

MEETING DATE: 6/24/09

AGENDA ITEM: JOINT ITEM - Review and Discussion of the Revised 2009 Draft Housing Element and Authorization to Submit the Revised 2009 Draft Housing Element for Review by California Department of Housing and Community Development.

ATTACHMENTS

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Meeting Date: 06/30/08		Item Number: J-1	
AGENDA ITEM: JOINT ITEM – Review and Discussion of Draft 2008 Housing Element.			
Contact Person/Dept.: Jose Mendivil and Susan Yun		Phone Number: 310-253-5757 and 310-253-5755	
Fiscal Impact: Yes ☐ No ☒		General Fund: Yes ☐ No ☒	
Public Hearing: ☐		Action Item: ☒ Attachments: ☒	
Public Notification: Notice of Joint Study Session was mailed Citywide (over 17,000 addresses), Culver City organizations, Housing Advocates, Developers, and Attendees of the Housing Element Workshop (06/16/08); Notice of Joint Study Session was published in the Culver City News (06/12/08, 06/19/08, and 06/26/08); Master E-Mail Notification List (06/25/08).			
Department Approval: Sol Blumenfeld (06/12/08)		City Attorney Approval: Carol Schwab (by H. Baker) (06/25/08)	
Fiscal Impact Review: Jeff Muir (06/25/08)		City Manager Approval: Jerry Fulwood (06/25/08)	

RECOMMENDATION:

Staff recommends the City Council and Planning Commission hold a joint study session to review the draft 2008 Housing Element, hear public comments, and provide direction to staff as deemed appropriate.

INTRODUCTION:

The Housing Element is one of nine elements comprising the City of Culver City's General Plan (seven of which are mandatory per State law). The General Plan is a comprehensive, long term general plan for the physical development of the City. The intent of the General Plan is to communicate the City's strategic thinking and philosophy for the future to residential and business communities and to provide for the physical, social, and economic needs of the City and its people. In essence it is the City's vision; the Culver City Municipal Code enacts that vision with specific legislative language.

The Housing Element specifically addresses the City's vision as it relates to housing. It is the primary planning guide to identify and prioritize the housing needs of the City and outline the goals, policies, and programs to address those needs while balancing community character, objectives and resources. As a planning document and like the other elements of the General Plan, the Housing Element along with its goals, policies, and programs is not part of the Culver City Municipal Code or an enforcement document. Further, it is the only element that the State is mandated to review. The Housing Element is not a construction document or a document that

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dictates or requires the City to build housing. Rather, it is a planning tool that demonstrates to the State how the City is able to address its housing needs.

BACKGROUND:

All cities and counties in California are required to adopt a comprehensive General Plan to govern land use planning decisions. State law requires that the General Plan contain seven mandatory elements, including a Housing Element. The Housing Element is the only General Plan element that is required to be updated regularly, at six-year intervals. In addition, State law mandates that cities submit their Housing Elements to the California Department of Housing and Community Development (HCD) for review and certification prior to adoption. Per State law, the Housing Element must demonstrate how the City will address new housing, rehabilitation of current housing stock where necessary, and preservation of existing affordable housing.

The City's current Housing Element was adopted in 2001 and was subsequently certified by the State as meeting all the requirements of State law. The new Housing Element covers the period 2008-2014. This Housing Element "cycle" commenced in July 2007 when the Southern California Association of Governments (SCAG) approved the Regional Housing Needs Assessment (RHNA) allocation for the period 2006-2014 (sometimes referred to as a "planning period or cycle"). The RHNA identifies the new housing needs for all economic levels in each city and county within the six-county SCAG region¹ during this planning period.

After receiving Culver City's RHNA new housing needs allocation from SCAG, staff hired a consultant (Conexus) to assist in drafting the Housing Element. In addition, a Joint City Council/Planning Commission Housing Element Subcommittee was formed so that there would be a forum for feedback, status updates, and guidance on policy issues throughout the Housing Element update process. Over a period of several months, staff, the consultant, and the Subcommittee met several times to review data and survey results; analyze draft Housing objective, policy, and program language; and finalize the draft Housing Element.

The purpose of the Joint Study Session is to allow the public to review and comment upon the Draft Housing Element and to allow the full body of the City Council and Planning Commission to also review and comment upon the draft Housing Element. At a future Council meeting and subsequent to tonight's Joint Study Session, the City Council will consider an item authorizing staff to submit the draft Housing Element to HCD for its review.

¹ The SCAG region is comprised of Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties.

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DISCUSSION:

The following discussion summarizes the chapters and appendices of the draft Housing Element and elaborates on two key components of the document – RHNA and Chapter V which contains the Housing goals, objectives, policies, and programs.

Summary of Draft Housing Element Chapters

The Draft Housing Element consists of the following major components:

- Chapter I is the Introduction describing the context of the Housing Element as a part of the City's General Plan, and how opportunities for public involvement were provided;
- Chapter II is an analysis of the City's demographic and housing characteristics and trends;
- Chapter III is an evaluation of land, financial, and administrative resources available to address the City's housing needs;
- Chapter IV is a review of potential constraints, both governmental and non-governmental, to meeting the City's housing needs;
- Chapter V is the Housing Action Plan for the 2008 – 2014 planning period, including housing goals, policies and programs;
- Appendix A is a review of the City's accomplishments and progress in implementing the 2001 Housing Element;
- Appendix B is a land inventory analysis that addresses HCD's requirement that the City demonstrate it has the land capacity to accommodate the number of new units allocated per the RHNA process;
- Appendix C is an analysis of at-risk affordable housing units;
- Appendix D is a glossary or definition of key housing terms.

All the chapters in the document address various components that HCD will consider during its review of the draft Housing Element. Some of these components cover topics such as policies and programs that will demonstrate how the City is able to accommodate new housing, housing rehabilitation, and housing preservation; constraints to housing; analysis of resources available to the City; general demographic information; and public outreach.

Regional Housing Needs Assessment (RHNA)

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One key focus of the Housing Element is the City's RHNA allocation. As stated above, the current Housing Element planning cycle began when SCAG approved, or allocated, Culver City's share of the SCAG region wide RHNA. For Culver City it is 504 new housing units for the 2008-2014 planning cycle. SCAG estimates that this number of new units will be needed to address the future population growth of Culver City during the new planning cycle. Further, SCAG distributed the 504 units by affordability or income level – Very Low, Low, Moderate, and Above Moderate (or Market). The allocation of new units by income level was calculated by using the City's income distribution as reported in the 2000 U.S. Census. The RHNA discussion begins towards the end of Chapter II of the draft Housing Element and continues at the beginning of Chapter III.

In its review HCD will be looking to see how the City can accommodate the construction of 504 new units. HCD does not necessarily require cities to build housing to satisfy these RHNA numbers but will look carefully to the Housing Element for a realistic plan that demonstrates the City's land capacity to meet its RHNA goals. Chapter III summarizes several tables in Appendix B into one Land Inventory Summary Table. This summary table and the more detailed tables in Appendix B demonstrate that the City has the land capacity to accommodate its RHNA allocation. Staff and the consultant conducted a land inventory analysis of approved mixed use developments that are currently in plan check, proposed mixed use projects currently under review by staff, vacant commercial sites, underdeveloped residential sites (that could accommodate medium density apartments and condominiums), underutilized commercial sites that could accommodate mixed use, sites that are part of the Redevelopment Agency Comprehensive Housing Strategy, and a general survey of all commercial lots that could accommodate mixed use under the revised mixed use ordinance.

This survey demonstrated that the City's land capacity can accommodate approximately 9,085 new units. This does not mean all these units will be built; it simply demonstrates to HCD that at least 504 units can be built over the next planning cycle (2008-2014). The land inventory analysis showed that given parcel sizes and the allowed densities depending on the Zoning designation for a given parcel, at full build-out, more units could be built than what SCAG allocated to the City. Due to the large number of units that potentially could be built and the allowable densities (per the Zoning Code), the City's affordable housing component can also be achieved. Further the Redevelopment Agency Comprehensive Housing Strategy, which sites are part of the land inventory analysis, specifically has the goal of building affordable housing units. Market forces and cost of construction will dictate what is actually constructed and HCD recognizes that the City does not have control over these forces and that the City is not a housing developer.

Chapter V of the Draft Housing Element

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The keys to achieving the City's new housing construction, housing rehabilitation, and affordable housing preservation needs are the Housing goals, policies, objectives, and programs (also referred to as measures) that are found in Chapter V. HCD will be analyzing this chapter to see how the City drafts overall Housing policy that strives to achieve new construction, rehabilitation, and preservation.

Chapter V sets forth the City's three housing goals which are overarching statements that address the need to preserve the peaceful small-town environment of the City's neighborhoods (Goal 1), call for a variety of housing opportunities that enhance economic vitality and prosperity (Goal 2), and promote access to affordable housing for all income levels (Goal 3). Further, Chapter V lists and describes housing objectives and the policies that implement those objectives, as well as housing programs (also called measures). These policies and programs will support the construction, maintenance and improvement of housing stock during the next six years; they will assist in addressing the three housing goals. The new Housing Plan builds on the plan from the previous Housing Element and recommends refinements, where appropriate, to address new opportunities or changed circumstances.

The following is a summary of the draft Housing Element objectives and policies:

Objective 1 - Housing Maintenance

Several policies address the maintenance of housing in order to promote availability of decent housing and to protect the overall quality of neighborhood environments. Among other things, these policies call for assistance to low-income and moderate-income households for rehabilitation and adequate maintenance of housing units, enforcement of building codes and property maintenance regulations, prevention of overcrowding, and prevention of illegal units.

Objective 2 - Housing Supply

In Objective 2, policies in the draft document address opportunities for development of a variety of housing types while protecting the character of existing neighborhoods. These policies encourage coordination of plans in order to ensure new residential development is orderly and is effectively served by transportation, transit – including the future Expo Light Rail station, community facilities, and public services. These policies call for mixed use where appropriate, new housing to support a balance of jobs and housing, and preservation of the character and scale of established residential neighborhoods.

Objective 3 - Housing Affordability

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Policies implementing Objective 3 are meant to provide rental and home ownership opportunities within a range of income levels. Specific policies promote, among other things, inclusion of affordable housing units in new housing developments by use of the Density and Other Bonus Incentives application process, affordable housing development, and conservation of existing affordable housing.

Objective 4 - Housing Access

Policies for this Objective strive to improve access to quality housing for all members of the community, including those in need of temporary housing and emergency shelters. Specific policies promote, among other things, housing opportunities for families of all income levels to maintain the family-oriented character of the City, assistance for first time home buyers, fair housing and non-discrimination in housing sales and rentals, barrier free housing for persons with disabilities, and assistance for homeless persons.

The following is a summary of the draft Housing Element Housing programs (also referred to as measures):

Measure 1 - Continue Current Housing Programs.

A series of current Housing programs that implement Measure 1, are recommended to be continued by staff and provide for the implementation of a variety of programs assisting City residents with the purchase or rental of housing and further, provide for the promotion of maintenance and rehabilitation of housing units.

Measure 2 - Programs to Facilitate Additional Housing.

Housing programs under this measure have been devised to facilitate new or additional housing. Some of these measures assist in implementing the City's Comprehensive Housing Strategy.

Measure 3 - Housing Division Administrative Activities.

The Housing Element contains administrative service programs that will assist affordable housing developers and preserve affordable housing opportunities.

Measure 4 - Regulatory Incentives.

Regulatory incentive measures are included that foster the development of affordable housing.

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Measure 5 - Distribute Public Information.

The last series of programs or measures in the draft Housing Element call for the distribution of public information material for residents and developers about housing programs and activities. By providing this information, these measures foster the policies of the Housing Element including the Comprehensive Housing Strategy.

OPPORTUNITIES FOR PUBLIC INVOLVEMENT

Public participation is an essential part of the planning process in Culver City. An initial public workshop was held in the Council Chambers on February 26, 2008. In addition, as described below in the "Conclusion" section, there will be an opportunity for public input at the future City Council Authorization meeting, a Planning Commission Adoption Hearing, and a City Council Adoption Hearing. For each of these meetings there will be a City-wide residential mailing and notification of Culver City organizations, housing developers, and Westside Housing advocates.

FISCAL ANALYSIS:

There is no fiscal impact associated with the review and discussion of this item this evening; this is part of the General Plan update and does not require action on the part of the City that would necessitate expenditure of City funds at this time.

CONCLUSION:

Staff requests that the City Council and Planning Commission review the Draft 2008 Housing Element, hear public comments, and provide direction to staff regarding any desired revisions to the document. A revised draft element will then be brought back to the City Council for review and authorization for submittal to HCD. Following HCD review, a revised draft Housing Element will be prepared addressing HCD comments, and public hearings will be scheduled before the Planning Commission and City Council for final review and to consider adoption.

MOTION:

That the City Council:

Conduct a study session to review the draft 2008 Housing Element, receive public comments, and provide direction to staff as deemed appropriate.

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That the Planning Commission:

Conduct a study session to review the draft 2008 Housing Element, receive public comments, and provide advice to the City Council as deemed appropriate.

ATTACHMENTS:

1. Draft Housing Element (delivered to Council and Commission under separate cover)

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Attachment No. 2

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Meeting Date: 08/25/08		Item Number: <u>A-2</u>	
AGENDA ITEM: Authorization to Submit the Draft 2008 Housing Element to the State for Review by the Department of Housing and Community Development.			
Contact Person/Dept.: Jose Mendivil and Susan Yun		Phone Number: 310-253-5757 and 310-253-5755	
Fiscal Impact: Yes ☐ No ☒		General Fund: Yes ☐ No ☒	
Public Hearing: ☐		Action Item: ☒ Attachments: ☒	
Public Notification: Mailed Citywide (over 17,000 addresses), Culver City Organizations, Housing Advocates, Developers, and Attendees of the Joint Study Session (08/8/08); Notice of Public Meeting was published in the Culver City News (08/14/08 and 08/21/08); Master E-Mail Notification List (08/20/08).			
Department Approval: Sol Blumenfeld (08/12/08)		City Attorney Approval: Carol Schwab (by H. Baker) (08/20/08)	
Chief Financial Officer Approval: Jeff Muir (by M. Noller) (08/20/08)		City Manager Approval: Jerry Fulwood (08/20/08)	
<u>RECOMMENDATION:</u> Staff recommends the City Council authorize the submission of the Draft 2008 Housing Element to the California State Department of Housing and Community Development (HCD or State) for its 60-day review as required by state law. <u>BACKGROUND:</u> All cities and counties in California are required to adopt a comprehensive General Plan to govern land use planning decisions. State law requires that the General Plan contain seven mandatory elements, including a Housing Element. The Housing Element is the only General Plan element that is required to be updated regularly, at six-year intervals. In addition, State law mandates that cities submit their Housing Elements to HCD for review prior to adoption. Per State law, the Housing Element must demonstrate how the City will address new housing needs, rehabilitation of the current housing stock where necessary, and preservation of existing affordable housing. The City's current Housing Element was adopted in 2001 and was subsequently certified by HCD as meeting all the requirements of State law. The new Housing Element covers the period 2008-2014. This Housing Element "cycle" commenced in July 2007 when the Southern California Association of Governments (SCAG) approved the Regional Housing Needs Assessment (RHNA) allocation for the period 2006-2014 (sometimes referred to as a "planning period or cycle"). The RHNA			

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identifies the new housing needs for all economic levels in each city and county within the six-county SCAG region¹ during this planning period.

After receiving Culver City's RHNA new housing needs allocation from SCAG, the City Council approved a professional services agreement with a consultant (Conexus) to assist in drafting the Housing Element. In addition, a Joint City Council/Planning Commission Housing Element Subcommittee was formed so that there would be a forum for feedback, status updates, and guidance on policy issues throughout the Housing Element update process. Over a period of several months, staff, the consultant, and the Subcommittee met several times to review data and survey results and update draft objectives, policies, and programs to reflect current conditions and incorporate recent changes to State law.

On June 30, 2008, a Joint Study Session was held to allow the public to review and comment upon the draft Housing Element and to allow the full body of the City Council and Planning Commission to also review and comment upon the draft Housing Element. At the Study Session the City Council gave staff direction to revise the Draft Housing Element based on comments made at the joint meeting. The purpose of tonight's meeting is to receive authorization from the City Council to submit the revised Draft Housing Element the State for their review.

DISCUSSION:

Overview of Housing Element - June 30th Study Session Agenda Item Report

Attachment No.1, the Agenda Item Report for the June 30th joint study session, provides an overview of the Draft Housing Element including a summary of the document's chapters and appendices, a discussion on RHNA, and a review of the objectives and measures of the Draft Housing Element.

Comments and Revisions to the Draft Housing Element

At the June 30th Joint Study Session, approximately 25-30 people attended and provided comments along with the City Council and Planning Commission. The key issue raised at the Study Session was that the City's Housing Element demonstrates to the State the City's commitment to affordable housing. Equally important was the issue that the character of existing residential neighborhoods be preserved. After discussion of these issues, the Planning Commission and City Council, for the most part felt that the draft Housing Element was adequate and addressed the State requirements for certification. Minor revisions and clarifications to the draft

¹ The SCAG region is comprised of Los Angeles, Orange, Riverside, San Bernardino, Imperial and Ventura counties.

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document were made based on comments and questions received at the study session.

It should be noted that not all comments received at the Study Session necessitated changes or revisions to the Draft Housing Element. Attachment No. 2, Table D-1 from the Draft Housing Element, provides a summary of the June 30th Study Session comments from the City Council, Planning Commission, and general public and staff response to those comments. Key changes, in response to comments, are summarized below.

Categorization of Properties as "Underutilized" in the Land Inventory Analysis. The City Council and Planning Commission wanted staff to explain within the document the meaning of the word "underutilized". There was concern that properties listed as underutilized within the Land Inventory tables would be misconstrued to indicate that they are not being used at all and that they will be developed with housing. Staff explained that "underutilized" only refers to the fact that properties either have no housing (but are developed for commercial uses) or have less housing than the Zoning Code allows. The State when which will be reviewing the Draft Housing Element, considers such properties as "underutilized". This does not mean that those sites will be developed with residential units because property owners have the right to develop their properties as they see fit.

The Preface to Housing Element, 2nd paragraph, contains an explanation of the Land Inventory Analysis and Appendix B has an added 1st paragraph that expands on the explanation of "underutilized"; in both cases "underutilized" is explained as properties with the potential for some additional housing development according to the current zoning, and does not indicate that those properties must be developed for housing. In other words, inclusion of a parcel on the list of underutilized properties has no effect on current laws and regulations regarding the future use and development of the site.

Affordable Housing, Housing for Caregivers/Young Professionals, Workforce Housing, and Life Cycle Housing. The City Council and Planning Commission wanted staff to address as policies or measures in the Draft Housing Element, housing for caregivers/young professionals, workforce housing, and life cycle housing. Life cycle housing refers to the notion that residents continue to live in the City as they age and their housing needs change. For example, a single, young professional lives in a condominium or apartment, then marries and moves into a single family home to start a family, and finally moves back into a condominium or apartment (or possibly assisted living), upon retirement when all the children have grown and moved away - all this occurring in the same City.

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- *In Chapter V, Policy 2E was revised to include a provision for "life-cycle housing" and housing for young professionals,*
- *In Chapter V, two new policies, 4.J and 4.K, that encourage housing for caregivers and the elderly (who may need in-home caregivers) were added;*
- *In Chapter V, A new Measure 2J was added regarding workforce housing.*

The Draft Element as an "Enforcement Document". The City Council and Planning Commission wanted staff to revise the "Introduction to the Housing Element" page which stated that the Draft Housing Element was not an enforcement document. The concern was over interpretation of the General Plan and whether or not it can be considered a document that has the force of law like the Zoning Code. Rather than state something that could be misconstrued, the City Council and Planning Commission asked that the enforcement reference be taken out.

The "Introduction" was re-named "Preface to Housing Element" and was relocated to just before the 1st page of Chapter I; the 2nd paragraph of the Preface was revised by eliminating previous language characterizing the document as not having enforcement capability.

Listing of Approved Mixed Use Projects As Affordable. Two approved (but not yet constructed) mixed use projects are listed in the Land Inventory Tables and have densities that are above the State "Default Density" of 30 dwelling units per acre. For the State, projects on developable land with densities that are equal to or greater than the Default Density are considered able to accommodate affordable housing and cities can categorize such sites as affordable. Staff listed the two approved mixed use projects as affordable. The City Council and Planning Commission did not feel comfortable submitting a document to the State that lists these two mixed use projects as affordable housing projects when it is known that those projects have no affordable components.

Chapter III, Table III-2 and Appendix B, Table B-2, were revised by moving some approved mixed-use dwelling units from the Very Low/Low category to the Above Moderate category. Even with these reductions in potential new affordable units, Table III-2 still demonstrates the City's ability to accommodate its RHNA allocation.

"At-Risk" Analysis in Appendix C. A member of the audience and the City Council and Planning Commission expressed concern about having the "At Risk" analysis in Appendix C. They thought that given the importance of the "At Risk" analysis, it should be in the main body of the document.

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The "At Risk" analysis that was previously in Appendix C was moved to the main body of the document and was specifically relocated under subsection F of Chapter II; Appendix C was revised accordingly.

Methods to Implement the Housing Element and the Housing Strategy. The City Council and Planning Commission were concerned about how the City could implement the Housing Element and wanted to know what was new in this Element as compared to the last Element. Staff indicated that the Housing Strategy is the most significant new feature of the Housing Element since it identifies potential sites for new affordable housing development to be initiated by the City's Redevelopment Agency. The City Council and Planning Commission instructed staff to specifically call out and name those measures that implement the Housing Strategy.

In Chapter V, Measures 2F, 2G and 2H were revised to specifically call out the new Comprehensive Housing Strategy.

Documenting Comments. The City Council and Planning Commission wanted to be sure that their comments and comments by the public (as well as staff responses to those comments) were included in either the Agenda Item Report or the Housing Element.

A new Appendix D has been added that summarizes the public/Council/Commission comments from the June 30th Study Session.

Other Revisions. The following are further revisions to the document that are editorial in nature.

- *In Chapter III, Subsection C, Energy Conservation, language was added that describes the Solar Photovoltaic Ordinance.*
- *In Chapter IV, Table IV – 5, Summary of Development Fees, was revised to reflect the new fees that became effective on August 22, 2008.*
- *In Chapter V, Measure 5D was revised by eliminating language that calls for "distribution" of property information.*
- *In Chapter V, Table V-2 was revised to be consistent with the revisions to the Measures noted above.*
- *The Glossary is now in Appendix E (formally Appendix D).*

Concern over Protection of Existing Neighborhoods from Development

The Draft Housing Element has in its Goals, Objectives, Policies, and Measures, language that specifically calls for the protection of the character of existing neighborhoods. Specifically within Chapter V, Goal 1, Policy 1.B, Policy 2.B, Policy

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2.C, Measure 1I, and Measure 1J all address in some form the preservation of existing neighborhoods and maintenance of their character.

City's Performance During Last RHNA Cycle/Consequences for not Achieving Goals

The City Council and Planning Commission asked about the City's performance in the last RHNA cycle and consequences if RHNA targets are not achieved. The City did not construct the number of dwelling units as called for by RHNA during the last RHNA Cycle. However, it must be recognized that cities do not build housing, and therefore a variety of factors, including general economic conditions and property owner intentions, affect when and what type of development occurs. If a City has adopted policies and measures in the Housing Element and development standards and allowed densities in the Zoning Code that accommodate a variety of new housing as called for in the RHNA, then a shortfall in housing production as compared to the level of need will not result in any action against the city.

Age and Validity of data sources - 1980 and 1990 Data

There was some discussion at the Study Session about data, its age, and other data sources. Data sources used in the Housing Element such as the 2000 U.S. Census and 2007 California Department of Finance, are standard sources acceptable to HCD and considered adequate for this Housing Element update. Chapter II was not revised to include 1980 and 1990 data because while such data may be interesting to some, it is not required by HCD for certification of the Housing Element. At this stage in the process, adding the 1980 and 1990 data and revising the analysis to reflect this information would delay the City's submission of the document to HCD.

Affordable Housing in the Form of Inclusionary Housing

Both the general public and some members of the City Council and Planning Commission inquired about inclusionary housing, which is a requirement for a certain percentage of dwelling units to be reserved for households of low- or moderate-income. In lieu of providing affordable units, inclusionary ordinances typically allow a developer to pay a fee that would be put into a trust fund for new affordable housing construction or conversion of existing units to affordable rents or prices.

Inclusionary policies are left to the discretion of each jurisdiction in state law, therefore the Council, if it wishes, may instruct staff to include a measure directing staff to prepare an inclusionary ordinance for Council consideration, or conduct a study of the feasibility of an inclusionary housing ordinance.

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OPPORTUNITIES FOR PUBLIC INVOLVEMENT

Public participation is an essential part of the planning process in Culver City. An initial public workshop was held in the Council Chambers on February 26, 2008 as well as the June 30, 2008 Study Session. In addition, as described below in the "Conclusion" section, following HCD review, there will be additional opportunities for public input at the future Planning Commission Adoption Hearing and a City Council Adoption Hearing. For each of these meetings there will be a City-wide residential mailing and notification of Culver City organizations, housing developers, and Westside Housing advocates.

FISCAL ANALYSIS:

There is no fiscal impact associated with the authorization for submission of the Housing Element to the State for their review; this is part of the Housing Element update budget and does not require action on the part of the City that would necessitate expenditure of City funds at this time.

CONCLUSION:

Staff requests that the City Council authorize transmittal of the draft 2008 Housing Element to HCD for their 60-day review. Following receipt of HCD comments, a revised draft Housing Element will be prepared and public hearings will be scheduled before the Planning Commission and City Council for final review and adoption of the Housing Element.

ATTACHMENTS:

1. June 30th Study Session Agenda Item Report
2. Summary of Comments and Responses from June 30th Study Session (Table D-1 Public Participation Summary)
3. Draft Housing Element dated August 25, 2008 (delivered to Council under separate cover)

MOTION:

That the City Council:

Authorize staff to submit the Draft 2008 Housing Element, as revised by staff, to HCD for their review.

~~STATE OF CALIFORNIA-BUSINESS TRANSPORTATION AND HOUSING AGENCY~~
DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT

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~~ARNOLD SCHWARZENEGGER, Governor~~



November 7, 2008

Mr. Sol Blumenfield
Community Development Director
City of Culver City
9770 Culver Boulevard
Culver City, CA 90232

Dear Mr. Blumenfield:

RE: Review of the Culver City's Draft Housing Element

Thank you for submitting Culver City's draft housing element received for review on September 8, 2008. The Department is required to review draft housing elements and report the findings to the locality pursuant to Government Code Section 65585(b). A telephone conversation on November 5, 2008, with Ms. Susan Yun, Mr. Jose Mendivil, and the City's Consultant, Mr. John Douglas, facilitated the review. In addition, the Department considered comments from Ms. Ruth Schwartz, of Shelter Partnership Inc., pursuant to Government Code Section 65585(c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State housing element law (Article 10.6 of the Government Code). In particular, the element should include analyses of the adequacy of identified sites to accommodate the regional housing need for lower-income households and revise programs to address identified housing needs. The enclosed Appendix describes these and other revisions needed to comply with State housing element law.

The Department would be happy to arrange a meeting in either Culver City or Sacramento to provide any assistance needed to facilitate your efforts to bring the element into compliance. If you have any questions or would like assistance, please contact James Johnson, of our staff, at (916) 323-7271.

Sincerely,

A handwritten signature in cursive script that reads "Cathy E. Creswell".

Cathy E. Creswell
Deputy Director

Enclosure

cc: John Douglas, Conexus, Consultant
Thomas Gorham, Planning Manager/Deputy Community Development Director
Ruth Schwartz, Executive Director, Shelter Partnership

APPENDIX CITY OF CULVER CITY

The following changes would bring Culver City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on the Department's website at www.hcd.ca.gov/hpd. Refer to the Division of Housing Policy Development and the section pertaining to State Housing Planning. Among other resources, the Housing Element section contains the Department's latest technical assistance tool *Building Blocks for Effective Housing Elements (Building Blocks)* available at www.hcd.ca.gov/hpd/housing_element2/index.php, the Government Code addressing State housing element law and other resources.

A. Housing Needs, Resources, and Constraints

1. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households (Section 65583(a)(1)).*

Extremely Low-Income: In accordance with Chapter 891, Statutes of 2006, the element must identify the number of existing and projected extremely low-income households and analyze their housing needs. While the element identifies (Table II-8) 800 renter and 265 owner extremely low-income households, the element must also analyze the specific housing needs of extremely low-income households to formulate policies and programs to assist in the development or maintenance of housing for extremely low-income households. For additional information, please refer to the *Building Blocks'* website at http://www.hcd.ca.gov/hpd/housing_element2/EHN_extremelylowincome.php.

2. *Include an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites (Section 65583(a)(3)). The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period (Section 65583.2).*

Considering units built and approved since January 1, 2006, the City has a remaining regional housing needs allocation (RHNA) of 402 housing units, of which 200 are for lower-income households. To address this need, the element relies on a combination of vacant, non-vacant and underutilized sites, including sites in Specific Plan and Mixed-Use areas. However, to demonstrate the adequacy of these sites and strategies, the element must include more detailed analyses, as follows:

Realistic Capacity: The element must describe the methodology used to calculate the anticipated residential capacity on the identified sites. This analysis must adjust the calculation based on land-use controls and site improvements and could also consider typical built densities. For non-residential sites, particularly in the Commercial General zone, the residential capacity estimates should consider the extent to which non-residential uses are allowed. In addition, the element should indicate whether the 9 unit per lot limit (Program 2.E) impacts the feasibility and capacity of sites identified in the inventory, particularly the Midway and Venice Projects as indicated in Table B-3.

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Suitability of Small Sites: If the City is relying on the sites in Table B-5 and B-6 to accommodate a portion of its remaining regional need for lower-income households, the element must also demonstrate the potential and ability to facilitate housing for lower-income households on these small parcels. For example, while it may be possible to build housing on a very small parcel, the nature and conditions necessary to construct the units often render the provision of housing affordable to lower-income households infeasible. For example, most assisted housing developments utilizing State or federal financial resources typically include at least 50 to 80 units. The element should describe opportunities for lot consolidation including consideration of development trends on small sites as well as policies or incentives to facilitate such development. The revised element could, for example, include a discussion of lot consolidation potential based on surrounding underutilized properties or information on whether sites have potential for medium and high density multifamily development.

Suitability of Underutilized Sites: Tables B-3, B-4, B-6 and B-7 list underdeveloped residential sites in Culver City. The element must however, demonstrate the suitability and feasibility of non-vacant sites to accommodate more intense residential development based on the extent to which existing uses may impede additional residential development and a description, relative to identified sites, of development trends, market conditions and regulatory incentives and standards to facilitate redevelopment or reuse. This analysis could utilize interest from property owners, applications in the planning stage or recent redevelopment activity. The analysis could also describe recent characteristics and circumstances leading to redevelopment, such as discontinuing uses, and could be compared to the identified sites to demonstrate their suitability in the planning period.

Adequate Sites Alternative: The element states the 40-unit Wade project (Table B-3) is a substantial rehabilitation project that will qualify for RHNA credit under AB 438. To credit the rehabilitation of these units toward the City's RHNA, the element must include an analysis pursuant to Government Code Section 65583.1. For example, the element must demonstrate the units were determined to be unfit for human habitation, requiring substantial rehabilitation, and confirm the City will obligate funds during the first two years of the planning period (June 30, 2008 to June 30, 2010). Please refer to the *AB 428 Compliance Checklist* and sample analysis on the Department's *Building Blocks* website at http://www.hcd.ca.gov/hpd/housing_element2/SIA_adeqsites.php.

Sites with Zoning for a Variety of Housing Types: The housing element must demonstrate the availability of sites, with appropriate zoning, that will *encourage and facilitate* a variety of housing types. An adequate analysis should, at a minimum, identify whether and how zoning districts explicitly allow the uses, analyze whether zoning, development standards and permit procedures encourage and facilitate these housing types. If the analysis does not demonstrate adequate zoning for these housing types, the element must include implementation actions to provide appropriate zoning:

- Emergency Shelters: The City has estimated an existing need of between 40 to 50 homeless persons and states the City has just recently approved 60-bed fulltime emergency shelter to address this need. However, to demonstrate the existing shelters can accommodate the homeless need, the element must also consider vacancy rates (i.e., whether the shelter is continually at full capacity) and seasonal fluctuation. In addition, it is the Department's understanding the Upward Bound

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Shelter is exclusively for homeless women and children. Therefore this analysis must also consider the needs for all identified homeless populations including, women, families with children and single adult males. Should the revised element demonstrate the need for additional emergency shelters to address the needs of all homeless population, the City must identify a zone(s) where emergency shelters are permitted without a conditional use permit (CUP) or other discretionary action. To assist in addressing this statutory requirement, refer to the Department's Chapter 633, Statutes of 2007 (SB 2) memo at http://www.hcd.ca.gov/hpd/sb2_memo050708.pdf.

- Single Room Occupancy: The element states (page IV-5) the City does not have specific zoning for SROs and that SROs are treated as similar commercial uses (i.e., hotels). As zoning does not explicitly allow SROs, the element must include a program to amend zoning to allow the use and ensure zoning, development standards and permit procedures encourage and facilitate the development of SRO units.
 - Transitional and Supportive Housing: The element indicates transitional housing is included in the definition of residential care facility and would therefore be subject to a CUP if the facility serves greater than 6 individuals (page IV-3, footnote to Table IV-3). Please note, pursuant to SB 2, transitional and supportive housing must be treated as a residential use, subject only to the same permitting processes as other housing in the subject zone (e.g., multifamily housing) without undue special regulatory requirements. The element must be revised to comply with these requirements. For your information, supportive housing is as defined (Section 50675.14 of the Health & Safety Code) as having no limit on the length of stay, is linked to onsite or offsite services, and is occupied by a target population as defined in Health & Safety Code Section 53260 (i.e., low-income persons with mental disabilities, AIDS, substance abuse or chronic health conditions or persons whose disabilities originated before the person turned 18).
3. *Analyze potential and actual governmental constraints upon the maintenance, improvement, and development of housing for all income levels, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures. The analysis shall also demonstrate local efforts to remove governmental constraints that hinder the locality from meeting its share of the regional housing need in accordance with Section 65584 (Section 65583(a)(5)).*

Land Use Controls: The element describes (pages IV-5 and IV-6) parking requirements for Culver City and concludes, without analysis, these standards are reasonable and are not considered a constraint to affordable development. The element, however, should analyze the cumulative impact of parking requirements, particularly for multifamily housing. For example, the two-space requirements for studio and one bedroom apartments greater than 900 square feet should be analyzed for its impact on the cost and affordability of housing development. The element could also discuss any allowable parking reductions for transit-oriented development or senior/disabled housing. If necessary, the element should include a program to address and remove or modify the potential constraint.

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In addition the element should describe the development standards for the City's commercial general and mixed-use zones.

Local Processing and Permit Procedures: The element must include a detailed description and analysis of the total typical review process for both single- and multi-family units to evaluate potential impacts on the cost and supply of housing. In addition, the element should describe the permit process for developing residential housing in the City's commercial general zone. Based on the outcomes of this analysis, the element may need to add programs to address the guidelines as a constraint. For additional information, refer to the sample analysis in the *Building Blocks*' section on Permit Processing and Procedures at http://www.hcd.ca.gov/hpd/housing_element2/CON_permits.php.

Design Review: Program 2-D states the City will develop design guidelines for residential zones to ensure that new multiple-family developments will be consistent with existing low density character of the neighborhood. The City should analyze the proposed guidelines to evaluate the impact on supply and affordability of multiple-family housing.

Fees: While the element included a listing of some typical fees for a multifamily project the City should consider all planning and impact fees. For example, the element indicates the City may require land dedication and or in-lieu fees but provides no further information. In addition, the element should discuss the residential surcharge fee for new construction.

On/Off-Site Improvements: While the element states the City requires developers to provide on- and off-site improvements necessary to serve their projects (page IV-9), no additional information on the actual standards is provided. The element must be revised to describe and analyze specific on- and off-site improvements for residential development such as requirements for street widths, sidewalks, water and sewer connections and circulation improvements required for residential developments and assess their impact on the cost and supply of housing.

Constraints on Persons with Disabilities: The element must include a complete analysis of zoning, development standards and approval procedures for the development of housing for persons with disabilities. For example, among other things, the element should identify and analyze: (1) any definitions of family in the zoning code; (2) whether the locality has an established reasonable accommodation procedure (3) maximum concentration requirements for residential care facilities; (4) any site planning requirements that may constrain housing for persons with disabilities; and (5) any parking requirements for housing for persons with disabilities. In addition, the element should analyze the permit processing procedures for residential care facilities serving seven or more and how this process encourages and facilitates the use. Please refer to the Department's *Building Blocks for Effective Housing Elements*' section on Constraints for Persons with Disabilities and SB 520 memo and analysis tool at http://www.hcd.ca.gov/hpd/housing_element2/CON_disabilities.

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4. *Analyze any special housing needs, such as those of the handicapped, elderly, large families, farmworkers, families with female heads of households, and families and person in need of emergency shelter (Section 65583(a)(7)).*

The identification and analysis of special needs should be expanded beyond the basic household and individual counts and general description of the various groups. The analysis must discuss the nature of the special housing need of each group in Culver City and could consider various housing types and available resources. For example, the element should include an analysis of resources available to address the needs of disabled, elderly and large-family households. A thorough analysis will help identify those with the most serious housing needs to develop and prioritize responsive programs. For additional information, please refer to the Department's *Building Blocks* at http://www.hcd.ca.gov/hpd/housing_element2/HN_SHN_home.php.

In addition, the element indicates Culver City comprises 6 percent of the total population of the West Los Angeles Planning Area (SP5) which would proportionally result in an estimated need of 400 homeless persons. However, it indicates an estimated need of between 40 and 50 homeless persons residing in parks, cars and homeless encampments along Ballona Creek. Given the extensive homeless need in the Los Angeles basin, the City should more thoroughly document its estimates of need, including as noted in finding A-2, consideration of the various subpopulations (single adult men, families with children, etc.) The City could engage service providers and groups such as Shelter Partnerships and the Special Needs Housing Alliance to assist with this analysis.

5. *Analyze the opportunities for energy conservation with respect to residential development (Section 65583(a)(8)).*

While the element describes some strategies for energy conservation through promotion of solar photovoltaic power and through weather-stripping and caulking doors and windows, the element must include a more thorough description of energy conservation opportunities in residential development. Given the importance of promoting strategies to address climate change and energy conservation, the element should facilitate adoption of housing and land-use policies and programs that meet housing and conservation objectives. For example, the element could include incentives to promote higher density housing along transit, encourage green building techniques and materials in new and resale homes, promote energy audits and participation in utility programs, and facilitate energy conserving retrofits upon resale of homes. Additional information on potential policies and programs to address energy conservation objectives is available in the *Building Blocks* technical assistance tool at http://www.hcd.ca.gov/hpd/housing_element2/SIA_conservation.php.

B. Housing Programs

1. *Include a program which sets forth a five-year schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the housing element through the administration of land-use and development controls, provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions (Section 65583(c)).*

To address the program requirements of Government Code Section 65583(c)(1-6), most programs should be revised to include a description of the City's specific role in implementation, specific objectives, quantified where appropriate, and definitive implementation timelines for the objectives. Programs to be revised include, but are not limited to the following:

Program 1-I: How will Culver City market its Neighborhood Preservation Program?

Program 1-K: indicate the City will continue to contract with the Housing Rights Center to provide information and assistance regarding landlord/tenant rights. In addition, the element should include specific commitment to disseminate fair housing information throughout the City in a variety of public locations and to establish a process to refer or resolve fair housing complaints.

Program 2-B: By what date will Culver City reintroduce its program to help developers purchase units to be rehabilitated?

Program 2-J: By what date will the City complete review of the Study and evaluate potential for a Workforce Housing Program? The Program should also include a specific date by which the City will commit to implementation of the new program.

Program 3-A: How will the City promote availability of the program? What specific incentives will be provided?

Program 4-C: What role will the City play in facilitating home purchases and how many per year?

2. *Identify adequate sites which will be made available through appropriate zoning and development standards and with public services and facilities needed to facilitate and encourage the development of a variety of types of housing for all income levels, including rental housing, factory-built housing, mobilehomes, and emergency shelters and transitional housing. Where the inventory of sites, pursuant to paragraph (3) of subdivision (a), does not identify adequate sites to accommodate the need for groups of all household income levels pursuant to Section 65584, the program shall provide for sufficient sites with zoning that permits owner-occupied and rental multifamily residential use by right, including density and development standards that could accommodate and facilitate the feasibility of housing for very low- and low-income households (Section 65583(c)(1)).*

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As noted in finding A-1, the element does not include a complete site analysis and therefore, the adequacy of sites was not established. Based on the results of a complete sites inventory and analysis, the City may need to add or strengthen programs to address a shortfall of sites or zoning available to encourage a variety of housing types. At a minimum, the element should be revised as follows:

- Program 2.F: As the City is relying heavily on sites and projects within its Redevelopment Agency's Comprehensive Housing Strategy Plan to accommodate its regional need for lower-income households, the element must indicate a specific date by which the Agency will complete its study of Agency owned sites to analyze opportunities for mixed-use development.
 - The element must include specific programs to encourage and facilitate mixed-use development in commercial general zones. While the element includes Program 2-G to monitor applications and work with the developer to include an affordability component, as the City is reliant on these sites to accommodate its regional need, the program must include specific efforts to assist in the development of affordable units on these sites.
 - Program 2.H: By what date will the City acquire sites identified in the Housing Priority List? How will the City assist in the development of affordable units on these sites?
 - Program 2.I: By what date will the City complete evaluation and submit to the City Council for Approval?
 - The element should be revised to include a specific date by which the City will amend its zoning ordinance to allow for transitional and supportive housing as residential uses. This action should occur early enough in the planning period to provide realistic opportunities for development of these uses.
 - The element must include a program to amend the zoning ordinance to expressly allow single-room occupancy units.
3. *Provide information on the redevelopment agency's role in the City's effort to encourage the development of a variety of housing types for all income levels (Section 65583(c)).*

The element lists several projects in the "Redevelopment Agency Housing Sites" (Table B-3) and includes costs for the projects in the redevelopment comprehensive housing strategy plan. The element, however, must also identify the estimated amount expected to accrue in the Low- and Moderate-Income Housing Fund (LMIHF) throughout the planning period. Given that most programs in the element rely on the LMIHF for implementation, the element should also demonstrate the adequacy of this funding resource.

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4. *The housing element shall contain programs which "assist in the development of adequate housing to meet the needs of extremely low-, low- and moderate-income households (Section 65583(c)(2)).*

While the element includes some programs to assist the development of very low-, low- and moderate-income households, programs should be expanded to specifically assist in the development of a variety of housing types to meet the needs of extremely low-income households. The element should include programs to address identified housing needs or modify existing programs to ensure they address extremely low-income households.

In addition, the element must be expanded to include specific actions the City will take to assist in the development of multifamily rental housing. Actions could include assistance with site identification and entitlement processing, fee waivers and deferrals, modifying development standards and granting concessions and incentives for multifamily projects to provide housing for lower-income households including large-family lower-income households. For example, the City could consider prioritizing use of other funds for rental projects which provide some units with three or more bedrooms.

Program 1-P: How will the City identify opportunities? What assistance will the City offer to developers? What is the City's specific role in implementation?

Program 1-A: How will the City promote its density bonus program?

Program 1-H: While the program indicates the City will monitor group homes to ensure compliance with Federal Housing Quality Standards, it is unclear what specific role the City will take in facilitating and encouraging housing to address the needs of identified special needs groups.

5. *The housing element shall contain programs which "address, and where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Section 65583(c)(3)).*

As noted in finding A-3, the element requires a more detailed analysis of potential governmental constraints. Depending upon the results of that analysis, the City may need to strengthen or add programs and address and remove or mitigate any identified constraints.

6. *The housing program shall preserve for low-income household the assisted housing developments identified pursuant to paragraph (8) of subdivision (a) (Section 65583(c)(6)).*

The elements indicate 101 units are at-risk of converting to market-rate during the planning period. Program 1-N includes a general commitment to provide assistance for the management and preservation of affordable housing units but provides no specific information on the City's role in implementation. Preserving the existing stock of housing affordable to lower-income households is important and the program should be revised to include more proactive and specific efforts. Specifically, the City could commit to specific actions to strengthen relationships with nonprofits and develop a plan or strategy for quickly moving forward in the case units are noticed to convert to market-rate uses in the

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planning period including efforts to ensure tenants receive proper notifications. Sample programs are included in the *Building Blocks'* section on Preserve Units At-risk of Conversion to Market Rate Uses at http://www.hcd.ca.gov/hpd/housing_element/screen34_atriskprogram.pdf.

The element should also include a list of potential non-profit organizations with an interest in maintaining affordable housing in Culver City and develop a program to monitor units at risk and develop a strategy to work with local entities interested in preserving affordable units. According to information provided to the Department, entities which may be interested in such developments in Los Angeles County are indicated on a roster which is available in the *Building Blocks'* technical assistance tool at <http://www.hcd.ca.gov/hpd/hrc/tech/presrv/hpd00-01.xls>. The element should reference this or other appropriate resource for this information.

C. Public Participation

Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the element shall describe this effort (Section 65583(c)(7)).

While the element describes the City's public participation process and provides comments from some of the participants, the element must clearly demonstrate the City's diligent effort to engage all economic segments in the development of the housing element including non-profit developers and specific organizations serving lower-income households by describing how input was solicited, considered and incorporated. In addition, the City must continue to make a committed effort to include all economic segments of the community throughout the revision, adoption and implementation of the housing element.

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DRAFT

HCD Comments and Responses
City of Culver City
June 24, 2009

HCD Comment	Housing Element Page Reference (revised draft)	Response
A.1 Extremely-low-income (ELI) needs	p. II-7 p. V-4, V-8 & V-12	Additional analysis of ELI households has been provided in the Needs Assessment (Chapter II). In addition, Measures 1a, 1b, 2f and 4b in the Housing Action Plan (Chapter V) have been expanded to address ELI needs.
A.2 Land inventory		Additional discussion of the methodology for determining realistic site capacity has been provided in Appendix B. This analysis demonstrates that the estimates of site capacity are justified based on actual development trends.
-Realistic capacity of sites for housing development	Page B-2	Additional discussion of small and underutilized sites has been provided in Appendix B. It must be noted that the City will meet most of its very-low- to moderate-income RHNA goals through the Redevelopment Agency Comprehensive Housing Strategy (CHS) as reflected in Table B-3 of Appendix B. Other sites such as those in Tables B-5 and B-6 may yield housing during the current RHNA Planning cycle but the thrust of new affordable housing construction will be concentrated in those CHS sites as listed in Table B-3. The analysis of underutilized Residential Medium Density (RMD) sites has been modified using a more conservative methodology resulting in a reduction in the estimated capacity.
-Suitability of small sites and underutilized sites	Pages B-1 to B-6	The land inventory analysis has been revised and no alternative site credit is claimed for the Wade Street substantial rehabilitation project.
-Adequate sites alternative	p. B-3	The analysis of emergency shelter needs has been revised in response to HCD comments. Measure 2.L has been included to amend the Municipal Code in conformance with SB 2.
-Emergency shelters	p. II-24 & 25 p. IV-8/9 p. V-10/11	

HCD Comment	Housing Element Page Reference (revised draft)	Response
-Single room occupancy	p. IV-9 p. V-10	The constraints analysis of SRO housing has been expanded and Measure 2.K has been added to the Housing Action Plan to amend the Municipal Code to provide a definition, development standards and permit procedures for SROs.
-Transitional & supportive housing	p. IV-9 p. V-10/11	The constraints analysis for transitional/supportive housing has been expanded and Measure 2.L has been included in the Housing Action Plan to amend the Municipal Code to add definitions, development standards and permit procedures for transitional/supportive housing that are no different than for other residential uses of the same type in the same zone, consistent with SB 2. This will include amending the definition of Residential Care Facilities.
A.3 Constraints analysis		
-Land use controls – parking and commercial/mixed-use development standards	p. IV-4 & IV-10 p. V-11	Additional discussion of parking requirements and mixed Use development standards has been provided in Chapter IV. Measure 2-O has been added to reduce parking requirements to one space for studio and 1-bedroom units that are reserved for lower-income occupants.
-Processing and permit procedures	p. IV-12/13	A description of the processing and permit procedures is included in Chapter IV (Constraints). These procedures are the same for multi-family and mixed-use developments.
-Design review	p. V-8	In response to HCD's comment, Measure 2.D has been amended to include a program commitment to consider the effect the Guidelines may have on housing supply and affordability.
-Fees	p. IV-14/15 p. V-11	Additional discussion of planning and development fees is provided in Chapter IV. The Housing Element notes that low- to moderate-income units are exempt from In-lieu Parkland Fees and Art in Public Places Fees. Measure 2-P also commits the City to offsetting the new construction surcharge fee for Agency-assisted projects from the housing set-aside fund.
-On/off-site improvements	p. IV-16	Additional discussion has been provided regarding the City's improvement

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HCD Comment	Housing Element Page Reference (revised draft)	Response
-Persons with disabilities	p. IV-7/8 p. V-11	Additional analysis has been provided regarding requirements and permit procedures for housing for the disabled, including the definition of "family", reasonable accommodation procedures, maximum concentration requirements for residential care facilities, site planning requirements, and parking requirements. In addition, Measures 2.M and 2.N have been included in the Housing Action Plan to adopt a definition of "family" and reasonable accommodation procedures.
A.4 Special housing needs & resources	p. II-19 through 26 p. V-10	Additional analysis has been provided in the Needs Assessment (Chapter II) regarding special housing needs as well as a discussion of resources and programs available to address these needs. Also, the discussion of homeless needs has been revised and Program 2.I has been expanded to include a Code amendment regarding emergency shelters pursuant to SB 2.
A.5 Opportunities for energy conservation	p. III-7/8	As described in the Housing Element the City already has a photovoltaic ordinance that reduces energy costs. Further, in 2009-10 the City will be implementing the Affordable and Green Rehabilitation Program through the use of Housing Set Aside Funds. With recent approval of the Solar Photovoltaic Ordinance, the Housing and Building Divisions will work to provide grants for projects that have a low/moderate income component and include other sustainable features such as higher efficiency windows and insulation. This grant is proposed to be offered as a rebate where property owners/developers will be reimbursed for the cost of "greening" their affordable units.
B.1 Housing programs	p. V-4 through 14	Additional details regarding City programs have been provided in Chapter V, the Housing Action Plan.
B.2 Adequate sites -Site inventory and analysis		Please see the discussion above under Item A.2, Land Inventory.

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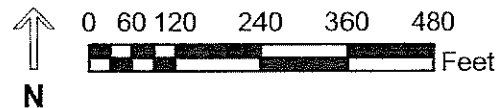
HCD Comment	Housing Element Page Reference (revised draft)	Response
-Measure 2.F	p. V-8/9	Measure 2.F has been expanded to describe the Agency's Comprehensive Housing Strategy in detail.
-Measure 2.G	p. V-9	Measure 2.G has been amended to include the following language: "...encourage developers to apply for DOB applications in order to include affordable units within development projects. In addition, the Redevelopment Agency Comprehensive Housing Strategy includes a strong commitment to work with developers to encourage and facilitate affordable housing.
-Measure 2.H	p. V-9	Measure 2.H has been expanded to provide more detail regarding how and when the Agency will assist affordable housing development.
-Measure 2.I & J	p. V-9/10	Measures 2.I and 2.J have been amended to provide additional detail including an implementation schedule.
-Transitional and supportive housing	p. V-10/11	Measure 2.L has been added to include a specific date for adoption of a Code amendment regarding Transitional/Supportive housing.
-SROs	p. V-10	Measure 2.K has been added to include a commitment and schedule for adoption of a Code amendment regarding SROs.
B.3 Redevelopment agency funding	p. III-4 through 7	Additional discussion of the Redevelopment Agency's Comprehensive Housing Strategy and funding has been provided in Chapter III, Resources and Opportunities.
B.4 Programs to assist extremely-low-income (ELI) households and multi-family housing development	p. V-4	Culver City addresses the needs of ELI households through the provision of rental assistance from both the federal Section 8 Housing Choice Voucher Program (HCVP) and the Redevelopment Agency's Rental Assistance Program (RAP) funded with Housing Set Aside funds. Because the Section 8 HCVP has an extensive wait period sometimes in excess of five years, Culver City created the RAP program to assist the homeless and other extremely-low-income residents. The RAP program functions similar to the Section 8 HCVP where a household does not pay more than 30% of its gross income

HCD Comment	Housing Element Page Reference (revised draft)	Response
		towards rent with the remainder subsidized through the RAP Program. The RAP Program is utilized to address the rental burden of extremely-low income households and to help homeless persons secure and retain shelter. This program is funded at \$500,000 annually and can assist up to 30 homeless and extremely-low income households.
	p. V-8	Additionally, where appropriate and financially feasible, the Agency will seek to include extremely low-income units in the unit mix of new projects identified in the CHS (see Program 2.F).
	p. V-7	The description of Measure 1.P has been expanded to include specific actions the City has taken and will pursue to encourage and facilitate development of multi-family rental housing.
	p. V-5	Measure 1.H has been expanded to include specific previous and proposed actions to assist persons with special needs.
B.5 Programs to remove constraints		Please refer to the revisions discussed under A.3, above.
B.6 Preservation of low-income housing at-risk of conversion	p. V-12	Measure 3.D has been added to the Housing Action Plan to describe specific actions the City will take to extend affordability covenants for at-risk units.
C. Public participation	Appendix D	Appendix D has been expanded to provide additional details regarding the City's efforts to notify and involve the public and non-profit housing organizations. Direct mail notice of Housing Element public meetings was provided to every residence in the City (approximately 17,000 notices), as well as over 100 non-profit organizations. The list of non-profit organizations is too voluminous to include in the Housing Element document, but has been provided to HCD for reference. Appendix D also includes a summary of public comments offered during the preparation of the Housing Element along with how those comments are addressed in the element.



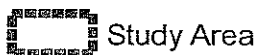
CULVER CITY HOUSING ELEMENT: **PROSPECTIVE AREA FOR EMERGENCY SHELTER LOCATION**

April 28, 2009

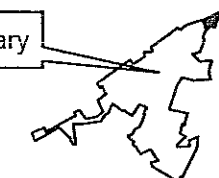


Study Area Map

Legend

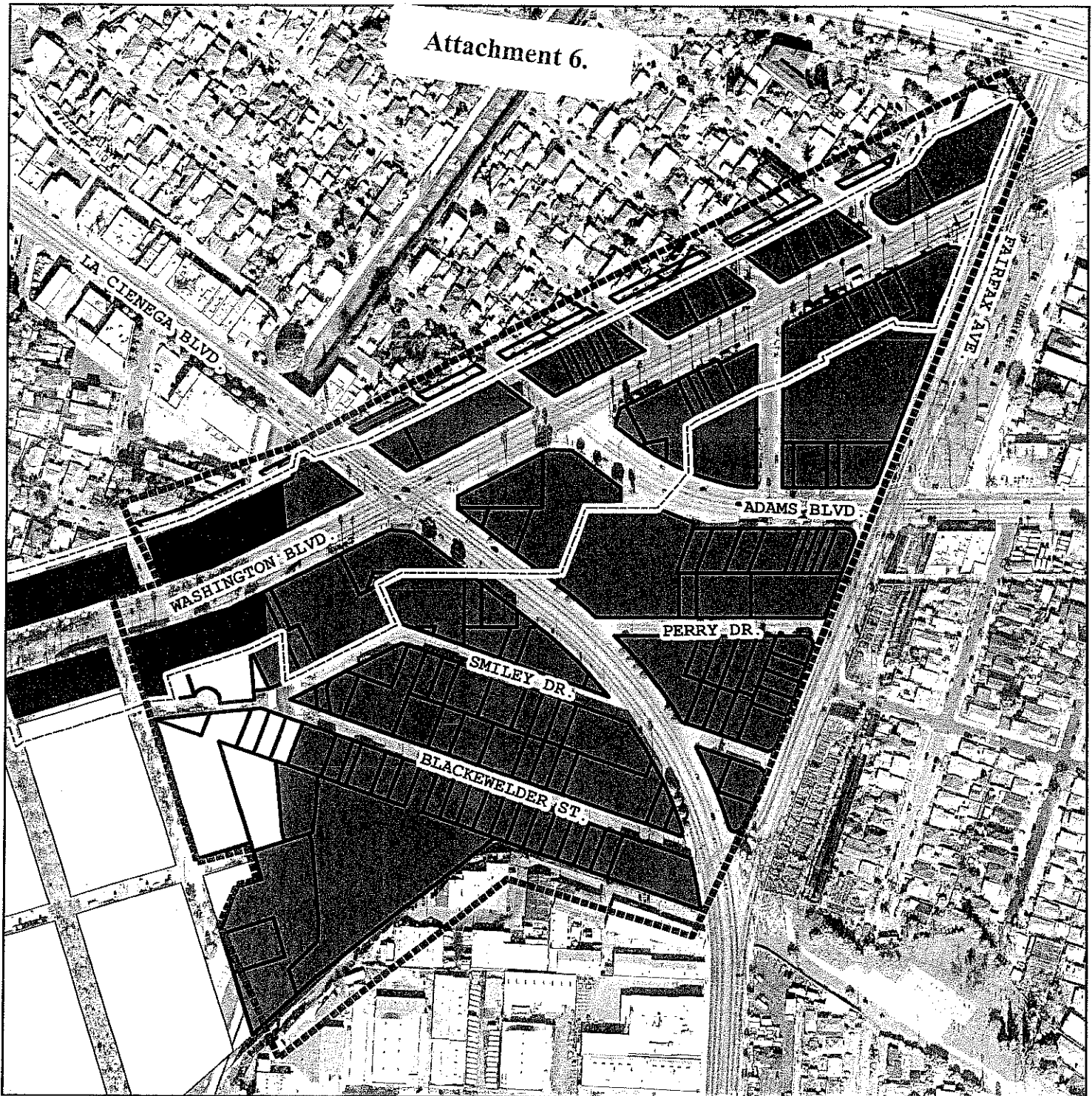


City Boundary



Prepared by

Culver CITY
 COMMUNITY DEVELOPMENT DEPARTMENT



CULVER CITY HOUSING ELEMENT: **PROSPECTIVE AREA FOR EMERGENCY SHELTER LOCATION**

April 27, 2009



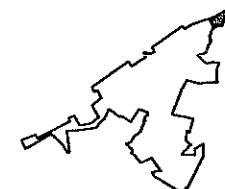
Legend

-  Study Area
-  East Washington Overlay
-  Parcels

Zoning

-  CG
-  IG
-  R2

Zoning Map



Prepared by
Culver CITY
 COMMUNITY DEVELOPMENT DEPARTMENT

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**CITY OF
CULVER CITY**

**2008-2014
HOUSING ELEMENT**

Revised Draft

June 24, 2009

Acknowledgements

The 2008 Housing Element update was a collaborative effort of the City Council/Planning Commission Housing Element Subcommittee, City staff, the City's consultant, and the many citizens of Culver City who gave their time and energy to participate in public workshops and hearings. The City gratefully acknowledges these efforts.

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Preface to Housing Element

The Housing Element is one of nine elements comprising the City of Culver City's General Plan (seven of which are mandatory per §state law). The General Plan is a comprehensive, long-term general plan guide for the physical development of the city. The intent of the General Plan is to communicate the City's strategic thinking and philosophy for the future to residential and business communities and to provide for the physical, social, and economic needs of ~~the City and its people~~ residents. In essence it is the City's vision; the Municipal Code enacts that vision with specific legislative language.

The Housing Element specifically addresses the City's vision as it relates to housing. It is the primary planning guide to identify and prioritize the housing needs of the city and outline the goals, policies, and programs to address those needs while balancing community character, objectives and resources. It is a planning tool that demonstrates how the City intends to address its housing needs during the next six years. More specifically, this document is required to provide a Land Inventory Analysis that establishes the City's ability to accommodate its fair share of the region's new housing construction. Various tables in Appendix B list specific parcels that could accommodate new housing construction with a variety of types and densities. While the land inventory indicates potential development opportunities, there is no obligation on the part of owners to build or redevelop these properties to the maximum potential indicated in this inventory of sites. In the case where the Culver City Redevelopment Agency is the property owner, the Agency shall determine if residential development is appropriate and consistent with applicable City plans and regulations.

References to State Law. Throughout this document are references to state laws related to housing. These references often cite particular bills – "AB" refers to Assembly Bills while "SB" refers to Senate Bills – or the relevant section of a state code. Most state laws relating to housing elements are found in Section 65580 et seq. of the California Government Code, although some applicable laws are found elsewhere, such as in the Health & Safety Code. A brief explanation of cited state laws can be found in the Glossary. Legislative histories and the actual text of these laws may be downloaded at: <http://www.leginfo.ca.gov/calaw.html>.

I. INTRODUCTION

Incorporated in 1917, Culver City is centrally located between Venice Beach/Marina Del Rey and downtown Los Angeles.

Culver City is a community of approximately 40,000 residents and measures approximately five square miles in area. Currently, Culver City's top five employers are Sony Pictures Entertainment, Fox Hills Mall, Brotman Medical Center, Symantec, and the City of Culver City (City Government).

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 workshops, and the Hayden Tract, which serves as a creative industries hub for architects. Throughout its history Culver City has maintained a small town atmosphere for its residents, has preserved single- and two-family neighborhoods, and nurtured medium-density multiple-family apartments and condominiums.

A. Purpose of the Housing Element

The purpose of the Housing Element is to identify the city's housing needs and outline goals, policies, and programs to address them. The Housing Element is a six-year plan, extending from July 1, 2008 through June 30, 2014. The primary issues addressed in the Housing Element include: 1) preservation and improvement of the existing housing stock, 2) housing availability for special needs populations, 3) planning for a sufficient supply of new housing to meet the city's fair share of regional need, and 4) fair housing.

B. Overview

State law requires the preparation of a Housing Element as part of a jurisdiction's General Plan (Government Code §65302(c)). It 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 2008 Housing Element consists of five chapters: 1) Introduction, 2) Housing Needs Assessment, 3) Resources and Opportunities, 4) Constraints, 5) Housing Plan, and six Appendices. The evaluation of the 2001 Housing Element is found in Appendix A, while Appendix B contains background details regarding the city's inventory of sites for housing development. Appendix C identifies affordable housing units that are at risk of conversion to market rate during the next ten years, along with a discussion of potential resources and methods that could be used to preserve their affordability. A summary of the public participation program is found in Appendix D, Appendix E contains a list of Acronyms, while Appendix G contains a Glossary of commonly used terms in this Housing Element.

A key component of the Needs Assessment is the quantification of new housing units needed to accommodate growth in the region. This process, known as the Regional Housing Needs Assessment (RHNA), is carried out by the Southern California Association of Governments (SCAG) and allocates to each jurisdiction a share of new housing need

based on demographic trends, employment, and other community characteristics. The RHNA identifies the level of new housing need that cities must plan for, but is not a construction mandate or "quota". The RHNA process is described further in Chapter II.

Guidelines adopted by the California Department of Housing and Community Development are must also ~~to be~~ considered in the preparation of the Housing Element (§65585). Periodic review of the Housing Element is required to evaluate (1) the appropriateness of its goals, objectives and policies in contributing to the attainment of the state housing goals, (2) its effectiveness in attaining the city's housing goals and objectives and (3) the progress of its implementation (§65588).

C. Public Participation

Public participation is an important component of the planning process in Culver City, and this update to the Housing Element has provided residents and other interested parties numerous opportunities for review and comment. Public notices of all Housing Element meetings and public hearings were published in the local newspaper in advance of each meeting, as well as posting the notices on the city's website. The draft Housing Element was made available for review at City Hall, posted on the city's website, as well as at the Culver City Julian Dixon Public Library. The document was also made available to housing organizations, housing advocates, and non-profit organizations representing the interests of lower-income persons and special needs groups.

As part of the public review process, a Community Public Workshop, two joint City Council/Planning Commission Study Sessions, Planning Commission and City Council Public Hearings on the Housing Element were held. An extensive effort was made to inform interested parties, including representatives of lower-income and special needs persons, of all opportunities for involvement in the Housing Element update process. All of these public meetings served as venues for review and discussion. Appendix D provides a summary of public notification efforts and the comments and issues raised during the preparation and public review of the 2008 Housing Element.

After receiving comments on the draft Housing Element from the state Housing and Community Development Department, a proposed final Housing Element was prepared and made available for public review prior to adoption by the City Council.

D. State Housing Element Requirements

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 §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, and scheduled programs for the preservation, improvement, and development of housing and shall make adequate

provision for the existing and projected needs of all economic segments of the community.

E. Consistency with Other Elements of the General Plan

This Housing Element has been reviewed for consistency with other General Plan elements. The policies and programs in this Element reflect the policy direction contained in the rest of the General Plan. 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 Land Use Element guides the type and intensity of housing units that can be constructed in the various land use districts. Areas in the Land Use Element that are designated for commercial and industrial uses create employment opportunities, which in turn, create demand for housing. The Circulation Element establishes the location and scale of streets, highways and other transportation routes that provide access to residential neighborhoods and to the employment areas.

Because of the requirement for consistency between the various General Plan elements, any proposed amendment or update to a General Plan Element will be evaluated against the other General Plan Elements to ensure that no conflicts occur.

SB 1087 of 2005 (Government Code §65589.7) requires cities to provide a copy of their Housing Elements 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.

II. HOUSING NEEDS ASSESSMENT

This chapter examines the city's general population and household characteristics and trends, such as age, race and ethnicity, 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, costs) are also addressed. Finally, the city's projected housing growth needs based on the 2007 Regional Housing Needs Assessment (RHNA) are examined.

The Housing Needs Assessment utilizes the most recent data from the 2000 U.S. Census, California Department of Finance (DOF), California Employment Development Department (EDD), Southern California Association of Governments (SCAG), and other relevant sources such as the Los Angeles County (2003-2008 Consolidated Plan) and the Los Angeles Homeless Services Authority. Supplemental data were also obtained through field surveys and, where appropriate, from private sources¹.

A. Population Characteristics

1. Population Growth Trends

The City of Culver City grew very slowly during the 1980s and 1990s. Most of the city's growth in the last 30 years has occurred since 2000, with a population increase of over 5% from 2000 to 2007, to an estimated current population of 40,792 (see Table II-1 and Figure II-1). This is similar to the trend for other Westside cities, but contrasts with Los Angeles County, which grew by 18.5% between 1980 and 1990, 8.1% between 1990 and 2000, and an additional 8.2% since 2000. As an essentially built-out city, there have been few opportunities for growth during the last 30 years, except through redevelopment and urban infill.

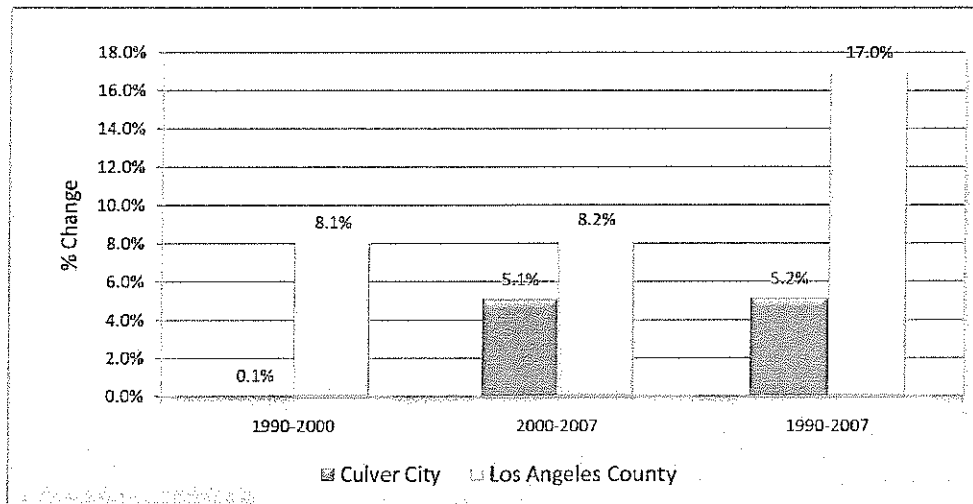
Table II-1
Population Trends, 1990-2007 –
Culver City vs. Los Angeles County

Jurisdiction	1990	2000	2007	Growth 1990-2000	Growth 2000-2007
Culver City	38,793	38,816	40,792	0.1%	5.1%
Westside cities*	193,787	192,478	205,653	-0.7%	6.8%
Los Angeles County	8,863,052	9,579,000	10,366,700	8.1%	8.2%

Sources: 1990 & 2000 Census; Calif. Dept. of Finance Table E-1 (2007)

*includes Culver City, Santa Monica, Beverly Hills, and West Hollywood

¹ The Housing market analysis relies on sales and rental data from DataQuick and RealFacts, two of the largest private sources of real estate data.

Figure II-1 Population Growth 1990-2007 - Culver City vs. Los Angeles County

Source: US Census, California Department of Finance, Table E-1

2. Age

Housing needs are influenced by the age characteristics of the population. Different age groups have different housing needs based on lifestyles, family types, income levels, and housing preference. Table II-2 provides a comparison of the city's and county's population by age group in 2000. This table shows that the age distribution of the city's population is older than Los Angeles County as a whole. Approximately 14% of the city's population is age 65 and over, and approximately 10% for Los Angeles County. An aging population has implications regarding the type and size of future housing needs, as well as accessibility.

Table II-2
Age Distribution

Age Group	Culver City		Los Angeles County	
	Persons	%	Persons	%
Under 18 years	8,096	20.9%	2,667,976	28.0%
18 to 24 years	2,570	6.6%	980,657	10.3%
25 to 44 years	12,930	33.3%	3,099,200	32.6%
45 to 64 years	9,830	25.3%	1,844,612	19.4%
65 to 74 years	2,707	7.0%	492,833	5.2%
75 to 84 years	2,009	5.2%	324,693	3.4%
85 and over	674	1.7%	109,147	1.1%
Total	38,816	100.0%	9,519,338	100.0%
Median Age	39.1		32.0	

Source: 2000 Census, Table QT-P1

3. Race and Ethnicity

The racial and ethnic composition of the city differs from the county in that a lower proportion of city residents are Hispanic/Latino or other racial minorities. Approximately 48% of city residents are non-Hispanic white, contrasted with 31% for the county as a whole. The percentage of Hispanics residing in the city, at 23.7%, is slightly over one-half that of the County. Asians and African Americans, at approximately 12% each, represent the largest non-Hispanic minorities (Table II-3).

Table II-3
Race/Ethnicity

Racial/Ethnic Category	Culver City		Los Angeles County	
	Persons	%	Persons	%
Not Hispanic or Latino	29,617	76.3%	5,277,125	55.4%
White	18,675	48.1%	2,959,614	31.1%
Black or African American	4,536	11.7%	901,472	9.5%
American Indian/Alaska Native	111	0.3%	25,609	0.3%
Asian	4,631	11.9%	1,124,569	11.8%
Native Hawaiian/Pacific Islander	72	0.2%	23,265	0.2%
Other Races or 2+ races	1,592	4.1%	242,596	2.5%
Hispanic or Latino (any race)	9,199	23.7%	4,242,213	44.6%
Total	38,816	100.0%	9,519,338	100.0%

Sources: 2000 Census, SF1 Table P8

B. Household Characteristics

1. Household Composition and Size

Household characteristics are an indicator of 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 sharing 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.

Culver City had 16,611 households as reported in the 2000 Census. Table II-4 provides a comparison of households by type for the city and Los Angeles County as a whole. Family households in 2000 comprised approximately 57% of all households in the city, over 10% less than the County. Another significant difference in household composition between the city and county is the number of single person households (34% city vs. 25% county). Due to these factors, the city's average household size is somewhat lower than Los Angeles County as a whole (2.31 persons per household city vs. 2.98 persons per household county).

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Table II-4
Household Composition

Household Type	Culver City		Los Angeles County	
	Households	%	Households	%
Total Households	16,611	100.0%	3,133,774	100.0%
Families	9,513	57.3%	2,136,977	68.2%
- w/children under 18	4,343	26.1%	1,152,202	36.8%
Non-family households	7,098	42.7%	996,707	31.8%
- Single living alone	5,727	34.5%	771,854	24.6%
- 65 and over living alone	1,544	9.3%	223,473	7.1%
Average household size	2.31		2.98	

Sources: US Census 2000, SF1 Tables P18 and H12

2. Housing Tenure

Housing tenure (owner vs. renter) is an important indicator of the housing market. Communities strive to have an adequate supply of units available both for rent and for sale in order to accommodate a range of households with varying incomes, family sizes and composition, and lifestyles. Table II-5 provides a comparison of the number of owner-occupied and renter-occupied units in the city in 2000 as compared to the county as a whole. It reveals a higher level of homeownership in the city, approximately 6 percentage points higher than the county.

Table II-5
Household Tenure

Tenure	Culver City		Los Angeles County	
	Units	%	Units	%
Owner Occupied	9,034	54%	1,499,744	48%
Renter Occupied	7,577	46%	1,634,030	52%
Total occupied units	16,611	100%	3,133,774	100%

Source: 2000 Census, QT-H1 and H7

3. Overcrowding

Overcrowding is often closely related to household income and the cost of housing. The U.S. Census Bureau considers a household to be overcrowded when there is more than one person per room, excluding bathrooms and kitchens, with severe overcrowding when there are more than 1.5 residents per room. Overcrowded households are usually a reflection of the lack of affordable housing (see Section D4, below for a detailed definition of "affordable" housing). Table II-6 summarizes overcrowding for Culver City in 2000.

**Table II-6
Overcrowding**

Household Type	Culver City		Los Angeles County	
	Households	Percent	Households	Percent
Owner-Occupied	9,033	100.0%	1,499,694	100.0%
Overcrowded	439	4.9%	204,345	13.6%
Severely overcrowded	223	2.5%	111,667	7.4%
Renter-Occupied	7,578	100.0%	1,634,080	100.0%
Overcrowded	1,080	14.3%	516,024	31.6%
Severely overcrowded	706	9.3%	359,608	22.0%

Source: 2000 Census, Table H20

Based on U.S. Census standards, Culver City residents live in relatively less crowded housing conditions than the rest of Los Angeles County. In Culver City in 2000, 9.1% of all occupied units were considered overcrowded based on U.S. Census criteria, including 4.9% of owner-occupied units and 14.3% of renter-occupied units. Overcrowding in both owner-occupied and renter-occupied units in the city is less than one-half of the county level.

4. Household Income

Household income is a primary factor affecting housing needs in a community – with the exception of senior citizens or others who own a home with little or no mortgage, the ability of residents to afford housing is directly related to household income.

Housing needs and assistance programs are based on income categories established in state and federal law. The five categories used in Housing Elements are as follows:

Extremely Low	Up to 30% of Areawide Median Income (AMI)
Very Low	31 – 50% of AMI
Low	51 – 80% of AMI
Moderate	81 – 120% of AMI
Above Moderate	Over 120% of AMI

The Extremely-Low, Very-Low and Low categories taken together are sometimes-referred to as "Lower-Income."

According to the 2000 Census, the median household income in Culver City was \$51,792, about 23% higher than for Los Angeles County as a whole, and slightly higher than for Santa Monica (Table II-7). About 29% of Culver City households fell within the Very-Low and Low-income categories, while just under 20% were Moderate and 52% were Above-Moderate. About 8% are estimated to fall within the Extremely-Low category (<30% of AMI) based on 2000 Census data (SF3 Table P52). In Table II-7 the Extremely Low category is a subset of Very Low.

Table II-7
Median Household Income, 1999 –
Los Angeles County and Surrounding Cities

Jurisdiction	Median Income	% Distribution			
		VL	Low	Mod	Above Mod
Culver City	\$51,792	15.4	13.2	19.5	52.0
Beverly Hills	\$70,945	15.7	9.4	12.3	62.6
Santa Monica	\$50,714	21.8	12.2	15.6	50.4
West Hollywood	\$38,914	27.9	15.6	17.9	38.6
County of Los Angeles	\$42,189	24.7	15.7	17.1	42.6

Median and Income distributions based on 2000 Census for Los Angeles County (data for 1999)
 Sources: 2000 Census SF3 Table P53 and SCAG 11/2/2006

5. Overpayment

According to state housing policy, overpaying occurs when housing costs exceed 30% of gross household income. Table II-8 displays estimates for overpayment in 1999 by lower-income households. According to SCAG, approximately 55% of all lower-income renter households and 66% of all lower-income owner households were overpaying for housing. Over 58% of all categories of lower-income households, both renters and owners were found to be overpaying for housing.

Although homeowners enjoy income and property tax deductions and other benefits that help to compensate for high housing costs, lower-income homeowners may need to defer maintenance or repairs due to limited funds, which can lead to deterioration. For lower-income renters, severe cost burden can require families to double up resulting in overcrowding and related problems.

Table II-8
Overpayment by Income Category – Culver City

Income Category	Renters		Owners	
	Households	Percent	Households	Percent
Extremely low households	800	--	265	--
Households overpaying	395	49.4%	220	83.0%
Very low households	725	--	380	--
Households overpaying	445	61.4%	305	80.3%
Low households	1,165	--	645	--
Households overpaying	640	54.9%	325	50.4%
All lower-income households	2,690	--	1,290	--
Households overpaying	1,480	55.0%	850	65.9%

Source: SCAG 2006 based on 2000 Census

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Extremely Low Income Households

State law requires an analysis of the existing and projected housing needs of extremely-low-income (ELI) households. ELI means a household whose income is 30% or less of the area median income (AMI), adjusted for household size. The 2007 AMI for Los Angeles County was \$56,500 (see Table II-19, page II-19). For ELI households, this results in an income of \$22,200 or less for a four-person household². ELI households have a variety of housing problems and needs.

The relatively high cost of housing on the Westside often results in overpayment and/or overcrowding when ELI households "double up" with more than one family sharing living space. Such conditions may lead to overtaxing of utilities and infrastructure, stress and adverse health effects. Several programs in the Housing Action Plan (Chapter V) designed to address housing affordability will help to alleviate the problems of ELI households. These programs include rental assistance, facilitation of emergency shelters and transitional housing, acquisition/rehab of substandard housing, and new construction of affordable units.

Though RHNA does not specifically call out ELI households as a category, meeting the housing need of these persons is an issue for all municipalities. Culver City will address the needs of this population through the provision of rental assistance from both the federal Section 8 Housing Choice Voucher Program (HCVP) and the Redevelopment Agency Rental Assistance Program (RAP) funded with Housing Set Aside funds. Because the Section 8 HCVP has an extensive wait period, sometimes in excess of five years, Culver City created the RAP to assist the homeless and low-income residents. The RAP functions similar to the Section 8 HCVP where a household pays no more than 30% of their income towards rent and the remainder is subsidized through the RAP. The RAP will be utilized to address the rental burden of ELI households and to help homeless persons secure and retain shelter. This program is funded at \$500,000 annually and can assist up to 30 homeless and ELI households. In addition, the Housing Plan (Chapter V) includes Measure 2K to provide explicit reference to SRO housing in the Municipal Code. SROs are intended to address the needs of extremely-low- and very-low-income persons.

C. 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.

² 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.

1. Current Employment

Current employment and projected job growth have a significant influence on housing needs during this planning period. Table II-9 shows that the city had a workforce of 21,448 persons, or 68% of the working-age population, as reported by Census 2000. This table also shows that the city's population has a somewhat higher participation in the workforce than the county (68% city vs. 61% county).

Table II-9
Labor Force – Culver City vs. Los Angeles County (2000)

Labor Force Status	Culver City		Los Angeles County	
	Persons	%	Persons	%
In labor force	21,448	68%	4,312,264	61%
-Work at home	880	4%	134,643	3%
Not in labor force	10,124	32%	2,810,261	39%
With Social Security income	3,737	12%	618,121	9%
Total population age 16+	31,572	--	7,122,525	--

Source: 2000 Census SF3 DP-3

In 2000, approximately 50% of the city's working residents were employed in management and professional occupations (Table II-10). A low percentage of workers (under 12%) were employed in service-related occupations such as waiters, waitresses and beauticians. Technical, skilled and unskilled occupations such as machine operators, assemblers, farming, transportation, handlers and laborers also constituted less than 12% of the workforce.

Table II-10
Employment by Occupation – Culver City

Occupation	Jobs	Percent
Management, professional and related	10,107	49.8%
Service	2,331	11.5%
Sales and office	5,540	27.3%
Farming, fishing and forestry	-	-
Construction, extraction, and maintenance	1,099	5.4%
Production, transportation, and material moving	1,208	6.0%

Source: 2000 Census, DP-3

As of 2005, the four largest employment sectors within Los Angeles County were manufacturing (484,776 employees), retail trade (410,193 employees), health care &

social assistance (424,173 employees), professional, scientific and technical services (359,249 employees), and accommodation & food services (323,460 employees)³.

2. Projected Job Growth

Table II-11 shows employment and projected occupational growth for Los Angeles County along with average salaries for the period 2004-2014. This data is not readily available for Culver City alone. The greatest number of new jobs projected to be produced in Los Angeles County over the next few years will be among the lower-waged occupations. Based on past trends and projections provided by the California Employment Development Department, 65% of these new workers within Los Angeles County will earn 80% or below of the median area income⁴. Because the majority of new jobs created will be low-wage jobs, there will be a growing demand for units county-wide that are affordable to low-income persons, typically below the average home price of the area.

³ U.S. Bureau of the Census, 2005 County Business Patterns.

⁴ Los Angeles County 2003-2008 Consolidated Plan.

Table II-11
Projected Job Growth by Occupation (2004-2014) –
Los Angeles County

SOC Code	Occupational Title	Employment Change	Median Hourly Wage*
		Numerical	
00-0000	Total, All Occupations	450,500	\$15.45
35-0000	Food Preparation and Serving Related Occupations	61,150	\$8.33
25-0000	Education, Training, and Library Occupations	58,290	\$21.79
41-0000	Sales and Related Occupations	49,520	\$12.27
29-0000	Healthcare Practitioners and Technical Occupations	39,420	\$30.25
53-0000	Transportation and Material Moving Occupations	33,330	\$11.01
11-0000	Management Occupations	29,580	\$43.06
13-0000	Business and Financial Operations Occupations	28,520	\$27.02
43-0000	Office and Administrative Support Occupations	26,840	\$14.29
27-0000	Arts, Design, Entertainment, Sports, and Media Occupations	24,530	\$18.32
31-0000	Healthcare Support Occupations	24,270	\$11.29
39-0000	Personal Care and Service Occupations	15,200	\$9.72
15-0000	Computer and Mathematical Occupations	15,160	\$33.17
37-0000	Building and Grounds Cleaning and Maintenance Occupations	15,090	\$9.94
47-0000	Construction and Extraction Occupations	12,890	\$19.21
33-0000	Protective Service Occupations	12,330	\$14.42
49-0000	Installation, Maintenance, and Repair Occupations	10,370	\$18.72
21-0000	Community and Social Services Occupations	7,800	\$18.81
17-0000	Architecture and Engineering Occupations	5,490	\$35.38
23-0000	Legal Occupations	5,230	\$41.69
19-0000	Life, Physical, and Social Science Occupations	5,170	\$28.07

Source: California Employment Development Dept., March 2005 Benchmark

*2006 wages

It is difficult to obtain accurate employment information, because of confidentiality issues and other constraints. A review undertaken in connection with the Workforce Housing Study by the Westside Cities estimated the worker population of Culver City, in the year 2000, at 40,850. Data from the 2002 Economic Census put the figure at 47,688. This latter study showed that the largest employment sectors in Culver City were "Information"⁵ (15,802 employees), followed by "Professional, scientific and technical services" (8,333

⁵ The "Information" sector comprises establishments engaged in the following processes: (a) producing and distributing information and cultural products, (b) providing the means to transmit or distribute these products as well as data or communications, and (c) processing data. The main components of this sector are the publishing industries, including software publishing, and both traditional publishing and publishing exclusively on the internet; the motion picture and sound recording industries; the broadcasting industries, including traditional broadcasting and those broadcasting exclusively over the Internet; the telecommunications industries; the industries known as Internet service providers and Web portals, data processing industries and the information services industries. (Source: U.S. Bureau of the Census - 2002 Economic Census)

employees), "Retail trade" (5,963 employees) and "Health care & social assistance" (2,949 employees) (Table II-12). The 2002 employment sector data are reflective of employment within the city, not necessarily employment of city residents.

Table II-12
Culver City Employment by Economic Sector (2002)

Economic Sector	Number of Establishments	Number of Employees
Information	179	15,802
Professional, scientific, & technical services	333	8,333
Retail Trade	332	5,963
Administrative & support & waste management & remediation services	120	4,358
Health care & social services	166	2,949
Wholesale Trade	161	2,483
Accommodation & food services	163	2,478
Manufacturing	80	1,847
Other services (except public administration)	161	1,252
Real estate & rental & leasing	105	1,027
Arts, entertainment, & recreation	116	877
Educational services	23	319
Total Employment		47,688

Source: 2002 Economic Census, Table 1

3. 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 percentage of their income for housing. In addition, a tight housing market can result in overcrowding and longer commute times as workers seek more affordable housing in outlying areas. The current jobs-housing objective for the entire SCAG region is one new housing unit for every 1.5 jobs.⁶

According to the 2000 Census, about 99% of employed Culver City residents worked in Los Angeles County, and 17% of all workers were employed within the city limits (Table II-13).

⁶ SCAG Draft 2008 Regional Comprehensive Plan, Land Use & Housing Chapter, P. 18

Table II-13
Job Location for Culver City Residents

Job Location	Persons	%
Work in Los Angeles County	19,693	99.3%
-Work in city of residence	3,415	17.2%
-Work elsewhere in Los Angeles County	16,420	82.8%
Work in another California county	348	1.8%
Work outside California	142	0.7%
Total workers age 16+	19,835	—

Source: 2000 Census, SF3 Tables P26 & P27

With 47,688 jobs and 17,149 housing units, the city's jobs/housing ratio was 2.78 as of 2002 (Table II-14). The city appears to be job-rich compared to Los Angeles County as a whole, which had ratio of only 1.11 jobs per housing unit in 2002. However, these statistics do not reflect the fact that many people who work in Culver City live in nearby Westside locations and commute relatively short distances to Culver City jobs. This regional aspect of employment patterns in Los Angeles County makes it difficult to translate the Culver City jobs/housing ratio into an unambiguous Culver City housing needs assessment.

Table II-14
Employment Profile and Jobs/Housing Ratio (2002) –
Culver City

Total Employees	47,688
Housing Units	17,149
Jobs/Housing Ratio	2.78

Sources:
2002 Economic Census
California Dept. of Finance, Report E-5

D. Housing Stock Characteristics

This section presents an evaluation of the characteristics of the community's housing stock and helps in identifying and prioritizing needs. The factors evaluated include the number and type of housing units, recent growth trends, age and condition, tenure, vacancy, housing costs, affordability, and assisted affordable units at-risk of loss due to conversion to market-rate. 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.

1. Housing Type and Growth Trends

Table II-15 provides a breakdown of the housing stock by type along with growth trends for the city compared to the county as a whole for the period 2000 to 2007. The housing

stock in Culver City is comprised predominantly of single-family detached homes, which make up about 39% of all units, and larger multi-family complexes (5+ units), which comprise about 36% of the total. About 11% of units are single-family attached (i.e., condo or duplex apartment) units, while mobile homes comprise the remaining 1%. Homes on R-2 zoned lots can either be two detached dwelling units on one parcel or two attached units (also known as a duplex) on one parcel. Duplexes would be captured under single-family attached and possibly multi-family 2-4 units.

**Table II-15
Housing by Type**

Structure Type	2000		2007		Growth	
	Units	%	Units	%	Units	%
Culver City						
Single-family detached	6,605	39%	6,618	39%	13	0%
Single-family attached	1,903	11%	1,903	11%	0	0%
Multi-family 2-4 units	2,301	13%	2,286	13%	-15	-1%
Multi-family 5+ units	6,140	36%	6,147	36%	7	0%
Mobile homes	181	1%	181	1%	0	0%
Total units	17,130	100%	17,135	100%	5	0%
Los Angeles County						
Single-family detached	1,593,449	49%	1,638,521	48%	45,072	3%
Single-family attached	241,575	7%	243,078	7%	1,503	1%
Multi-family 2-4 units	287,575	9%	291,406	9%	3,831	1%
Multi-family 5+ units	1,091,766	33%	1,151,750	34%	59,984	5%
Mobile homes	56,605	2%	56,701	2%	96	0%
Total units	3,270,906	100%	3,382,356	100%	11,450	3%

Source: Cal. Dept. of Finance, Table E-5

According to the city's Building and Safety data base, during the last RHNA Planning Cycle, January 1998 through December 2005, 96 gross new housing units were built in the city; from January 2006 through December 2007, 97 gross new units were built (the 97 units built in 2006/07 can be credited towards meeting the RHNA allocation for this current RHNA Planning Cycle). There is a discrepancy between the city's Building and Safety database and the state Department of Finance (DOF) data shown in Table II-15. While the reason for this difference is unclear, the city's database is believed to be a more accurate reflection of units built from 1998 through 2007 than the data reported by DOF.

2. Housing Age and Conditions

Housing age is often an important indicator of housing condition. Housing units built prior to 1978 before stringent limits on the amount of lead in paint were imposed, may have interior or exterior building components coated with lead-based paint. Housing units built before 1970 are the most likely to need rehabilitation and to have lead-based paint in

deteriorated condition. Lead-based paint becomes hazardous to children under age six and to pregnant women when it peels off walls, windows and doors.

Table II-16 shows the age distribution of the housing stock in Culver City compared to Los Angeles County as a whole as reported in the 2000 Census.

Table II-16
Age of Housing Stock by Tenure –
Culver City vs. Los Angeles County

Year Built	Culver City		Los Angeles County	
	Units	%	Units	%
Owner occupied	9,033	100%	1,499,694	100%
1990 or later	353	4%	101,563	7%
1980-89	402	4%	173,413	12%
1970-79	2,094	23%	185,447	12%
1960-69	938	10%	222,641	15%
1950-59	2,414	27%	403,784	27%
1940-49	1,817	20%	209,298	14%
1939 or earlier	1,015	11%	203,548	14%
Renter occupied	7,578	100%	1,634,080	100%
1990 or later	187	2%	109,917	7%
1980-89	446	6%	214,549	13%
1970-79	1,923	25%	302,096	18%
1960-69	1,594	21%	333,517	20%
1950-59	1,445	19%	298,342	18%
1940-49	1,148	15%	175,275	11%
1939 or earlier	835	11%	200,384	12%

Source: 2000 Census H36

This table shows that 68% of the owner-occupied housing units and 66% of rented units in Culver City were constructed prior to 1970. These findings indicate the possibility of a need for some maintenance and rehabilitation, including remediation of lead-based paint, for approximately one-third of the city's housing stock.

Table II-17 identifies the number of owner-occupied and renter-occupied housing units lacking complete kitchen or plumbing facilities in the city and the county as a whole. This table shows that less than 1% of rental units lacked complete plumbing facilities. Almost no owner-occupied housing units and approximately 2% of renter occupied units lacked complete kitchens. A lack of complete kitchen or plumbing facilities is an indicator that housing units may need rehabilitation.

**Table II-17
Kitchen and Plumbing Facilities by Tenure –
Culver City vs. Los Angeles County**

Status of Kitchen and Bathroom Facilities	Culver City		Los Angeles County	
	Units	%	Units	%
Owner occupied	9,033	100%	1,499,694	100%
Complete kitchen facilities	9,029	100%	1,493,930	99.6%
Lacking complete kitchen facilities	4	0%	5,764	0.4%
Renter occupied	7,578	100%	1,634,080	100%
Complete kitchen facilities	7,420	98%	1,593,522	97.5%
Lacking complete kitchen facilities	158	2%	40,558	2.5%
Owner occupied	9,033	100%	1,499,694	100%
Complete plumbing facilities	9,018	100%	1,492,247	99.5%
Lacking complete plumbing facilities	15	0%	7,447	0.5%
Renter occupied	7,578	100%	1,634,080	100%
Complete plumbing facilities	7,530	99.4%	1,610,239	98.5%
Lacking complete plumbing facilities	48	0.6%	23,841	1.5%

Source: 2000 Census H48, H51

To supplement this analysis of Census data, a targeted field survey of selected neighborhoods was conducted in September 2007. The surveyed neighborhoods were chosen based on the knowledge of experienced planning, housing and code enforcement staff, with the intent of identifying areas where units in need of repair are concentrated (see Figure II-2).

The survey found that 38% of the 202 units surveyed were considered to be in sound condition although minor cosmetic work may be needed. About 32% of the units showed signs of minor structural problems, while 30% were in need of major rehabilitation. Since the survey focused on those areas known to have the highest incidence of problems, these statistics are not representative of the entire city. Rehabilitation needs are considered to be far less prevalent in other areas.

A separate survey of residential multi-family dwelling (RMD) areas was also conducted (also shown in Figure II-2). Within the RMD Zone study area, 414 properties and 631 dwelling units were surveyed. This evaluation found that 87% of the units surveyed were considered to be in sound condition although minor cosmetic work may be needed. About 12% of the units showed signs of minor structural problems and 1% of the units were in need of major rehabilitation.

Based on the field surveys and staff knowledge of other areas not surveyed, it is estimated that there may be approximately 140 housing units in need of minor to moderate repair and approximately 67 units in need of major rehabilitation.

There are other dwelling units in the survey areas that were not noted (or counted) because they showed no signs of debilitation. Within the RMD Zone survey, units that

were not in need of repair and located on properties that were fully developed based on Zoning Code density maximums were not counted.

3. Vacancy

Housing vacancy rates as reported in the 2000 Census are shown in Table II-18. The table shows that vacancy rates in the city were relatively low, with just 2.1% of rental units and 1.2% of for-sale units available for rent or sale, respectively. The rental vacancy rate for the County as a whole was somewhat higher, at 3.3%, while the rate of for-sale housing was approximately the close to that of the city, at 1.6%. Rental vacancy rates in the 2% range indicate nearly full occupancy, and contribute to upward pressures on rents.

**Table II-18
Housing Vacancy –
Culver City vs. Los Angeles County**

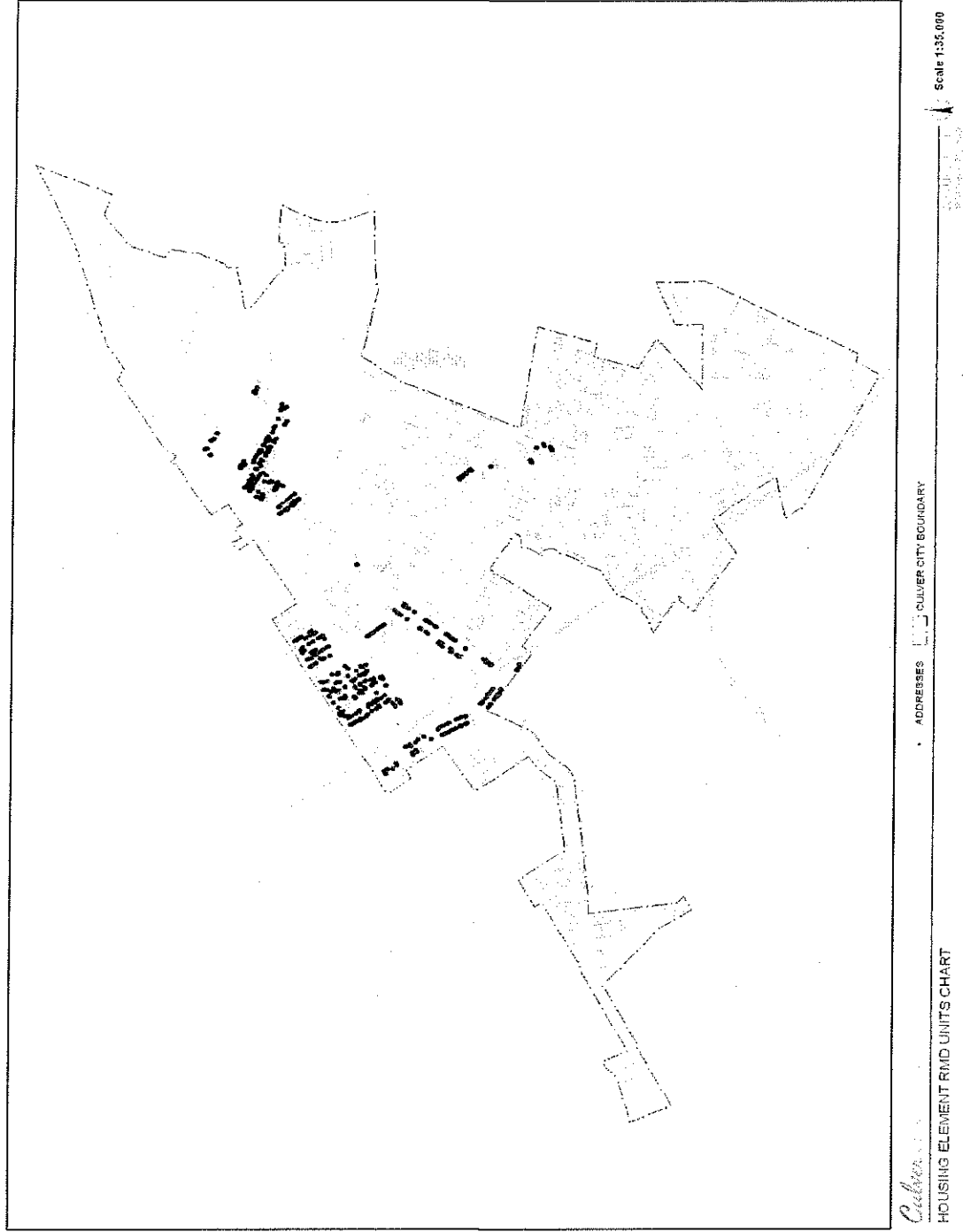
Occupancy Status	Culver City		Los Angeles County	
	Units	%	Units	%
Total housing units	17,130	100.0%	3,270,909	100.0%
Occupied units	16,611	97.0%	3,133,774	95.8%
-Owner occupied	9,034	52.7%	1,499,744	45.9%
-Renter occupied	7,577	44.2%	1,634,030	50.0%
Vacant units	519	3.0%	137,135	4.2%
-For rent ¹	164	2.1%	56,089	3.3%
-For sale ²	112	1.2%	23,874	1.6%
-Rented or sold, not occupied	58	0.3%	11,716	0.4%
-For seasonal or occasional use	42	0.2%	13,565	0.4%
-For migrant workers	0	0.0%	68	0.0%
-Other vacant	143	0.8%	31,823	1.0%

Source: 2000 Census, Table QT-H1

Notes: ¹ Est. % of all rental units

² Est. % of all for-sale units

Figure II-2
Housing Conditions Survey Area



4. Housing Cost

a. Housing Affordability Criteria

State law establishes five income categories for purposes of housing programs based on the area (i.e., County) median income ("AMI"):

- Extremely-Low (30% or less of AMI),
- Very-Low (31-50% of AMI),
- Low (51-80% of AMI),
- Moderate (81-120% of AMI), and
- Above Moderate (over 120% of AMI).

Housing affordability is based on the relationship between household income and housing expenses. According to U.S. Department of Housing and Urban Development (HUD) and the California Department of Housing and Community Development⁷, housing is considered "affordable" if the monthly payment is no more than 30% of a household's gross income. In some areas, these income limits may be increased to adjust for high housing costs⁸.

Table II-19 shows affordable rent levels and estimated affordable purchase prices for housing in Los Angeles County by income category. Based on state-adopted standards, the maximum affordable monthly rent for extremely-low-income households is \$555, while the maximum affordable rent for very-low-income households is \$925. The maximum affordable rent for low-income households is \$1,480, while the maximum for moderate-income households is \$1,695.

Maximum purchase prices are more difficult to determine due to variations in mortgage interest rates and qualifying procedures, down payments, special tax assessments, homeowner association fees, property insurance rates, etc. With this caveat, the maximum home purchase prices by income category shown in Table II-19 have been estimated based on typical conditions.

⁷ HCD memo of 4/18/07 (<http://www.hcd.ca.gov/hpd/hrc/rep/state/inc2k7.pdf>)

⁸ 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. The determination of affordable rent and affordable purchase price for assisted units may vary depending upon the requirements of various funding sources. In addition, affordable housing costs may be restricted to the extent needed to allow units to be counted toward the Redevelopment Agency's housing production obligations.

Table II-19
Income Categories and Affordable Housing Costs –
Los Angeles County

2007 County Median Income = \$56,500	Income Limits	Affordable Rent	Affordable Price (est.)
Extremely Low (<30%)	Up to \$22,200	Up to \$555	Up to \$70,000
Very Low (31-50%)	Up to \$37,000	Up to \$925	Up to \$116,000
Low (51-80%)	Up to \$59,200	Up to \$1,480	Up to \$185,000
Moderate (81-120%)	Up to \$67,800	Up to \$1,695	Up to \$213,000
Above moderate (120%+)	Over \$67,800	Over \$1,695	Over \$213,000

Assumptions:

-Based on a family of 4

-30% of gross income for rent or PITI

-10% down payment, 6.25% interest, 1.25% taxes & insurance, \$200 HOA dues

Source: Cal. HCD; Conexus

b. For-Sale Housing

Housing sales price statistics for the period January 2006 through August 2007 (Table II-20) show that the vast majority of resale homes sold for more than \$500,000 during this period.

Table II-20
Resale Housing Sales Price Distribution (2006-07) –
Culver City

Price	Condo	SFD
Under \$150,000	0	2
\$150,000-174,999	0	0
\$175,000-199,999	0	0
\$200,000-224,999	0	0
\$225,000-249,999	0	0
\$250,000-274,999	0	0
\$275,000-299,999	3	0
\$300,000-324,999	3	1
\$325,000-349,999	17	0
\$350,000-374,999	19	0
\$375,000-399,999	32	0
\$400,000-424,999	27	0
\$425,000-449,999	25	0
\$450,000-474,999	24	0
\$475,000-499,999	20	1
\$500,000+	44	146
Median	\$423,000	\$750,000

Notes:

Data for Jan 2006 through Aug 2007

Resale only - number of new home sales too small to be reliable

The median price for resale single-family detached homes was \$750,000. For resale condos, the median price was \$423,000. Based on the estimated affordable purchase prices shown in Table II-19 (page II-19), no for-sale units were affordable to lower-income or moderate-income residents. These data illustrate that public subsidies are generally required to reduce sales prices to a level that is affordable to low- and moderate-income buyers. At a median price of \$423,000 for condominiums, there is a "gap" of over \$210,000 between the market price and the maximum price a moderate-income household can afford to pay for a home. For low-income households, this gap is over \$238,000.

c. Rental Housing

Table II-21 shows current (2007) market data for rental apartments in Culver City based on recent surveys of large complexes. The table shows that the average rent for all surveyed units was \$1,598 per month, with an average of \$1,099 for studios and \$1,859 for 2-bedroom units.

**Table II-21
Rental Market Survey –
Culver City**

	Average Rent	Average Square Feet	Average Cost per Square Foot
All	\$1,598	862	\$1.85
Studio	\$1,099	427	\$2.57
1 bedroom/1 bath	\$1,578	835	\$1.89
2 bedroom/2 bath	\$1,859	1,109	\$1.68

Source: RealFacts, 9/07

When market rents are compared to the amounts low-income households can afford to pay (Table II-19, page II-19), it is clear that very-low- and extremely-low-income households have a difficult time finding housing without overpaying. The gap between market rent and affordable rent at the very-low-income level is about \$934 per month, while the gap at the extremely-low-income level is over \$1,300 per month. An average 2-bedroom, 2-bath apartment currently rents for about \$1,859 while the affordable payment for a 4-person low-income household is \$1,480, which represents a gap of \$379 per month.

E. Special Needs

Certain groups have greater difficulty in finding decent, affordable housing due to special circumstances. Such circumstances may be related to one's employment and income, family characteristics, disability, or other conditions. As a result, some Culver City residents may experience a higher prevalence of overpayment, overcrowding, or other housing problems.

State Housing Element law defines "special needs" groups to include persons with disabilities, the elderly, large households, female-headed households with children, homeless people, and farm workers. This section contains a discussion of the housing needs facing each of these groups.

1. Persons with Disabilities

In 2000, 2,858 people between 16 and 64 years of age, or 11% of the working age population, reported a work-related disability (Table II-22). Of those aged 65 and over, 1,368 (25%) reported some form of physical disability. Included within these disabilities are persons whose disability hinders their ability to go outside the home (7% of the working age population and 21% of the senior population). Housing opportunities for the handicapped can be maximized through housing assistance programs and universal design features such as widened doorways, ramps, lowered countertops, single-level units and ground floor units.

Persons with disabilities may require exceptions to zoning or building standards in order to allow them full accessibility to housing. Measure 2.N in the Housing Plan (Chapter V) addresses these needs by committing the city to adopting an ordinance establishing procedures to ensure reasonable accommodations for persons with disabilities pursuant to SB 520 (Government Code §65583.c.3). In addition to physical accessibility, disabled persons often have lower incomes than the population at large. Numerous measures contained in the Housing Plan that are intended to encourage housing that is affordable to lower-income households will indirectly benefit persons with disabilities. Examples include Measures 1.A (Section 8 Rental Assistance), 1.B (City Rental Assistance), 1.I (Neighborhood Preservation), 1.M (Temporary Emergency Rental & Relocation Assistance), 1.N (Acquisition/Rehab), 1.P (Affordable Housing Development Assistance), 2.C (Second Units), 2.F/G/H (Redevelopment Agency Comprehensive Housing Strategy), 2.K (SROs), 2.L (Transitional/Supportive Housing), and 5.A (Housing Program Promotion).

Table II-22
Persons with Disabilities by Age –
Culver City

Disability by Age	Persons	Percent
Age 5 to 15 - total persons	5,277	--
Sensory disability	18	0.3%
Physical disability	54	1.0%
Mental disability	337	6.4%
Self-care disability	98	1.9%
Age 16 to 64 - total persons	26,169	--
Sensory disability	476	1.8%
Physical disability	1,366	5.2%
Mental disability	842	3.2%
Self-care disability	419	1.6%
Go-outside-the-home disability	1,768	6.8%
Employment disability	2,858	10.9%
Age 65 and over* - total persons	5,403	--
Sensory disability	687	12.7%
Physical disability	1,368	25.3%
Mental disability	595	11.0%
Self-care disability	542	10.0%
Go-outside-the-home disability	1,108	20.5%

Source: 2000 Census, SF3 Tables P8 and P41

Note: Totals may exceed 100% due to multiple disabilities per person

2. Elderly

In 2000, there were 3,394 households in Culver City where the householder was 65 or older (Table II-23). Of these, 265 persons were below the poverty level in 1999⁹. Many elderly persons are dependent on fixed incomes and many have some type of disability. Elderly 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. The following specific measures in the Housing Plan (Chapter V) help to address the needs of seniors: 1.A (Section 8 Rental Assistance), 1.B (City Rental Assistance), 1.C (Shared Housing for Seniors), 1.I (Neighborhood Preservation), 1.M (Temporary Emergency Rental & Relocation Assistance), 1.N (Acquisition/Rehab), 1.P (Affordable Housing Development Assistance), 2.C (Second Units), 2.F/G/H (Redevelopment Agency Comprehensive Housing Strategy), 2.K (SROs), 2.L (Transitional/Supportive Housing), and 5.A (Housing Program Promotion).

⁹ 2000 Census, SF3 Table DP-3

Table II-23
Elderly Households by Tenure –
Culver City

Householder Age	Owners		Renters	
	Households	%	Households	%
Under 65 years	6,584	73%	6,633	88%
65 to 74 years	1,263	14%	607	8%
75 to 84 years	978	11%	260	3%
85 and over	208	2%	78	1%
Total households	9,033	100%	7,578	100%

Source: 2000 Census, SF3 Table H14

3. Large Households

Household size is an indicator of need for large units. Large households are defined as those with five or more members. The city's average household size remained relatively consistent from 1990 to 2000 (2.34 and 2.31 persons per household, respectively)¹⁰. Among both owners and renters, more than 65% of all households have only one or two members. About 8% of renter households had five or more members, while about 7% of owners were large households (Table II-24).

While this distribution suggests that the need for large units with four or more bedrooms is expected to be less than for smaller units, several of the measures contained in the Housing Plan (Chapter V) will help to address the needs of large households, including the following: 1.A (Section 8 Rental Assistance), 1.B (City Rental Assistance), 1.I (Neighborhood Preservation), 1.M (Temporary Emergency Rental & Relocation Assistance), 1.N (Acquisition/Rehab), 1.P (Affordable Housing Development Assistance), 2.F/G/H (Redevelopment Agency Comprehensive Housing Strategy), 2.L (Transitional/Supportive Housing), and 5.A (Housing Program Promotion).

¹⁰ 1990 and 2000 Census, DP-1

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Table II-24
Household Size by Tenure –
Culver City

Household Size	Owners		Renters	
	Households	%	Households	%
1 person	2,798	31%	2,922	39%
2 persons	3,147	35%	2,157	28%
3 persons	1,355	15%	1,132	15%
4 persons	1,147	13%	744	10%
5 persons	417	5%	327	4%
6 persons	900	1%	216	3%
7+ persons	79	1%	80	1%
Total households	9,033	100%	7,578	100%

Source: 2000 Census, SF3 Table H17

4. Female-Headed Households

Of the 16,611 households in the city, 11.7% or 1,037 were headed by a female (Table II-25). Female-headed households often have special challenges such as balancing work, child care and other family responsibilities, and their incomes may be significantly lower than traditional families. The following specific measures in the Housing Plan (Chapter V) help to address the needs of these households: 1.A (Section 8 Rental Assistance), 1.B (City Rental Assistance), 1.I (Neighborhood Preservation), 1.M (Temporary Emergency Rental & Relocation Assistance), 1.N (Acquisition/Rehab), 1.P (Affordable Housing Development Assistance), 2.C (Second Units), 2.F/G/H (Redevelopment Agency Comprehensive Housing Strategy), 2.L (Transitional/Supportive Housing), and 5.A (Housing Program Promotion).

Table II-25
Household Type by Tenure –
Culver City

Household Type	Owners		Renters	
	Households	%	Households	%
Married couple family	4,615	51%	2,348	31%
Male householder, no wife present	267	3%	361	5%
Female householder, no husband present	803	9%	1,134	15%
Non-family households	3,348	37%	3,735	49%
Total households	9,033	100%	7,578	100%

Source: 2000 Census, SF3 Table H19

5. Farm Workers

Farm workers are considered a special needs group due to their transient nature and low incomes. Migrant workers, and their places of residence, are generally located in close proximity to agricultural areas. Although agriculture produces a total annual value of approximately \$278 million per year in Los Angeles County, no agricultural activities are found in Culver City or in the surrounding communities¹¹. Further the city does not have any agriculturally zoned areas. In addition, the 2000 Census did not identify any migrant worker households in the city. Based on the above, farm workers are not considered to be a special needs group in Culver City.

6. Homeless Persons

The U.S. Department of Housing and Urban Development (HUD) defines the term "homeless" as the state of a person who lacks a fixed, regular, and adequate night-time residence, or a person who has a primary night time residency that is:

- A supervised publicly or privately operated shelter designed to provide temporary living accommodations;
- An institution that provides a temporary residence for individuals intended to be institutionalized; or
- A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.¹²

Although there are myriad causes of homelessness, among the most common are:

- Substance abuse and alcohol
- Domestic violence
- Mental illness

According to the 2007 Homeless Count Report by the Los Angeles Homeless Services Agency Authority (LAHSA), the estimated homeless population for the entire County of Los Angeles is 73,702 persons on any given day. Of this population, 17% were in shelter facilities and 83% were unsheltered. Approximately 15% of these homeless persons are children under the age of 18. Based on HUD protocols, an estimated 141,737 people in Los Angeles (city and county) experience homelessness at some time during the year.

¹¹ 2005 Crop and Livestock Report, Los Angeles County Agricultural Commissioner.

¹² Stewart B. McKinney Act, 42 U.S.C. §11301, et seq. (1994).

Shelter and service needs of the homeless population are significantly different depending on the population subgroup. Los Angeles County's Continuum of Care approach to homelessness is a coordinated and systematic local approach to meet the needs of homeless individuals and families within these subgroups, including:

- Chronic Homeless Persons;
- Episodic Homeless Persons; and
- Persons at Risk of Becoming Homeless

The Continuum of Care approach to end homelessness involves a comprehensive system that includes 1) outreach, intake and assessment, 2) emergency shelter, 2) transitional housing, and 3) permanent housing.

The County's focus is to provide funding for access to mainstream resources such as income supports, health care, mental health care, substance abuse treatment programs, child care, and job training placement¹³. These resources serve the existing homeless population, and also work toward the prevention of homelessness.

Senate Bill 2 of 2007 (Government Code Sec. 65583) strengthened the planning requirements for local governments in the area of 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).

~~Based on the data provided by the LAHSA 2007 Homeless Count, it is estimated that there may be approximately 6,703 homeless persons in Service Project Area (SPA) 5, who are in need of emergency shelter at any given time. Culver City is located in SPA 5, and represents about 6% of the total population of the West LA planning area, and therefore a crude estimate of the potential homeless population in the City could be determined through a proportional distribution based on total population. Applying the City's population share to the point-in-time count of homeless persons would result in an estimated 400 homeless persons in the City. However, through the Culver City homeless outreach efforts, it is estimated about 40 to 50 homeless persons reside within the parks, cars and homeless encampments along Ballona Creek. This number is derived from observations from the City's homeless outreach efforts by St. Joseph Center. St. Joseph Center has been retained by the City to conduct homeless outreach and provide referrals to supportive services and housing for the homeless in Culver City. Since the LAHSA survey mapped the highest concentrations of homeless in the beach communities of Santa Monica, Marina del Rey and Venice, it is believed that the proportional estimate method significantly overstates the City's homeless population (see Figure II-3). On January 23, 24, and 25, 2007 LAHSA conducted the 2007 Greater Los Angeles Homeless Count. This point-in-time count canvassed 505 U.S. Census Tracts over a three-night period. Two Hundred and thirty-five (235) tracts were selected for enumeration based on prior knowledge of homeless encampments. The remaining 270 tracts were randomly selected from the 1,651 census tracts that lie within the Los Angeles~~

¹³ Los Angeles County Housing and Community Development Consolidated Plan, page 5-21.

Continuum of Care area. This information was broken down by Service Planning Area (SPA). The City of Culver City is located in SPA 5. From the 2007 LAHSA Homeless Count, 6,703 homeless persons were identified in the point-in-time assessment. Of this number 1,041 were sheltered and 5,662 were unsheltered. Racially, 2,359 were Black/African American, 1,140 were Hispanic/Latino and 2,400 were White. This point-in-time homeless population consisted of 4,232 men and 1,411 women. The majority (2,874) were substance abusers and 2,165 reported a mental illness.

The LAHSA study found fewer than 50 homeless persons in Culver City. This estimate is supported by information gathered from Saint Joseph Center, a homeless services provider retained by Culver City to conduct outreach, assessment and referrals to Culver City homeless persons. Through its daily outreach efforts, Saint Joseph Center has noted approximately 40 to 50 homeless persons in Culver City. Saint Joseph Center provides monthly reports to Culver City detailing the demographic and service needs of the homeless they have encountered. The majority are single adult men with mental health issues.

Emergency Shelter Facilities

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. Housing referral programs are also offered by the Culver City Senior Center (4095 Overland Avenue). In addition, a seasonal emergency shelter is provided at the National Guard Armory, located at 10808 Culver Boulevard, during the months of November through March. The nearest year-round homeless facility outside Culver City is operated by the Pathfinder Job and Career Center, located at 2436 Cotner Avenue in West Los Angeles.

Although the new Upward Bound House shelter provides more beds than the estimated total need for Culver City, its target clientele does not include single men. Therefore, in order to minimize constraints to the provision of additional shelter facilities, Measure 2.L is included in the Housing Plan (Chapter V). This measure calls for the designation of a zoning district where new shelters may be established "by-right" subject to appropriate development standards and complies with the requirements of SB 2. With the approval of Upward Bound House, there are adequate year-round emergency shelter facilities to serve the City's needs. Further, the City believes that it complies with the language of SB 2 related to providing year-round shelters for families and individuals; however, staff will continue to evaluate Senate Bill 2 to determine whether or not the City's year-round emergency facilities requirement has been met.

Several other measures contained in the Housing Plan (Chapter V) also address the needs of homeless persons and families, including 1.A (Section 8 Rental Assistance), 1.B (City Rental Assistance), 1.E (Homeless Service Referrals), 1.F (Emergency Shelters), 1.G (Emergency Food Vouchers), 1.M (Temporary Emergency Rental & Relocation Assistance), 1.N (Acquisition/Rehab), 1.P (Affordable Housing Development Assistance), 2.C (Second Units), 2.F/G/H (Redevelopment Agency Comprehensive Housing Strategy), and 5.A (Housing Program Promotion). In addition, in 2008 the City Council awarded a grant of \$51,000 to St. Joseph Center to continue its homeless outreach efforts.

Figure II-3
Greater Los Angeles Homeless Count - 2007

