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Appendix D: Public Participation

Overview

The City of Culver City created and implemented a robust engagement program for the General Plan, including the Housing Element. Throughout the General Plan Update (GPU) and Housing Element Update process, City staff consistently asked the public to provide feedback on how to improve the engagement process and to share information about the effort to all they know who live, work, and play in Culver City. During the General Plan process, the GPU team tried to increase awareness of the GPU and Housing Element, including among underrepresented groups, by presenting information about the GPU at various community meetings and having a table with staff and materials at various community events. Many of the groups represent, and attendees at the community events included, diverse and underrepresented voices in planning processes.

Groups

- Advisory Committee on Housing and Homelessness
- Cultural Affairs Commission
- Fox Hills Neighborhood Association
- Lindberg Park Group
- Blair Hills Association
- Leadership Culver City
- Art Walk and Roll
- CicLAvia
- Community Conversations
- Experience Elenda - GoHuman
- Farmers Market
- Fiesta La Ballona
- Summer Concert Series
- Speaker Series
- Voting Center

Events

- Abilities Carnival

By presenting information about the GPU and Housing Element to these groups and having a booth at the events listed above, City staff attempted to reach populations who may not typically participate in public meetings. Attendees and passersby had the opportunity to sign up for the City's listserv to learn about upcoming events and activities related to the GPU, including the Housing Element.

The GPU team also held a series of stakeholder interviews at the beginning of the GPU process to learn more about the stakeholders' visions and goals for Culver City. The stakeholders interviewed included industry leaders, educational entities, political representatives, and organizations. The GPU process also included an arts, culture, and creative economy report, for which the GPU team interviewed architects, City stakeholders, a few artists living and working in Culver City, and City of Culver City Council and Departments. These interviews served as a platform to help engage a broader audience in the GPU process.

A summary of the engagement activities is attached at the end of this appendix. This Appendix consists of a comprehensive package of community meetings, surveys, and

other activities materials and summaries for the General Plan, specifically related to housing, and specifically related to the Housing Element. It includes links to more information where available.

Throughout the General Plan/Housing Element development process, a key message from the community that most significantly influences the General Plan and Housing Element is the desire of the community to move toward a proactive local affordable housing agenda. The General Plan Preferred Land Use Alternative responds to this community goal by incorporating the Incremental infill concept that significantly reduces the amount of land available for single-family residential uses. Replacing single-family homes are infill opportunities that allow up to four units per low-density residential lot, inclusive of accessory units. This approach will allow additional affordable housing opportunities to be spread throughout the community. The pro-housing community goal also led to density increase in almost all residential and mixed designations in the city and introduction of mixed use development in some industrial areas.

Other significant input from the community includes exploring affordable housing tools such as:

- Affordable Housing Overlay
- Streamlining for affordable housing development
- Emergency streamlining of housing development (increasing the threshold for site plan review requirements)
- Community land trust
- Article 34 authority

Specifically, the Housing Element includes a program to prioritize and explore the various options for affordable housing. The City Council has directed staff to begin studying these various tools, rather than delaying until after the adoption of the Housing Element.

Pursuant to AB 1397, RHNA sites that require rezoning after the statutory deadline of the Housing Element (October 15, 2021) would be subject to by-right approval if the project includes 20% affordable units. The Housing Element recommends extending by-right approval of all projects with 20% affordable units, regardless of whether the site is identified as a RHNA site.

Engagement Process

Public notices of all public meetings and hearings related to the Housing Element for the City Council and Planning Commission were published in the local newspaper in advance of each meeting. The GPU team went beyond State-mandated noticing requirements to share information on the GPU, including the Housing Element and land use alternatives informing the Housing Element. These efforts were meant to ensure that people were properly informed of the GPU and Housing Element and to engage the voices of those who are typically underrepresented at public meetings. Information about the Draft Housing Element and land use alternatives, including public meetings and hearings covering it, requests to review and comment, the comment submission deadline, and requests to share information about it were distributed:

- In the “News” section on the City website;
- On the GPU project website www.PictureCulverCity.com/. Regardless of which link visitors clicked to access the site, visitors were immediately greeted with pop-up windows with informational updates about the Housing Element, land use, and the GPU;
- Through the City’s virtual newsletter, GovDelivery, to those subscribed to the E-mail listservs to receive GPU project updates: ‘General Plan Advisory Committee’ (1,888 subscribers) and ‘General Plan Update’ (2,502 subscribers). The newsletters were also distributed to those subscribed to the City’s ‘Public Notifications’ (2,156 subscribers) and ‘Culver City News and Events’ (9,030 subscribers) listservs;
- On the City’s social media channels, including Nextdoor, Instagram, Facebook, and Twitter; and its cable channel;
- To the following neighborhood groups and community-based organizations, many of which represent the interests of lower-income persons, including persons experiencing homelessness; groups with special needs; and voices often missing from planning processes, such as youth;

Neighborhood Groups

- Cameo Woods Homeowners Association
- Raintree Homeowners Association
- Village Green Homeowners Association
- Blair Hills Neighborhood Association
- Downtown Neighborhood Association
- Fox Hills Alliance
- Fox Hills Neighborhood Association
- Lindberg Park Neighborhood Association
- Rancho Higuera Neighborhood Association
- Sunkist Park Neighborhood Association

Service Organizations

- Ballona Creek Renaissance
- Culver City Julian Dixon Library
- Big Brothers Big Sisters Culver City Branch
- YMCA, Culver-Palms
- St. Joseph Center

Faith-Based Groups

- Culver-Palms Methodist Church
- King Fahad Mosque
- St. Gerald Majella Church
- Temple Akiba
- Vintage Faith Foursquare
- West Los Angeles Christian Center

Education and Research-Based Institutions

- Antioch University

- Culver City Unified School District
- Culver City High School
- RAND
- West Los Angeles College

Businesses

- Twichell Studio, Ballona Creek Renaissance
- wHY
- Kirk Douglas Theater/Center Theater Group
- The Actor's Gang
- Downtown Business Association
- Culver City Chamber of Commerce
- Arts District Business Improvement District
- Amazon Studios
- Apple
- Sony Studios
- LOWE Enterprises
- Hackman Capital Partners
- Samitaur
- Industry Partners
- Southern California Hospital at Culver City
- To the GPU's Volunteer Communications Network and the GPU's advisory bodies (the General Plan Advisory Committee - GPAC and the Technical Advisory Committee - TAC); and
- Through two citywide mailed notices. On June 16, 2021, the City mailed a notice citywide that included upcoming dates related to the Housing Element. A second, citywide mailed notice with more information on the Housing Element was sent out on August 13, 2021. Both of these notices were mailed out in response to community requests to do so and at City Council's direction.

Note that the list above does not comprehensively list all the individuals, groups, and interests reached in the process, as Members on the GPAC, TACs, Volunteer Communications Network, e-mail listservs, and other groups listed above belong to other groups and organizations.

While nearly every GPU engagement event and activity has touched on housing to a degree, the below summarizes the most recent and closely related to housing. These events were held on varying days and times of the week to attract participants with different schedules. The GPU team also provided diverse opportunities to participate, either through virtual meetings, interactive polls in the meetings, small group breakouts, online surveys, and noticing and engagement materials in English and Spanish. This was meant to attract voices to the process that are typically underrepresented in public meetings. COVID-19 delayed non-essential community engagement events, even virtual meetings, between March 16, 2020 through the end of Spring 2020.

Throughout the Housing Element community engagement period, COVID-19 safety regulations and concerns restricted engagement online. However, the GPU team worked to ensure engagement events and activities online and in-person were informative (through presentations and materials distributed beforehand), included interactive ways to

provide feedback (through in-meeting polls, small breakout rooms, and surveys both during and after the event), and included information on how to remain engaged in the process. The GPU team also remained responsive to community input on how to improve engagement. For example, the GPU team distributed a survey asking community members to indicate their preferred times of day and days of the week for events and tried to schedule events and activities accordingly. Additionally, after asking the GPAC how to improve the meetings and hearing requests for a more interactive setup, the GPU team adjusted, based on technologic capabilities, and incorporated more in-meeting polling activities.

The GPAC and Housing Technical Advisory Committee (HTAC) have received presentations on and discussed Culver City's existing conditions, issues, opportunities, and alternatives related to housing and reviewed the Draft Housing Element. The Advisory Committee on Housing and Homelessness (ACOHH) received a presentation on and discussed the Draft Housing Element. The Planning Commission (PC) and City Council (CC) held several meetings on land use and housing that informed the Draft Housing Element, including City Council's meetings on the Housing Element Guiding Principles and PC's review and discussion of the Draft Housing Element. See Introduction, Section VI. City Council Guiding Principles for further detail.

- August 13, 2020: GPAC – Housing, land use, and community design
- September 10, 2020: GPAC – Land use and community design
- October 8, 2020: GPAC – Land use and community design
- December 8, 2020: HTAC – Identify housing issues and opportunities
- January 27, 2021: Community workshop on land use scenarios
- January 27, 2021: CC/PC – Land use scenarios
- March 11, 2021: HTAC – Innovative housing programs, initiatives, tools
- April 8, 2021: GPAC – Proposed land use alternatives
- April 12, 2021: CC – Adopted Housing Element Guiding Principles
- April 20, 2021: HTAC – Land use strategies and alternatives
- April 29 and May 5, 2021: Community workshops on land use alternatives
- April 29 to June 13, 2021: Online land use alternatives survey
- May 12, 2021: PC – Housing Element kickoff
- June 10, 2021: GPAC – Proposed land use alternatives
- June 23, 2021: CC/PC – Discussion on exclusionary zoning practices and direction to staff on affordable housing studies
- June 23 and 28: CC/PC – Direction on preferred land use map to inform the Housing Element sites inventory analysis
- July 22, 2021: GPAC – Draft Housing Element review
- July 28, 2021: HTAC – Draft Housing Element review
- July 28, 2021: PC – Draft Housing Element review
- August 16, 2021: ACOHH – Draft Housing Element review
- July 19 to October 1, 2021: Online Draft Housing Element public comment period
- September 13 to November 9, 2021: HCD 60-day review and comment period
- September 27, 2021: CC – Informational update on the Draft Housing Element and recommendations from the Planning Commission
- October 7 – November 8, 2021: 30-day CEQA circulation

- November 30, 2021: PC - Discussed updates on the Housing Element and related CEQA findings
- December 10, 2021: CC – Discussed updates on the Housing Element and related CEQA findings
- January 6, 2021: PC Adoption Hearing – Recommended that the City Council adopt the 2021-2029 Housing Element and related CEQA findings
- January 24, 2022: CC Final Adoption Hearing – Adopt the 2021-2029 Housing Element and related CEQA findings

Housing Element Process and Engagement

The City began drafting the 2021-2029 Housing Element after holding a Housing Element kickoff meeting with the Planning Commission on May 12, 2021 to discuss minimum requirements, contents, RHNA, past accomplishments, process, and timeline. However, community engagement around Culver City's housing needs and goals for the Housing Element began much earlier when the General Plan Update (GPU) project launched in September 2019. In June 2020, the City released a report and video summary on Culver City's existing housing conditions as of 2019 for the GPU and asked community members for their input on housing priorities, priority populations, and desired housing types through a survey. Since then, the City has held a series of community meetings and workshops asking for input on the community's housing needs and goals that informed the preparation of the 2021-2029 Housing Element.

The Preferred Land Use Map informed the Sites Inventory and its corresponding analysis. As noted in the timeline above, the GPU held 12 events, activities, and discussions around land use and its relationship to housing. During these conversations, the GPU team invited input on goals to increase housing supply, including in single family, R1, neighborhoods. These events were noticed and held over the course of nearly one year, beginning on August 13, 2020 during the GPAC meeting on housing, land use, and community design, and ending on June 28, 2021 when the City Council provided direction on which Land Use Alternative to study. After holding seven meetings on land use, including a community workshop on it, the GPU team held a series of three additional community workshops to gauge interest on the land use and mobility alternatives under consideration. Originally, the GPU team only planned for two workshops on the alternatives: one on land use and one on mobility. However, after hearing requests for more meetings on the land use alternatives, the GPU team added a second workshop on land use alternatives. The online survey on the land use alternatives was open for over a month, beginning on the day of the first workshop, April 29, 2021, and ending on June 13, 2021. At the June 28, 2021 City Council meeting, the Council directed staff to study Incremental Infill development as part of the proposed Preferred Land Use Map.

The City posted a First Draft of the Housing Element on the GPU project website for public review on July 19, 2021 and accepted comments through October 1, 2021. During the public review period, the City also presented and discussed the Draft Housing Element with the GPAC on July 22, 2021; the HTAC on July 28, 2021; the Planning Commission on July 28, 2021; and the ACOHH on August 16, 2021. During July and August 2021, the City received draft Housing Element input from the GPAC, HTAC, ACOHH, and PC and the public.

The GPU team considered all the diverse perspectives reflected in the community's comments and input received to date and revised technical aspects of the Draft Housing Element wherever feasible before submitting this draft version to the California Department of Housing and Community Development (HCD) for their 60-day review period. The revised Draft Housing Element was submitted to HCD on September 13, 2021. The Second Draft was made available for public review on the GPU project website at www.PictureCulverCity.com/Housing-Element while the City continued to accept comments on the First Draft. The community was encouraged to review and provide input on the Second Draft as well.

The community continued to leave comments on the interactive public review draft online at pictureculvercity.com/draft-housing-element through October 1. Another round of revisions were made in November and December, after the GPU team reviewed all comments received on the online draft from July 10 to October 1 and from HCD. These revisions were reflected in the Final Housing Element for Planning Commission and City Council consideration.

Through the July 19 through October 1, 2021, public comment period, City staff received 106 emailed correspondences; 331 comments on the interactive online First Draft Housing Element posted on July 19, 2021; and 100 comments on the interactive online Second Draft Housing Element submitted to HCD on September 13, 2021 and posted on the GPU project website the same day. HCD received 342 public comments during their 60-day review period.

After presenting an update on the Housing Element to the Planning Commission on November 30, 2021 and to the City Council on December 10, 2021, City staff received an additional 114 emailed public comments. Additionally, City staff received 154 emailed public comments for the January 6 Planning Commission hearing on the Housing Element and 202 emailed public comments for the January 24 City Council adoption hearing on the Housing Element bringing the total number of emailed public comments submitted to the City to 576.

Public Comments and Responses

The type of input received includes the following: sites inventory and related methodology; housing plan (policies and programs); fair housing assessment; and other revisions that do not materially affect the document. Comments received on specific sections of the Draft Housing Element Update were primarily on how the draft could be improved, other sites to consider for the inventory, and on where the Housing Element does not comply with the City of Culver City City Council's Housing Element Guiding Principles, some with suggestions on how to do so. After reviewing the public comments received, the GPU team identified several key themes. The sections below summarize those comments by theme and how the GPU team or the Housing Element addresses them.

CEQA

1. **Comments:** Commenters expressed concern that a full environmental impact report (EIR) was not prepared for the Housing Element.

Response: The General Plan Update (GPU) environmental consultant, ESA, conducted an environmental review of the Housing Element through an Initial Study and Negative Declaration (IS/ND) and found the plan would not result in significant environmental impacts since it is a policy document that will not result in physical development at this time. A full Environmental Impact Report (EIR) will be prepared for the entire GPU, which will include the updated Housing Element. The GPU EIR will evaluate the environmental impacts the future development contemplated by the GPU will have on Culver City.

The Frequently Asked Questions page on the General Plan Update (GPU) project website explains how a full EIR will be prepared for the GPU at www.pictureculvercity.com/faq. Staff emailed a public notice explaining the California Environmental Quality Act (CEQA) process for the Housing Element and GPU on November 19, 2021, to those subscribed to receive information through the following listservs: "Culver City News and Events," "General Plan Advisory Committee," "General Plan Update," and "Public Notifications." In total, 9,745 recipients received the public notice.

Incremental Infill, R1, and Fair Housing

- 2. Comments:** Commenters have both stated opposition to and support for studying changes to the R1 (single-family residential) zone associated with the GPU's preferred land use map, which informed the Housing Element.

The number of commenters in opposition to changes in R1 zoning has been greater than comments in support. Common concerns expressed include, but are not limited to, impacts to existing properties, changes that might occur from more people living in existing neighborhoods, Incremental Infill will not result in affordable housing being built, inadequate infrastructure, impacts to schools, and parking and traffic increases. Commenters stated that the State rejected the notion that R1 zoning has to change to meet RHNA and that the City can reach its RHNA allocation with existing its land use and zoning.

Recommendations to meet RHNA without increasing density in R1 zones included allowing for more units along corridors and on larger opportunity sites, and allowing for increased density, height, and other standards in such areas to allow for more units. Most related comments also requested the State to deny certification of the Housing Element because of multi-family units being considered on non-vacant sites in the R1 zones.

Commenters speaking in support expressed common themes, including but not limited to, equitably distributing housing to affirmatively further fair housing, notably affordable housing, throughout the city and especially in the highest resourced areas including R1 zones and changing the exclusionary impacts of R1 zoning. Commenters stated that the AFFH analysis and associated programs are insufficient as most lower income RHNA units are located in the lowest resource neighborhoods and vice versa, and existing single-family sites flagged for Incremental Infill are located in neighborhoods that were historically redlined.

Recommendations to revise the Housing Element to address the AFFH analysis included that the Housing Element should include clearer actions including to identify the percent of low-income sites located in the highest income neighborhoods, if there are as many or more sites in the city's higher income neighborhoods as lower-income ones, the specific programs that will get affordable units built in these high opportunity neighborhoods, detail and specific timelines for program implementation, annual monitoring and recalibration as needed, annual funding needs estimates, and initiatives to encourage lower income unit production, increase the concentration of lower-income households in areas of the city where the existing concentration of lower-income households is low, reduce the concentration of lower-income households in areas with significant exposure to noise/pollution, prioritize high-

opportunity census tracts and well-resourced areas when selecting sites for lower-income housing opportunities, adequately identify funding sources, public resources, and density bonus programs to maximize the likelihood that projects with below-market-rate units are built.

Response: When reviewing the public comments related to single family neighborhoods (R1), Incremental Infill, and affirmatively furthering fair housing requirements, the GPU team found that many of the comments in opposition to allowing Incremental Infill in R1 zones came from property owners.

City staff clarified the matter of the existing General Plan land use designations and Zoning Code compared to the General Plan Update's preferred land use alternatives with community members through several public meetings, the GPU project website's FAQ page, public notices, emails, and phone calls. When studying the land use strategies to address the RHNA, the GPU team found that the existing General Plan land use designations and Zoning Code cannot accommodate the RHNA, but that the RHNA could be accommodated without applying the Incremental Infill land use designation in R1 as long as residential units are concentrated along corridors. Staff presented this land use alternative to City Council and Planning Commission on June 23 and 38, 2021, and presented tradeoffs with this option.

Significantly, applying this approach would not equitably distribute units of all incomes throughout the city, including lower income units in the highest resources areas, as required by the "Affirmatively Furthering Fair Housing" stipulation under California Assembly Bill 686 (AB 686). Another issue with this approach that staff has described is that concentrating growth along the corridors exposes those residents to higher levels of pollution. Since renters tend to be lower-income and minority households, this approach would conflict with the City's efforts to advance environmental justice goals, as outlined in the Equity, Community Health, and Environmental Justice Element in the General Plan. The City Council voted to move forward with studying the alternative which included Incremental Infill.

Several programs in the Housing Programs section were revised to address how zoning standards, including height and density, will need to change in the Zoning Code Update process to accommodate the RHNA. Housing Program 4.F. indicates the City's commitment to studying affordable housing tools, like Transit Oriented Community (TOC) programs. The purpose of TOCs is to encourage housing production with access to transit, reduce traffic impacts, and support climate sustainability and environmental justice goals by discouraging reliance on single occupancy vehicles and other inefficient transportation methods that increase pollution. Through Program 4.F., City staff will research funding sources to finance affordable housing projects. The "Consistency with Other Elements of the General Plan" section in the Housing Element also describes how the Housing Element considers the relationship between the proposed housing plan and efforts related to transportation, land use, environmental justice, schools, public infrastructure, and other General Plan topics.

Additionally, the GPU team revised the Fair Housing Assessment section in the Housing Element (Appendix E) to discuss Culver City's history with redlining and other trends that affect fair housing. It also expands on how the distribution of housing affects the Affirmatively Furthering Fair Housing and environmental justice goals and how it impacts populations by income, race and ethnicity, ability, and other groups.

Sites Inventory

- 3. Comments:** Commenters stated that the sites inventory must be expanded and should add a new column indicating the estimate of development likelihood. Reasons explaining why the inventory should be expanded include that the inventory inflates realistic development

capacity, e.g., concerns that Table B-5 overestimates anticipated unit production in the planning period and that substantial evidence is not included to show that nonvacant sites will be redeveloped. Related comments included that all sites, not just R1, should show the probability of development data and assessment and that the quantified objectives should be informed by this assessment and backed by evidence.

Response: Appendix B explains the assumptions used to calculate realistic capacity, including on nonvacant sites. For example, regarding Incremental Infill capacity assumptions, the Sites Inventory referred to a 2020 UCLA study that calculated a recycling trend rate for single-family neighborhoods. The “Outcome of the 5th Cycle Sites Inventory” and “Likelihood of Redevelopment on Nonvacant Sites” sections also discuss related factors considered in calculating realistic capacity, or the likelihood of redevelopment. The “Intensifying Existing Multi-Family Neighborhoods” section in Appendix B describes how Culver City’s residential recycling activities informed the assumptions applied in these neighborhoods. Furthermore, the “Integrating Residential Uses in Commercial and Industrial Areas” section describes how community input informed the additions of a few sites the community identified as being ripe for redevelopment. City staff and the GPU consultant team carefully analyzed the sites to determine their suitability for residential development and re-examined sites if requested by community members.

4. **Comments:** Commenters requested certain properties be removed from the Sites Inventory citing various factors, e.g., local/owner statement that property will not be redeveloped, double-counting of sites, historic building present, exclude parcels containing Rent Stabilization Ordinance (RSO) housing units, and existing non-residential project taking place. Requests to remove properties included all sites in the Culver Crest neighborhood related to the prohibition of accessory dwelling units due to problems of emergency access on substandard width streets in proximity to a high fire safety zone with surficial slope instability.

Response: The GPU team reviewed each of the sites identified in public comments and removed residential properties from the Sites Inventory if the property owners indicated their lack of plans or interest to add additional residential units to their property. Noncommercial properties were removed based on ground-truthing research provided by commenters (e.g., information on property leases or environmental studies). The Sites Inventory was revised to remove all properties in the Culver Crest neighborhood based on findings from an environmental study conducted associated with the City’s ADU prohibition in the neighborhood related to the factors mentioned by the commenters. The GPU team did a scan and removed any erroneous site duplications.

5. **Comments:** Commenters questioned the need to have a buffer higher than HCD’s recommended 15-30% and questioned the buffer’s purpose.

Response: HCD recommends that jurisdictions include a 15-30% buffer of additional sites listed in their Sites Inventory to reduce the likelihood of having to rezone. In Culver City’s case, the Sites Inventory includes a 121% buffer. Having a buffer gives jurisdictions needed flexibility over the eight-year Housing Element planning cycle to remain in compliance with State law. For example, many factors could affect development trends and decisions. Specifically, the No Net Loss Law (Government Code § 65863) ensures that assumptions jurisdictions make in Housing Element site inventories match what is actually built. Unless jurisdictions have more sites in their Housing Element inventory than the minimum required, there is a risk they may fall out of compliance due to factors over the planning period like reducing a site’s residential density, approving development applications with fewer units on the site than identified in the Inventory, or approving development applications with higher income units than stated in the Housing Element. Having a buffer exceeding the minimum best practices enables the

City to further ensure compliance with the No Net Loss requirements without having to rezone throughout the planning period.

6. **Comments:** Commenters stated the Housing Element should consider various steps in assessing the Site Inventory capacity, including that it should estimate and report both the likelihood of development and the net new units if developed of vacant and nonvacant inventory sites, report the proportion of sites from the previous inventory that were developed during the previous planning period and use HCD-recommended methodologies and data sources to analyze sites' realistic development capacity, use statistical methods to determine that sites' existing uses are likely to be discontinued during the planning period, provide a quantitative estimate of the likelihood that pipeline projects will be completed, based on historical data, and should adjust the number of pipeline units counted towards the 6th cycle RHNA target accordingly, and commit to a mid-cycle review to verify the housing element's assumptions about development probabilities.

Response: The Housing Element includes a section "Benchmarking Against Outcome of the 5th Cycle Sites Inventory," which describes how the outcome from the 5th Cycle Housing Element informed the 6th Cycle Housing Element. Appendix B's section, "Progress Toward RHNA," describes the pipeline projects considered in the Housing Element and on what assumptions the likelihood of development was based (e.g., based on discussions with the developer or project proposals). The Housing Element includes Objective 6 "Housing Production Accountability" and Policy 6.B, which commits the City to a mid-cycle review to make any adjustments necessary to achieve the RHNA. Appendix B in the Housing Element elaborates on the methodology used to determine the sites' realistic development capacity. For example, the Sites Inventory referred to a 2020 UCLA study that calculated a recycling trend rate for single-family neighborhoods. The "Intensifying Existing Multi-Family Neighborhoods" section in Appendix B describes how Culver City's residential recycling activities informed the assumptions applied in these neighborhoods. Furthermore, the "Integrating Residential Uses in Commercial and Industrial Areas" section describes how community input informed the additions of a few sites the community identified as being ripe for redevelopment. City staff and the GPU consultant team carefully analyzed the sites to determine their suitability for residential development and re-examined sites if requested by community members.

Outreach

7. **Comments:** Commenters stated that the Housing Element public engagement efforts were inadequate and the City failed to conduct diligent efforts to engage the community, including that noticing about the R1 zoning change being studied by the City was not clearly conveyed to the public with enough time to provide feedback, a lack of in-person meetings, and better efforts to engage communities who were not well-represented in the process. Commenters also stated that the State was unhappy with the public engagement efforts, the City did not respond to the public comments received, and the City Council did not listen to community concerns. Some commenters stated concern that staff, under direction from elected officials, purposely took actions to inhibit public review of drafts.

Response: Appendix D has been expanded to explain how noticing was conducted for the Housing Element and the discussions around land use and R1 zoning. Appendix D also explains how noticing for the Housing Element and land use exceeded State-mandated requirements, how COVID-19 restricted engagement online for public health and safety reasons, and the efforts the City made to engage communities who are typically underrepresented in planning meetings. Appendix B shows how the City responded to

community feedback regarding the Sites Inventory, and as discussed above under the “Sites Inventory” section.

- 8. Comments:** Some of the public comments raised during the Housing Element hearing process recommended denial of the Housing Element for not complying with the public noticing requirements under Assembly Bill 215 (AB 215).

Response: AB 215 was passed on September 28, 2021, and requires local governments to make the first draft revision of the housing element available for public comment for at least 30 days and take at least 10 additional business days to consider and incorporate public comments submitted during that time into the draft revision before submitting it to the department. This 30-day requirement applies to the first draft of the Housing Element only.

Culver City complied with AB 215 before the State passed it. Culver City posted its First Draft revision of the Housing Element online for a 60-day review and comment period on July 19, 2021. After considering and incorporating public comments the City received on the First Draft, the City drafted a revised, Second Draft of the Housing Element and submitted it to HCD for their review on September 13, 2021. The City posted this Second Draft online and sent out public notices inviting public comments on September 13, 2021.

The City's public comment period on the First and Second drafts of the Housing Element extended from July 19, 2021, through October 1, 2021. AB 215 requires jurisdictions to post any subsequent draft revisions to the Housing Element online for at least seven days before submitting it to HCD. Staff are considering the comments it received on the First and Second Drafts from both the community and HCD before submitting the Third Draft to HCD after adoption. AB 215 also requires that jurisdictions notify individuals who have requested notices related to the Housing Element. Culver City will meet this requirement when the agenda and materials, including the Third Draft of the Housing Element, for the January 24, 2022, City Council Housing Element adoption hearing are finalized. City staff will send public notices informing the community of the availability of the Third version of the Housing Element, including a GovDelivery notice to those who have signed up to receive GPU emails, through the City's social media platforms, emails to the Volunteer Communications Network to spread the word, and on the City's cable channel and GPU project website.

Housing Constraints

Parking

- 9. Comments:** Commenters expressed concerns that Incremental Infill would not be adequately parked, especially in areas not readily served by transit. Others expressed concern that requiring parking, especially parking minimums, is a disincentive to affordable housing development. Some expressed support for eliminating parking requirements in transit-rich areas.

Response: The Housing Element includes Measure 4.J. "Zoning Code Review and Amendments to Address Constraints to Housing Production," which states that the City will complete a comprehensive parking code update to ensure it has appropriate parking standards to accommodate the allowed densities under the GPU. These updates will include the parking standards for studio, one-bedroom, and live/work units. Overall, these updates are meant to encourage affordable housing development.

Objective 2 in the Housing Element includes Policy 2.B. around ensuring that the Housing Element coordinates its plans, policies, and programs with other City departments, including

the Transportation and Public Works Departments. This is meant to ensure that residential development is adequately and effectively served by transit and active transportation options so that it is planned in an orderly way that is least disruptive or even improves the quality of life for existing and future residents.

As noted in the section "Consistency with Other Elements of 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. By tying mobility and transit-oriented efforts into the Housing Plan, the Housing Element is attempting to reduce the impacts of increased housing supply on traffic.

Housing Program 4.F. indicates the City's commitment to studying affordable housing tools, like Transit Oriented Community (TOC) programs. TOCs help ensure that the City constructs housing that has access to transit, reduce impacts to traffic, and support climate sustainability and environmental justice goals by discouraging reliance on single occupancy vehicles and other inefficient transportation methods that increase pollution.

Permitting

- 10. Comments:** Commenters stated the Housing Element must streamline housing entitlements and ease permitting processes, timelines, fees, standards, and overall development restrictions; include existing data on processing times and fees from actual projects, not typical averages; put measurable goals in place that can be tracked to ensure compliance with State law; and that much more residential construction should be eligible for ministerial approval to remove constraints to housing production.

Response: The HE includes Measure 4.I. "Permit Streamlining and Monitoring," which describes the City's current and future commitment to streamline the permitting and development process. Policy 2.F. under Objective 2 in the Housing Element also describes the City's commitment to expanding opportunities to develop various housing types by streamlining entitlement, environmental, and permitting processes for sustainable buildings and affordable housing.

Process

- 11. Comments:** During the Housing Element hearing process, commenters expressed concern over the City adopting a Housing Element before HCD has determined that the Housing Element substantially complies with State law.

Response: City staff have outlined the Housing Element process noted below through public meetings with the GPU advisory committees (the GPAC and the TAC), Planning Commission, City Council, and the Advisory Committee on Housing and Homelessness. City staff have also explained this process, including the adoption requirements through community newsletters and e-mailed correspondence.

HCD cannot determine whether a Housing Element substantially complies with State law until the City first adopts its Housing Element. HCD outlines a 4-step process for jurisdictions to follow when updating their Housing Elements. State law requires that jurisdictions revise their Housing Element (Step 1), then submit a draft of the updated Housing Element to HCD for review for substantial compliance (Step 2). "Substantial Compliance" is the best a jurisdiction can achieve and there is no "certification." "Certification" is a colloquial term not used in State law. After submitting the Draft Housing Element to HCD in Step 2, HCD provides a "pre-

submittal” comment letter documenting its assessment of the Housing Element for compliance with State law. The jurisdiction is required to “consider” HCD comments before adopting the Housing Element during Step 3 of the process. After adopting the Housing Element in Step 3, the jurisdiction must submit the adopted Housing Element to HCD for review. If the jurisdiction’s revisions satisfy HCD, HCD will issue a letter stating that the Housing Element substantially complies with State law. If HCD determines that the Housing Element requires additional revisions, the City can make additional revisions and adopt an amended version of the Housing Element.

Housing Programs

- 12. Comments:** Commenters stated the Housing Element should include stronger programs and measures to ensure renter protections, including just-cause eviction protections and an enforcement program; codify tenants’ right to counsel in eviction proceedings; strengthen programs to inform tenants of their rights and how to access eviction defense resources; require that no net loss provisions apply to parcels in the Site Inventory and rezoning program with a monitoring and implementation program; and institute local programs and funding sources to preserve existing affordable housing.

Response: The Housing Programs section was revised to add more information on the Permanent Rent Control Ordinance and include programs around expanding opportunities for affordable housing. Program 1.E. describes resources for tenants in at-risk affordable housing units. Programs under Measure 5 are dedicated to affirmatively furthering fair housing, and include programs related to anti-displacement efforts and tenant protections. For example, Program 5.E., the Landlord Fair, educates landlords on leasing units to households that receive rental assistance and those exiting homelessness. Program 5.J. describes the City’s resources around mediating landlord and tenant disputes and Program 5.H. describes the City’s efforts around spreading information about the City’s landlord-tenant mediation board. Program 4.A. describes the City’s efforts to abide by the no net loss requirements. Through Program 4.F., City staff will research funding sources to finance affordable housing projects.

- 13. Comments:** Commenters stated the Housing Element should include programs to prioritize affordable housing including locally funding and/or incentivizing affordable housing, prioritize developing affordable housing on public land, and include programs for 100% affordable housing zoning overlays and ensure they apply to high-opportunity areas, including R1.

Response: Housing Programs under Measure 5 are dedicated to affirmatively furthering fair housing and include programs like 5.B., which will focus outreach to areas designated for Incremental Infill and other high opportunity areas to encourage property owners to accept Housing Choice Vouchers. Program 4.F. commits the City to finish studying affordable housing tools and best practices like 100% affordable housing zoning overlays, providing a report of the findings and recommendations, and pursuing funding opportunities to implement those tools, catered to Culver City’s needs.

- 14. Comments:** Commenters suggested that the HCD-recommended methods should be used to forecast housing production and the Housing Element should include a mid-cycle adjustment with the ability to shift regulations if housing production is lower than projected to make up for shortfalls.

Response: Appendix B in the Housing Element describes the methodologies to forecast housing production. The Housing Element includes Objective 6 “Housing Production Accountability” and Policy 6.B, which commits the City to a mid-cycle review to make any adjustments necessary to achieve the RHNA.

State Law

15. Comments: Commenters stated that the Housing Element should be revised to be consistent with changes in State law including Senate Bill (SB) 9, 10, and 478. Regarding SB 9, some comments were received that the Housing Element should make fourplex development allowed by-right (ministerial) on all single family lots in a more flexible manner, e.g., allowing fourplexes without a lot split, not requiring that the future inhabitant act as developer, and allowing/promoting condo-ized fourplexes to provide more starter home opportunities. Regarding SB 10, comments were received that the Housing Element should consider allowing increased units near transit, including allowing up to six units in single family zones by right when units are affordable. Regarding SB 478, comments were received that the Housing Element should comply with the minimum 1.0 floor area ratio and no minimum lot size requirements. Comments were also received in opposition to the City being compelled to comply with these State laws.

Response: The Housing Element includes Program 4.J. "Zoning Code Review and Amendments to Address Constraints to Housing Production" which states that the City will review and amend the Zoning Code during the comprehensive Zoning Code update process to remove potential constraints to housing production. Through that program, the City will also ensure that it is meeting State laws including SB 9, 10, and 478 as the City is required to comply with all State laws.

Next Steps

The GPU team anticipates the Housing Element will be amended after adoption during the remaining GPU process based on the results of the Westside Cities Council of Governments' Regional Early Action Planning (REAP) Grant project. The REAP project seeks to develop a comprehensive subregional approach to accelerate housing production to accommodate critically needed affordable housing within the Westside subregion. Refer to Item C-4 on the August 9, 2021, City of Culver City Council agenda for the full REAP scope.

Public Participation Materials

The following pages include engagement and event summary materials related to Housing Element engagement. A summary of engagement information can also be found at pictureculvercity.com/housing-element.