

City of Culver City 2021-2029 Housing Element Guiding Principles Compliance Summary

Guiding Principle	Draft Housing Element Compliance	Status
<p>1. Sites Realistic Capacity. The estimate of a site’s “realistic capacity” (number of new residential units in the planning period) shall be adjusted to reflect the site’s “likelihood of development” and other required capacity factors during the planning period.</p>	<p>The Resources and Opportunities section of the Draft Housing Element summarizes the inventory of sites for housing development, and a detailed analysis can be found in Appendix B, Residential Sites Inventory. Likelihood of development factors used include known opportunity sites based on institutional knowledge, known developer interest, projects in progress at various stages (plan check, entitled, proposed, and pipeline), and development in infill areas with conversion/addition or redevelopment scenarios considering lots size, placement of existing units, past production trends, and average development density. Additional sites in the mixed use and multi-family areas were identified using objective criteria such as existing floor area ratio, age of structure, value of improvements on site, and ability to yield at least 16 units per site (per AB 1397).</p>	<p>Phase 1 - In compliance.</p>
<p>2. Likelihood of Development. The Housing Element should report the proportion of parcels in the previous Housing Element’s site inventory that were developed during the previous planning period. Other methods are discussed if this information cannot be obtained.</p>	<p>Table A-2 of the Draft Housing Element shows the progress in achieving quantified objectives for units in the previous inventory. The GPU team will work towards analyzing data on the parcel level during the coming months as a part of the second phase of complying with the principles.</p>	<p>Phase 2 - Upcoming.</p>
<p>3. Zoning for Lower-Income Housing. Zones sites designated to accommodate lower-income housing to allow at least 30 dwelling units per acre.</p>	<p>The Inventory of Sites for Housing Development section, including Table 30, discuss the assignment of sites into RHNA income level based on a combination of density and site size. A default density of 30 dwelling units per acre (du/ac) or more is considered adequate to facilitate lower income housing, pursuant to State law (Assembly Bill [AB] 1397), provided that the site must be at least 0.5 acre in size. Sites meeting the selection criteria offer an overall 49% buffer above the RHNA for Culver City in the 6th cycle.</p>	<p>Phase 1 - In compliance.</p>
<p>4. Distribution of Lower-Income RHNA Sites. Zones to equitably distribute lower-income housing throughout the city,</p>	<p>Tables 30 and B-5 of the Draft Housing Element illustrate capacity for RHNA by income category under the Existing General Plan and Preferred Land Use Maps and Figure B-2 show where those sites</p>	<p>Phase 1 - In compliance.</p>

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<p>consistent with requirement that housing elements affirmatively further fair housing. The ratio of “realistic capacity for new Mullin-density housing” to “total number of extant housing units” should be at least as large in high-opportunity neighborhoods as it is in low-opportunity neighborhoods.</p>	<p>are located throughout the city. Housing units would be distributed throughout the city under the Preferred Map located in incremental infill areas dispersed throughout the city, on opportunity sites, and in multi-family and mixed use sites throughout the city. A majority of lower income RHNA units are in high resource areas (as defined by California Tax Credit Allocation Committee Opportunity Score), while a majority of moderate and above moderate income units are in highest resource areas.</p>	
<p>5. Capacity Buffer. Requires, and defines assumptions for, a capacity buffer during the planning period to comply with Senate Bill 166 (SB 166) (No Net Loss) without further rezoning.</p>	<p>The Sites Inventory Analysis found that with the Preferred Land Use Map, the inventory would have a 49% buffer. A 15-30% buffer is recommended by HCD and City Council’s adopted Guiding Principles calls for a 30% buffer.</p>	<p>Phase 1 - In compliance.</p>
<p>6. Minimum Additional Density. If, after applying Principles 1-5, the capacity or distribution of developable sites under current zoning is determined to be inadequate, the Housing Element’s site inventory table shall specify the minimum additional density that will be allowed on each site.</p>	<p>Table B-5 in the Draft Housing Element summarizes the capacity of sites selected for RHNA under the current regulations and the Preferred Land Use Map. Under the Preferred Map, which includes an Incremental Infill designation distributed throughout the city, the inventory would allow for a 49% buffer over what is needed to meet RHNA. Further, the inventory identifies income category and total capacity, and Appendix B overall provides detailed information on how sites were selected taking into account existing uses, existing floor area ratio, age of structures, improvement-to-land ratio, lot size, adjacency to parcels with redevelopment potential and lot consolidation potential, and expressed interest of developers or property owners, among others.</p> <p>The Preferred Land Use Map upzones the majority of the City’s residential and mixed use areas. All these areas are subject to the minimum density of 20 du/ac with the upper end of the density range being at least 30 du/ac (pursuant to AB 1397). All sites used for the lower income RHNA, except for ADUs, comply with the minimum density requirement.</p>	<p>Phase 1 - In compliance.</p>

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<p>7. Quantified Objectives / Mid-cycle Adjustments. Identifies quantified objectives for each income category and requiring an adjustment if at least 50% of the objective in each category have not been developed by 2025 mid-cycle. At a minimum, the adjustment would include a density bonus on inventory sites that makes up for the deficit. It also suggests ministerial approvals and development standard waivers under certain conditions.</p>	<p>Quantified objectives for each income category are found in Table 42 of the draft Housing Element.</p> <p>The Draft Housing Element Housing Plan includes Objective 5, Housing Production Accountability to monitor housing production effectiveness throughout the planning period and adjust as necessary, including a mid-cycle adjustment, monitoring and reporting on production, and reducing regulatory and procedural barriers to housing production.</p>	<p>Phase 1 - In compliance.</p>
<p>8. Constraints Analysis / Objective Standards. Assesses the City’s compliance with state law requirements on development permitting, integrating results from the Westside Cities Council of Governments’ Regional Early Action Planning (REAP) project.</p>	<p>The draft Housing Element Constraints section identifies governmental and non-governmental constraints at a high-level.</p> <p>The REAP project is scheduled to complete its constraints analysis and associated housing production policy best practices by June 2022.</p>	<p>Phase 1 - In compliance.</p> <p>Phase 2 - The City may amend the Housing Element to integrate REAP project results along with the remainder of the General Plan Update in Fall 2022.</p>
<p>9. Quantitative Data. Analyzes constraints to housing production using quantitative data and compare Culver City with peer municipalities in regions where the housing market’s response to sharp increases in demand has taken the form of rapidly expanding housing production rather than rapidly escalating housing</p>	<p>The draft Housing Element Constraints section identifies quantitative data throughout the Constraints section.</p> <p>The REAP project is scheduled to complete its an analysis memo detailing specific policy recommendations and key actions for the Westside, including from cities across the country that are leading in accelerating housing production.</p>	<p>Phase 1 - In compliance.</p> <p>Phase 2 - The City may amend the Housing Element to integrate REAP project results along</p>

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prices, integrating results from the REAP project.		with the remainder of the General Plan Update in Fall 2022.
<p>10. Public Participation. Public opinion should be gathered through, among other things, a survey about housing priorities, and this survey should elicit basic demographic information about the respondent (age, place of residence, status as tenant or homeowner, race/ethnicity).</p>	<p>Appendix D, Public Participation, of the Draft Housing Element summarizes the engagement activities, including multiple surveys related to housing that collected basic demographic information, community workshops, General Plan Advisory Committee, Housing Technical Advisory Committee, Planning Commission, and City Council meetings. Detailed information can be found in Appendix D and on the project website at pictureculvercity.com/housing-element and /faq.</p>	<p>Phase 1 - In compliance.</p>