



# DRAFT HOUSING ELEMENT UPDATE (HEU)

*Commission and Committees Input Summary*

NOVEMBER 2021



The Housing Element outlines goals, policies, and programs to meet the current and future housing needs of everyone in Culver City while balancing other community objectives and resources. As the primary planning guide for housing, the Housing Element update requires extensive public and stakeholder input.

On July 19, 2021, the City of Culver City posted the draft 2021 – 2029 Housing Element update on the General Plan Update (GPU) project website for public comment through October 1<sup>st</sup> and began holding public meetings seeking feedback on the draft.

Meetings included the Planning Commission, General Plan Advisory Committee (GPAC), Housing Technical Advisory Committee (TAC), and Advisory Committee on Housing and Homelessness. The following sections summarize comments provided by members of these bodies, which will inform the Housing Element alongside public input. The following sections do not document every comment made at the meetings but summarize the breadth of diverse comments made and attempt to retain members' unique perspectives.

This summary also includes comments received after the comment periods ended for the community and HCD when staff presented an update to the Planning Commission on the Housing Element progress.

## Planning Commission (November 30, 2021)

- Draft Housing Element (DHE) should include dates by which programs and policies will be implemented and when the City will evaluate its progress.
- Set development standards so we see the types of development that align with the community's goals.
- Consider allowing live/work in the Hayden Tract.
- Consider housing opportunities on underused parking lots.
- DHE does not do enough to affirmatively further fair housing (AFFH) and allow increased density in high opportunity areas; many sites in the inventory are in areas already zoned for high density residential. Complying with AFFH is a State directive and Culver City must comply.
- The City needs to create programs and policies that create opportunities for affordable housing in high opportunity neighborhoods. For example, these programs and policies can increase height limits, implement an affordable housing overlay zone (AHOZ), set design standards, approve residential development by-right, expand density bonus opportunities, consider Transit Oriented Communities (TOCs).
- One suggested that inclusionary housing policies are ineffective and incentives are more effective.
- Consider integrating Senate Bill (SB) 9 in the HE regarding lot splits and allowing four-plexes by-right.

- Consider integrating Senate Bill (SB) 10 in the HE to allow higher residential density near major transit corridors.
- Ensure the mixed use and residential development permitting processes are streamlined; ministerial review processes for permits are less costly than discretionary review processes. Review timelines for residential projects and reduce them. See Sacramento's ministerial housing ordinance.
- Set metrics by which the City will measure its progress to streamline the permit review process.
- Ensure the City becomes a place where people can build Accessory Dwelling Units (ADUs) quickly. Evaluate whether the City can piggy back on what the City of Los Angeles has done with its pre-approved ADU plans.
- Culver City has become less diverse and more wealthy because the City is not doing enough to AFFH.
- The HE should ensure the analysis around the sites inventory is realistic; adjust the sites inventory to consider the probability of development.
- If it is possible to identify suitable sites that can accommodate density, consider removing opportunity sites from the R1 zone.
- Ensure the HE is a realistic plan that includes progress checks during the implementation.
- Consider adding a ballot measure to fund affordable housing.
- Consider how to increase density in the city. Many cities outside of the U.S., such as Tokyo and Copenhagen, have done it effectively. However, current development standards may not allow the development community to do it well.
- All zones in the city should allow increased density. Consider the potential in office and light industrial areas.

## Options considered

- Overall, the Commissioners requested more options. Of the options presented, the following outlines their perspectives.
- Option 1
  - 1 Commissioner supports setting a floor on the number of units one can build in the multifamily zones.
  - 2 Commissioners want more information: Expand on the proposal. For example, identify whether it applies to new residential construction or rehabilitation projects. Add design guidelines to strengthen this option's effectiveness.
  - 1 Commissioner does not support setting minimum densities, suggesting that it burdens homeowners and developers.
- Option 2



- 1 Commissioner wants more information
- Option 3
  - 1 Commissioner supports
  - 2 Commissioners asked for more information: explain what the standards would be and consider streamlining by implementing design standards.
  - Commercial sites could offer big opportunities, such as the Pavillions Center
- Option 4
  - 1 Commissioner asked for more information
- Option 5
  - 1 Commissioner supports.

## Advisory Committee on Housing and Homelessness (August 16, 2021)

- Consider pursuing creative and innovative solutions to increase and create usable land (e.g., by using technology).
- Accommodate more lower-income housing and ensure we build them (e.g., by extending by-right approval, strengthening the inclusionary housing ordinance, incentivizing affordable ADUs and other infill development, including an 100% affordable housing overlay zone; and considering community land trusts and joining a public land bank).
- Ensure no low-income units are lost.
- Provide enough housing for persons experiencing homelessness (e.g., by master leasing vacant units).
- Ensure there is funding for housing and homelessness programs.
- Ensure the Housing Element considers households that are extremely low income.

## Planning Commission (July 28, 2021)

- Ensure that the Housing Element does not reference development standards as those will be considered in the Zoning Code Update. For example, remove references to FAR, height and story limits, and consider how GPU will affect Culver City's existing form-based zoning. Consider how height limit discussions will be controversial.
- Accommodate more housing. For example, incentivize and reduce barriers to lot consolidation, streamline the development review process, allow by-right approval for 3- and 4-plexes, reconsider floor area ratio (FAR), setbacks, and parking; and allow 100% residential projects in commercial zones, not just residential through mixed-use development.

- Ensure the sites inventory is realistic, feasible, and excludes sites that are improbable of being developed (e.g., Tito's Tacos) and sites that may not be safe to be developed based on environmental or infrastructural concerns (e.g., hillside areas).
- Implement objective residential design standards that meet State standards and ensure housing development seamlessly integrates increased density in the city.
- Ensure the Housing Element considers density levels that residential lots can accommodate, and that multifamily development preserves the neighborhood scale and character.
- Consider impacts of rising construction costs, the financial feasibility of multifamily development, and attracting interest from developers who may see more profit from single-family development.
- Ensure the City has funding like in-lieu fees to conserve existing units.
- Support a moratorium on converting duplexes into single-family homes.
- Consider affordable housing solutions. For example, transit-oriented corridors (TOCs) and incentivizing affordable Accessory Dwelling Units (ADUs)
- Increase housing (e.g., through ministerial review) for special needs groups and others who may not be included in the State law definition.
- Ensure families can live in the multifamily development properties. For example, ensure that the units are large enough
- Ensure the sites inventory does not exclude too many sites through criteria that is too restrictive.
- Include more focus on homelessness and get input from the Advisory Committee on Housing and Homelessness.
- Consider addressing local skilled workforce into policies.
- Consider the realistic development capacity based on likelihood of development.
- The Housing Element is an opportunity for the city to be a transformative leader in the state.
- The Housing Element can realize the goal of allowing people local access to jobs, transportation, and good schools, qualities that many love about Culver City.
- The Housing Element can address issues related to segregation and racial and economic inequality.
- Increasing housing is a way to redress historical racist housing policies that resulted in the scarce supply of housing that exists today.
- Offering diverse housing options beyond single-family, such as condominiums and multifamily development, allows families of different socioeconomic backgrounds to buy property.

- The Housing Element should focus on density for all, not just for low-income households.
- Propose denser development than what the draft presents.
- Ensure that Culver City increases density in a manner that makes sense for the community and that density is equitably distributed throughout the community.
- Culver City has an opportunity to seize this moment and transform it as desired. The principles are aspirational, but the draft could do more to be transformative.
- Ensure the Housing Element accommodates everyone's needs, which requires that the input process is diverse and not biased and skewed. Typically, public comments are dominated by small group, usually homeowners. However, it is also important to hear from those who are often not represented or not well-represented. For example, youth, renters, and people new to the city or who are looking for opportunities to move in should be considered.
- Include a representative survey.
- Ensure the Housing Element's policies are user-friendly for developers and property owners interested in creating more housing units.
- Consider how well-intentioned policies typically fall short somewhere and there are no guarantees that they will achieve their intended goals.
- Consider the demographics of the participants and beneficiaries of existing housing programs and ensure that the programs are benefiting their targeted demographic (e.g., marginalized communities).
- Include protections against developers buying out properties and residents being displaced.
- Ensure that no housing units are lost and that affordable units are replaced.
- Consider a housing solution that uses entrenched commercial lots like Vons.
- Consider how increasing density and approaching development through incremental infill does not automatically produce affordable housing.
- Ensure that the Housing Element meets Culver City's housing needs.
- Ensure that the Housing Element meets State law and the Housing Element Guiding Principles that City Council adopted.

## Housing TAC (July 28, 2021)

- Ensure the Housing Element horizon aligns with overall goals of the General Plan Update.
- Include stronger discussion around land trusts (see Objective 3, Policy 3.J in the draft Housing Element).
- Consider public/private partnerships for retail spaces that can accommodate small businesses. Do not accommodate too many high-end retail sites.
- Consider rent-to-own housing options.

- Ensure the Housing Element includes policies around revenue generation (e.g., taxing major employers that bring new employees to the city), long-term financing, and rehabilitative financing.
- Re-invest generated revenue into the community.
- Ensure that the City is financially accountable.
- Include more information on the possibility of joining a public land bank.
- Consider vacant lots and units for housing. For example, convert vacant units into housing units and enforce Airbnb rentals.
- Include more information on homelessness.
- Ensure the goals and policies address what the City wants and not just what the California Department of Housing and Community Development (HCD) wants.
- Incentivize more affordable housing units.
- Ensure housing is equitably distributed throughout Culver City to achieve goal of Affirmatively Furthering Fair Housing (AFFH).
- Do not concentrate housing solely in areas that are densely populated by marginalized groups, including by race and socioeconomic status.
- Consider the environmental justice impact of concentrating housing along high density corridors that tend to have higher levels of pollution.
- Consider housing opportunities in neighborhoods that have historically been protected.
- Ensure the Housing Element plans for true affordability and accomplishes restorative racial justice.
- Ensure the Housing Element adequately calculates the likelihood of development, is informed by past development patterns in the community, and shows how the development likelihood is calculated.
- Show goals alongside housing site inventory and map.
- Incorporate more sites in the sites inventory.
- Implement a moratorium to reduce the number of units.
- Consider accommodating mixed-use development that has community centers and/or low-income businesses with low-income housing above.
- Maintain and encourage mixed use development with neighborhood-serving retail along corridors to draw activity along the public ways and reduce additional car trips.
- Increase the supply of affordable housing (e.g., consider changing zoning standards to incentivize the private sector to build at-scale).
- Ensure the Housing Element meets State requirements.

## General Plan Advisory Committee (July 22, 2021)

- Ensure the Housing Element meets Guiding Principles that City Council adopted.
- The draft seems to fall short of the proposed production goals and does not show calculations for development probability.
- Ensure the Housing Element uses actual and empirical evidence to calculate development probability.
- Consider referencing recent projects to determine typical fees and permitting times.
- Ensure programs have measurable objectives and describe what they will do and by when.
- Include a representative survey and ensure property owners, youth, and renters, are consulted in the plan. Create forums that allow people who have not spoken to speak.
- Ensure the Housing Element considers equity and does not perpetuate segregation.
- Make Objective 3 more equitable.
- Ensure that growth is equitably distributed throughout the city.
- Provide examples of what infill development will look like.
- Consider using the Regional Housing Needs Allocation (RHNA) as a minimum requirement for housing.
- Be bold with Housing Element.
- Frame the Housing Element and discussions to bridge differences around approaches to housing; the current political divisiveness distracts from the Housing Element's purpose of addressing housing needs.
- Ensure the Housing Element considers the environment and the relationship between density and open space.
- Ensure the Housing Element ties to other goals in the GPU around transportation, mobility, the environment, and equity.
- Acknowledge how increasing density will reduce carbon footprints, greenhouse gas emissions, utilities, water, energy usage, single-occupancy vehicle trips, and the length of trip commutes.
- Increased density will allow homeownership opportunities for younger populations and help seniors age in place.
- Include explicit discussion about displacement, gentrification, and links to affordability.
- Include information about protections against displacement like the Ellis Act and the City's work around notice and relocation assistance.



- Consider anti-displacement protections for tenants that are upzoned where the owner will redevelop and evict tenants.
- Provide community-owned housing.
- Consider information on right of first refusal.
- Preserve Naturally Occurring Affordable Housing (NOAH).
- Change has a neutral value, but how we choose to approach changes can shape that value. Ensure values lead the Housing Element and GPU and consider how these values relate to people.
- Consider how historical development mirrors a different world; Culver City used to be a mid-sized city, but is now in a large, metropolitan area and must prepare for current and future changes.
- Concerned about developers gaining more from the Housing Element than the broader community.
- Ensure the Housing Element considers developers to be people.
- Ensure the Housing Element adequately provides special needs housing (e.g., incentivize aging in place, senior housing).
- Ensure the Housing Element addresses homelessness.
- Increase the supply of housing by changing development standards (e.g., increasing height, reducing parking requirements), and effectively using underused space.
- Frame the Housing Element so the community understands that it is meant to prepare the next generation.
- Ensure the Housing Element preserves and improves upon community values: more density, walkability, and quality public transit.
- The Housing Element seems to be more of a modest proposal.
- Consider how multifamily development would likely have the same visual impact as mansion-sized single-family homes.
- Ensure the Housing Element focuses on meeting affordable housing needs and uses creative solutions to meet them. The draft does not seem to meet these needs.
- Make Table B-5 clearer (e.g., show totals and subtotals).
- Make mobility improvements and opportunity zones.
- Consider proposing assisted living high density along the corridors.
- In Tables 8 through 13, show a cross tabulation of concerns around renters and homeowners.