



# HOUSING ELEMENT UPDATE (HEU)

*Commission and Committees Input Summary*

JANUARY 2022



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 City Council and the Planning Commission on the Housing Element progress.

## Planning Commission (January 6, 2022)

- The Commissioners discussed setting a unit floor for residential projects in multifamily zones. Three Commissioners expressed concerns about setting a floor, one of them asked for more information and another argued that setting minimum unit thresholds infringes on personal choice and property rights. One Commissioner expressed support for setting a floor and would like to see analysis on this approach.
- The Commissioners discussed SB 9 and how it might apply in Culver City (e.g., regarding owner-occupancy requirements).
- The Commissioners discussed allowing four-plexes by right, how allowing four-plexes by-right offers an income-stream for persons and some mansions are larger than four-plexes. The Commissioners opposed to allowing four-plexes by-right explained how maintaining multifamily neighborhoods can help meet the RHNA and how increasing opportunities for four-plexes is good, but allowing them by-right could be problematic. One Commissioner in support of allowing four-plexes by-right stated that it is consistent with comments from City Council.
- The Commissioners discussed maintaining incremental infill, as defined in the Housing Element.
- Concentrating housing along busy boulevards poses environmental justice issues, as it exposes those households to pollution. This exposure increases the likelihood of those households developing asthma and developmental disabilities.
- Accurately analyzing the realistic capacity of development is the most urgent aspect of the Housing Element.
- One Commissioner expressed concern that the Housing Element does not address HCD's comments related to realistic capacity.

- One Commissioner expressed hope about the progress the City is making with streamlining mixed-use permits.
- Regarding the housing programs in the Housing Element, one Commissioner believes the Housing programs have not been revised enough to meet HCD standards, explaining that the timelines and outcomes in the Housing Element should be more robust and that the programs still sound “exploratory.” Another Commissioner explained how they would like to see the programs to go further. For example, the programs could allow fee waivers for affordable housing projects, allow fee concessions, and remove minimum unit sizes in the Zoning Code, as they are too high.
- One Commissioner discussed how property values and housing density affect neighborhood character.
- Regarding staff’s efforts to contact opportunity site property owners, one Commissioner supported these efforts. Another Commissioner was happy to see City staff act on Planning Commission and City Councils request to research capacity of sites in industrial areas like the Hayden Tract and Smiley-Blackwelder areas.
- Allow residential units in industrial areas like Hayden Tract and Smiley-Blackwelder by-right.
- One Commissioner expressed confusion over complaints around insufficient and a non-transparent community engagement process when the General Plan Update has been in progress for about three years and discussions around the Housing Element have occurred in the past two years.
- Many of the comments from the Commissions and Committees prove to be consistent with each other. However, there are a few differences in opinion related to the details.
- Overall, the Housing Element’s main themes and concepts have remained consistent throughout the process.
- Although no policy document is perfect, this Housing Element appears capable of accomplishing what it is meant to do.
- Another example of staff responding to HCD, public, Planning Commission, and City Council Comments was that staff removed sites in the Culver Crest neighborhood from the Sites Inventory.
- Discussions around height in the fall will likely be contentious.
- One Commissioner expressed concern over the timeline to change the residential development standards, asking how the City can facilitate housing before the Zoning Code Update is adopted. Another Commissioner discussed keeping the 2023 timeline for the Zoning Code updates.
- If the City does not meet its RHNA, it will likely see a higher RHNA in the next housing cycle.

## City Council (December 10, 2021)

- Supports implementing affordable housing overlay zones (AHOZ). AHOZ can facilitate affordable housing in mixed use or residential zones.
- Streamlining development is powerful in eliminating costs, making projects more competitive in an AHOZ.



- The AHOZ should be for 100% affordable projects.
- Reconsider live/work options in the Hayden Tract and Smiley-Blackwelder areas.
- Consider retail on mixed use lots that make sense.
- Consider parking as a development incentive. The Advisory Committee on Housing and Homelessness (ACOH) supports establishing parking maximums as part of the strategy to support affordable housing production.
- Consider committing to ending parking minimums, particularly in Transit Oriented Development (TOD) areas.
- Consider designing a program along corridors that encourages 3-4 story buildings.
- Expand the TOD to include the Move Culver City area.
- Encourage low-carbon buildings. Implement a covenant that prevents occupants living in buildings with reduced parking from parking in neighborhoods.
- Ensure ground level uses comply with the Americans with Disabilities Act (ADA).
- Consider reducing setback requirements.
- Culver City is obligated to address housing needs for all. This is important for service workers, teachers, City staff, and young professionals. The affordable housing crisis is so dire that even young professionals who achieved advanced educational degrees and earn incomes in the low six-figure range cannot afford homes. Ensure we invest in solutions that allow people of different backgrounds to live in Culver City.
- Ensure we allow housing throughout the city, not concentrated on thoroughfares. We need to do more to build housing and build housing for all income levels.
- Our focus should be on building affordable housing, not just housing.
- Ensure Culver City is more equitable and welcomes people of all income levels, unlike Beverly Hills, Brentwood, and Santa Monica, which are privileged enclaves.
- The Housing Element is an opportunity to encourage housing that the city wants.
- Achieving equity often involves people giving something up. It is related to being community-oriented and caring about the community's overall wellbeing.
- Ensure future development in the city provides adequate green space.
- 1 Council Member explained that Incremental Infill does not result in many residential units and has divided the community. They questioned the need to equitably distribute housing, arguing that it is important to retain Residential Single Family (R1) and Residential Two Family (R2) zones. They also noted how Culver City is already diverse.
- Maintaining R1 does not help with homelessness.
- Culver City is not an island community that needs to address the jobs/housing imbalance alone.
- HCD criticized the City's community engagement efforts; the City should consider in-person meetings after the holidays.

- Those who attend public City meetings, claiming that the Council and City staff do not listen are not listening to their fellow neighbors. The suggestions that the conversations are polarized seem purposeful.
- It is inaccurate to suggest that the conversation is polarized between homeowners and renters since some homeowners support Affirmatively Furthering Fair Housing (AFFH).
- If a topic is divisive, it means that it is important.
- Everyone needs to step up and lead.
- Misinformation is spreading around the idea that the City is proposing tall apartment complexes and that the City can achieve its Regional Housing Needs Allocation (RHNA) without re-zoning.
- Some participants in the discussions are confusing philosophy with ideology.
- Affordable housing is only possible with large development projects.
- Many in Culver City live on fixed incomes but are considered wealthy because they bought their homes when they were affordable.
- The only constant is change. Many in the community are resistant to change or want to control how change occurs.
- Single family homeowners are not oppressed. Claiming they are experiencing oppression is offensive for groups in the population who identify with oppressed groups. It is more accurate to explain that they disagree with the land use policies, not that they are oppressed.
- Encouraging Accessory Dwelling Unit (ADU) production and affordability covenants for ADUs is an important strategy.
- Consider Community Land Trusts (CLTs) as a strategy.
- Many of California's problems related to the housing supply shortage, homelessness, and long commute times are land use issues.
- City Council adopted Guiding Principles to support and guide the Housing Element since the sixth RHNA cycle is more stringent. The Housing Element should commit more to conducting a mid-cycle review of its progress towards its goals.
- The *Los Angeles Times* conducted a poll that showed that a plurality and majority of LA County voters support allowing more residential units on R1 lots.
- Construction costs for development employing Incremental Infill is less expensive than, for example, projects that employ parking podiums or require land use attorneys. It is more affordable to build a three or four plex by repurposing a large, single-family home.
- HCD's comment letter provides the City with clear guidance, particularly around public outreach and incremental infill. Culver City has been aligned with many of the suggestions HCD made related to addressing the City's history with fair housing. The General Plan Update (GPU) team should do more with AFFH.
- Consider a by-right density bonus.

## Options considered

- Overall, the Council Members support all five options proposed. The list below includes comments the Council Members made about the options.
- Option 1
  - 1 Council Member supports creating a floor for the minimum number of units allowed in multifamily zones and allowing four-plexes by-right. Ideally, the floor should be set to four residential units. However, three residential units should be the minimum.
  - 1 Council Member supports setting a minimum unit floor or implementing financial incentives.
- Option 2
  - 1 Council Member discussed how incremental infill provides the city 135 more units than it would otherwise have. Allowing incremental infill is equitable and the right thing to do. Concentrating housing along commercial corridors exposes those households to pollution and segregates neighborhoods by class.
  - 1 Council Member suggested replacing Incremental Infill with a strategy of adaptively reuse shopping centers and developing along commercial corridors. The Council Member explained that Incremental Infill is inefficient and developing in the commercial corridors would focus on areas that are affordable.
  - 1 Council Member suggested implemented Senate Bill 9 (SB 9) rather than Incremental Infill.
- Option 3
  - 1 Council Member discussed how important it is to streamline projects and consider meaningful incentives
  - 1 Council Member supports this but explained that it should not be the only solution as housing should be spread equitably throughout the city.
  - Having a flexible, adaptive re-use approach to big box stores will help ensure financial stability as the market for shopping centers shifts. For example, in some communities in the southern states in the U.S., communities that relied on big box stores for economic development suffered when those big box stores closed. Those closures left acres of land vacant. Recycling shopping centers and using vacant or underused parking lots is important. However, we need to meet our RHNA requirements and build housing for low-income persons.
- Option 4 – permit streamlining
  - 1 Council Member supports permit streamlining, conducting ministerial permit review, reducing parking for affordable housing, reducing setbacks, and prioritizing these efforts.
  - 1 Council Member supports streamlining the permitting process to help ensure that housing is financially feasible. This requires reducing development and permitting fees.
  - Ensure that we prioritize housing security and that the process to achieve it is transparent. If the City acts slowly, it will harm people who are housing insecure.

- It typically takes 1-2 years to build housing. This slow process can be fatal for those who experience housing insecurity.
- Ensure the permitting times do not violate the Permit Streamlining Act (see Table 39 in the Housing Element).
- For projects along boulevards, particularly East Washington, consider a Program that encourages and streamlines three- and four-story buildings.
- Option 5
  - 1 Council Member supports this but explained that it should not be the only solution as housing should be spread equitably throughout the city.
  - The Westfield Mall has potential for housing.

## 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).
- Consider increasing micro units from 25% to 50-100% affordable.
- Height limits are a ballot initiative.
- Consider setting a base transition height consistent with surrounding neighborhoods and reducing setbacks.
- Eliminate density restrictions up to 10 homes. Eliminate front setbacks. Have preapproved design plans for commercial development.
- Consider meeting with a group working on AARP livable communities projects.
- Inclusionary housing policies may not be as effective as incentives.
- 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
  - 3 Commissioners support
  - 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
  - All 5 Commissioners support this option.

## 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.