Guiding Principle	Draft Housing Element Revisions and Principle Compliance	Status
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.	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. These sections have been revised with a detailed discussion of the methodology used to comply with this principle based on public input, including a detailed analysis on the City's progress to meet the 5th cycle goals (see Section B.VI Review of 5th Cycle Sites Inventory). The Redevelopment Scenario section was revised to consider a UCLA study that examines the trend of recycling single-family neighborhoods. Likelihood of development factors continue to be used including 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. A fiscal feasibility analysis was not conducted, as this task is not included the GPU project scope of work approved by the City Council.	Phase 1 - In compliance.
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.	Table A-2 of the Draft Housing Element shows the progress in achieving quantified objectives for units in the previous inventory.	Phase 1 - In compliance.
	Appendix B, Section VI "Review of 5th Cycle Sites Inventory" was added and describes the City's progress on the 5th cycle Housing Element sites inventory goals, how this informed assumptions for the 6th cycle, and more information explaining the methodology behind how likelihood of development was determined for the sites inventory. Specifically, Section IV.1 Outcome of the 5th Cycle Sites Inventory includes a detailed breakdown of sites that were developed during the previous planning period, including a discussion of underdeveloped RMD (Medium Density Multiple-Family Residential parcels.)	
	The Housing Plan Goals, Objectives and Policies section was revised to show deadlines and objectives for programs.	
3. Zoning for Lower-Income Housing. Zones sites designated to accommodate lower-income housing to allow at least 30 dwelling units per acre.	The Inventory of Sites for Housing Development section, including Table 32, 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.	Phase 1 - In compliance.
4. Distribution of Lower-Income RHNA Sites. Zones to equitably distribute lower-income housing throughout the city, 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.	Housing units would be distributed throughout the city under the Preferred Land Use 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 TCAC Opportunity Score), while a majority of moderate and above moderate-income units are in highest resource areas.	Phase 1 - In compliance.
	Tables 32 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 are located throughout the city. Based on public input, Section V. Inventory of Sites and the sites inventory itself were revised and the Goals, Objectives, and Policies section of the Housing Element was revised to include policies and programs to more equitably distribute housing related to an affordable housing overlay zone, lot consolidation, and other incentives to build affordable housing.	
	Appendix B, Section 4. Access to Opportunities, provides further discussion on distribution of lower-income units, including a finding that most very low (53.7%) and low (55.5%) income units are in high resource tracts, and most moderate (65%) and above moderate (70.9%) income units are in highest resource tracts. Refer to Appendix E, Section 4 for further detail.	
	Appendix E, Section II "Assessment of Fair Housing Issues" includes maps with the sites inventory and their neighborhood's corresponding opportunity score, cost burdens, income, and other factors related to Affirmatively Furthering Fair Housing. These sections also show the breakdown of how sites are distributed based on these factors.	
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.	HCD's Sites Inventory Guidebook recommends a buffer for the lower and moderate income RHNA for 15 to 30%. The Housing Element was revised to compile a sites inventory that includes a buffer of 71% overall and 110% for the lower income RHNA. Refer to Appendix B, Section V.4 for further discussion.	Phase 1 - In compliance.
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	Tables 32 and 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 now allow for a buffer of 71% overall and 110% for the lower income over what is needed to meet RHNA. The capacity counts were updated related to revisions to methodology and assumptions documented throughout Appendix B.	Phase 1 - In compliance.
	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	

Guiding Principle	Draft Housing Element Revisions and Principle Compliance	Status
minimum additional density that will be allowed on each site.	redevelopment potential and lot consolidation potential, past development trends, and expressed interest of developers or property owners, among others. The Preferred Land Use Map upzones the majority of the City's residential and mixed use areas. 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 which are not subject to density requirements per State law, comply with the minimum density requirement.	
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.	Quantified objectives for each income category are now found in Table 44 of the draft Housing Element and have been revised to meet the RHNA allocation. The Draft Housing Element Housing Plan includes Objective 6, 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. Specifically, refer to Policy 6.B.This policy identifies strategies to implement, including a density bonus and expansion of development types subject to by-right approvals, should a mid-cycle assessment require adjustment.	Phase 1 - In compliance.
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.	The draft Housing Element Constraints section identifies governmental and non-governmental constraints at a high-level. The REAP project is scheduled to complete its constraints analysis and associated housing production policy best practices by June 2022, which should provide added detail to inform the Housing Element. The Constraints section of the report includes subsection 3 on "Planning and Development Fees" to outline the city's planning and development fees. The City does not currently track permitting; however, the Goals, Objectives, and Policies Section was revised to include Measure 4.1 "Permit Streamlining and Monitoring," which proposes a program for the Current Planning Division to evaluate processing times to streamline the development review process. The Current Planning Division is also currently (Summer/Fall 2021) working on strategies to streamline the review process.	Phase 1- In compliance. 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.
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 prices, integrating results from the REAP project.	The draft Housing Element Constraints section identifies quantitative data throughout the Constraints section. 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.	Phase 1 - In compliance. 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.
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).	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. Appendix D has been revised to provide further detail on engagement, including a comprehensive attachment of engagement materials, to illustrate the project's diligent public engagement. The draft Housing Element is online for public review and requests that those commenting on the draft complete a voluntary demographic survey. The survey asks the respondent whether they live in Culver City, how long they have lived in the city, their relationship to Culver City (homeowner, businessowner, employee, etc.), their annual household income level, their race and ethnicity, gender identity, age, homeowner or renter status, and neighborhood (both in and outside of Culver City). As of September 3, 2021, at least 123 respondents have completed the demographic survey.	Phase 1 - In compliance.