

July 11, 2024

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City of Culver City

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Subject: Consistency Between the Adopted 2021-2029 Culver City Housing Element and 2045 Culver City General Plan Final Draft Land Use Map

The 2021-2029 Culver City Housing Element was adopted on August 8, 2022. The Housing Element includes a sites inventory – Appendix B – to demonstrate the City’s ability to meet its RHNA under the 2045 General Plan Preferred Land Use Map. Since adoption of the Housing Element, however, the City has revised its Preferred Land Use Map with the following changes to formulate the Final Draft Land Use Map:

- Expanded the Mixed Use Industrial area
- Redesignated some regional shopping centers as Mixed Use High
- Reduced the area designated as Mixed Use Medium
- Removed the Incremental Infill Land Use Designation

**Shifting Designations Among Mixed Use Medium, Mixed Use High, and Mixed Use Industrial**

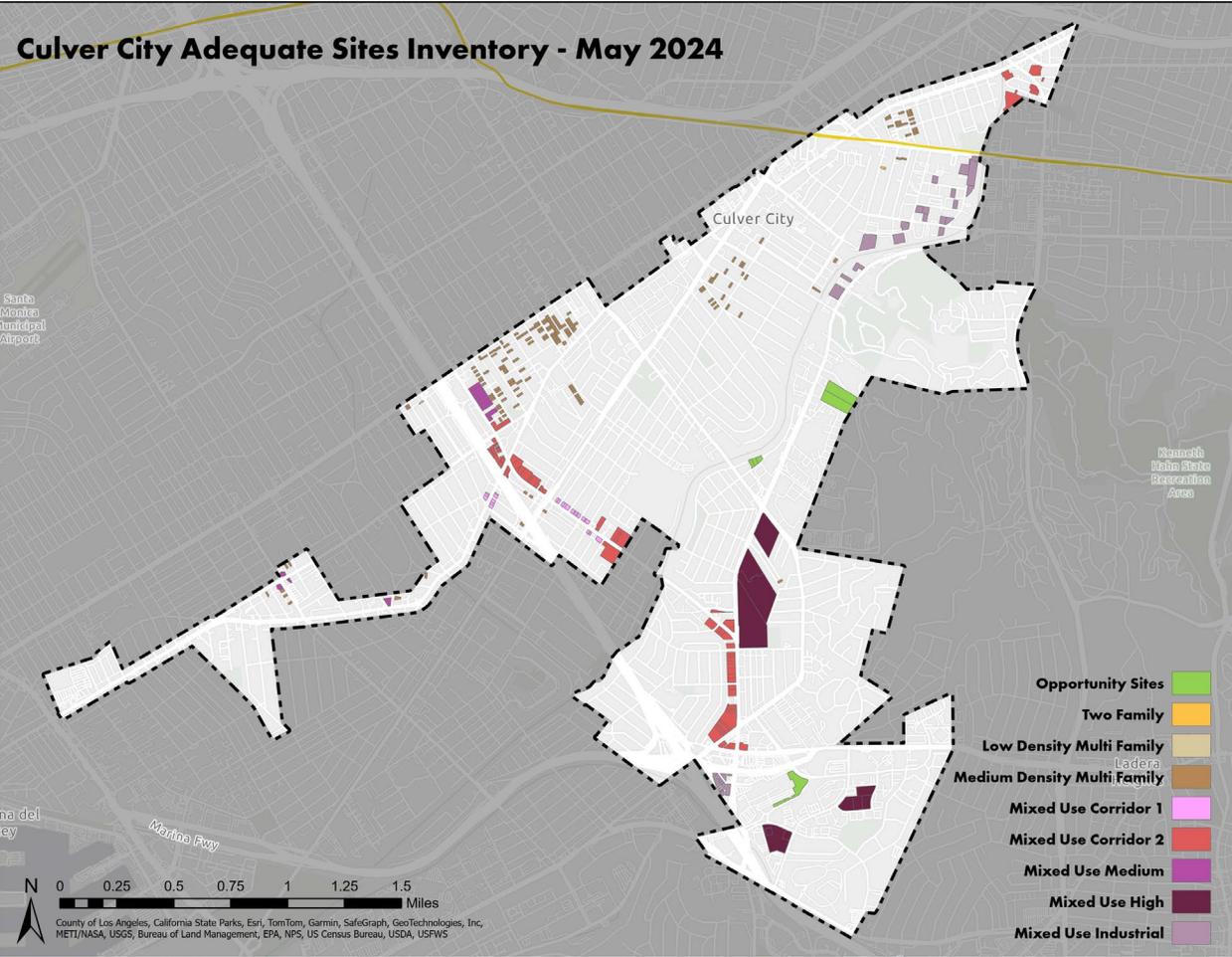
Shifting land use designations among Mixed Use High, Mixed Use Medium, and Mixed Use Industrial would not impact the City’s ability to fully accommodate its RHNA. Under any of these designations, mixed use and high density residential uses will be permitted. The geographic distribution of these sites is virtually identical to that identified in the adopted Housing Element. The major difference is the maximum density (65 vs 100 du/ac). Table B-5 in Appendix B (shown below) summarizes the sites capacity under the Final Draft Land Use Map. Figure B-1 illustrates the location of these sites. The Final Draft Land Use Map continues to offer a comfortable buffer over the overall RHNA.

*Table 1: Capacity for RHNA Under 2045 General Plan Final Draft Land Use Map*

RHNA Strategy	Lower	Moderate	Above Moderate	Total
<b>RHNA</b>	<b>1,712</b>	<b>560</b>	<b>1,069</b>	<b>3,341</b>
Approved/Entitled/Proposed/Pipeline Projects	712	20	2,742	3,476
Permitted ADUs/JADUs (June 30, 2021 – June 30, 2024)	137	14	88	239
<b>Remaining RHNA</b>	<b>861</b>	<b>526</b>	<b>0</b>	<b>1,387</b>
<b>Capacity under 2045 General Plan Final Draft Land Use Map</b>				
Projected ADUs (7/1/2024-10/15/2029)	150	15	85	250
Family (17.4 du/ac)	0	4	0	4
Opportunity Sites				
Virginia Lot	28	19	0	47
Westfield Culver City	0	0	193	193
Parcel at Entrance to WLAC	0	0	300	300
Low Density Multi-Family (35 du/ac)	0	14	0	14
Medium Density Multi-Family (50 du/ac)	0	634	0	634

RHNA Strategy	Lower	Moderate	Above Moderate	Total
Mixed Use Medium (65 du/ac)	308	56	0	364
Mixed Use High (100 du/ac)	893	254	822	1,969
Neighborhood/Corridor MU1 (35 du/ac)	0	91	0	91
Neighborhood/Corridor MU2 (50 du/ac)	852	576	154	1,582
Industrial Mixed Use (65 du/ac)	95	173	430	698
<b>Capacity (Projects + ADUs + Sites)</b>	<b>3,177</b>	<b>1,870</b>	<b>4,814</b>	<b>9,861</b>
Surplus/(Shortfall) over Total RHNA	1,463	1,310	3,745	6,520
% Buffer over Total RHNA	85%	234%	350%	195%

Figure 1: Summary of Sites Inventory – Final Draft Land Use Map (May 2024)



**Removing Incremental Infill**

Another key change between the Preferred Land Use Map identified in the Adopted Housing Element (with the Preferred Land Use Map) and the Final Draft Land Use Map is the removal of Incremental Infill.

Under the Preferred Land Use Map, the City introduced the concept of Incremental Infill into the City’s existing low density residential neighborhoods. This concept would allow more than just

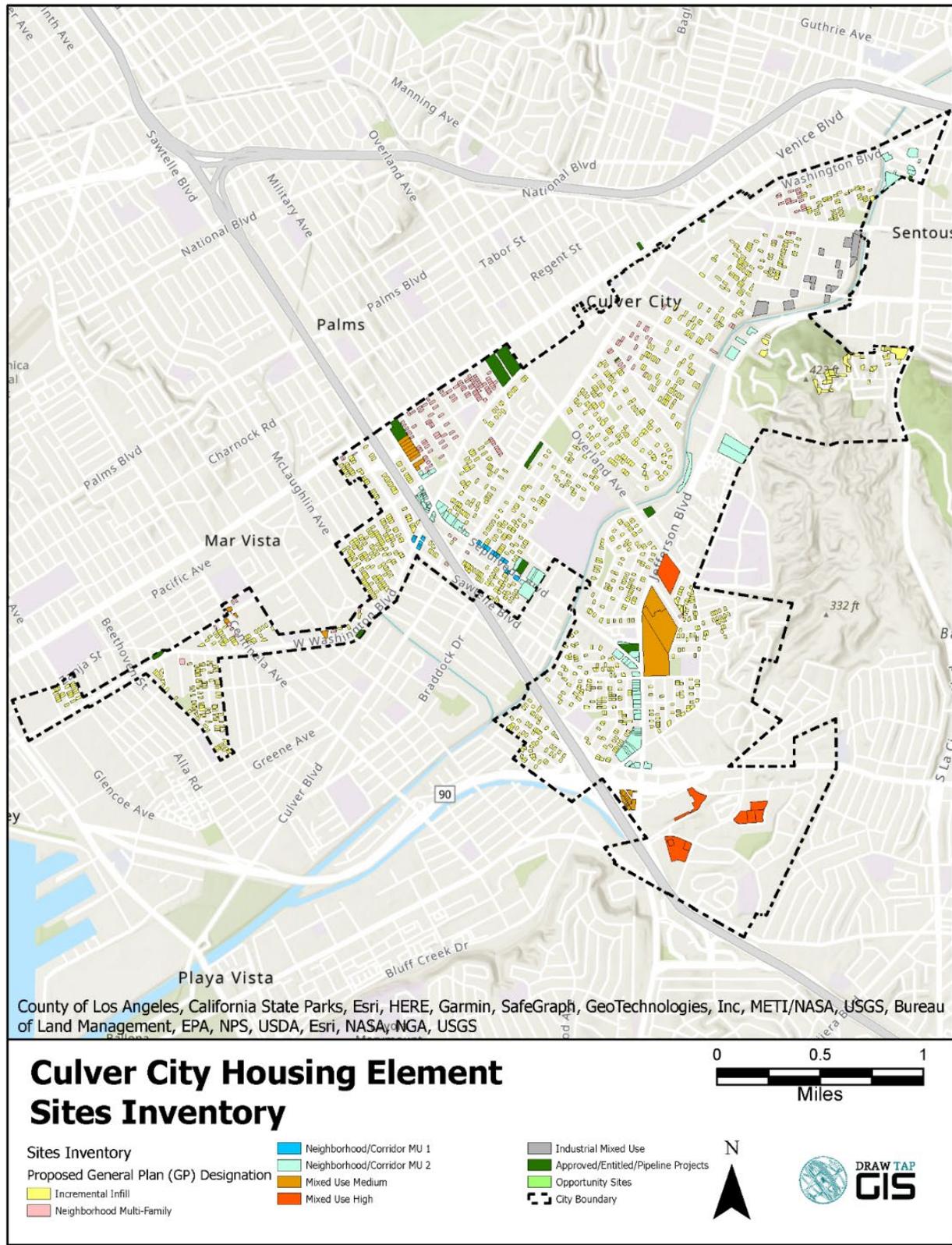
detached single-family units, ADUs, and JADUs, in these neighborhoods. Lots over 4,950 square feet would allow up to four units, if the fourth one is dedicated as affordable housing to lower income households, inclusive of an ADU and JADU. This concept was introduced as one of the City's myriad actions to affirmatively further fair housing by expanding housing choices in terms of types and locations for lower and moderate income households, affording them the opportunity to reside in lower density neighborhoods.

The Housing Element estimates a total of 535 units could occur as a result of infilling the low density residential neighborhoods:

- ADUs/JADUs – 400 units based on trends
- Redevelopment – 135 units based on eligible properties and UCLA study

Based on the Assessor's data on estimated lot sizes, about 5,000 parcels within the Incremental Infill designation would meet this requirement. Figure 2 illustrates the distribution of these potential parcels, which are fairly evenly distributed throughout the lower density residential neighborhoods.

Figure 2: Distribution of Potential Incremental Infill Eligible Sites – Preferred Land Use Plan (August 2022)



However, the State has continued to relax the ADU law and introduced SB 9 to facilitate the infilling of single-family neighborhoods with affordable housing options. The concept of Incremental Infill would not comply with new State laws. Specifically, AB 68 allows any property to have up to four units if specific standards are met. SB 9 allows a single-family lot to be subdivided and accommodate up to four units, provided the subdivided lots are at least 1,200 square feet in size. The Incremental Infill designation limits the locations where up to four units may be constructed, provided the lot size is at least 4,950 square feet, and one of the four units must be deed-restricted as housing affordable to lower income households. The requirements for Incremental Infill are more stringent than allowable under State laws. Therefore, the Final Draft Land Use Plan proposes to eliminate the Incremental Infill designation.

### **Accessory Dwelling Unit (ADU) Trend**

Culver City has a robust ADU trend. The City's ADU production trend from conversion/expansion is as follows:

- August 14, 2017 – August 13, 2018: 29 ADUs
- August 14, 2018 – August 13, 2019: 50 ADUs
- August 14, 2019 – August 13, 2020: 52 ADUs
- August 14, 2020 – August 13, 2021: 94 ADUs

Based on the ADU production trend, the Housing Element conservatively assumes 50 ADUs per year. Building permit records show that actual production exceeds projection. The RHNA projection period began on June 30, 2021. Since that date, the City has issued building permits for 239 ADUs and JADUs:

- June 30, 2021 – June 30, 2022: 83 ADUs/JADUs
  - Average Size – 568 sf
  - Median Size – 465 sf
- July 1, 2022 – June 30, 2023: 82 ADUs/JADUs
  - Average Size – 599 sf
  - Median Size – 503 sf
- July 1, 2023 – June 30, 2024: 74 ADUs/JADUs
  - Average Size – 592 sf
  - Median Size – 540 sf

More than 40 percent of the units are small units less than 500 square feet (including 7 percent that are less than 300 square feet). Only about 16 percent of the ADUs/JADUs are over 800 square feet. This size distribution aligns well with the SCAG ADU survey (15% extremely low, 2% very low, 43% low, 6% moderate, and 34% above moderate income).

Using the SCAG survey, the 239 ADUs/JADUs permitted thus far during RHNA projection period can be distributed into: 36 extremely low; 5 very low; 96 low; 14 moderate; and 88 above moderate income units. For the remaining five years of the planning period, conservative assumption (50 units per year) would add 250 additional ADUs/JADUs to the inventory. If the current trend of 80

ADUs per year persists, then the City could potentially add another 400 ADUs over the next five years. Therefore, the City anticipates exceeding the overall eight-year projected ADUs of 400 units.

### **Distribution of Accessory Dwelling Units**

The naturally occurring ADU construction activities are distributed throughout the City’s lower density residential neighborhoods, not unlike the pattern originally anticipated in the Housing Element (Figure 2). As shown in Figure 3, ADU permit activities are distributed throughout the lower density residential areas. The majority of the ADUs are being constructed in areas now designated as Single-Family Residential and Two-Family Residential under the Final Draft Land Use Plan.

*Table 2: Distribution of ADU Permits by Final Draft Land Use Plan Designation*

<b>Draft Land Use Designation</b>	<b>Number of Units</b>	<b>% of Total</b>
Single-Family	133	55.6%
Two-Family	73	30.5%
Low Density Multi-Family	29	1.7%
Medium Density Multi-Family	4	12.1%
Total	239	100.0%

Therefore, removal of the Incremental Infill designation from the Preferred Land Use Plan (August 2022) has not impacted the City’s:

1. Overall ability to accommodate its RHNA (see Table 1); or
2. Ability to introduce alternative housing options that are more affordable by design in the City’s lower density neighborhoods

Figure 3: Geographic Distribution of ADU Permits (June 30, 2021 – June 30, 2024)

