Resources and Opportunities

Overview of the Regional Housing Needs Assessment

The Regional Housing Needs Assessment (RHNA) is a key tool for local governments to plan for anticipated growth. The RHNA quantifies the anticipated need for housing within each jurisdiction for the 8-year period from October 2021 to October 2029. Communities then determine how they will address this need through the process of updating the Housing Element of the General Plan.

Under state law, regional councils of governments are required to develop housing needs plans for use by local governments in their Housing Element updates. The regional housing needs analysis is derived from the statewide growth forecast, which is then allocated to regions, cities, and counties based on a variety of factors such as local growth trends, future development potential, job growth, and physical constraints (e.g., floodplains, steep slopes, biological habitat). The current RHNA was adopted by SCAG in March of 2021. The methodology developed by SCAG to allocate the RHNA to local jurisdictions in the current planning cycle is notably different than previous cycles. In the 4th and 5th RHNA cycles, allocations were based only on projected household growth. In contrast, the 6th cycle methodology also considered existing housing needs, job accessibility, and transit accessibility. Also, special consideration was given to designated disadvantaged communities whereby a portion of their RHNA was distributed to jurisdictions that are not disadvantaged. According to SCAG's Final RHNA Methodology, disadvantaged communities are "jurisdictions with more than half of the population living in high segregation and poverty are low resource areas as defined by the California Tax Credit Allocation Committee (TCAC)/HCD Opportunity Index Scores".

2021-2029 RHNA for Culver City

SCAG determined the RHNA for each city within the SCAG region, plus the unincorporated areas. The total housing growth need for the City of Culver City during the 2021-2029 planning period is 3,341 units. This total is distributed by income category as shown in Table 31.

Table 31: 2021-2029 Regional Housing Needs Assessment for Culver City

Extremely Low*	Very Low	Low	Moderate	Above Moderate	Total
554	554	604	560	1,069	3,341
16.5%	16.5%	18.0%	17.0%	32.0%	100%

*The RHNA did not include the extremely low category. It is estimated to be ½ of the very-low-income need, per Government Code §65583.a.1. The total very-low-income RHNA is 1,108; therefore, 554 is designated as extremely-low-income and 554 is designated as very-low-income.

Source: SCAG 6th Cycle Final RHNA Allocation Plan, adopted March 2021

Inventory of Sites for Housing Development

Section 65583(a)(3) of the Government Code requires Housing Elements to contain an “inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites.” A detailed analysis of vacant land and potential redevelopment opportunities has been prepared and is described in Appendix B. The results of this analysis are summarized in Table 32 below, which indicates the number of dwelling units approved as well as potential units that could be built based on the analysis of parcels shown in Appendix B. The table shows that under the City’s current General Plan, available capacity is not adequate to accommodate the 6th cycle RHNA, based on the selection of available sites using objective criteria and known conditions. After adopting the 2045 General Plan (anticipated in 2022), assuming the Preferred Land Use Map, opportunities for housing development in Culver City would be significantly expanded.

Assignment of sites into RHNA income level is based on a combination of density and site size. A default density of 30 dwelling units per acre (du/ac) or more is considered adequate to facilitate lower income housing, pursuant to State law (Assembly Bill [AB] 1397), provided that the site must be at least 0.5 acre in size. However, larger sites are conservatively assumed to be mixed income sites. Approved projects, pipeline projects, opportunities sites, sites recommended by community members, sites meeting the selection criteria offer an overall 223% buffer above the RHNA for Culver City in the 6th cycle.¹⁵

Table 32: RHNA Capacity Under Current and General Plan Preferred Land Use Map

RHNA Strategy	Lower	Moderate	Above Moderate	Total
RHNA	1,712	560	1,069	3,341
<u>Approved/Entitled/Proposed/Pipeline Projects</u>	<u>603</u>	<u>20</u>	<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
<u>CG/CN</u>	<u>704</u>	<u>545</u>	<u>0</u>	<u>1,249</u>
<u>Capacity (Projects + ADUs + Sites)</u>	<u>1,547</u>	<u>779</u>	<u>1,580</u>	<u>3,906</u>
<u>Surplus/(Shortfall) over Total RHNA</u>	<u>(165)</u>	<u>219</u>	<u>551</u>	<u>(165)</u>
Capacity under 2045 General Plan Preferred Land Use Map				
Incremental Infill				

¹⁵ HCD recommends a buffer of at least 15 to 30% to ensure that sufficient capacity exists in the Housing Element to accommodate the RHNA throughout the planning period. HCD, No Net Low Loss Memorandum, October 2, 2019.

RHNA Strategy	Lower	Moderate	Above Moderate	Total
<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>	<u>893</u>
Mixed Use High (100 du/ac)	<u>973</u>	<u>152</u>	<u>457</u>	<u>1,382</u>
Neighborhood/Corridor MU1	<u>0</u>	<u>92</u>	<u>0</u>	<u>92</u>
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>
<u>Capacity (Projects + ADUs + Sites)</u>	<u>3,481</u>	<u>1,972</u>	<u>3,484</u>	<u>8,747</u>
<u>Surplus/(Shortfall) over Total RHNA</u>	<u>2,372</u>	<u>1,432</u>	<u>3,484</u>	<u>7,467</u>
<u>% Buffer over Total RHNA</u>	<u>139%</u>	<u>256%</u>	<u>326%</u>	<u>223%</u>

Financial and Administrative Resources

The City has access to several funding sources to preserve at-risk housing, improvement of existing housing, and development of affordable housing.

State and Federal Resources

Community Development Block Grant Program (CDBG)

Federal funding is available from the Department of Housing and Urban Development (HUD) through the CDBG program administered by Los Angeles County. The City receives about \$200,000 in funding annually through Los Angeles County Development Authority (LACDA) CDBG Program. The City uses CDBG funds for programs serving seniors, persons with disabilities, and to fund infrastructure improvements.

Through the CARES Act, the City has received also additional one-time CDBG funding (CDBG-CV) from LACDA to address the needs associated with impacts of the COVID-19 pandemic.

Section 8 Rental Assistance

The Section 8 Housing Choice Voucher (HCV) program assists very low income seniors, families, and persons with disabilities with the cost of rental housing. Generally, a tenant pays 30% of their adjusted income towards the rent and the Section 8 program pays the balance directly to the landlord. The Culver City Housing Division selects program participants from a waiting list of qualified households, giving preference to Culver City residents, Veterans, the elderly and persons with disabilities. Currently, 215 households are being served with HCVs.

SB 2 Permanent Local Housing Allocation

In 2017, Governor Brown signed a 15-bill housing package aimed at addressing the State's housing shortage and high housing costs. Specifically, it included the Building Homes and Jobs Act (SB 2, 2017), which establishes a \$75 recording fee on real estate documents to increase the supply of affordable homes in California. Because the

number of real estate transactions recorded in each county will vary from year to year, the revenues collected will fluctuate.

The first year of SB 2 funds are available as planning grants to local jurisdictions. Culver City received \$160,000 for planning efforts to facilitate housing production. For the second year and onward, 70 percent of the funding will be allocated to local governments for affordable housing purposes. A large portion of year two allocations will be distributed using the same formula used to allocate federal Community Development Block Grants (CDBG). However, as a non-entitlement jurisdiction participating in the CDBG program under the Los Angeles County CDBG program, Culver City is receiving funding under the Permanent Local Housing Allocation (PLHA) component of SB 2 through LACDA. SB2 PLHA funds can be used to:

- Increase the supply of housing for households at or below 60 percent of AMI
- Increase assistance to affordable owner-occupied workforce housing
- Assist persons experiencing or at risk of homelessness
- Facilitate housing affordability, particularly for lower and moderate income households
- Promote projects and programs to meet the local government's unmet share of regional housing needs allocation

Project Homekey

HCD offers grant funding for local entities to support a variety of housing types for persons experiencing homelessness or who are at risk of homelessness. For the fiscal year 2021-2022, HCD set aside \$1.4 billion in grant funding and is accepting applications on a rolling basis until funds are exhausted or May 2, 2022, whichever comes first. The various housing types it supports include multifamily and single-family housing, hostels, motels, hotels, adult residential facilities, and manufactured housing. The funding can also support adaptive reuse of projects into permanent or interim housing for this population. The Culver City Housing Division, Economic Development Division, and City Manager's Office staff are collaborating across City Departments to apply for this funding to support persons experiencing and who are at risk of experiencing homelessness in Culver City. The City will submit a Homekey Round 2 application to acquire and rehabilitate two motels that will serve persons experiencing chronic homelessness. If awarded Homekey funds, the City will convert the motels to 35 units of interim housing and 38 units of Permanent Supportive Housing (PSH).

Local Resources

Culver City Successor Agency

The Culver City Housing Authority serves as the City's Successor Agency to oversee the Low/Moderate Income Housing Asset Fund (LMIHAF). The City anticipates that about \$12 million in LMIHAF will be available over the next six years. LMIHAF is used to implement the City's various housing programs. Planned uses of the LMIHAF have been incorporated in the housing programs of this Housing Element.

Commercial Linkage Fee

The City adopted a Commercial Linkage Fee program that will go into effect in January 2022. The program applies a \$5 per square foot fee on commercial development in the city. The City will collect the fee and use it to help produce or rehabilitate affordable housing units and/or acquire existing at-risk units. The fee may also fund studies and administration costs to support the fee program.

Public/Private Partnerships

The City will partner with nonprofit housing developers to preserve and develop affordable housing, including preserving low income housing projects that are at-risk of converting to market-rate housing. Active nonprofit developers in Southern California include, but are not limited to:

- Bridge Housing
- Community Corporation of Santa Monica
- Habitat for Humanity
- Jamboree Housing
- Linc Housing
- Los Angeles County Development Authority
- Menorah Housing Foundation
- Many Mansions
- Mercy Housing
- Meta Housing
- National CORE

The City will actively pursue affordable housing opportunities with qualified developers.

Energy Conservation Opportunities

State law (*Government Code §65583(a)(7)*) requires a Housing Element to provide an analysis of opportunities for energy conservation in residential development. Not only do such energy conservation measures reduce consumption of non-renewable or limited resources, but they can also substantially lower housing maintenance costs. Despite the mild climate of Southern California, old fixtures and appliances and older housing construction may wastefully consume water, gas, and electrical resources.

In Culver City, where 50% of the housing stock was constructed before 1950 and more than two-thirds was built before the state adopted energy conservation standards in 1975, a substantial number of units are likely to be using energy and water inefficiently. The City's best strategy for effective energy conservation is to promote and encourage energy-efficient retrofitting of existing homes. Common and effective measures include weather-stripping, caulking doors and windows, and installing insulation in ceilings and walls.

All new residential construction in the city is required to be constructed in an energy efficient manner by complying with state energy conservation standards. Also, pursuant to the City's Solar Photovoltaic Ordinance, all new construction projects, commercial or

multi-family, of 3 or more units or 10,000 new square feet or greater, are required to install 1 kilowatt (kw) of solar photovoltaic power for each 10,000 square feet of new construction, not including parking garage areas. Additionally, new additions of over 10,000 square feet or major renovations of over 10,000 square feet are required to install 1 kilowatt of solar photovoltaic power for each 10,000 square feet of major renovation or additional area. The solar photovoltaic requirement does not apply to new construction, major remodels, or additions of less than 10,000 square feet. One kilowatt of solar photovoltaic power is estimated to add less than half of 1% to the cost of construction. This ordinance not only helps to conserve energy, but also reduces greenhouse gas emissions.

The City's Green Building Ordinance also helps to reduce energy costs by requiring new developments to incorporate Leadership in Energy and Environmental Design (LEED) equivalent measures. These include energy-efficient glazing, additional building insulation, improved heating, ventilation, and air conditioning (HVAC) efficiency; planting or retaining on-site trees providing shade; and using re-cycled materials during construction. While these requirements may add to the cost of development, energy conservation is a statewide goal. Many affordable housing programs also encourage the incorporation of green building measures. Furthermore, these measures would reduce long-term operating costs. There is no requirement that projects obtain LEED certification.

The City has also adopted a Water Conservation Ordinance designed to limit water consumption and effectively reduce monthly water costs.

These programs, along with land use strategies that promote transit-oriented development (TOD) projects, will further local and statewide energy conservation goals.

Constraints

Governmental Constraints

Transparency in Development Regulations

The City of Culver City complies with the requirement of providing transparency in development regulations. The City website's Building & Development page provides information on building and development at

<https://www.culvercity.org/Services/Building-Development>. The information on the website covers the following topics:

- General Plan
- Permit requirements
- Planning documents
- Development-related City documents, such as the Municipal Code
- Planning applications and forms, and the schedule of fees

Land Use Plans and Regulations

General Plan

Each jurisdiction in California must prepare a comprehensive, long-term General Plan to guide its future. The Land Use Element of the General Plan establishes the community's vision, goals, and policies for the city's urban form and physical development. The Land Use Element includes basic land use designations and density of development within the various areas of the City. In this way, the Land Use Element and its land use categories greatly influence the type and density of residential development that can occur with a jurisdiction. Culver City's current General Plan was adopted in 1996; however, a comprehensive update to the General Plan, including the Land Use Element, is currently underway and anticipated to be completed in the Fall of 2022. The update will include significant changes to the City's land use designations; therefore, both the current designations and draft proposed designations are discussed in this section.

Table 33 summarizes the six residential land use designations set forth in the existing Land Use Element. In addition to the residential land use categories, housing is also permitted in several commercial land use designations, including the Neighborhood Serving Corridor, General Corridor, and Downtown designations. Within the commercially designated areas, residential development must be part of a mixed-use (MU) development, which combines both commercial and residential uses within the same project. The industrial land use designations do not allow housing.

Table 33: Current Residential Land Use Categories - Culver City General Plan

Designation	Maximum Density (du/ac)	Description
Low Density – Single Family	8.7	One dwelling unit per lot on lots typically 5,000 square feet in area, Accessory Dwelling Units (ADUs), Junior ADUs (JADUs)
Low Density – Two Family	17.4	One to two dwellings per lot/parcel on parcels of not less than 5,000 square feet, ADUs, JADUs
Low Density – Three Family	29	Up to three dwelling units per parcel at not less than 1,500 square feet of net lot area per unit, ADUs, JADUs
Low Density -Multiple Family	15	Multiple family dwellings, as well as single family, two family and three family dwellings, on parcels of 15,000 square feet or more, ADUs, JADUs
Medium Density – Multiple Family	29	Multiple family dwellings, as well as single family, two family and three family dwellings, on parcels of up to 13,000 square feet, ADUs, JADUs
Planned Residential Development	Flexible	Large residential complexes which may consist of more than one building on a site of one acre or larger

Source: Culver City General Plan, 1996; ADU Ordinance (Code Section 17.400.095, 2020)

Table 34 summarizes the Preferred Land Use Map land use designations. Under the Preferred Alternative, new housing growth is distributed throughout the city. The previous Low Density Two Family, Three Family, and Multiple Family designations would be consolidated into the new Incremental Infill designations which would allow for infill development. The Neighborhood/Corridor designations would allow for a greater mix of uses compared to present conditions, including standalone residential, at more moderate densities. The proposed Mixed Use High designation allows for up to 100 units per acre, significantly higher than what is allowed in any designation under the existing Land Use Element.

Table 34: Draft Preferred Land Use Map Designations - 2045 General Plan

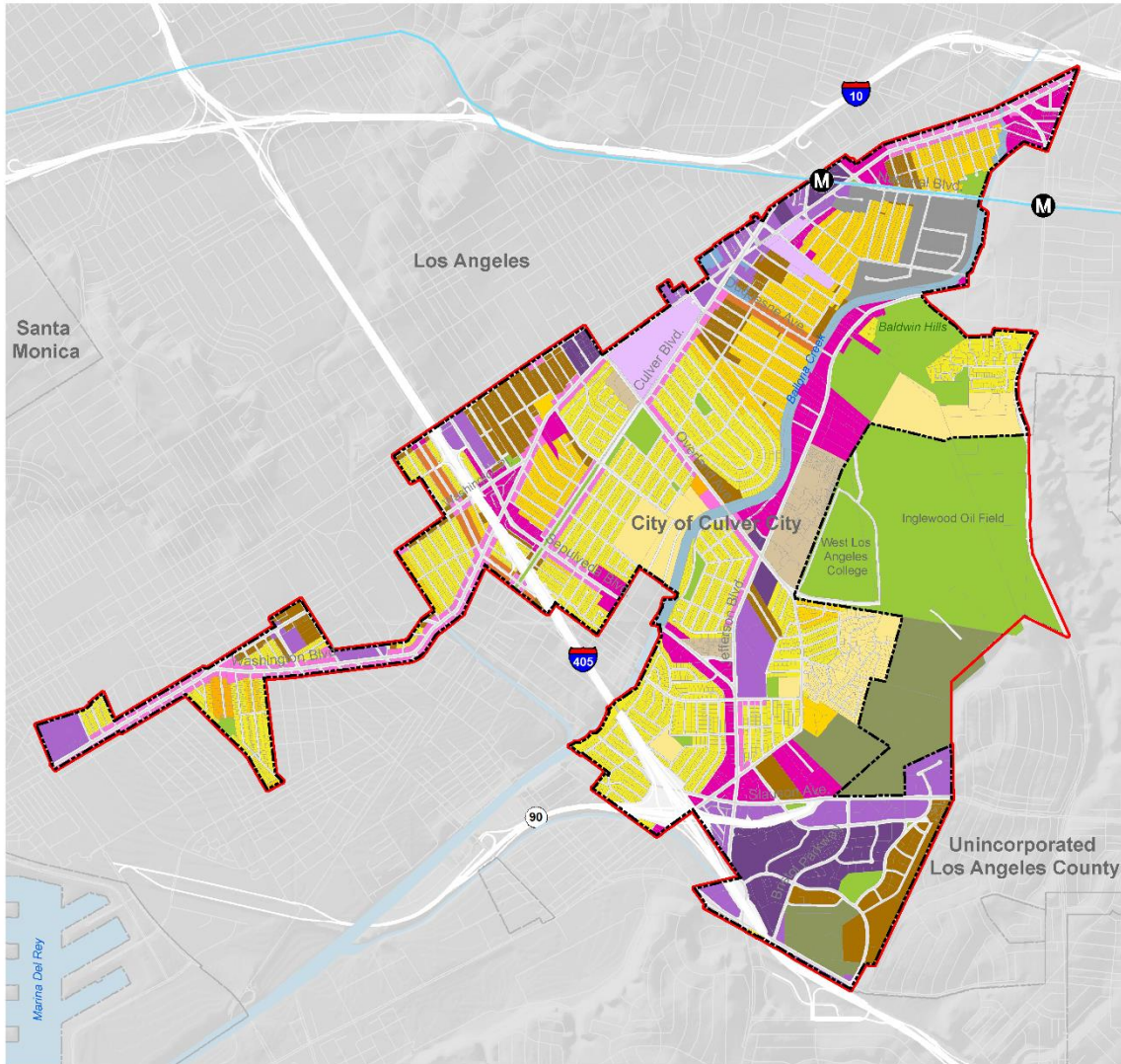
Proposed Designations	Maximum Density (du/ac)	Description
Incremental Infill A (Parcels <4,950 square feet)	8.7	<ul style="list-style-type: none"> Detached single unit residential, ADUs, JADUs Standards consistent with existing residential single family (R1) zoning
Incremental Infill A (Parcels >4,950 square feet)	35	<ul style="list-style-type: none"> Detached or attached single unit residential, duplexes, triplexes, and fourplexes Standards consistent with existing R1 zoning Allows up to 4 units per lot, <u>inclusive of ADUs and JADUs</u> 4th unit must be affordable Triplex/fourplexes are inclusive of ADUs and JADUs

Proposed Designations	Maximum Density (du/ac)	Description
Incremental Infill B	35	<ul style="list-style-type: none"> • Detached or attached single unit residential, duplexes, triplexes, and fourplexes • Standards consistent with existing residential two family (R2)/ residential three family (R3) zoning • Allows up to 4 units per lot for R2, <u>inclusive of ADUs and JADUs</u> • Allows up to 5 units per lot for R3, <u>inclusive of ADUs and JADUs</u> • 4th unit must be affordable • Triplex/fourplexes are inclusive of ADUs and JADUs
Incremental Infill C	15	<ul style="list-style-type: none"> • Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and low density multi-family • Standards consistent with existing RLD zoning
Corridor Multi-Family	30	<ul style="list-style-type: none"> • Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and moderate density multi-family • Standards consistent with RMD zoning • Allows up to 9 units per lot
Neighborhood Multi-Family	50	<ul style="list-style-type: none"> • Mix of multi-family residential
Neighborhood/Corridor MU 1	35	<ul style="list-style-type: none"> • Lower-scale, mixed use blending residential, commercial, and retail uses and public spaces serving both surrounding neighborhoods and visitors from nearby areas
Neighborhood/Corridor MU 2	50	<ul style="list-style-type: none"> • Moderate-scale, mixed use blending residential, commercial, retail uses, and public spaces
Mixed Use Medium	65	<ul style="list-style-type: none"> • A broad range of commercial, office, and residential uses serving both surrounding neighborhoods and visitors from nearby areas
Mixed Use High	100	<ul style="list-style-type: none"> • High-intensity active uses and mixed-use development, including retail stores, restaurant, hotels, services, residential, and office uses
Industrial Mixed Use	65	<ul style="list-style-type: none"> • A transition between mixed-use and high industrial areas with a mix of residential and industrial uses

Source: City of Culver City, City Council/Planning Commission Memo, June 28, 2021; Raimi and Associates, Designation Refinement Process, July 2021

As the City is updating the Land Use Element and the Housing Element simultaneously, it has ensured that the policies and land use designations of the Land Use Element will promote residential development to meet the City's RHNA; therefore, the 2045 General Plan preferred land use map designations will not constrain residential development within the city.

Figure 5: Preferred Land Use Map - 2045 General Plan



Sources: City of Culver City, 2019; County of Los Angeles, 2019.

Jurisdictional Boundaries

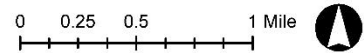
- City of Culver City City Limits
- City of Culver City Sphere of Influence
- Jurisdictional Boundaries

Transportation Features

- E Line
- Metro Station

Other Features

- Water
- Parks and Open Spaces



General Plan Land Use

- | | |
|-----------------------|----------------------------|
| Ballona Creek | Mixed Use High |
| Cemetery | Mixed Use Medium |
| Corridor Multi Family | Neighborhood Multi Family |
| Incremental Infill A | Neighborhood/Corridor MU 1 |
| Incremental Infill B | Neighborhood/Corridor MU 2 |
| Incremental Infill C | Open Space |
| Industrial Mixed Use | Planned Unit Residential |
| Institutional | Single Unit Residential |
| | Studio |
| | Transportation |

Zoning Designations and Development Standards

The City regulates the type, location, density, and scale of residential development through the Municipal Code. Zoning regulations serve to implement the General Plan and are designed to protect and promote the health, safety, and general welfare of residents. The Municipal Code also helps to preserve the character and integrity of existing neighborhoods, and sets residential development standards for each zone district. Once the City has adopted the new 2045 General Plan, a comprehensive update to the Zoning Code will be necessary to ensure that the Zoning Code is consistent with and can effectively implement the new General Plan. The following section contains an analysis of the current Zoning Code as it will continue to govern development in the City until updates are adopted.

The six zones that allow for exclusive residential use are as follows:

- R1 Single-Family Residential
- R2 Two-Family Residential
- R3 Three-Family Residential
- RLD Low Density Multiple-Family Residential
- RMD Medium Density Multiple-Family Residential
- RHD High Density Multiple Family Residential

In addition to these zones, residential uses are permitted within either mixed-use or live/work projects in the following four commercial zoning districts:

- CN Commercial Neighborhood
- CG Commercial General
- CC Commercial Community
- CD Commercial Downtown

A summary of the types of residential use permitted within each zoning district is provided in [Table 35](#).

Table 35: Permitted Residential Development by Zone

Housing Type Permitted	R1	R2	R3	RLD	RMD	RHD	CN	CG	CC	CD
Single-family Detached ¹	P	P	P	P	P	P				
Duplex		P	P	P	P	P				
Triplex			P	P	P	P				
Multi-Family				P	P	P				
Residential Care Facility (6 or fewer residents)	P	P	P	P	P	P	P	P	P	P
Residential Care Facility (7 or more residents)	C ³	C ³	C ³	C	C	C	C	C	C	
Supportive Housing ⁴	P	P	P	P	P	P	P ²	P ²	P ²	P ²
Transitional Housing ⁴	P	P	P	P	P	P	P ²	P ²	P ²	P ²
Accessory Dwelling Units	P	P	P	P	P	P				
Emergency Shelters							C	C	C	
Single Room Occupancy Units							P ²	P ²	P ²	P ²
Senior Citizen Congregate Care				C	C	C	C	C	C	
Live/work units							P	P	P	P
Mixed Use Projects							P	P	P	P

P=Permitted Use; C=Conditional Use Permit Required

Source: Culver City Zoning Code

Notes:

1. Includes factory built modular homes and mobile homes/manufactured housing on permanent foundations
2. Use only allowed as part of a mixed use project.
3. Only allowed on 5+ acre sites
4. Use is subject only to those restrictions that apply to other residential uses of the same type in the same zone.

The East Washington Boulevard Overlay Zone also provides for some residential uses, including live/work units and mixed use projects. Emergency shelters are also permitted by-right in some portions of the Overlay Zone. Low income housing can be accommodated in all zones permitting residential use in Culver City. These may include accessory dwelling units (ADUs) in the R1, R2, and R3 districts, multi-family apartments in the RLD, RMD and RHD zones, as well as high-density commercial/residential mixed-use developments within the Commercial districts.

The Residential Hillside Overlay Zone (RH) provides area-specific regulations for incremental improvement and sustainable development of hillside neighborhoods. It has slightly different development standards than underlying zoning, mostly taking slope constraints into account.

Development Standards in Residential Districts

A summary of the development standards for the six zones permitting residential development is provided in Table 36. Allowable densities range from 8.7 units/acre in the R1 zone up to 29.0 units/acre in the RMD and RHD zones. These development standards continue to be viewed as necessary to protect the public health, safety, and welfare and maintain the quality of life, and are not considered constraints on the development of housing for all income levels.

The Planned Development (PD) District is applied to areas of existing large scale, multiple-family residential and commercial complexes and to sites suitable for similar large-scale development. Within the PD District, there is no maximum density - only minimum site area (one acre) and height limit (56 feet) apply. A Comprehensive Plan establishes all other standards within the PD District.

Table 36: Development Standards in Residential Zones

Development Standard ⁶	R1	R2	R3	RLD	RMD	RHD
Minimum Lot Area (sq.ft.) ¹	5,000	5,000	5,000	5,000	5,000	5,000
Minimum Front Yard (ft.)	20	15	10 ²	10 ²	10 ²	10 ²
Minimum Interior Side Yard (ft.)	5	4	5	10	5	10
Minimum Rear Yard (ft.)	15	10	10	15	10 ³	15
Maximum Building Height (ft.)	30	30	30	30	30	40
Maximum Density (units/acre) ⁴	8.7	17.4	26.1	15.0	29.0 ⁵	29.0
Minimum Unit Size (sq. ft.)	1,000 ground floor	SF: 1,000 Duplex: 750/unit	SF: 1,000 Duplex/ Triplex: 750/unit	Micro-unit: 350 Studio: 500 1 Bedroom: 700 2 Bedroom: 900 3 Bedroom: 1,100 >3 Bedroom: 1,100 + 150 for each additional bedroom		
Minimum Unit Size (sq. ft.)	1,000 ground floor	SF: 1,000 Duplex: 750/unit	SF: 1,000 Duplex/ Triplex: 750/unit	Micro-unit: 350 Studio: 500 1 Bedroom: 700 2 Bedroom: 900 3 Bedroom: 1,100 >3 Bedroom: 1,100 + 150 for each additional bedroom		

Source: Culver City Zoning Code, 2021

Notes:

1. Condominium, townhome, or planned development projects may be subdivided with smaller air space sizes for ownership purposes.
2. Or one-half of building height, whichever is greater
3. 5 feet when adjacent to an alley
4. Based on applicable minimum development standards (excluding density bonus)
5. Up to a maximum of 9 units (excludes RMD parcels on Grand View Blvd. between Washington Pl. and Herbert St.)
6. Parcels subject to the RH Overlay may have slightly different standards based on slope.

Development Standards in Mixed-Use Districts

Residential/commercial mixed-use projects are allowed in four of the City's six commercial zoning districts at a base density of 35 units per acre. In February 2021, the City Council approved an ordinance modifying the City's mixed-use development standards and modified the Community Benefit Incentive program to require a minimum of 15 percent affordable units in new mixed-use projects while also providing an increase in the base density up to 65 units per acre (see Table 37). The ordinance further incentivizes affordable units within mixed-use developments for projects that also

qualify for a State Density Bonus by allowing the State bonus to be calculated in addition to the Community Benefit Density Bonus, thus resulting in higher density. In other words, the State Density Bonus would be calculated based on the Community Benefit Density of 50-65 units per acre rather than calculated based on the base density of 35 units per acre.

Development standards for mixed-use projects are summarized in Table 37. These development standards allow building heights ranging from 35 to 56 feet depending on location. The 35-foot height limit only applies to parcels that are adjacent to lower-density R1 or R2 areas. The 56-foot height limit is on parcels in the CD and CG zones where they will not create conflicts with adjacent residential uses or on sites that are adjacent to a parcel in another jurisdiction where a density higher than 35 units/acre is permitted.

These current standards must be adjusted to implement the General Plan Update, particularly the proposed Mixed Use High designation which allows up to 100 units per acre. The City's current development standards, such as setbacks and parking requirements, will be revised as part of the comprehensive update to the Zoning Code to reflect the General Plan Update's proposals and facilitate development at the allowable densities. The minimum unit size for live/work units will also be addressed in the Zoning Code update. The City's height limit of 56 feet was established by a voter-initiated ballot in 1990. This height limit may present a constraint to achieving the highest allowable density.

As part of the General Plan update, the City conducted a survey on the Land Use Alternative to solicit public input. When asked if respondents would allow development to exceed the 56-foot height limit, most (39%) suggested specific parcels in specific locations like near transit, 21% suggested higher density areas in the city, 18% suggested exemptions for projects that provide onsite open space, 17% would allow exemptions for projects that provide affordable housing that exceed the City's requirements, and 6% would allow the exemption citywide.

Within the mixed use areas, the City has established a Community Benefit program which encourages the inclusion of 15% affordable housing. Virtually all development projects in the mixed use areas participate in this program and therefore qualify a State density bonus and concessions. Such concessions would allow the increase in height limit. Furthermore, projects located within transit areas would receive additional height bonus. Nevertheless, this Housing Element includes an action for the City to conduct outreach and education on the impact of height limit on development potential and to develop mitigating strategies.

Table 37: Mixed-Use Development Standards

Minimum Lot Size			
5,000 square feet (Two or more abutting parcels may be combined to create a total site development area that is at least 5,000 square feet.)			
Density			
Base Density: 35 dwelling units/acre Density with Community Benefit Incentive: <ol style="list-style-type: none"> Up to 50 dwelling units/acre; or, Up to 65 dwelling units/acre on lots identified for transit-oriented development; or, Up to a density allowed by an abutting jurisdiction (up to 65 dwelling units/acre) on a split jurisdiction lot For projects that also qualify for a State Density Bonus, the density bonus shall be calculated in addition to the Community Benefit Density.			
Height			
Adjacent to R1 or R2 Zone	Adjacent to R3, RLD, RMD, or RHD Zone	Adjacent to Non-Residential Zone	Split Jurisdiction Lot
CN/CD/CG Zone: <ul style="list-style-type: none"> 35 ft 45 ft for portion of building \geq35 ft from R1/R2 Zone 	CN Zone: 45 ft CD/CG Zone: <ul style="list-style-type: none"> 45 ft on lots <150 ft in depth 56 ft on lots \geq150 ft in depth 	CN Zone: 45 ft CD/CG Zone: 56 ft	CN Zone: 45 ft CD/CG Zone: 56 ft
Setbacks ¹			
Building Height	Front	Side and Rear Adjacent to Residential Zone ⁴	Side and Rear Adjacent to Non-Residential Zone
Underground	None Required		
Portion of building \leq 15 ft	Ground-level 15 ft pedestrian setback required, except setback may vary from 0-15 ft when pedestrian improvements are included in the setback area as approved by the Director ²	10 ft ^{3,5}	0 ft ⁵
Portion of building >15 ft	5 ft	60 degree clear-zone angle must be maintained, measured from 15 ft above existing grade and 10 ft from the rear/side property lines	0 ft ⁵
Portion of building >35 ft abutting R1 or R2 Zone	N/A	35 ft	N/A

Portion of Building >45 ft abutting R3, RLD, RMD or RHD Zone	N/A	50 ft	N/A
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Source: Culver City Zoning Code, 2021

1. Screening, landscaping or greater setback than prescribed herein, may be required where necessary to comply with visual clearance requirements for driveways and where the reviewing authority under a site plan review may condition the use necessary to protect the public interest due to lot, site plan or building configuration and operations.
2. Pedestrian improvements include landscaping, benches, outdoor dining, planters, additional bike racks, additional street trees, small plazas, mobility related improvement, or other similar features.
3. Adequate screening and landscaping shall be provided
4. The width of an alley may be credited toward the setback requirement for properties adjacent to residential zones.
5. If abutting an alley, a minimum 2-foot setback is required, except within the TOD area.

Off-Street Parking Requirements

The City's parking requirements for residential zones vary by residential type and housing product (Table 38). Two off-street parking spaces are required per unit for single-family, duplex, or triplex dwellings. Parking requirements for multi-family dwellings and the residential component of mixed-use development are based on the number of bedrooms and include standards for guest parking. Mobile homes are required to have one space per site, plus one guest parking space for each two mobile home sites. The Code does not have a direct incentive to reduce parking standards for providing affordable housing. However, the city's Density Bonus Ordinance includes incentives following Government Code §65915. The number of parking spaces provided may also be reduced by paying parking in-lieu fees or for implementing mobility measures as part of project approval.

The graduated parking requirement based on unit size in multi-family projects, and the reduced standard for senior housing units help encourage development of smaller, more affordable units. However, studio/one-bedroom units over 900 square feet require two parking spaces, similar to a two- or three-bedroom unit. With COVID changing how people live and work, the City's parking standards for live/work units (up to four spaces per unit) may be re-assessed for appropriateness.

Reductions in parking for mobility measures aimed at improving transportation options for non-drivers can also benefit residents of affordable projects and encourage the development of new affordable housing. The City is pursuing a comprehensive parking code update that includes eliminating parking minimums and is studying parking maximums and measures to reduce required parking by implementing transportation demand management measures. The parking code update will address constraints for smaller units and overall the appropriate standards for facilitating the development intensities as anticipated in the General Plan update. The parking code update is expected to be completed by 2022.

Table 38: Residential Parking Requirements

Type of Unit	Minimum Parking Space Required
Single Family, duplex, and triplex units, includes supportive housing and transitional housing	2 spaces per dwelling unit
Mobile home park	1 space for each mobile home site plus 1 guest space for each 2 mobile home sites
Multi-family dwellings and residential component of mixed-use development, includes supportive housing and transitional housing	Studio micro-units – 0.5 space, or 0 spaces for units in the TOD district
	Studio and 1 bedroom, less than or equal to 900 sf - 1 space
	Studio and 1 bedroom, greater than 900 sf - 2 spaces
	2-3 bedroom units – 2 spaces
	4 bedroom units – 3 spaces (plus 1 space for every bedroom greater than 4)
Guest parking – 1 space for every 4 units	
Accessory dwelling units	None required
Live/work unit	Up to 900 sf – 2 spaces 900 sf to 1500 sf – 3 spaces Greater than 1500 sf – 4 spaces
Senior housing	1 space per unit, plus 1 guest parking space for each 10 units
Senior citizen congregate care housing	1 space for each 2 residential units, plus one guest/employee space for each 4 units
Single room occupancy units	0.5 spaces per unit, none required if within TOD district
Residential care facilities	1 space for each 3 patient beds

Source: Culver City Zoning Code, 2021

Density Bonus

State density bonus regulations have changed significantly in recent years. AB 1763, adopted in 2019, requires a density bonus to be granted for projects that include 100 percent lower income units, but allows up to 20 percent of total units in a project that qualifies for a density bonus to be for moderate-income households. Additionally, density bonus projects must be allowed four incentives or concessions, and developments within ½ mile of a major transit stop are allowed a height increase of up to three additional stories or 33 feet. For most projects, a density bonus of 80 percent is required; however, there are no limitations on density for projects located with ½ mile of a major transit stop. The bill also allows developers to request the elimination of minimum parking requirements for rental units affordable to lower-income families that are either supportive housing or special needs housing, as defined. AB 2345, which took effect on January 1, 2021 further incentivizes the production of affordable housing by increasing the maximum density bonus from 35 percent to 50 percent for projects not composed exclusively of affordable housing.

The City last updated its Zoning Ordinance pertaining to Density Bonus in 2005 (Chapter 17.580). However, the ordinance was written in anticipation of future state legislative

changes to density bonus law in that it consistently references California Government Code Section 65915 rather than explicitly stating the requirements within the ordinance. Therefore, the City's density bonus regulations comply with recent changes to state law and are not required to be updated at this time. The city has used the Density Bonus Program in the past to support dwelling units developed for lower-income seniors, persons with disabilities, and families.

Housing for Persons with Disabilities

Persons with physical, mental, and/or developmental disabilities may have special housing needs related to restricted mobility or difficulty caring for oneself. The City's Zoning Code, permitting procedures, and building codes have been analyzed to identify any potential constraints to development of housing for persons with disabilities. The city's provisions for these housing types are discussed below.

Residential Care Facilities

The Culver City Municipal Code provides the following definition for residential care facilities:

Facilities providing 24-hour residential, assisted living, social and personal care for children, the elderly, and people with limited ability for self-care. Varying levels of care and supervision are provided. Residential care facilities may include basic services and community space. Includes board and care homes; children's homes; orphanages; rehabilitation centers; convalescent homes, nursing home and similar facilities. Excludes emergency shelters, transitional housing, supportive housing, and facilities for persons requiring surgical or other primary medical treatment.

Health and Safety Code §§1267.8, 1566.3, and 1568.08 require local governments to treat licensed residential care facilities with six or fewer residents no differently than other by-right single-family housing uses. "Six or fewer persons" does not include the operator, the operator's family, or persons employed as staff. Local agencies must allow these licensed residential care facilities in any area zoned for residential use and may not require licensed residential care facilities for six or fewer persons to obtain conditional use permits or variances that are not required of other family dwellings.

The Code identifies residential care facilities that serve six or fewer persons as permitted uses within all residential zones and all commercial zones allowing residential development with no required discretionary review. Large residential care facilities (7 or more persons) are conditionally permitted in all residential zones, as well as the CN, CG and CC zones. In the R1, R2, and R3 zones, a minimum 5-acre site is required. [This minimum site size is constraining the development of larger residential care facilities as the number of large sites in the City is limited.](#) The City will revise the Zoning Code to address the provision of residential care facilities for seven or more persons in residential zones.

The Zoning Code requires one parking space for each three patient beds for residential care facilities. For small facilities with six or fewer persons, this constitutes a parking

requirement equivalent to that of a single-family residence. The Zoning Code contains no other development standards that are specific to residential care facilities.

There are currently two group homes in Culver City that address the supportive service and housing needs of persons ages 18 to 59 with developmental disabilities. These homes serve a total of 10 persons.

Definition of Family

Some definitions of “family” may impermissibly limit the development and siting of group homes for persons with disabilities by defining a family based on biological relation or by size. However, California court cases have ruled that such definition is invalid. The Culver City Zoning Code contains no definition of family and therefore does not place any constraints on housing for persons with disabilities in this regard.

Reasonable Accommodation Procedures

In July of 2013, the City Council adopted amendments to the Zoning Code that provide for reasonable accommodation procedures consistent with State law. According to the definition in the Zoning Code, reasonable accommodation means “providing an individual with a disability, or developers of housing for individuals with disabilities, flexibility in the application of land use and zoning regulations or policies, including the modification or waiver of certain requirements when necessary to eliminate barriers to housing opportunities.” The Director may grant reasonable accommodations using the same procedures that are applied to administrative modifications.

Generally, the process involves the following:

1. Submission of a No-Fee Reasonable Accommodations application including plans and written request describing why there is no reasonable alternative accommodation that complies with the Code.
2. Staff level review of application.
3. After staff level review, mail notice of Pending Administrative Decision to all Adjacent Property Owners and Occupants for a 15-day comment period.
4. Shortly after the comment period, the Community Development Director administratively decides and issues a notice of decision letter which may include Project conditions.
5. A 15-day appeal period follows the Notice of Decision.
6. At end of appeal period, the applicant has 12 months to submit for plan check, pull building permits, and start construction.

The Zoning Code (Section 17.550.020) outlines the findings for reasonable accommodations. The Director shall record the decision in writing with the findings on which the decision is based. The Reasonable Accommodation may be approved with or without conditions only after making all the following findings:

1. The dwelling, which is the subject of the request for reasonable accommodation, will be used by an individual with a disability.
2. The requested accommodation is necessary to make the dwelling available to an individual with a disability.
3. There is no reasonable alternative accommodation that will comply or come closer to complying with the development standards of this Title.
4. The requested accommodation will not negatively impact surrounding uses or properties.
5. Approval of the reasonable accommodation would not be detrimental to the public health, interest, safety, or general welfare and would not be detrimental or injurious to property or improvements in the vicinity and in the same zoning district.

The finding requiring the requested accommodation to not negatively impact surrounding uses or properties may be viewed as subjective with the potential to impede providing housing for persons with disabilities. The Housing Plan includes an action to remove this finding.

Provision For A Variety Of Housing Types

Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of types of housing for all income levels, including single- and multi-family homes, mobile homes, transitional and supportive housing, emergency shelters and low barrier navigation centers, and farmworker housing. A summary of the housing types permitted in each zoning designation is provided in Table 35. Additional discussion on various housing types is included below.

Single-Family Homes

The Culver City Zoning Code defines single-family dwellings as “a building designed for and/or occupied exclusively by one family. The definition also includes: factory-built, modular housing units, constructed in compliance with the Uniform Building Code (UBC), and mobile homes/manufactured housing on permanent foundations.” Single-family homes are permitted by-right in all of the City’s residential zones. To encourage the efficient use of the City’s multi-family residential land, the City may consider requiring a minimum density requirement for residential projects in multi-family neighborhoods during the comprehensive Zoning Code Update process.

With the General Plan update, the Preferred Land Use Map proposes to replace the Low Density Residential designation with Incremental Infill, which would allow single-family lots above 4,950 square feet to be developed with a total of three units, or four units if one of the units is deed restricted as affordable housing, inclusive of an ADU and JADU.

The City will implement SB9 in the eligible Single-Family Residential zone. Sites 4,950 square feet and larger in the new Incremental Infill designation will allow up to four residential units (inclusive of ADUs), preserve SB 9's anti-displacement protections for renters, environmental site constraints, protection of historic homes, and unit size protections.

Mobile Homes/Manufactured Housing

There is often an economy of scale in manufacturing homes in a plant rather than on site, thereby reducing cost. State law precludes local governments from prohibiting the installation of mobile homes on permanent foundations on single-family lots. It also declares a mobile home park to be a permitted land use on any land planned and zoned for residential use and prohibits requiring the average density in a new mobile home park to be less than that permitted by the Municipal Code.

As noted above, mobile homes and manufactured housing on a permanent foundation are included in the definition of single-family dwelling and are, therefore, permitted by-right in all of the City's residential zones and subject to development standards consistent with single-family detached dwellings.

Multi-family Housing

The Zoning Code defines multiple-family dwellings as "a building or a portion of a building used and/or designed as residences for four or more families living independently of each other. Includes: apartments; townhouse development (four or more attached single-family dwellings where no unit is located over another unit); senior citizen multiple-family housing; and common interest development (such as condominiums)."

Currently, multi-family housing is permitted in the RLD, RMD, and RHD zones. Multi-family housing is also permitted as part of mixed use projects within the CN, CG, CC, and CD zones. Duplexes are also permitted in all residential zones except for the R1 zone and triplexes in all residential zones except for the R1 and R2 zones.

Pursuant to the Preferred Land Use Map for 2045 General Plan, duplex, triplex, and fourplex structures will be permitted in Incremental Infill, inclusive of ADUs and JADUs. In addition, multi-family housing will be permitted in Corridor Multi-Family and Neighborhood Multi-Family areas. Standalone multi-family housing will also be permitted in all mixed use designations, and not required to be part of a mixed use project.

Farm Worker Housing

The City's Zoning Ordinance does not identify farm worker housing separately as a permitted use. No agricultural activities are found within Culver City or in the surrounding communities. Additionally, the 2014-2018 American Community Survey identified only 18 persons with agricultural occupations residing in Culver City. Therefore, there is no significant need to provide farm worker housing.

Emergency Shelters and Low Barrier Navigation Centers

SB 2 of 2007 strengthened the planning requirements for local governments in the area of emergency shelters and transitional/supportive housing. Cities must estimate the number of persons in need of emergency shelter and determine whether adequate capacity currently exists to serve the need. If there is insufficient capacity, cities are required to identify at least one zone where emergency shelters may be established “by-right” (i.e., without a conditional use permit) or enter into a multi-jurisdictional agreement with up to two other agencies to provide a facility.

Passed in 2019, Assembly Bill 139 limits the standards for emergency shelters that may be imposed by local jurisdictions to only standards that apply to residential or commercial development within the same zone, except that a local jurisdiction may apply standards that include the following:

- The maximum number of beds
- Sufficient parking to accommodate all staff, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses in the same zone
- The size and location of onsite waiting and client intake areas
- The provision of onsite management
- The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart
- The length of stay
- Lighting
- Security during hours that the emergency shelter is in operation

In Culver City, emergency shelters are allowed by-right in parts of the IG zone, the East Washington Boulevard Overlay zone, and along Sepulveda Boulevard as designated in the Zoning Code. The area where emergency shelters are allowed includes about 119 parcels (24 acres) of land. Most parcels are between 0.4 acre to slightly over one acre. The types of industrial uses in Culver City are usually related to creative technology. No manufacturing uses are located in the city. Therefore, these areas do not have environmental hazard issues that are typically associated with manufacturing or heavy industrial uses and not suitable for human habitation. As shown in Appendix B, many industrial properties are old and developed with low existing FAR. The Proposed Land Use Plan redesignates these areas as Industrial Mixed Use, allowing residential uses in these areas.

The Culver City Zoning Code currently has the following specific standards for emergency shelters, which comply with state law:

- Minimum lot size – 0.25 acre
- Number of beds – 30 beds per shelter
- Separation of another shelter – 300 feet

In addition, on March 22, 2021, the City Council directed staff to move forward with the Venice Parking Lot site (9415-25 Venice Blvd.) to build 10 modular units for temporary shelter, affordable housing, or permanent supportive housing. A budget of \$3 million has been allocated to this project. Another \$6.8 million has been allocated to construct and operate a 70-bed sprung shelter on the Venice Parking Lot site.

According to the 2020 point-in-time homeless count completed by LAHSA, there are an estimated 49 sheltered and 167 unsheltered persons experiencing homelessness living in Culver City. Based on this population, the parcels where emergency shelters are allowed by-right, along with the Venice Parking Lot projects, are adequate to provide emergency shelters for the unsheltered homeless population. Emergency shelters are also conditionally permitted within the CN, CG and CC commercial zoning districts.

Chapter 17.320 of the Zoning Code (Off-Street Parking and Loading) requires that one parking space be provided for each bed within an emergency shelter. Additional standards related to the development of emergency shelters are contained in Section 17.400.046 of the Zoning Code and include requirements related to lot size, facilities for laundry, secure storage of personal property and refuse, and limitations on outdoor activity. [The City is starting the process of eliminating parking minimums and is studying parking maximums.](#) As part of the Zoning Code update to implement 2045 General Plan, the City will [also](#) address the parking standards for emergency shelters.

Enacted in 2019, 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,¹⁶ low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing." Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents' possessions. AB 101 also sets a timeline for jurisdictions to act on applications for Low Barrier Navigation Center developments. The requirements of this bill are effective through the end of 2026, at which point they are repealed. As part of the Zoning Code update to implement 2045 General Plan, the City will address the provisions for Low Barrier Navigation Centers.

Transitional and Supportive Housing

Per State Law (SB 2 passed in 2007 and SB 745 passed in 2013), transitional and supportive housing shall be considered residential uses that are subject only to those procedures and requirements that apply to other residential dwellings of the same type in the same zone. In July of 2013 zoning code amendments were adopted by the City Council that contain definitions for transitional and supportive housing and provide regulations for these uses that are no more restrictive than other residential developments of the same type in the same zone.

¹⁶ Housing First refers to an approach to serving people experiencing homelessness by first providing a decent, safe place to live before addressing any other barriers that may have resulted in the person's homelessness and could put them at risk of homelessness again (e.g., increasing income, improving health, or reducing harmful behaviors).

Adopted in 2018, AB 2162 requires supportive housing projects of 50 units or fewer (for cities with a population of less than 200,000) to be permitted by-right 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 and requires developers to provide the planning agency with documentation detailing the type of supportive services that would be provided with the housing development. The Housing Plan includes a program to address supportive housing as part of the Zoning Code update to implement 2045 General Plan.

Single Room Occupancy

In July of 2013, the City Council adopted Zoning Code amendments (Section 17.400.106) that include explicit reference, development standards and permit procedures to encourage and facilitate Single Room Occupancy (SRO) housing. SRO housing is a permitted use as part of mixed use projects in the CN, CG, CC, and CD zones. The Zoning Code requires SRO housing units to be a minimum of 200 square feet and include kitchen and bathroom facilities. One parking space is required for each unit. This Housing Element includes an action for the City to consider allowing SRO housing as a standalone residential use.

Accessory Dwelling Units

The creation of an accessory dwelling unit is permitted by right in all residential zones. Recent state legislation, including AB 68, AB 587, AB 881, and SB 13, modifies the fees, application process, and development standards for accessory dwelling units, with the goal of lowering barriers to accessory dwelling unit development and increasing overall numbers of accessory dwelling units. In January 2020, the City Council adopted updates to the zoning ordinance to comply with current state law (Section 17.400.095). Per the Zoning Code, accessory dwelling units may not exceed 850 square feet for a one-bedroom unit or 1,200 square feet for a two-bedroom or larger unit. The Zoning Code does not require parking for an accessory dwelling unit, and replacement parking is not required when existing off-street parking is demolished or converted in conjunction with the construction of an accessory dwelling unit. Accessory dwelling units may not be sold separately from the primary dwelling or rented for less than 30 days.

The proposed 2045 General Plan redesignates the single-family neighborhoods as Incremental Infill areas. Each single-family lot over 4,950 square feet can accommodate up to four units if one of the units is dedicated as affordable housing, inclusive of ADUs and JADUs. The Zoning Code will be updated to implement the 2045 General Plan, including amending the ADU ordinance to implement the Incremental Infill concept, should the City Council adopt the General Plan with the Preferred Land Use Map (adoption scheduled for Fall 2022).

Employee Housing

State Employee Housing Act (Health and Safety Code Section 17021.5) specifies that any employee housing providing accommodations for six or fewer employees should

be deemed a single-family structure with a residential land use designation. In Culver City, caretaker and employee housing is allowed with a conditional use permit in the Light Industrial (IL) and General Industrial (IG) zones. The Housing Plan includes a program to address employee housing as part of the Zoning Code update to implement the 2045 General Plan.

Condominium Conversions

Section 17.400.040 of the Zoning Code contains provisions for the conversion of existing rental dwelling units to condominiums. Condominium conversions of existing developments of five or more rental dwelling units may be permitted subject to approval of a Site Plan Review and Tentative Map by the Planning Commission. Compliance with basic development standards for the zoning district is required. Developments of less than five rental units are prohibited from converting to condominiums.

Building Codes and Enforcement

State law prohibits the imposition of building standards that are not necessitated by local geographic, climatic, or topographic conditions and requires that local governments making changes or modifications in building standards must report such changes to the Department of Housing and Community Development and file an expressed finding that the change is needed.

The City's Building Code currently incorporates the 2019 California Building Codes (CBC) as mandated by the State. Newly constructed and renovated buildings must conform to the standards of the CBC.

In 2019, the City also adopted local amendments to the CBC to establish "Reach Code" standards (Culver City Municipal Code (CCMC) Section 15.02.1100). The purpose of the Reach Code is to reduce the use of natural resources, create healthier living environments, and minimize the negative impacts of development on local, regional, and global ecosystems. The City's Reach Code is in addition to all current Title 24 Energy Code requirements. The extent of additional improvements required is based upon the type and size of the project.

Additionally, the City's Solar Photovoltaic Ordinance requires all new construction projects of 10,000 square feet or greater to install 1 kilowatt (kw) of solar photovoltaic power for each 10,000 square feet of new construction, not including parking garage areas. Additionally, new additions of over 10,000 new square feet or major renovations of over 10,000 square feet are required to install 1 kilowatt of solar photovoltaic power for each 10,000 square feet of major renovation or additional area. The solar photovoltaic requirement does not apply single- and two-family residences. One kilowatt of solar photovoltaic power is estimated to add less than half of 1% to the cost of construction.

These codes and regulations are reasonable and necessary to ensure health and safety, as well as encourage energy conservation and reduce greenhouse gas emissions. No additional regulations have been imposed by the city that would unnecessarily add to housing costs.

The CBC and the City's amendments to the CBC are implemented by the Building Division during the plan check and permit issuance process. Additionally, Code Enforcement Division staff is responsible for monitoring compliance with the CBC and other property maintenance issues. Code Enforcement staff attempts to assist property owners in carrying out needed maintenance and repairs by providing information and referrals to city assistance programs, particularly for low-income persons, persons with disabilities, and the elderly.

Short Term Rentals

As home-sharing websites have risen in popularity in recent years, there has been a significant increase in the number of homes being offered on a short-term basis to generate rental income. Homes may be offered as "home-shares," where the primary resident offers one or more rooms to visitors while remaining on site, or whole homes may be rented on a daily or weekly basis. While the impact of short-term rentals on housing availability and affordability is still being evaluated, there is evidence that short-term rentals have a negative effect on housing affordability by changing the way residential properties are used and reducing housing availability for local residents.

Jurisdictions vary in their approach to short-term rentals. On one end of the spectrum, some cities remain silent on the issue and do not create specific permits or regulations for short-term rentals. On the other end, some cities choose to ban short-term rentals of any kind in their city. Many cities do allow short-term rentals in at least some zones, while also requiring permits for rental properties and including performance standards for short-term rentals.

Currently, short-term rentals (less than 30 days) are prohibited in Culver City. The City Council has considered changing the regulations to permit short-term rentals in some form. To provide guidance on this issue, the City formed both a task force and City Council Subcommittee in 2017. Several public meetings were held to gather input from the public on the topic, and to consider proposed short term rental regulations. In February 2019, the City Council held a special meeting to begin the formal process of drafting policy recommendations for short term rentals. Following public input and discussion, the City Council directed staff to begin writing a short-term rental ordinance that would:

1. Allow short term residential rentals in Culver City
2. Limit short term rentals to the host's primary residence only
3. Allow both hosted and unhosted short term rentals
4. Not impose a limitation on the number of nights short term rented annually
5. Not allow short term rental of a duplex, triplex, or apartment unit, except for the primary residence of the owner if it is on site
6. Require neighbor notification by hosts
7. Require annual reporting to City Council on short term residential rentals

Development Processing Procedures

Residential Permit Processing

State Planning and Zoning Law provides permit processing requirements for residential development. Within the framework of state requirements, the city has structured its development review process to minimize the time required to obtain permits while ensuring that projects receive careful review.

Early consultation with City staff is encouraged to identify issues as soon as possible and reduce processing time. Many residential uses are permitted by-right and do not require discretionary permits (see Table 35). However, some permitted uses do require Preliminary Project Review (PPR) and/or administrative site plan review as described below.

For projects requiring discretionary permits, the applicant must submit a formal discretionary application with the Current Planning Division after addressing any changes/comments made during the PPR process. Concurrent processing of required discretionary entitlements (e.g., subdivision and site plan review requests) is also provided to expedite the review process. Discretionary project applications are first reviewed by the Project Review Committee (consisting of staff representatives from the Public Works, Building Safety, Fire Prevention, and Current Planning Departments and Divisions). The applicant will then make any required corrections or provide additional information prior to the item being scheduled for a Planning Commission public hearing. Once a decision is made by the Planning Commission, the discretionary application is then ready for building permit plan check (unless the discretionary entitlement procedures require final approval by City Council). The procedures for common discretionary permits are described in greater detail below.

Preliminary Project Review

Applicants are required to undergo a PPR for some discretionary projects. This process allows the applicant to determine the feasibility of the project and make adjustments during the preliminary planning stages to minimize costs. A PPR Request form summarizing the project, along with a proposed site plan indicating parking, and pedestrian and vehicular access, are circulated among city departments for review. The applicant then attends a meeting of the Project Review Committee (PRC) (comprised of representatives of the reviewing departments) at which comments and corrections are provided by the PRC. The PRC meeting is typically held within two to three weeks after the PPR request submittal. Ministerial or non-discretionary projects do not require PPR or PRC review. For discretionary projects, the applicant should address any comments/corrections from the PRC prior to submitting a discretionary permit application.

Site Plan Review

As stated in Chapter 17.540 of the Zoning Code, the purpose of the Site Plan Review process is to ensure compliance with the required standards, design guidelines, and ordinances of the City; minimize potential adverse effects on surrounding properties and the environment; and protect the integrity and character of the residential, commercial, and public areas of the City. Site Plan Review is required for residential

projects which include the construction of three or more units. For projects consisting of less than ten units, the Community Development Director may approve the site plan review administratively. However, for residential projects proposing ten or more units, or projects that require approval of another discretionary permit, a public hearing is required in front of the Planning Commission, which is the approval authority. The City is currently working on a text amendment to increase the thresholds for Site Plan Review to increase the number of housing units that may be approved administratively that include affordable housing. This is anticipated to be complete in 2021.

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 units. To avoid inconsistent application of this incentive, the City will extend the by-right approval to all multi-family projects that include 20% affordable to lower income households.

To approve a site plan review, the Director or Planning Commission must make the following required findings:

- The general layout of the project, including orientation and location of buildings, open space, vehicular and pedestrian access and circulation, parking and loading facilities, building setbacks and heights, and other improvements on the site, is consistent with the purpose and intent stated above, the requirements of the zoning district in which the site is located, and with all applicable development standards and design guidelines.
- The architectural design of the structure(s), and their materials and colors, are compatible with the scale and character of surrounding development and other improvements on the site. The designs are also consistent with the purpose and intent stated above, the requirements of the zoning district in which the site is located, and with all applicable development standards and design guidelines.
- The landscaping, including the location, type, size, color, texture, and coverage of plant materials, provisions for irrigation, and protection of landscape elements, has been designed to create visual relief, complement structures, and provide an attractive environment, and is consistent with the purpose and intent stated above, the requirements of the zoning district in which the site is located, and with all applicable development standards and design guidelines.
- The design and layout of the proposed project will not interfere with the use and enjoyment of neighboring existing or future development, will not result in vehicular or pedestrian hazards, and will be in the best interest of the public health, safety, and general welfare.
- The existing or proposed public facilities necessary to accommodate the proposed project (e.g., fire protection devices, parkways, public utilities, sewers, sidewalks, storm drains, streetlights, traffic control devices, and the width and pavement of adjoining streets and alleys) will be available to serve the subject site.

- The proposed project is consistent with the General Plan and any applicable specific plan.

With the development objective design standards (see Housing Program 4.H – Objective Design Standards), the finding regarding the design and layout of the proposed project may need to be revised. However, the finding related to compatibility with character of surrounding development is based on design and layout of the project, and has never been used to deny a housing project. The development of objective design standards will also address this finding. Furthermore, the General Plan update will establish specific performance standards for public facility improvements for new development. These standards are comparable to those required for urbanized communities and are necessary for serving the new development.

Conditional Use Permit

Conditional use permits are discretionary permits intended to allow for specific activities and uses whose effect on the surrounding area cannot be determined before being proposed for a particular location (Chapter 17.530 of the Zoning Code). Conditional use permits are not required for the majority of residential uses; however, the City requires a conditional use permit for all large residential care facilities, emergency shelters in the CN, CG, and CC zones, and senior citizen congregate care facilities. Conditional use permits require a public hearing before the Planning Commission. To approve a conditional use permit, the Planning Commission must make five required findings as stated in Chapter 17.530 of the Zoning Code. The Planning Commission may also impose conditions of approval to ensure that the project complies with the required findings. The typical processing time for conditional use permits is three to six months.

Tentative Tract Map / Tentative Parcel Map

Subdivision of land is regulated by Chapter 15.10 of the Culver City Municipal Code and the Subdivision Map Act. Tentative parcel maps are required when a project proposes to subdivide land into four or fewer parcels. Projects proposing the creation of more than four parcels require a tentative tract map. Both tentative tract maps and tentative parcel maps require a public hearing before the Planning Commission, which is the approval authority. Both tentative tract and tentative parcel maps take approximately three to six months to process.

Environmental Review

Environmental review is required for all development projects under the California Environmental Quality Act (CEQA). Most projects in Culver City are either Categorical Exempt or require only an Initial Study and Negative Declaration or Mitigated Negative Declaration. Developments that have the potential of creating significant impacts that cannot be mitigated require the preparation of an Environmental Impact Report. Environmental review typically occurs concurrently with entitlement review and the time it takes to process a Negative Declaration or Mitigated Negative Declaration does not typically add to the overall processing time for an application. Additionally, Categorical Exemptions such as accessory dwelling units require a minimal amount of

time to process. As a result, state-mandated environmental review does not pose a significant constraint to housing development.

Plan Check

The building permit plan check review period for the processing of residential building permits is generally ten days for the first round of reviews by various city departments and five days for resubmittal, depending on the city's workload. Building codes are applied to new construction, and are monitored and inspected under the building permit process. Where no permits have been obtained, inspections are made in response to request and complaints. As indicated previously, the City's Building Code incorporates the California Building Codes 2019 Edition. The city's Building, Mechanical, Plumbing and Electrical codes include minor revisions and amendments to the Uniform Codes that exceed state standards. These amendments are related to fire alarms, smoke detectors, sprinkler systems, and other basic safety measures. All new structures are required to provide fire sprinklers. Although this requirement adds incrementally to the cost of construction, it is considered a vital public safety issue that justifies the additional cost.

Processing Time

Permit processing times are often cited as a factor that contributes to the high cost of housing. However, development review and permit processing procedures are necessary to ensure that development proceeds in an orderly manner, consistent with the General Plan. Additionally, the City is obligated to comply with various time requirements imposed by State law, including the Permit Streamlining Act, the Subdivision Map Act, and the California Environmental Quality Act. The processing times listed in Table 39 include the preliminary plan review process and environmental review, as well as entitlement review.

Table 39: Planning Permit Processing Times

Development Application	Processing Time (months)	Reviewing Body
Site Plan Review	6-12	Community Development Director / Planning Commission
Conditional Use Permit	3-6	Planning Commission
Variance	3-6	Planning Commission/City Council
Zone Change	9-12	Planning Commission/City Council
General Plan Amendment	9-12	Planning Commission/City Council
Tentative Parcel Map	3-6	Planning Commission
Tentative Tract Map	3-6	Planning Commission/City Council

Source: City of Culver City, 2021

In summary, the City's review procedures and related processing times help to ensure that the development review process meets all legal requirements and facilitates high quality development within the City. Many proposed residential developments can be approved administratively and discretionary permits are processed concurrently to minimize processing time. Therefore, the city's review procedures do not cause a significant unwarranted constraint to housing development.

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. 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. 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.

Table 40: Comparison of Planning Fees for Westside Cities

Fee Type	Culver City ¹	Santa Monica	Beverly Hills	West Hollywood
Site Plan Review	Administrative: \$4,411 Planning Commission: \$20,541	N/A	N/A	Development Permit, Class A: \$23,910 Development Permit, Class B: \$6,855
Conditional Use Permit	1-2 Units: \$8,392 Other: \$19,401 ²	\$17,241	\$21,457	Major: \$9,082 Minor: \$6,246
Variance	\$17,833	\$14,328	\$14,954	\$8,021
Zone Change	\$28,627	\$24,527	Actual cost; deposit determined by staff	\$19,012
General Plan Amendment	\$30,310	\$16,513	Actual cost; deposit determined by staff	\$19,012
Tentative Parcel Map	\$15,130 ³	\$8,247	\$20,247	\$4,084
Tentative Tract Map	\$16,663 + \$30/lot	\$8,247	\$20,247	\$4,084
Time Extension	Administrative: \$358 Planning Commission: 50% of application fee		Without public hearing: \$1,070 With public hearing: \$1,774	Administrative: \$2,079 Planning Commission: 50% of application fee

Notes:

1. Fee includes a 4% Technology Fee.
2. CUP fee for multi-family is project-based and therefore represents a lower per-unit fee compared to the fee for 1-2 units.
3. Fee is reduced to \$7,868 if processed in conjunction with a site plan review.

Sources: City of Culver City, 2013; City of Santa Monica, 2020; City of Beverly Hills, 2020; City of West Hollywood, 2018

In addition to the planning entitlement fees discussed above, development projects are subject to building permit, plan check, impact, and development fees. Plan check, building permits, and other associated fees cover the cost for the City to review the project to ensure compliance with the California Building Code. Development fees are assessed on new development projects to cover the cost of the additional burden the project places on existing infrastructure and services, including the sewer system, transportation network, parks, and schools. Impact and other fees may be required to support amenities like mobility and parks infrastructure and paying a fair share of costs toward affordable housing. For example, the City recently approved a mobility improvement fee and linkage fee.

Because many of the City's fees are based on building valuation, it is difficult to summarize total fees that apply to all residential projects. Therefore, a specific project example is used to provide a per unit cost for illustrative purposes. Table 41 provides a summary of the development fees and permit costs for a mixed-use project which includes 97 apartment units, approximately 14,000 square feet of commercial space, and one level of subterranean parking. As shown, the total fees per unit for the project are \$15,589. However, it should be noted that for a mixed-use project, it is difficult to separate certain fees by the residential and commercial portions of the project; therefore, the actual per unit cost for a standalone residential project is likely lower than what is presented because some fees that apply to the commercial portion of the project have been included in the per unit calculation below. It is also important to note that not all of these costs are due during the entitlement phase of the project. Some fees, including school and sewer facility fees, are due at building permit issuance or before receiving the certificate of occupancy.

Since the City provides an exemption from the public art fee and the parkland fee for affordable projects, a per unit cost for a hypothetical affordable project is also included in Table 41. With these fees excluded, the per unit cost is \$14,766.

Table 41: Summary of Fees for a Typical Mixed-Use Development at 11924 Washington Blvd

Project Specifics: Mixed-use development including 97 apartment units (86,501 s.f.), 13,687 s.f. of retail and restaurant space, and one level of subterranean parking (35,313 s.f.)	
Fee Description	Cost (\$)
Planning Entitlement Fees	
Preliminary Plan Review	2,392
Site Plan Review	20,541
Environmental Analysis: Mitigated Negative Declaration	6,045
Surcharge for New Residential Construction (\$250/unit, \$12,750 maximum) ¹	12,750
Building & Safety Fees	
Building Permit Fee (based on project valuation)	373,108
Seismic Fees (Residential, 3 stories or less = valuation x \$0.00013, Commercial or Residential, over 3 story = valuation x \$0.00028)	Residential: 3,564 Commercial: 834
Plan Check Fees (75% of building permit fee)	279,943
Other Fees	100
Temporary Certificate of Occupancy (3 at \$500 each)	1,500
CA Building Standards Fee	1,216
Fire Prevention Plan Check Fee	59,697
Structural Outside Review Fee	11,165

Project Specifics: <i>Mixed-use development including 97 apartment units (86,501 s.f.), 13,687 s.f. of retail and restaurant space, and one level of subterranean parking (35,313 s.f.)</i>	
Fee Description	Cost (\$)
Technology Surcharge (4% of all permit/plan check fees)	28,565
Development and Impact Fees	
School Fees (Residential=\$4.08/s.f., Commercial = \$0.66/s.f.)	Residential: 484,065 Commercial: 7,569
Commercial/Industrial Tax (\$25 for first \$250,000 of valuation plus 1.5% of any amount over \$250,000) ²	40,947
In Lieu Parkland Fee ³	79,854
New Development Impact Fee ²	8,124
Culver City Sewer Facility Fee	80,451
City of LA Sewer Facility Fee	67,172
Art in Public Places ³ (1% of project valuation)	Project chose an installation over fee
Total Fees	1,569,601
Cost per Square Foot (entire project)	11.58
Cost per Unit⁴	15,589
Cost per Unit for Affordable Project⁵	14,766

Source: City of Culver City, Planning, Building & Safety and Public Works Departments

Notes:

1. This fee was enacted as means of recovering the cost of staff time associated with projects - larger projects tend to take up more time so the fee is based on number of units rather than a flat rate.
2. Applies to commercial projects only.
3. Affordable projects are exempt from parkland and public art fees.
4. The cost per unit calculation excludes fees specifically applied to the commercial portion of project. However, in some cases (i.e. building permit fees and plan check fees), it is difficult to separate the fees based on the commercial/residential portions of the project. Therefore, per unit costs for a standalone development of 97 units would likely be lower than what is presented here.
5. The cost per unit for affordable project calculation excludes fees specifically applied to the commercial portion of the project, parkland fees, and public art fees.

As shown in Table 41, development impact fees make up a significant proportion of the total required fees for a project. A discussion of these fees is included below.

School Fees

The city collects school fees on behalf of the Culver City Unified School District to pay for new facilities and the ongoing maintenance of existing buildings and facilities. School fees are levied for all new development, both commercial and residential, over 500 square feet. However, since new residential development naturally creates an additional need for school facilities through the resulting population growth, school fees are significantly higher for residential projects than for commercial projects (\$4.08 per square foot compared to \$0.66 per square foot). While school fees are often the largest individual fee required to be paid by a developer, the fee amounts are set by the District and the City has no authority over this constraint.

Parkland and Public Art

Public parks are developed and maintained by the City's Parks, Recreation, and Community Services Department. Municipal Code Title 15, §§15.06.300-15.060.330 (Residential Development Park Dedication and In Lieu Parkland Fee) requires that all new residential developments of two or more dwelling units or additions of one or more units on existing residential developments either dedicate land or pay a fee for the development and/or maintenance of public parks. Title 15 states a goal of providing 3 acres of parkland for every 1,000 residents or, if no land is available, to pay a fee that quantifies the 3 acres per 1,000 resident objective.

Culver City implements an Art in Public Places Program (APPP) requirement for all new residential development projects of five or more units, or remodels of five or more units. The required APPP allocation is 1% of the project valuation. If the APPP allocation is \$75,000 or less, it is required to be paid into the Culver City Cultural Trust Fund. If the APPP allocation is greater than \$75,000, then the developer may choose to either deposit the amount into the Fund or commission a work of art equivalent in value to the APPP allocation.

To facilitate development of covenanted low and moderate-income units, the City specifically exempts such projects from In-lieu Parkland Fees and Art in Public Places Fees.

Sewer Facility Fees

In Culver City, sewer facility fees are due to both the City of Culver City and the City of Los Angeles. Fees are used to fund ongoing maintenance of the wastewater system and expansion of capacity as necessary. The City's wastewater infrastructure is discussed further in the Infrastructure Constraints section

Mobility Improvement Fee

In June 2021, the City Council adopted the Mobility Improvement Fees Ordinance to partially fund mobility improvement projects and programs to support forecasted growth related to new development. This Ordinance will apply a Mobility Improvement Fee requirement to both new residential and nonresidential development. Beginning August 27, 2021 (the effective date), the fee for new residential developments will be \$7,636 per single-unit residential unit, \$3,394 per multi-unit residential unit, and \$3,818 per accessory dwelling unit. While the City completed a nexus study and economic analysis to ensure the appropriateness of the fee, the City Council has expressed an interest in ongoing monitoring of this new fee to ensure that it does not constrain residential development. Currently, affordable housing and ADUs are exempt from the Mobility Improvement Fees.

Affordable Housing 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.

On- and Off-Site Improvements

After the passage of Proposition 13 and its limitation on local governments' property tax revenues, cities and counties have faced increasing difficulty in providing public services and facilities to serve their residents. One of the main consequences of Proposition 13 has been the shift in funding of new infrastructure from general tax revenues to development impact fees and improvement requirements on land developers.

The City requires developers to provide on-site and off-site improvements necessary to serve their projects. On- and off-site improvements are required when discretionary permits are issued (such as site plan reviews, comprehensive plan, zone change, or General Plan amendment). The City uniformly attaches the conditions of approval (COA) that include fees, such as parkland fees and administrative fees, for monitoring affordability covenants. The COAs also specify the standard improvements. Such improvements may include water, sewer and other utility extensions, street construction and traffic control device installation that are reasonably related to the project. Dedication of land or in-lieu fees may also be required of a project for rights-of-way, transit facilities, recreational facilities, and school sites, consistent with the Subdivision Map Act.

The City's Capital Improvement Program (CIP) contains a schedule of public improvements including streets, bridges, and other public works projects to facilitate, among other things, the continued build-out of the City's General Plan. The CIP also helps to ensure that construction of public improvements is coordinated with private development.

City road standards vary by roadway designation as provided in Table 41. The City's road standards are typical for cities in Los Angeles County and they do not act as a constraint to housing development. Since the City is fully developed, it is unlikely that any new streets or roadway widening will be required through the subdivision process. With new development projects (housing, commercial, or mixed-use), the City's Public Works Department will usually require improvements for public rights-of-way adjacent to proposed development projects. These improvements can vary depending on the specifics of each development and may include relocation of utilities, new street trees and tree grates, repaving or repair of adjacent alleys, repaving of adjacent sidewalks and streets, restriping of traffic lanes, and installation of traffic signals.

Table 42: Road Improvement Standards

Roadway Designation	Number of Lanes	Right-of-Way Width
Primary Arterial	4 - 6	95 ft.
Secondary Arterial	2 - 4	80 – 94 ft.
Collector Street	2	60 – 79 ft.
Local Street	2	60 ft. or less

Source: City of Culver City General Plan, Circulation Element

Although development fees and improvement requirements increase the cost of housing, cities have little choice in establishing such requirements due to the limitations on property taxes and other revenue sources needed to fund public improvements. Overall, the City's nexus study on Commercial Linkage Fees found that Culver City's total development impact fees are comparable to surrounding jurisdictions.

Non-Governmental Constraints

Environmental Constraints

Environmental constraints include physical features such as steep slopes, fault zones, floodplains, sensitive biological habitat, and agricultural lands. In many cases, development of these areas is constrained by state and federal laws (e.g., Federal Emergency Management Agency (FEMA) floodplain regulations, the Clean Water Act and the Endangered Species Act, and the State Fish and Game Code and Alquist-Priolo Act). The Public Safety Element of the City's General Plan discusses the environmental hazards that have the potential to impact the city, including urban fires, seismic shaking, and landslides. The Public Safety Element contains policies to address these hazards and "reduce adverse economic, environmental, and social conditions resulting from fires and geologic hazards." In keeping with the goals and policies of the Public Safety Element, the City's land use plans have been designed to protect sensitive areas from development, and to protect public safety by avoiding development in hazardous areas. While these policies constrain residential development to some extent, they are necessary to support other public policies.

Infrastructure Constraints

As in most cities of similar age, Culver City faces challenges of aging infrastructure and related maintenance issues. However, the city's physical infrastructure is generally of adequate size and capacity to accommodate the projected build-out of the General Plan.

Wastewater

The city is served by the Hyperion Wastewater Treatment Plant operated by the City of Los Angeles. The treatment plant has a design capacity of 450 million gallons per day. It is currently functioning at approximately 275 million gallons per day which is about 61% of its capacity. It is unlikely, but expansion of the Hyperion treatment plant may be required if changes in Los Angeles or Culver City land uses cause increased wastewater flows. Costs for wastewater system expansions are passed on to Culver City by the City

of Los Angeles in accordance with the Amalgamated Sewer Agreement between the cities. Culver City collects sewer facility charges from new developments to offset these costs. In addition, new development has the potential to impact the local sewer collection system and require capacity upgrades. Developers are required to fund these improvements when necessary. As noted in the previous section, developers are also required to pay sewer facility fees to both Culver City and Los Angeles to fund ongoing maintenance and necessary increases in capacity.

Water

Water for city residents is supplied by Golden State Water Company and the City of Los Angeles Department of Water and Power (for the portion of the city west of McLaughlin Avenue). The system depends primarily on imported water from Metropolitan Water District (MWD). Water system expansions to individual projects are the responsibility of the developer with fees paid to cover major capital expenditures.

Dry Utilities

Gas, electricity, cable, internet, and telephone services are provided by Southern California Gas Company, Southern California Edison, as well as AT&T, Spectrum, and Verizon Communications. All systems are adequate and are upgraded as demand increases. Supplies of natural resources, such as gas, currently appear adequate.

Storm Water Drainage

Storm water runoff is primarily handled by a flood control system maintained by the Los Angeles County Department of Public Works. Surface drainage uses streets and gutters until the runoff reaches catch basins. The storm drain system is currently operating within capacity and is sized to accommodate planned growth within the city. The City is required by the National Pollutant Discharge Elimination System (NPDES) to address water quality runoff for construction activities and post-construction runoff from all types of development, including residential projects. In November 2016, city residents approved Measure CW, which provides funding for stormwater projects to improve water quality in the city and region. Best management practices (BMPs) are implemented through the city's NPDES regional storm-water discharge permit. Individual projects are required to comply with all applicable NPDES requirements.

Road Improvements and Parking

Roadways in Culver City are subject to high levels of traffic, which would be further impacted by new development. To the extent possible, the City addresses this issue by requiring developers to mitigate negative traffic impacts through various methods, such as improvements to the roadway network and traffic control systems, implementation of the Travel Demand Management strategies, and Mobility Improvement Fees to pay a fair share into citywide mobility improvements to reduce vehicle miles traveled.

One of the primary infrastructure issues associated with the current level of development is the limited capacity of on-street parking. The City is addressing this constraint incrementally by ensuring that all new developments, both residential and commercial, provide adequate off-street parking.

The City has a Capital Improvement Program to schedule public improvements including roadway network, traffic control systems and other public works projects to allow for, among other things, the continued build-out of the city's General Plan. This helps to ensure the progression of improvements is coordinated with anticipated development.

Land Costs

Land represents one of the most significant components of the cost of new housing. Land values fluctuate with market conditions, and overall have been steadily increasing since the Great Recession. Like much of the region, Culver City has little to no vacant land available for residential development. An online survey of residential and commercial real estate listing websites (Zillow and LoopNet) conducted in January 2021 indicated that no vacant property was listed for sale within Culver City. Therefore, properties with existing improvements must be recycled, further adding to the high cost of land.

Per-unit land cost is directly affected by density – higher density allows the cost to be spread across more units, reducing the total unit price. The Culver City Zoning Code allows a base density of 35 units per acre in some areas of the city, which can be increased up to 65 units per acre for projects that incorporate community benefits and located within ½ mile of major transit facilities and higher for projects that use the affordable housing density bonus pursuant to State Density Bonus law. This facilitates lower per-unit land costs compared to lower-density development.

Construction Costs

Construction cost is affected by the price of materials, labor, development standards and general market conditions. According to Cumming, a project management company that compiles data on the construction industry, construction costs in the Los Angeles area can reach over \$200 per square foot for single-family residential development, and \$294-\$529 per square foot for multi-family residential development.¹⁷ The city has no direct influence over materials and labor costs, and the building codes and development standards in Culver City are not substantially different from other cities in the West Los Angeles area.

Similar to land costs, higher density development allows for a reduction in construction costs through economies of scale. This reduction in cost can be particularly beneficial when a project is also receiving a density bonus for affordable housing. Chapter 17.580 of the Culver City Municipal Code contains provisions for density bonuses for developments providing affordable housing as required by state law.

Timing and Density

Market factors can also constrain the timing between project approval and requests for building permits. In some cases, this may be due to developers' inability to secure

¹⁷ Source: Cumming, U.S. Costs per Square Foot of Gross Floor Area 2020

financing for construction or the applicant's ability to respond quickly to requests for corrections. However, building permit applications are applicant-driven. For example, the recently completed mixed use project with 48 units (The Haven) was approved in December 2015 but the developer did not submit a permit application until March 2017. Alternatively, other mixed use projects can turn around and submit permit applications shortly after project approval. The Lucky mixed use project with 37 units was approved in September 2016 and the developer requested a building permit in December 2016. Similarly, Icon West (mixed use project with 12 units) was approved in February 2021 and filed a permit application in May 2021.

The City's Mixed Use Ordinance offers a Community Benefits program, whereby if a mixed use project includes 15% of the units as affordable housing, the project would be eligible for a local density bonus that increases the base density to 50 du/ac or up to 65 du/ac if the project is located within the Transit Oriented Development District. The project would also be eligible for the State density bonus (to be calculated after the Community Benefit bonus is applied). Inclusion of micro units also provides additional density bonus up to 14%. Therefore, mixed use projects in Culver City typically achieve over 65 du/ac and up to 80 du/ac using a combination of local and State density bonus laws (see Appendix B for examples of recent mixed use projects and their achieved densities). Also, residential development projects in medium density residential zones rarely go below 80% of the allowable density due to the high land costs.

Financing and Foreclosures

Culver City is similar to most other communities with regard to private sector home financing programs. The crisis in the mortgage industry and 2008 recession affected the availability and cost of real estate loans and rate of foreclosures. Foreclosures peaked in Culver City in 2011, with 94 foreclosures that year and a total of 410 foreclosures between 2007 and 2018. However, as of 2018, foreclosure rates had dropped to pre-recession levels, with only three foreclosures in 2018.¹⁸ The rise in foreclosure rates and subsequent changes in mortgage underwriting standards are likely to have greater impacts on low-income families than other segments of the community.

The sharp rise in unemployment as a result of the Covid-19 pandemic may impact households' ability to pay their mortgage, particularly lower income households, and may result in an uptick in foreclosures. However, historically low interest rates have also resulted from the pandemic, creating more opportunity for home purchases and refinancing. Overall, the full impact of the pandemic is still unknown.

Table 43 summarizes applications for home loans in Culver City in 2018. Of the total applicants, 68 percent were approved. Loan approval rates are similar to rates in Los Angeles County overall, where 67 percent of all county loans were approved in 2018. Applications for refinance were the most common, comprising about half of all loan applications. Refinance applications were approved 67 percent of the time.

¹⁸ Source: SCAG 2019 Local Profiles, [City of Culver City](#)

Approximately 36 percent of applications were for conventional purchase loans, which were approved 77 percent of the time. Home improvement loans had the highest denial rate at 38 percent.

Under state law, it is illegal for real estate lending institutions to discriminate against entire neighborhoods in lending practices because of the physical or economic conditions in the area ("redlining"). City staff is not aware of any significant incidence of discriminatory lending practices in recent years.

Table 43: Home Purchase and Improvement Loan Applications in Culver City (2018)

Loan Type	Total Applicants	Percent Approved	Percent Denied	Percent Withdrawn
Conventional Purchase	538	77	8	16
Government-Backed Purchase	3	67	0	33
Home Improvement	208	53	38	10
Refinance	757	67	19	14
Total	1,506	68	17	14

Source: www.ffiec.gov, Home Mortgage Disclosure Act (HMDA) data for 2018.

Note: Approved applications include those that are approved and originated (accepted by the applicants) and those that are approved but not accepted by the applicants.

In 2018, FFIEC changed the format of HMDA reporting. Due to delays in the reformatting of data, publicly available data after 2018 is not currently available at city level.

Housing Plan

Goals, Objectives and Policies

Goals, objectives, and policies convert the community's vision for housing into actions. Goals describe a desired future condition or "end" state and are based on needs and constraints, meant to be aspirational, and orient changes and outcomes. Objectives are specific statements of purpose to achieve goals and policies guide the related actions needed.

- Goal 1 A city that proactively provides equitable access to safe, healthy, and affordable housing for all income levels to create a balanced jobs-to-housing ratio and commits to addressing the housing needs of persons experiencing homelessness and special needs populations.*
- Goal 2 A city with a variety of rental and ownership housing opportunities that complement and enhance the city's goals for continued economic vitality and prosperity.*
- Goal 3 A city that plans to grow sustainably and intelligently by revisiting policies and programs frequently to update and adjust if they are not meeting goals.*
- Goal 4 A city that affirmatively furthers fair housing to reverse the legacy of segregation and provide housing and opportunity for historically disenfranchised groups.*

Objective 1. Housing Maintenance. Encourage a high level of housing maintenance to promote the availability of decent housing and to protect the quality of neighborhood environments.

- Policy 1.A Maintain a housing stock free of health or safety hazards.*
- Policy 1.B Maintain quality neighborhood living environments throughout the entire city.*
- Policy 1.C Assist low and moderate income and special needs households to encourage the rehabilitation and adequate maintenance of existing housing units.*
- Policy 1.D Monitor the maintenance of residential properties and enforce the provisions of the City's building code and property maintenance regulations.*
- Policy 1.E Promote assistance programs and enforce applicable health and safety standards to prevent overcrowding in units.*
- Policy 1.F Promote sustainable development through energy conservation, water consumption, and waste reduction measures to reduce future operating costs, and ensure local regulations support*

environmental justice that protects public health and open space, and expands the tree canopy.

Policy 1.G Promote rehabilitation or replacement of substandard housing with healthy, safe, and affordable housing.

Objective 2. Housing Supply. Expand opportunities for developing a variety of housing types.

Policy 2.A Provide for a residential lifestyle that is environmentally sound and aesthetically pleasing and that places a high priority on quality development.

Policy 2.B Coordinate the plans, programs, and policies of all city departments to ensure that residential development is orderly, and that new development is adequately and effectively served by a balanced system of transportation, transit, amenities, community facilities, and public services. Residential development must be sensitive to the environmental, recreational, social, and economic needs of the community. The City should promote access, where feasible, to the LA Metro E Line Culver City Station, for new residential development.

Policy 2.C Promote mixed use residential development that is sensitive to adjacent residential uses and reinforce the compatible nonresidential uses of the area.

Policy 2.D Encourage the incremental infilling of residential neighborhoods to enhance housing affordability and supply through the provision of smaller units.

Policy 2.E Promote programs that seek to provide housing opportunities to meet the needs of people who work in the city.

Policy 2.F Streamline entitlement, environmental, and permitting processes for sustainable buildings and affordable housing.

Policy 2.G Promote reduced parking requirements and discretionary thresholds for review, for affordable housing, to incentivize production

Policy 2.H Encourage infill development, such as brownfield site redevelopment.

Policy 2 I Explore repurposing of City-owned surface parking lots for affordable housing development.

Objective 3. Housing Affordability. Encourage a diverse range of rental and ownership housing opportunities that are compatible with the needs of all socioeconomic segments of the community.

- Policy 3.A *Encourage the inclusion of affordable housing units in new housing developments by granting incentives as called for by the Zoning Code and the State Density Bonus law.*
- Policy 3.B *Actively support affordable housing development by private and non-profit housing developers.*
- Policy 3.C *Conserve existing affordable housing, particularly rental and assisted units such as affordable housing that exists naturally in the market.*
- Policy 3.D *Explore strategies to Incentivize and reduce the costs of affordable housing production like a 100% affordable housing overlay zone, transit-oriented communities programs, and partnership funding opportunities.*
- Policy 3.E *Incentivize converting existing market rate and vacant rental units into affordable units and extend expiring affordability covenants to preserve affordability.*
- Policy 3.F *Encourage an equitable distribution and the production of affordable housing in areas that have historically not accommodated affordable housing or have excluded diverse housing opportunities, especially in the highest opportunity areas, to help overcome historic patterns of segregation. Explore strategies like public funding, incentives, infrastructure investments, and a “Right to Return” program to support historically displaced families and individuals in Culver City with housing.*
- Policy 3.G *Explore partnering with a non-profit organization to form a community land trust to assist housing providers in developing housing for lower income households.*
- Policy 3.H *Encourage new affordable housing production by providing incentives to consolidate adjacent lots and assisting affordable housing developers to identify and consolidate lots.*
- Policy 3.I *Explore City-owned sites for 100% affordable housing production.*
- Policy 3.J *Incentivize housing development on surface parking lots on underused sites that would not displace existing residents.*
- Policy 3.K *Incentivize adaptively reusing existing structures for affordable housing and existing ground floor commercial space for artists and live-work use.*

Objective 4. Housing Access. Improve access to quality housing for all members of the community by eliminating discrimination, reducing governmental and non-governmental constraints, increasing the number of affordable housing units, and supporting access to emergency shelters.

- Policy 4.A *Promote efforts aimed at the development of housing available to all income and age levels.*
- Policy 4.B *Promote housing opportunities for households of all income levels to help maintain the family-oriented character of the city into the future.*
- Policy 4.C *Assist first time home buyers to purchase housing with alternative financing mechanisms.*
- Policy 4.D *Promote rental assistance programs to minimize the extent to which lower income households must pay more than 30% of their income for housing.*
- Policy 4.E *Promote fair housing and non-discrimination in housing sales and rentals for all, including those outside of designated protected classes, by supporting organizations that provide information, counseling and mediation on fair housing laws and landlord-tenant disputes.*
- Policy 4.F *Prohibit discrimination in the sale or renting of housing to anyone on the basis of their special characteristics as protected by state and federal fair housing laws.*
- Policy 4.G *Encourage the rehabilitation and construction of barrier-free housing for persons with disability.*
- Policy 4.H *Enable elderly and/or persons with disabilities to age in place by providing housing arrangements and programs that accommodate their needs.*
- Policy 4.I *Promote the education of homebuyers and renters on their rights, for housing practices and requirements, financing, available subsidies, protections, and housing unit changes.*
- Policy 4.J *Explore ways to encourage the development of ownership housing for affordable, moderate/workforce housing, including opportunities for employer-provided permanent housing.*
- Policy 4.K *Promote home ownership and related wealth generation opportunities through accessible education and technical assistance, particularly in communities of color and among special needs populations.*
- Policy 4.L *Increase access and transparency in the lease-up process for restricted affordable housing units, particularly for those who have experienced or are at-risk of displacement and those who may not be aware of affordable housing choices.*

Objective 5 Housing Stability. Preserve existing affordable housing, prevent the displacement of existing residents, and prevent homelessness.

- Policy 5.A Actively work to prevent or minimize the displacement of existing residents and neighborhood instability from foreclosures. Ensure that rehabilitation of existing units does not negatively impact or permanently displace existing residents. The City shall notify residents about Ellis Act protections and other rights, and provide resident protections including a temporary relocation program with oversight during construction to minimize resident disruption.*
- Policy 5.B Promote outreach and education programs that protect communities, particularly communities of color and special needs populations, from predatory lending, speculative real estate transactions, land acquisition, and other practices that undermine intergenerational wealth growth and housing stability.*
- Policy 5.C Assist persons experiencing homelessness by referral to services and provision of emergency services.*
- Policy 5.D Ensure an adequate supply of emergency or temporary housing for people experiencing or who are at risk of homelessness.*
- Policy 5.E Promote the rapid re-housing of persons experiencing homelessness.*
- Policy 5.F Apply a Housing-First approach to ending homelessness that matches persons experiencing homelessness with appropriate services or services with housing, like permanent supportive and rapid-re-housing options.*
- Policy 5.G Provide a high level of outreach to priority populations experiencing homelessness, as determined by the lead Continuum of Care agency, to inform them of their rights and opportunities for housing and support services.*
- Policy 5.H Encourage a regional fair share approach to providing housing opportunities and assistance to households with special needs, those experiencing homelessness, and extremely low-, very low-, and low-income households.*
- Policy 5. I Create a community engagement and education program to continuously connect with the community on the complexity of how individuals become unhoused and the multitude of solutions and programs needed to support rehousing.*
- Policy 5.J Remove barriers to housing for persons experiencing homelessness, including those related to siting and operating restrictions, that disproportionately affect populations in protected classes, and special needs populations.*

Objective 6 Housing Production Accountability. Monitor rental and ownership housing production effectiveness throughout the planning period and adjust as necessary to meet projected needs.

- Policy 6.A Conduct a mid-cycle assessment of the City's progress toward achieving RHNA, and adjust if needed.
- Policy 6.B Should a mid-cycle assessment require adjustment, implement strategies like establishing a density bonus on inventory sites that is proportionate to the deficit accrued during the first half of the planning period, an affordable housing overlay that applies the density and design standards of the Neighborhood Multi Family designation to Incremental Infill lots for development of deed-restricted affordable units, and expansion of development types subject to by-right approvals.
- Policy 6.C Monitor and report on housing production towards achieving RHNA periodically throughout the planning period.
- Policy 6.D Facilitate a balanced jobs to housing ratio citywide.
- Policy 6.E Continue to evaluate and reduce regulatory and procedural barriers to housing production, such as streamlining the entitlement, environmental, and building permit processes for households of all income levels and those with special needs.
- Policy 6.F Periodically review City regulations and fees to ensure they are not suppressing housing development.
- Policy 6.G Ensure that local regulations support innovations in construction technology to the extent that is technically feasible.
- Policy 6.H Create a community engagement and education program to continuously connect with the community on growth, housing need, homelessness, discriminatory housing practices, how current land use patterns and socioeconomic disparities reflect historically racist policies, planning, zoning, and real estate practices; and the benefits of mixed use and income communities, and amplify and prioritize underrepresented voices to ensure more equitable outcomes.
- Policy 6.I Explore a pre-approved standard plan program for ADUs subject to ministerial entitlement approval.
- Policy 6.J Develop objective design standards for residential and mixed use projects to add certainty to the permitting process, promote quality development that maximizes the benefit of nearby amenities and minimizes exposure to features that may result in negative health or environmental impacts, apply universal design principles, promote complete neighborhoods with amenities like open space, and ensure seamless transitions between single-family and multi-family development, commercial and residential development, and industrial and residential development.

Policy 6.K Promote public outreach and education on the need to address housing needs relative to other important outcomes like health, the environment, public safety, and transportation.

Quantified Objectives

The City's eight-year quantified housing objectives are described in Table 44. These objectives reflect the City's assessment of what is feasible during the planning period in light of existing and proposed housing programs, land use policies, financial resources, and anticipated economic conditions.

Table 44: Quantified Objectives

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction	554	554	604	560	1,069	3,341
Preservation	30	30	60	0	0	120
Conservation	29	30	134	38	0	231

Housing Programs

California State housing law requires that the Housing Element set forth an eight-year schedule of actions for the 2021-2029 planning period that the City intends to undertake to implement its stated policies and objectives. The following section describes the measures that the city plans to implement consistent with its identified policies and objectives described above. Table 45 identifies the timeframe, responsible agency, and funding source for implementation of housing programs and their quantitative objectives.

Measure 1. Programs to Enhance Housing Affordability

- A. **Section 8 Housing Choice Voucher Program.** Help very low and extremely low income households secure decent, safe and sanitary affordable housing through the provision of rental subsidies through the Section 8 program and conduct outreach to attract new property owners. Through the County of Los Angeles Homeless Initiative and approved by HUD, 50% of annual turnover vouchers will be provided to unhoused individuals.
- B. **Rental Assistance Program.** Assist extremely low income up to and including moderate income households to pay for housing through the Rental Assistance Program (RAP).
- C. **Shared Housing.** Through the Los Angeles County Measure H Rapid Rehousing Program, assist persons experiencing homelessness with up to 18 months of rental assistance 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 assistance 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.
 - Waive/reduce/defer 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). The City will complete the Zoning Code Update to implement 2045 General Plan within three years and 120 days from October 15, 2022. 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 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 are require rezoning to accommodate the lower income RHNA shortfall are subject to by-right approval if the project includes 20% affordable. 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.

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.
- 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.

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.

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

Anti-Displacement and Tenant Protections

- G. **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

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

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.
- Government subsidized dwelling units.

H. **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.

I. **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.
- J. **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.
- K. **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.
- L. **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
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 	Annually reviewed with Housing Authority Budget and Work Plan approval

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p>compliance with the three-year, one-year, and six-month noticing requirements.</p> <ul style="list-style-type: none"> • 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. 	
<p>F. Affordable Housing Development Assistance</p>	<p>Housing Authority</p>	<ul style="list-style-type: none"> • LMIHAF • Apply for Project Homekey funding 	<ul style="list-style-type: none"> • <u>Facilitate the development of 250 affordable units over eight years.</u> • 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 – <u>95</u> affordable units 	<p>Housing Authority staff will coordinate with other Community Development Department staff to actively identify sufficient development opportunity sites for persons experience homelessness.</p>
<p>G. Inclusionary Housing</p>	<p>Current Planning</p>	<p>Current Planning</p>	<ul style="list-style-type: none"> • Review and revise the Mixed Use Ordinance 	<ul style="list-style-type: none"> • By 2023

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
	Division	Division Budget	<p>as appropriate to ensure consistency with 2045 General Plan.</p> <ul style="list-style-type: none"> • Monitor to ensure the Mixed Use Ordinance effectively supports affordable housing production. 	<ul style="list-style-type: none"> • Ongoing
H. Linkage Fee	Economic Development Division	Economic Development Division Budget	<ul style="list-style-type: none"> • Review and revise the Affordable Housing Commercial Development Impact Fee Ordinance as appropriate to ensure consistency with 2045 General Plan. • Monitor to ensure the Affordable Housing Commercial Development Impact Fee Ordinance effectively supports affordable housing production. 	<ul style="list-style-type: none"> • By 2023 • 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 	<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>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p>properties for affordable and special needs housing.</p>	
<p>B. Zoning Code Amendments to Address Special Needs Housing</p>	<p>Planning Division</p>	<p>Planning Division Budget</p>	<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 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. • Emergency Shelter (AB 139) – Parking standards be established solely based on staffing level. • <u>Low Barrier Navigation Center (AB 101) –</u> 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 	<p>By 2023, as part of the comprehensive Zoning Code update to implement 2045 General Plan</p>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p><i>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 experiencing homelessness to income, public benefits, health services, shelter, and housing.” CGC §65660</i></p> <ul style="list-style-type: none"> • Employee Housing (California Health and Safety Code Section 17021.5) – Requires that housing for six or fewer employees be considered a single-family residential use. • <u>Residential Care Facilities for Seven or More Persons in Residential Zones – to <i>remove</i> the 5-acre requirement <i>and to establish objective criteria for project review to ensure certainty in outcomes.</i></u> • <u>Reasonable Accommodation – <i>Remove findings that are subjective (such as negatively impacting surrounding uses or properties).</i></u> 	
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 	<ul style="list-style-type: none"> • Ongoing • Annually

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<p>conduct homeless outreach and connect individuals experiencing homelessness to services.</p> <ul style="list-style-type: none"> Continue to provide up to 50 hotel/motel vouchers as needed 	reviewed with Housing Authority Budget and Work Plan approval
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. 	<ul style="list-style-type: none"> By Fall 2022 By 2022 At least semi-annually Within three years from October 15, 2021 2024

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			<ul style="list-style-type: none"> Update the sites inventory to determine adequate capacity for remaining RHNA. If the City is not 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.	Within three years from October 15, 2021
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	Upon adoption of General Plan 2045 and within three years from October 15, 2021

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			conversion/expansion of existing properties and 135 ADUs/multiplexes through the demolition/ reconstruction of properties. <u>Update to the ADU Ordinance will implement Incremental Infill and ensure consistency with SB 9 requirements.</u>	
	Current Planning Division	Current Planning Division Budget	<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. 	<ul style="list-style-type: none"> • Annually • By 2024
E. Affordable ADU Incentive Program	Housing Authority	Housing Authority	<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</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
			<p>Program)</p> <p>Create fee waiver for development projects that include an affordable ADU</p>	
<p>F. Affordable Housing Tools and Best Practices</p>	<p>Advance Planning Division</p>	<p>Advance Planning Division Budget</p>	<p>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></p>	<p>Complete study with summary of findings and recommendations by 2022</p> <p>Update City Council on the research progress by 2022</p> <p>Pursue affordable housing funding opportunities by 2022</p> <p>Apply for HCD Prohousing Designation by 2022</p>
<p>G. Hotel/Motel Conversion</p>	<p>Housing Authority</p>	<p>Housing Authority</p>	<p>Continue to identify properties and negotiate for acquisition and adaptive reuse or redevelopment as affordable and special needs housing.</p> <p>Submit Project Homekey application for 2022 funding cycle.</p> <p>Submit a Homekey Round 2 application to acquire and rehabilitate two motels that will serve persons experiencing chronic homelessness.</p> <p>If awarded Homekey funds, convert the motels to 35 units of interim</p>	<p>Ongoing</p> <p>Obtain \$2.84M earmarked as matching grant funds from LA County</p> <p>Begin pursuing Homekey funding in 2022</p> <p>State grant funding decision Q1: 2023</p> <p>City study motel conversion feasibility Q2 and Q3 2022</p> <p>Submit Round 2</p>

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
			housing and 38 units of Permanent Supportive Housing (PSH).	application by early 2022 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 (<u>eliminating parking minimums and studying parking maximums</u>) to facilitate the achievement of allowable densities 	By 2023

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
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. • <u>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.</u> • 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 with HACLA	Housing Authority	Housing Authority	Establish agreement with LACLA to allow use of City vouchers within one mile from city limits	Present to City Council in Winter 2021/early 2022 By 2022 to allow 20 vouchers to be used in City of LA

Implementation Measures/ Programs	Responsible Agency	Funding Source	Objectives	Schedule
G. Permanent Rent Control Ordinance	Housing Authority	Housing Authority	Continue to implement the Rent Control Ordinance.	Ongoing
H. Landlord-Tenant Mediation Board	Housing Authority	Housing Authority	Provide services as requested throughout the planning period	Ongoing
I. 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)
J. Plan to Prevent and Combat Homelessness	Housing Authority	Housing Authority	Update plan to address homelessness	By 2023
K. 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
L. 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>				
<u>Measure 5A: Fair Housing Outreach and Counseling</u>	<u>Continue to refer fair housing inquiries to the Housing Rights Center</u>	<u>Ongoing</u>	<u>Citywide</u>	<u>Increase fair housing inquiries by 20 percent over eight years</u>
	<u>Advocate LACDA to provide fair housing service records specific to Culver City</u>			
	<u>Update City website to provide information of fair housing rights and resources</u>	<u>Expand website by 2022 and update annually</u>		
<u>Measure 5B: Source of Income Protection</u>	<u>Develop outreach and education materials and implement an outreach campaign</u>	<u>Develop outreach materials by 2023</u>	<u>Citywide with emphasis in Higher Resource tracts</u>	<u>At least 20 percent of new vouchers in Higher Resource areas over eight years</u>
	<u>Include a fair housing factsheet in ADU, Incremental Infill, and SB9 application packets</u>			
<u>Housing Mobility</u>				
<u>Measure 1A: Housing Choice Vouchers</u>	<u>Conduct outreach to attract new property owners</u>	<u>Annually</u>	<u>Citywide with emphasis on Higher Resource tracts</u>	<u>Increase landlord participation by 15 landlords annually (5 at the County level, 10 at the local level)</u>
<u>Measure 5C: Landlord Roundtable</u>	<u>Hold joint roundtable discussions with LTMB and ACOHH</u>	<u>Annually</u>		
<u>Measure 5E: Landlord Fair</u>	<u>Host landlord fairs</u>	<u>Annually</u>		
<u>Measure 2A: Homeless and Special Needs Housing</u>	<u>Facilitate the development of housing for special needs populations</u>	<u>2021-2029</u>	<u>Citywide</u>	<u>28 modular units at Venice/Virginia lots and community garden</u> <u>70-bed sprung shelter at Venice lot</u> <u>100 supportive housing units at</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
				<u>Virginia lot</u>
<u>Measure 2B: Zoning Code Amendments to Address Special Needs Housing</u>	<u>Zoning Code amendments to address:</u> <ul style="list-style-type: none"> - <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 two 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</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>Measure 6D: Surcharge Fee for New Construction</u>	<u>Pursue funding to offset the New Construction Surcharge fee for affordable units assisted</u>	<u>Annually</u>		

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
	<u>by LMIHAF</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 properties over eight years</u>
<u>Measure 4E:</u>	<u>Assist homeowners to</u>	<u>2021-2029</u>	<u>Citywide with</u>	<u>Tier 1: Workforce</u>

<u>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</u>
<u>Affordable ADU Incentive</u>	<u>pursue affordable ADUs</u>		<u>emphasis in Higher Resource tracts</u>	<u>- 43 Affordable ADUs Tier 2: Low/Mod - 20 Amnesty Properties 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</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</u>
<u>Tenant Protection and Anti-Displacement</u>				
<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>Program</u>	<u>Specific Commitment</u>	<u>Timeline</u>	<u>Geographic Targeting</u>	<u>2021-2029 Metrics</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>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>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</u>