City Council / Planning Commission Joint Session Memo – June 23, 2021

Honorable Mayor, City Council Members, and Planning Commissioners:

On Wednesday, June 23, 2021, at 7 PM, the City of Culver City a joint session of the City Council and Planning Commission. This memo provides further detail to the staff report and includes:

- Section 1: Process: Provides background information on the process.
- Section 2: Draft Preferred Land Use Map, Land Use Designations, and Growth Projections Describes the proposed Preferred Land Use Map, Land Use Designations, and growth projections.
- Section 3: Land Use Alternatives and Analysis Reviews the land use alternatives presented in April and May, including technical analysis of the alternatives. It also includes existing conditions report analysis used to develop the growth projections.
- Section 4: Community Engagement
- Summarizes community engagement related to the land use alternatives.
- Section 5: Guide to Key Terms
- Provides a list of key terms related to the land use alternatives to assist GPAC and community members. Terms bolded in blue throughout the memo are defined further in this section.
- Section 6: Additional Resources Provides links to additional resources, including GPAC materials, community workshop materials, and existing conditions reports.

Section 1: Process

The General Plan Update (GPU) was initiated in fall 2019 and consists of five main phases of work (see Figure 1). Phase I (Existing Conditions) included reviewing existing documents/policies, assessing existing conditions, and publishing a series of existing conditions reports (pictureculvercity.com/resources).

Phase II (Listening and Visioning) included community conversation to understand what the community loves about Culver City and what they would like to see in the future. This listening led to the preparing the Vision Statement, Core Values, and Guiding Principles, which guides Phases III and IV of the GPU process (pictureculvercity.com/vision-corevalues-and-guiding-principles).

To move Phase III (Plan Alternatives) forward, a draft Preferred Land Use Map is being presented for discussion. Recommendation of the Preferred Land Use Map by the Planning Commission and direction by the City Council at this session will allow the project team to move into Phase IV (Policy and Plan Development).



Phase IV includes preparation of public review drafts of the policy frameworks, General Plan Elements (including the Housing Element and Housing Sites Inventory), and the Environmental Impact Report, including technical studies.

The Vision Statement, Core Values, and Guiding Principles; Housing Element Guiding Principles adopted by City Council; and the feedback received during the alternatives process will guide this work. Documents prepared in this phase will be available for review in 2022.

Figure 1: General Plan Update Process



General Plan Land Use Element and Map

The purpose of the Land Use Element is to describe present and planned land uses and their relationship to the community's long-range vision and goals for the future. The Land Use Element identifies the proposed general distribution, location, and extent of land uses such as open space, residential, commercial, and mixed use. The Preferred Land Use Map is a citywide map that illustrates the future intended use of land, a "land use designation."

The land use designations include the range of land uses allowed and the density or intensity allowed on each parcel, described further below. The City's Zoning Code provides detailed regulations, project development standards, and guidelines. The land use designation may identify new uses or more intense development than what is currently built (the existing land use). Changes to the City's General Plan Land Use Map will require updates to the City's Zoning Code, as the Zoning Code is the primary implementation tool of and must be consistent with the General Plan.



Section 2: Draft Preferred Land Use Map, Land Use Designations, and Growth Projections

The discussion of Preferred Land Use Map and Growth Projections is divided into two primary sections: 1) the location of land uses and 2) how much growth in terms of housing and jobs. The Preferred Land Use Map increases residential opportunities throughout the city, while allowing continued nonresidential development, including retail, services, hospitality, and office uses. Final land use decisions will also be influenced by the results of various studies, including the Environmental Impact Report.

The Preferred Land Use Map (Figure 2) builds on Alternative 2. It distributes new growth across the city. Opportunity sites accommodate medium to high density mixed-use. Commercial corridors would be allowed a greater mix of uses compared to present conditions, including standalone residential, at more moderate densities. Low density two family, three family, and multifamily would be consolidated into new incremental infill types. Table 1 describes the proposed Land Use Designations in more detail, including allowable uses, densities, and heights.

The Preferred Land Use Map shows the existing low-density single-family areas in gray. The GPU team identified three specific options for these areas during analysis of the alternatives and need direction on which option to study going forward. These options consider community input received at the June 10, 2021, General Plan Advisory Committee meeting, and are the next iteration of what was presented in that meeting's memo.

Option 1: No Change to Low-Density Single-Family Areas

As shown in Figure 3, there would be no major change in low-density single-family areas. Detached single unit residential, accessory dwelling units (ADUs) and junior ADUs (JADUs) would continue to be allowed. These areas will continue to see some change as they allow ADUs and JADUs.

Potential advantages include:

• Limiting change to accessory units in existing single-family neighborhoods.

Potential disadvantages include:

- When homes are redeveloped, new homes will likely be larger and more expensive;
- Fewer opportunities for homeownership;
- Less efficient use of land results in higher greenhouse gas emissions;
- Large portions of the city are "off limits" for growth and redevelopment, concentrating development onto a limited number of sites, which tends to generate conflict;
- Concentrates more affordable, often rental, residential units along corridors with higher rates of traffic and air quality impacts; and



• Maintaining structural barriers to equitable opportunities to housing stability, economic mobility for some socio-economic and demographic groups.

Option 2: All Low-Density Single-Family Areas Allow Incremental Infill 1

As shown in Figure 4, low-density single-family areas would evolve with Incremental Infill 1. Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and fourplexes would be allowed. This would allow up to 4 units on a lot, requiring the 4th unit to be affordable.

Potential advantages include:

- Applying the policy consistently across all single-family parcels;
- Increasing the opportunity for more varied housing types that provide relatively smaller, less expensive, and more energy-efficient units;
- Providing more choice to individual homeowners to convert their homes to different housing types;
- Creating new opportunities for homeownership and wealth building; and
- Expanding residential choices can help to ensure a more inclusive and diverse neighborhood.
- If coupled with lower parking requirements, reduces development costs which reduces cost to residents.

Potential disadvantages include:

- Changing development standards (e.g., lot coverage and setbacks) may have an impact on neighborhood character; and
- Does not account for lot characteristics (e.g., parcel size and lot dimensions) to determine if the site is adequate to support different housing types.

Option 3: Hybrid Approach to Low-Density Single-Family Areas

As shown in Figure 5, this hybrid option uses parcel size and geometry to ensure the lots are better suited to accommodate additional infill development.

- Lots in low-density single-family areas less than 4,950¹ square feet would remain the same. Detached single unit residential, ADUs, and JADUs would continue to be allowed.
- Lots in low-density single-family areas equal to and greater than 4,950 would be allowed to evolve with Incremental Infill 1. Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and fourplexes would be allowed. This would allow up to 4 units on a lot, requiring the 4th unit to be affordable.

Potential advantages include:

• Same as Option 2; plus

¹ Using 4,950 square feet as a threshold is intended to capture lots just under 5,000 square feet where this level of density remains appropriate.



• Establishing a minimum lot size ensures sites are large enough to accommodate reasonably sized units.

Potential disadvantages include:

- Same as Option 2; plus
- Creating some "winners and losers" by not allowing Incremental Infill 1 on all single-family parcels; and
- More difficult for City staff to administer on parcels close to the threshold in size, especially where there may be discrepancies or outdated information.

Figure 2: Draft Preferred Land Use Map **Land Use Designations** See Separate Maps Incremental Infill 1 Neighborhood Multi Family Neighborhood/Corridor MU 1 Neighborhood/Corridor MU 2 Mixed Use Medium Mixed Use High Industrial/Studio Mixed Use Planned Unit Development Note: Draft alternative land use map for discussion and evaluation. Land use map is simplified for clarity. Affordability is mandated for

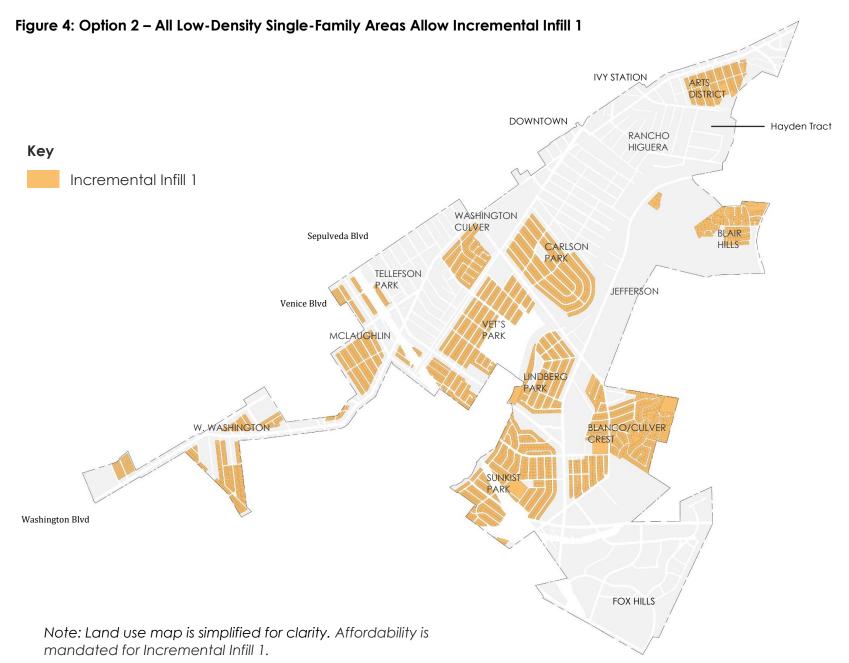
Incremental Infill 1.



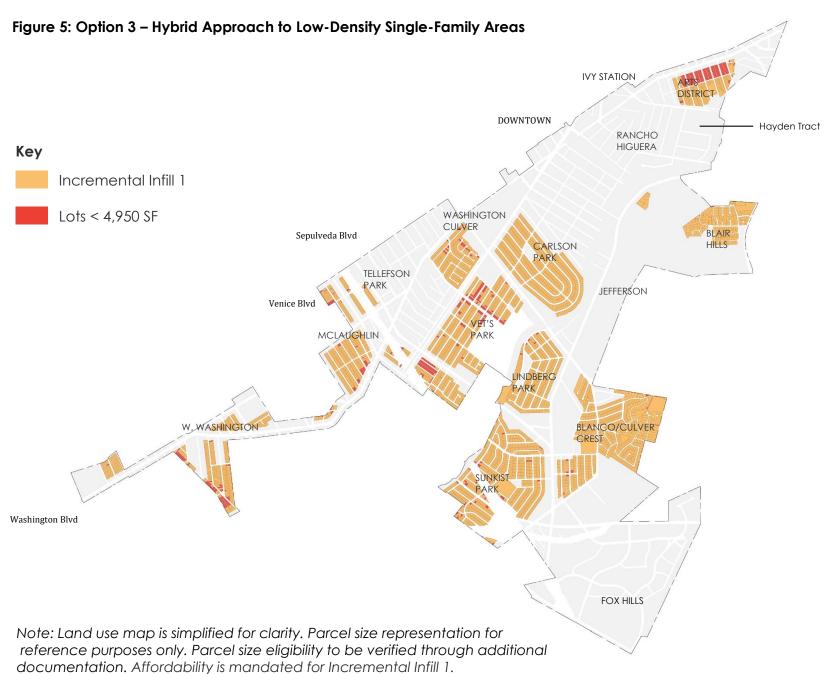
Note: Land use map is simplified for clarity.

Figure 3: Option 1 – No Change to Low-Density Single-Family Areas IVY STATION DOWNTOWN Hayden Tract RANCHO HIGUERA Key Single Unit Residential WASHINGTON CULVER BLAIR Sepulveda Blvd CARLSON HILLS PARK **TELLEFSON** PARK JEFFERSON Venice Blvd VET'S PARK MCLAUGHLIN W. WASHINGTON SUNKIST PARK Washington Blvd FOX HILLS









Proposed City of Culver City Land Use Designations

State law requires that the categories used on the General Plan Land Use Map be accompanied by definitions. These definitions establish the allowable land uses and density of development in residential areas or intensity of development in commercial areas permitted within each land use designation. In residential areas, density is usually expressed as the maximum number of dwelling units allowed per acre (du/ac). In commercial areas, intensity is usually expressed using floor area ratio (FAR), or the ratio of building floor area to total lot area.

Accessory dwelling units (ADU) and junior ADUs (JADUs) are allowed in multiple districts as shown in the table. Specific to Culver City, ADUs are not permitted in the Upper Culver Crest Neighborhood.² Per State law, ADUs do not count toward calculating allowable density under the General Plan, but do count towards meeting the Regional Housing Need Allocation (RHNA).³ Table 1 outlines the proposed land use designations included in the alternatives. Any designations not included in the Preferred Map will be removed in the future.

Table 1: Proposed Land Use Designations

Designation	Description	Illustrative Example
Residential Types		
Single Unit Residential (R1) In Alternative 1	 Detached single unit residential, ADUs, JADUs Allows up to: 2 stories 8.7 du/ac 	
Low Density Two Family (R2) In Alternative 1	 Detached or attached single unit residential, ADUs, JADUs, and duplexes Allows up to: 2 stories 17.4 du/ac 	

² City of Culver City. ADU Handout. 2020. Retrieved from https://www.culvercity.org/files/assets/public/documents/community-development/updates-handouts/adusummarysheet2020feb2020.pdf

³ California Department of Housing and Community Development. Accessory Dwelling Unit Handbook. 2020. Retrieved from https://www.hcd.ca.gov/policy-research/docs/adu_december_2020_handbook.pdf



Designation	Description	Illustrative Example
Low Density Three Family (R3) In Alternative 1	 Detached or attached single unit residential, ADUs, JADUs, duplexes, and triplexes Allows up to: 2 stories 29 du/ac 	
Low Density Multifamily (RLD) In Alternative 1	 Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and low density multifamily Allows up to: 2 stories 15 du/ac 	
Medium Density Multifamily (RMD) In Alternative 1	 Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and moderate density multifamily Allows up to: 9 units per lot 2 stories 30 du/ac 	
Incremental Infill 1 In Preferred Alternative In Alternative 2	 Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, and fourplexes Allows up to: 4 units per lot (4th unit must be affordable) 2 stories 35 du/ac 	
Incremental Infill 2 In Alternatives 2 & 3	 Detached or attached single unit residential, ADUs, JADUs, duplexes, triplexes, fourplexes, courtyard, and cottage clusters Allows up to: 6 units per lot (5th and 6th units must be affordable) 3 stories 50 du/ac 	



Designation	Description	Illustrative Example
Neighborhood Multi- Family In Preferred Alternative In Alternatives 2 & 3	 A mix of multifamily residential Allows up to: 3 stories 50 du/ac 	
Commercial and Mixed-L	Jse Types	
Neighborhood/ Corridor MU 1 In Preferred Alternative In Alternatives 2 & 3	 Lower-scale, mixed use blending residential, commercial, and retail uses and public spaces serving both surrounding neighborhoods and visitors from nearby areas Allows up to: 3 stories 2.0 FAR 35 du/ac 	
Neighborhood/ Corridor MU 2 In Preferred Alternative In Alternatives 1, 2 & 3	 Moderate-scale, mixed use blending residential, commercial, retail uses, and public spaces Allows up to: 4 stories 2.5 FAR 50 du/ac 	
Mixed Use Medium In Preferred Alternative In Alternatives 1, 2 & 3	 A broad range of commercial, office, and residential uses serving both surrounding neighborhoods and visitors from nearby areas Allows up to: 4 stories 2.5 FAR 65 du/ac 	
Mixed Use High In Preferred Alternative In Alternatives 1, 2 & 3	 High-intensity active uses and mixed-use development, including retail stores, restaurant, hotels, services, residential, and office uses Allows up to: 5 stories 3.5 FAR 100 du/ac 	



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Designation	Description	Illustrative Example
In Preferred Alternative In Alternatives 1, 2 & 3	 Private studio campus with corporate headquarters, offices, facilities, and sets Allows up to: 2.0 FAR 	
Industrial Mixed Use	A transition between mixed-	
In Preferred Alternative In Alternatives 1, 2 & 3	use and high industrial areas with a mix of residential and industrial uses Allows up to: 2.5 FAR 65 du/ac	
Public and Institutional Ty	pes	
Parks and Open Space In Preferred Alternative In Alternatives 1, 2 & 3	Parks, recreation complexes, and cemeteries	
Public and Institutional In Preferred Alternative In Alternatives 1, 2 & 3	Public facilities, including but not limited to government offices; parks, recreation, and community services facilities; and hospital uses	
In Preferred Alternative In Alternatives 1, 2 & 3	School sites and facilities	ROBERT FROST

Proposed Growth Projections

Growth projections refer to the predicted amount of development that will likely occur in a specified time period (2045). Projected growth is determined by many factors including the availability of land for development, market demand for new development, regional economic trends, government regulations, and the potential for new development on any given parcel.



When preparing a General Plan, the horizon year growth projections are lower than full buildout. The full buildout assumes every parcel is developed with the maximum amount allowed under the General Plan. Actual development is typically much less than the theoretical limit of development; therefore, a more realistic scenario was developed for Culver City based on projected demand for housing and jobs as part of the Socio-Economic Profile and Market Analysis and parcel characteristics (detailed in Section 3: Land Use Alternatives and Analysis below). The Environmental Impact Report for the General Plan will analyze 2045 growth projections and not full buildout.

Table 2: Growth Projections for the Preferred Alternative

	Hous	ing Units				Jobs	
2019	2045	Net New (2019-2045)	Growth	2017	2045	Net New (2019-2045)	Growth
17,700	29,300	11,500	2.0%	60,000	83,000	23,000	1.2%

Section 3: Land Use Alternatives and Analysis

The land use alternatives are different options to achieve the community's vision for Culver City over the next 25 years to 2045. The alternatives were based on technical studies and community input collected between September 2019 and April 2021. Land use alternatives test different land use and urban design patterns, illustrate the trade-offs between policy questions, and help us make informed choices about the future. The GPU team developed three land use alternatives for Culver City, as follows:

- Alternative 1 Concentrated Growth: This alternative focuses new residential and commercial growth along the commercial corridors and in existing non-residential districts. Opportunity sites accommodate significant density. Commercial corridors like Washington and Sepulveda would be allowed higher densities. There would be no major change in low density single family areas, though these areas will continue to see some change as they allow ADUs and junior ADUs.
- Alternative 2 Dispersed Infill: This alternative distributes new growth across the
 city. Opportunity sites accommodate medium to high density mixed-use.
 Commercial corridors would be allowed a greater mix of uses compared to
 present conditions at more moderate densities, including standalone residential.
 Many low density single family areas would evolve with missing incremental infill
 (up to 4 units on a lot).
- Alternative 3 Dispersed Densification: Developed in response to GPAC and Housing Technical Advisory Committee feedback, this alternative distributes new growth across the city but at higher densities than Alternative 2. Opportunity sites accommodate high density mixed-use development. Commercial corridors would be allowed a greater mix and intensity of uses compared to present conditions. Exisiting low and medium density multifamily areas would allow additional height and encourage lot consolidation. Many low density single family areas would evolve with incremental densification (up to 8 units on a lot).

Figure 6 illustrates the land use strategies associated with each land use alternative. Land use alternative maps are shown in Figures 7-9. Key phrases used below are explained in Section 5.

Figure 6: Land Use Alternatives Comparison

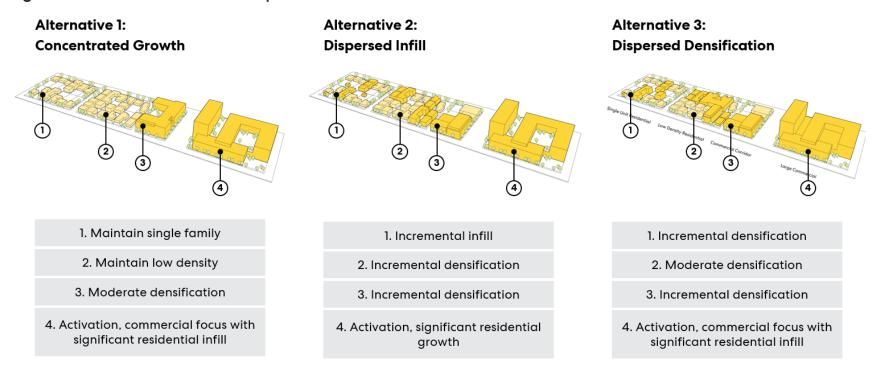




Figure 7: Alternative 1 - Concentrated Growth

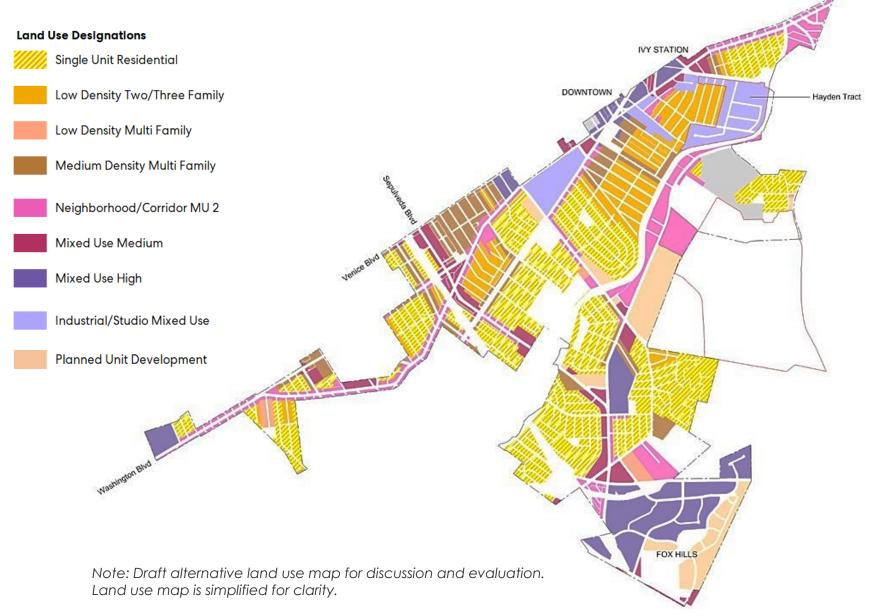




Figure 8: Alternative 2 - Dispersed Infill

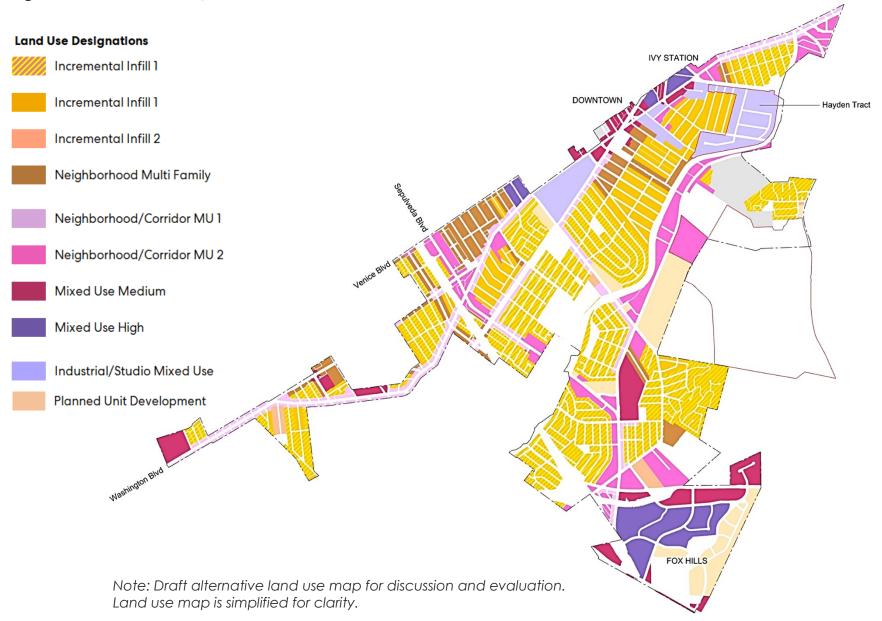
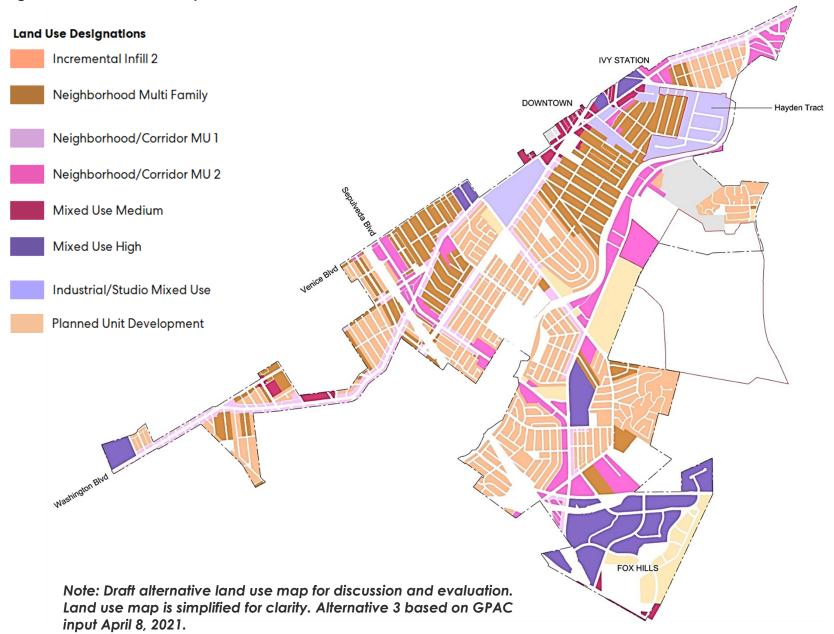




Figure 9: Alternative 3 - Dispersed Densification



Growth Projections

The following table shows the growth projections for the land use alternatives. It includes housing unit and job growth to 2045, including total growth and annual growth.

Table 3: Growth Projections for the Alternatives

Alternatives	Housing Units						Jobs	
	2019	2045	Net New (2019-2045)	Annual Growth	2017	2045	Net New (2019-2045)	Annual Growth
Alternative 1	17,700	27,200	9,500	1.7%	60,000	83,200	23,200	1.2%
Alternative 2	17,700	28,100	10,400	1.8%	60,000	83,400	23,300	1.2%
Alternative 3	17,700	29,300	11,500	2.0%	60,000	83,500	23,500	1.2%

Summaries of the Socio-Economic Profile and Market Analysis and Regional Housing Needs Allocation follow to provide context for the growth projections.

Socio-Economic Profile and Market Analysis Growth Scenarios

The Socio-Economic Profile and Market Analysis report,⁴ prepared by HR&A Advisors, projects citywide demand for residential, office, commercial, hotel, and industrial land uses through the year 2045. This demand analysis was used to inform the growth projections for the GPU.

Potential job growth in Culver City was projected based on the capture of projected job growth in LA County by SCAG.⁵ For **capture rates** (percentage of projected job growth in LA County expected to be in Culver City), this analysis looked at the percentage of new jobs in LA County between 2007 and 2017 that are in Culver City, and the percentage of new jobs in LA County between 2012 and 2017 that located in LA County – 3.90% and 2.68%, respectively.

In the low job growth scenario, this analysis conservatively assumes that Culver City will sustain more recent capture of LA County jobs (2012-2017), whereas the high job growth scenario assumes that Culver City will capture a share of new LA County jobs equivalent to what was seen in the last ten data years (2007-2017). These scenarios result in projected job growth of 22,300 to 32,400 new primary jobs by 2045, respectively.

Culver City's historic job growth and low housing production have created a severe jobs to housing imbalance within the city. Culver City's 3.5 jobs to housing unit ratio is higher

⁵ SCAG is the Southern California Association of Governments (our local metropolitan planning organization). This analysis uses SCAG's industry-level growth projections for LA County between 2016 and 2040 and extends the projections to the year 2045 using the same rate of growth. SCAG has not yet released industry-level projections through 2045, but the overall rate of total employment growth projected for all jobs by 2045 is in line with SCAG's previously released 2040 projections which were used in this analysis.



than any peer city and significantly higher than the **competitive market area (CMA)** and LA County. Culver City's CMA includes the Westside cities of Santa Monica, Beverly Hills, and West Hollywood (See Figure 1 in the Socio-Economic Profile & Market Analysis Report).

Further, Culver City has added 49 jobs for every housing unit added during the past 15 data years, a ratio that is unprecedented within the CMA. As Culver continues to add jobs, matching job growth with residential development will be critical to ensuring that a housing shortage does not impede Culver City's economic development priorities and that Culver City is providing its fair share of housing within the region, as well as allowing employees to live near where they work.

The residential growth scenarios assume that Culver City will meet the CMA's jobs to housing ratio of 1.5 jobs per housing unit for each job that the City adds. The growth scenarios are not meant to be prescriptive, but rather reflect an estimate of demand for housing caused by Culver City's expected employment growth, which may or may not be accommodated in the city itself, surrounding cities, or other parts of the metropolitan area (based on physical or other constraints). Overall, if Culver City were to meet this job to housing ratio it would result in 14,900 new housing units (530 units annually) under the low job growth projection or 21,600 new housing units (770 units annually) under the high job growth projection, as detailed in Table 4.

Table 4: Growth Scenarios based on CMA Jobs to Housing Ratio

	Projected Growth				
	Low	Medium	High		
2017 Jobs	60,000	60,000	60,000		
2045 Job Projection Estimate	82,300	87,300	92,400		
Annual Job Growth, 2017-2045	800	980	1,200		
Jobs-to-Housing Ratio Assumption (Applied to Incremental Job Growth)	1.5	1.5	1.5		
2017 Housing Units	16,900	16,900	16,900		
2045 Total Housing Units	31,800	35,100	38,500		
2045 Housing Units Added	14,900	18,200	21,600		
Annual Housing Unit Growth, 2017-2045	530	650	770		

Regional Housing Needs Allocation

State housing law mandates the Regional Housing Need Allocation (RHNA) as part of the periodic process of updating local jurisdictions' General Plan Housing Elements. The RHNA



calculates how much housing each jurisdiction needs during specified eight-year planning cycles to adequately meet everyone in the community's housing needs.

Per the 2013 – 2021 RHNA, the City is required to ensure its land is zoned to accommodate 185 housing units at varying levels of affordability (very low, low, moderate, and above moderate) by 2021 (see Table 5). Very low-income housing is considered affordable to those who earn 0 - 50% of the area median income (AMI).⁷ Low income housing is affordable to households that earn 51 - 80% of the AMI, moderate income housing is affordable to those who earn 81 - 120% of AMI, and above moderate housing is affordable to households that earn more than 120% of the AMI.

As of 2020, the City has permitted about 49% of its total RHNA-required units. However, about 85% of permitted units have been at the above moderate-income level, and the City has only met about 14.6% of its very low income, 13.8% of its low income, and 12.9% of its moderate-income housing requirements.

Table 5: Culver City's 2013-2021 Regional Housing Need Allocation⁸

Income Category ^a	RHNA Allocation	% of RHNA Total	Total # of Units the City of Culver City Has Permitted	% of RHNA Allocation Met
Very Low (0 – 50% of AMI) ^b	48	26.0	7	14.6
Low (51 – 80% of AMI)	29	15.7	4	13.8
Moderate (81 – 120% of AMI)	31	16.8	4	12.9
Above Moderate (more than 120% of AMI)	77	41.5	630	818.2
Total	185	100.0	92 ^c	49.7°

Notes:

- a. Income levels are based on area median income (AMI) in Culver City in 2010 of \$67,736.
- b. The City divides the Very Low category into Extremely Low (0-30% of AMI) and Very Low (31-50%). The City targets 24 units in the Extremely Low category and 24 units in the Very Low category.
- c. These total calculations only count the allocated 77 units permitted and % of allocation met for the above moderate-income category.

Source: City of Culver City, 2021

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⁶ Southern California Association of Governments. What is RHNA? 2020. Retrieved from http://www.scag.ca.gov/programs/Pages/Housing.aspx

⁷ The Department of Housing and Urban Development (HUD) calculates AMI, or the average of all incomes for a given area and sets the corresponding affordable limits for households.

⁸ Reflects updated data provided by the City's Current Planning Division and confirmed by the Housing Division. This data shows changes to numbers shared previously, as 2013-2016 units were not required to be reported to the State and had not been included previously.



SCAG finalized RHNA allocations for the 2021-2029 cycle. Based on SCAG's final RHNA allocation plan, the City will have to zone enough land to permit 3,341 units, as shown in Table 6.9

Table 6: Culver City's 2021-2029 Regional Housing Need Allocation

Income Category	RHNA Allocation (Housing Units)	% of Culver City's RHNA Total
Very Low (0 – 50% of AMI)	1,108	33.2
Low (51 – 80% of AMI)	604	18.1
Moderate (81 – 120% of AMI)	560	16.8
Above Moderate (more than 120% of AMI)	1,069	32.0
Total	3,341	100

Sources: SCAG, 6th Cycle Final RHNA Allocation Plan, March 4, 2021. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1616462966

Land Use Analysis

The following charts illustrate different metrics or measurements for the three land use alternatives from a modeling software tool, called UrbanFootprint. These outputs allow us to compare and contrast future land use decisions and their environmental and health impacts as well as the effect on quality of life in the community. The following metrics are evaluated:

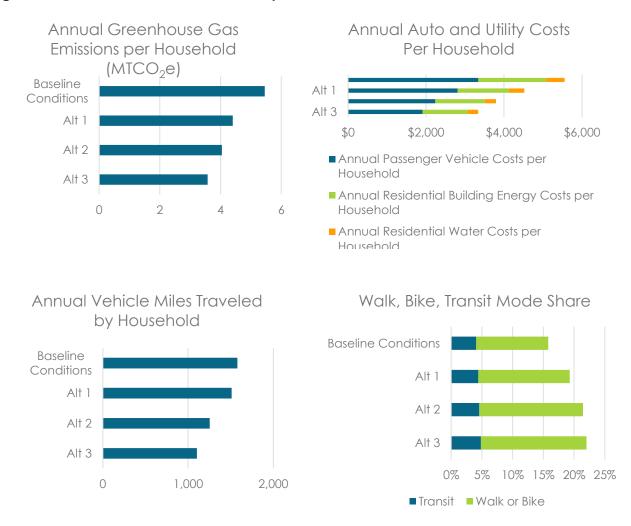
- Annual greenhouse gas emissions per household
- Annual auto and utility costs per household
- Annual vehicle miles traveled per household
- Walk, bike, and transit mode share
- Annual water and energy use

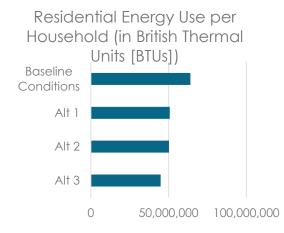
The three alternatives perform similarly across these metrics and generally improve conditions compared to the modeled baseline condition or current condition. Alternatives reduce greenhouse gas emissions, household utility and auto costs, and water and energy use. The three alternatives propose mixed use near existing goods, services, jobs, and transit which result in lowered annual vehicle miles traveled and increased mode split of walking, biking, and transit use. Alternatives 2 and 3 generally improve conditions more than Alternative 1, as shown in Figure 10.

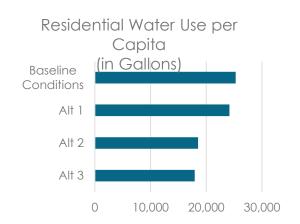
⁹ Southern California Association of Governments. SCAG 6th Cycle Final RHNA Allocation Plan. March 2021. Retrieved from: https://scag.ca.gov/sites/main/files/file-attachments/6th-cycle-rhna-final-allocation-plan.pdf?1616462966



Figure 10: Environmental and Health Impacts of Alternatives









Land Use Alternatives Impacts on Displacement and Environmental Justice

This analysis describes the potential impacts of the land use alternatives on displacement and begins to identify policy topics for addressing the unintended consequences of future growth in the GPU.

Context

From 2000 to 2020, the total population of Culver City has remained about the same, hovering between 38,800 in 2000 at its lowest and 40,400 in 2016 at its highest point.¹⁰ While the total population number would indicate that not much has changed in the city, the demographic data indicates that change over the second half of this twodecade period was not equally distributed by race or ethnicity. For example, block group data show that in the Fox Hills planning area / neighborhood, hundreds of Black residents moved out and white and Asian residents moved in. 11

Another demographic change of note is a sharp decrease in population in parts of Clarkdale, a Senate Bill 1000 (SB 1000) Priority Neighborhood. 12 All neighborhoods experienced demographic change and the preliminary review of American Community Survey (ACS) data supports statements and comments from community members regarding the patterns of demographic change, where lower income residents, many of whom are Black or African American, are being displaced from the city.

During the same time, Culver City has added nearly 50 times as many jobs as housing units since 2002. This has led to an increased the shortage of housing available.

Alternatives Analysis

The City's GPU will describe how and where the City plans to accommodate expected growth. By 2045, the land use alternatives test adding up to 12,000 new housing units and 23,000 new jobs. Because Culver City has a limited amount of vacant land, new development will primarily occur on parcels that already contain some existing homes or businesses. The City's primary approach to accommodating growth is to distribute growth along corridors, including in areas well served by Metro, Culver CityBus, or Big Blue Bus service, incrementally add housing in existing residential areas, and provide good access to opportunity (such as jobs, neighborhood amenities, and health care facilities). Table 7 lists the housing and employment growth estimates for each of these planning areas as compared to the proportion of non-white population, displacement risk, and SB 1000 Priority Neighborhoods.

 ¹⁰ Southern California Association of Governments. Profile of the City of Culver City. 2019.
 11 Analysis based on comparison of population data by race or ethnicity in the 2019 Census Planning Database.

¹² City of Culver City. Culver City General Plan Update Community Health and Environmental Justice Exiting Conditions Report. 2021. Prepared by Raimi + Associates.

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Table 7: Planning Area / Neighborhood Comparison

Planning Areas /	% Non- White	Displace- ment	SB 1000 Priority	Alternatives - Range of Growth Projections		
Neighborhoods	Neighborhoods Popula- tion		Neighbor- hood ¹⁴	Total Housing Growth ^a	Total Employment Growth ^a	
Blair Hills	48%	Low-risk	No	200 to 300 (3.0%)	N/A	
Blanco/Culver Crest	57%	Low-risk	No	600 to 1,200 (2.6%)	N/A	
Clarkdale (Tellefson Park), Washington Culver (Studio Estates)	55%	High-risk	Yes	500 to 600 (1.2%)	600 to 700 (0.9%)	
Culver/West (W. Washington)	58%	High-risk	Yes	500 to 700 (1.7%)	200 (0.1%)	
Downtown, McManus (Arts District), Lucerne/ Higuera (Rancho Higuera)a	57%	Rent- burdened	No	1,800 to 2,000 (2.5%)	7,100 to 7,700 (2.0%)	
Fox Hills	58%	Rent- burdened	No	3,500 to 3,800 (3.1%)	3,500 to 3,700 (0.4%)	
Jefferson (Raintree / Lakeside Village / Tara Hills)	48%	Low-risk	No	1,000 to 1,100 (1.7%)	800 (0.3%)	
McLaughlin (W. Washington)	60%	High-risk	No	100 to 300 (0.9%)	N/A	

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¹³ The displacement risk analysis quantifies both the percentage of severely rent-burdened households (defined as those paying more than 50% of their household income on rent) and lower-income households (defined as those earning less than the AMI). The AMI threshold was adjusted according to household size, which mainly ranges between one and three people per household for Culver City's Census Tracts. Census tracts containing a relatively high share of both rent-burdened households and low-income households are considered at the highest risk for displacement. For more information on the displacement risk analysis, see report in Footnote 3.

¹⁴ Through SB 1000, the State of California mandates that jurisdictions concurrently updating two or more elements of their general plan identify "disadvantaged communities" and adopt either an environmental justice (EJ) element or integrate EJ policies throughout the general plan. The EJ element or policies should show how they prioritize the needs of "disadvantaged communities" and reduce their unique and compounded health risks and pollution burdens. "Disadvantaged communities," are referred to here as "Priority Neighborhoods." For more information on the SB 1000 Priority Neighborhoods, see report in Footnote 11.



Planning Areas /	% Non- White	Displace- ment	SB 1000 Priority	Range	atives - of Growth ections
Neighborhoods	Popula- tion	Risk ¹³	Neighbor- hood ¹⁴	Total Housing Growth ^a	Total Employment Growth ^a
Park East (Carlson Park)	40%	Low-risk	No	100 to 500 (0.7%)	N/A
Park West (Veterans Park)	46%	Low-risk	No	300 to 700 (2.0%)	N/A
Studio Village (Lindberg Park)	46%	Low-risk	No	300 to 600 (2.5%)	600 to 700 (1.3%)
Sunkist Park	57%	High-risk	No	400 to 900 (2.4%)	N/A

Notes: a. Annual Growth Rate. b. The Downtown, McManus (Arts District), Lucerne/ Higuera (Rancho Higuera) neighborhoods are grouped into a subarea for the purposes of this data analysis only. The neighborhoods will remain distinct in the General Plan.

The total amount and rate of growth differs by planning area / neighborhood. The total amounts and differing rates of growth expected among Culver City's planning areas reflect multiple policy goals, such as creating transit-oriented communities near Metro, reinforcing Downtown as the heart of the community, and producing workforce and affordable housing to meet the City's Regional Housing Needs Allocation (RNHA). The Downtown, McManus (Arts District), Lucerne/ Higuera (Rancho Higuera) and Fox Hills subareas are expected to have the most significant housing and employment growth, approximately half of the total city housing growth. These subareas have been identified as rent-burdened on the displacement risk assessment.

Areas like Downtown, McManus (Arts District), Lucerne/ Higuera (Rancho Higuera), and Fox Hills also provide significant opportunities for linking housing growth with job access. The higher rates of reinvestment and growth could accommodate more of the city's expected long-term growth but could increase residential displacement risk. Both planning areas are likely to experience business displacement to accommodate new housing, necessitating consideration of business displacement, mobility, and healthy community policies. Nonetheless, housing growth can increase opportunities for people to live and work in these jobs-rich, opportunity areas.

Focusing housing in transit-oriented communities (TOCs) around the Metro and Culver CityBus transit stations / centers and along existing and future high-frequency transit corridors like Jefferson can help expand employment and education opportunity access and housing choices for marginalized populations. Access to transit can help offset higher housing costs and reduce the need for a car (or second car) and a parking space. Therefore, investment in affordable housing in TOCs can increase employment opportunities and help to minimize displacement.



In certain areas like Fox Hills and Clarkdale, displacement is a concern regardless of the level of growth. This displacement is likely to have disproportionate impacts on marginalized populations. In these areas specifically, the City can use anti-displacement policies to ensure equitable growth in the planning areas. Significant housing development can occur within these areas without displacement if the policies accompany or precede that growth. There is a need to consider additional policies to prevent displacement, develop healthy and safe neighborhoods (particularly including improving park access), and advancing economic and educational opportunities.

The city's lower density residential areas (Blair Hills, Blanco/Culver Crest, Park East (Carlson Park), Park West (Veterans Park), Sunkist Park, and Studio Village (Lindberg Park)) will accommodate a relatively small amount of new housing grow at relatively low growth rates. In Alternative 1, this is primarily ADU and junior ADU growth. In Alternatives 2 and 3, it is a mix of incremental infill and ADU / junior ADU growth. Despite this fact, targeted policies may be appropriate in areas like Sunkist Park and McLaughlin which have high displacement risk and environmental pollution concerns due to their proximity to I-405.

The land use alternatives estimate the new housing units and jobs expected in Culver City over the next 25 years, but the alternatives do not address the timing of housing and job growth. The pace of redevelopment can influence the likelihood of gentrification and displacement. Faster growth is more likely to displace existing residents than a constant rate of growth because the City will have more time to develop policies and investments to reduce displacement.

Fiscal Analysis

Estimate of Fiscal Impacts by per Square Foot of New Land Use

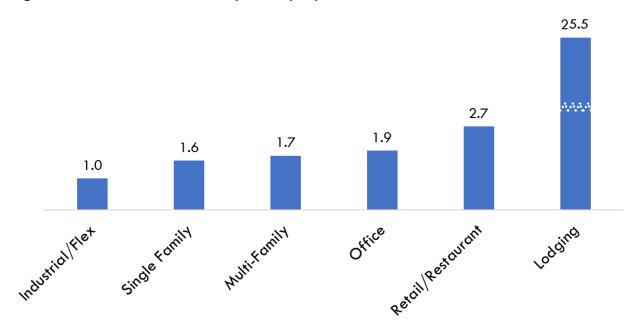
HR&A estimated the relative net fiscal impacts of each land use by square foot, in order to guide qualitative discussions of how the various land use alternatives might impact Culver City. The land uses included were single family residential, multi-family residential, retail/restaurant, office, industrial, flex, and lodging.

To calculate property tax revenues, HR&A estimated an average assessed value per square foot of each land use (using recent City data). Estimates for all other fiscal revenues was first estimated on an equivalent dwelling unit (EDU) basis under current conditions. HR&A then derived an EDU per developed square foot equivalency factor for each commercial land use and applied these factors to estimate average fiscal revenues per square foot.

Similarly, expenditures per square foot were estimated through a crosswalk with the total fiscal expenditures per EDU (which HR&A had previously calculated in the GPU's Socio-Economic Profile & Market Analysis.) Each land use's net fiscal impacts were then compared to the land use with the lowest net fiscal impact per square foot (Industrial) to create a relative ranking presented in Figure 11.



Figure 11: Relative Net Fiscal Impacts by Square Foot of Land Use



Lodging has the highest net fiscal impact across land uses by a large degree (and as such, is scaled down here to make the relative differences among the other land uses easier to see). Value is derived from Transient Occupancy Tax (TOT) and relatively high sales tax, generating revenues from visitors who otherwise do not increase the need for City services and therefore do not trigger a proportional increase in expenses. Business and leisure travelers also are likely to spend more in Culver City than the average resident or worker.

Retail/Restaurant also generates relatively high fiscal impacts due to higher revenues and lower expenses. Retail/Restaurant generate revenues from sales tax without creating proportional amounts of expenses, as operating and property tax costs remain constant (similar to Lodging).

Residential uses are more or less a fiscal wash. Both single and multi-family generate approximately the same amount per square foot in net fiscal impacts. Generally speaking, the higher the household's income, the more revenue a household produces for the general fund.

Industrial/Flex spaces also generate roughly as much revenue as they do expenses for the general fund. Industrial/Flex expenses and revenues are also lower than the other land uses, as they support a lower density of workers (who contribute to sales tax revenues) and have lower property values.

Office's net fiscal impacts are the result of a hot office market. Office uses require the highest amount of expenses, as denser worker populations increase costs to the City. Office's high revenues are also indicative of a strong Class A office market in Culver City, generating high property taxes.



Estimate of Fiscal Impacts by Land Use Alternative

HR&A estimated the relative net fiscal impact of the three land use alternatives using the projected net new jobs and housing units added for each alternative.

First, HR&A calculated the net fiscal impacts from the anticipated growth in non-residential land uses within each alternative. HR&A translated the net new jobs added in each alternative into net new square feet of the following land uses, based on the current distribution of jobs within each land use type: retail/restaurant, office, warehouse/industrial/manufacturing, media studio and research and design/flex, and lodging. ¹⁵ Then, HR&A calculated the net fiscal impact using the fiscal impact per square foot of each land use.

HR&A calculated the net fiscal impacts from the anticipated growth in residential land uses within each alternative by translating the number of new housing units added across each alternative into total new residential square feet, and then generating the net fiscal impacts from these square feet. HR&A assumed that, given Culver City's existing density and build-out, all new units are likely to be comparable to multifamily sizes and fiscal impacts.

HR&A then combined the nonresidential and residential fiscal impacts to calculate the net fiscal impact per alternative. Each alternative's net fiscal impacts were then compared to the alternative with the lowest net fiscal impact (Alternative 1), to create a relative ranking presented in Figure 12. The relative net fiscal impacts by land use were calculated similarly, by comparing each land use's fiscal impact to its lowest net impact across all land uses. The net fiscal impacts by land use are presented in Figure 13 below.

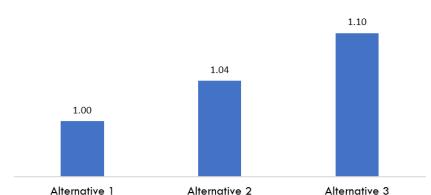


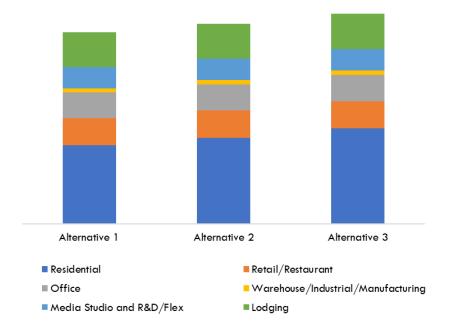
Figure 12: Relative Net Fiscal Impacts of Alternatives

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¹⁵ Documented in the GPU's Socio-Economic Profile & Market Analysis, linked in Footnote 3.



Figure 13: Relative Net Fiscal Impacts by Land Use Alternatives



As each alternative relies on the same proportional distribution of net new non-residential land uses, and each housing unit added is assumed to have the same fiscal impact across alternatives, the net fiscal impacts of Alternative 1-3 (both in total and by land use) are directly proportional to the amount of new housing units and jobs added, leading to a consistent rise in impacts. And because the differences in new housing units and jobs added within each alternative are also relatively modest, there is only a 10% difference across all the alternatives (Figure 9). A change in the mix of projected jobs will have a significant impact on projected fiscal revenues and costs.

Section 4: Community Engagement

Throughout the GPU process, the project team gathered public comment, feedback, and ideas from community members, GPAC, Technical Advisory Committees, Planning Commission, and City Council, among others. Listening on land use, housing, and economic development strategies started in February 2020 at the Community Visioning Festival and closed with the Land Use Survey on June 13, 2021. Also, community members provided comments on land use and housing at other meetings, including at the City Council meetings on the Housing Element Guiding Principles.



Figure 14: Community Engagement Process for Land Use



In April and May, the project team gathered public comment, feedback, and ideas on the land use alternatives. The following synthesizes discussion from GPAC, the Housing Technical Advisory Committee, and Community Visioning Workshops. Summaries from previous events are linked below.

GPAC Meeting #17

On June 10, 2021, the GPAC reviewed the Preferred Land Use Map. The discussion focused on what changes should be considered in low-density single-family areas. The GPAC reviewed a scenario similar to Option 3 – Hybrid Approach. Of note was that 47 members of the public attended, with 20 speakers and five eComments received. Highlights from that discussion include:

GPAC Members

General Comments

- Culver City is part of a megalopolis that is changing and if more people live closer to where they work would not have to be in the car as much when we have mobility options;
- We should prioritize protecting renter-occupied properties to ensure they are not displaced by development;
- Desire to have a joint GPAC and Planning Commission or GPAC and City Council meeting on the GPU at a future date;
- Changes will happen over time and not all at once and neighborhoods are already changing. The realistic pace of change may be reassuring to some people;
- The most urgent issue around land use changes is climate change, and Alternative 3 has the most beneficial impact;



- More visual examples of the proposed changes would help people to understand how neighborhoods would change over time; and
- Feedback that more noticing is needed and some people haven't heard about the changes being considered.

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Commercial Corridor and Industrial Area Comments

- Support for proposed designations along corridors'
- A floor area ratio of 1.0 is not large enough for mixed use along the corridors; won't pencil for developers; and
- Allow for small commercial uses in residential areas like Jackson Market so
 people can easily walk to get a coffee or groceries, which would also have
 decrease traffic.

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Residential and Residential Neighborhood Comments

- Concern over the option for up to 6-8 units and upzoning;
- Unwinding the way zoning segregates people in U.S. cities is hard;
- Any changes to R1 should be applied in the same manner citywide;
- Density is the only way lower income households can compete with higher income households for expensive land. Multifamily on the same land makes the units more affordable on high-cost land;
- Neighborhoods are changing regardless so we have to consider one new higher income household versus a few lower income neighbors;
- Developers already remodel single-family homes and there is tons of construction;
- Post-sale single-family should be compared to post-sale multi-family, to make sure it's equivalent to what a person would buy today;
- Best chance to avoid ever increasing single-family costs are to allow greater density;
- We need to make aggressive moves for affordable housing;
- Comment that we can meet our RHNA numbers with existing zoning;
- Culver City is not large enough to make a significant impact on housing prices;
 and
- Comments on what regulations are in place to ensure we develop to RHNA.

Mobility Comments

Desire to see how the mobility and land use alternatives work together. If mobility
was the driving theme there could be creative ideas.

Public Comments

- Support for a 100% affordable housing zoning overlay, incentivizing affordable housing, including government funding;
- Feedback that there was confusion on the land use alternatives survey;
- Interest in ensuring the City's sustainability goals are met;
- Support for Alternatives 1 and 3;



- Comment on how the process has provided an opportunity to learn and see a difference in owner and renter perspectives;
- Support for relying on ADUs to get density;
- Concern over the option which showed up to 6-8 units in the Clarkdale area, especially as it is difficult to access;
- Support to maintain R1 and not add density beyond what's currently allowed; and
- Concern that incremental density would alter the size and scale of neighborhoods and upzoning would make it harder for homeowners to compete with developers.

GPAC Meeting #15

On April 8, 2021, the GPAC reviewed a series of land use alternatives for Culver City. The discussion focused on feedback received to date on the land use strategies, prototypical place types in Culver City and how they accommodate growth, and the advantages and limitations of different approaches to land use growth. The GPAC reviewed alternatives maps, including Alternative 1 "Concentrated Growth" that focused growth along the commercial corridors and Alternative 2 "Dispersed Growth" that distributed incremental growth throughout the city. Highlights from that discussion include:

- Discussing why Culver Crest does not allow ADUs;
- Concerns with some of the industrial areas (e.g., Hayden Tract, Smiley Blackwelder, and areas along Ballona Creek) being grayed out on the maps;
- Encouraging the City to provide more opportunities for community members to engage in the process;
- Recognizing the need to meet minimum densities (at least 30 units per acre) to qualify as a potential affordable site for RHNA, to improve development feasibility, and to help Affirmatively Further Fair Housing (AFFH);
- Considering Portland's Residential Infill Project as a model for Culver City and other communities and countries, e.g., Sweden;
- Recognizing that the maps show the land use vision, not necessarily what will happen in the future;
- Concerns over losing some types of jobs, including creative economy jobs in the Hayden Tract;
- Encouraging the team to use a different term instead of "Missing Middle;"
- Articulating a desire for the land use vision to go further, allowing more housing growth in the existing residential neighborhoods;
- Recognizing the need to provide affordable housing and not just market rate housing;
- Transforming Ballona Creek into a community amenity;
- Creating walkable, bikeable places;
- Considering by-right development for four-plexes and six-plexes; creating preapproved plans; reducing parking requirements to make projects more feasible;
- Reducing parking, creating parking maximums, and establishing a shared parking system:
- Discussing the mobility benefits/costs of allowing more retail near residential uses;



- Emphasizing the need for helping people understand what a four-, five-, or six-unit building looks and feels like; and
- Discussing the height limit in Culver City.

Housing Technical Advisory Committee Meeting #3

The City held the third Housing Technical Advisory Committee (TAC) meeting on April 20, 2021. The City is convening TACs to explore innovative General Plan topics in detail and serve as an advisory body to the GPU team. The Housing TAC reviewed and discussed the draft land use alternatives. The section below summarizes comments provided by TAC members on the alternatives as well as general comments.

- Concentrated growth makes people angry (e.g., Cumulus project) and increases the cost of construction;
- Break up large parcels into smaller areas with streets and pathways;
- Establish a goal for no surface parking by 2045;
- Upzoning R1 may replace existing affordable units in those areas;
- Need to look at both small and large sites to meet the RHNA;
- Zoning needs to encourage different housing types;
- Make a lot of room for people; and
- Not requiring retail for housing projects along the city's commercial corridors.
- Parcels need 40 to 50 units for affordable units to pencil, ADUs are not the solution for affordability;
- Need to protect the artist community;
- Concern about the housing needs for lower income (and no income) households and it's important to meet their housing needs;
- Consider 100% affordable housing overlay, public housing, and land banking as strategies to increase housing for lower-income households;
- Consider strategies for preserving naturally-occurring affordable housing;
- Consider a moratorium on redevelopment / mansionization of R2 district;
- Consider larger density bonuses for affordable housing than allowed under the State density bonus;
- Break the myth that you cannot have community in areas with multifamily; and
- Adding housing reduces vehicle miles traveled.

Land Use Alternatives Community Workshops

On April 29 and May 5, the City hosted two Land Use Alternatives Community Workshops. The purpose of the workshops was to provide an overview of the GPU and the process to date, share findings from community engagement that have shaped development of alternatives, and review the land use alternatives. Through a presentation, discussion topics, and live polls, meeting participants were provided opportunities to ask questions and provide comments. The following is a brief summary of the workshop and input received.

What is your vision for the city's residential neighborhoods?

People frequently supported or opposed densifying single-family neighborhoods. Reasons for/against include the following:



- Support for increasing density in single-family neighborhoods:
 - o Do this while maintaining character
 - o Creation of affordable housing for ownership or rental
 - o More homes need to build to keep pace with job growth
- Opposition to densifying single-family neighborhoods:
 - Don't need to upzone to meet RHNA
 - o Big buildings don't fit into scale of neighborhoods
 - o Culver City is too crowded
 - o Traffic, parking, and noise issues
 - o Don't want to lose "family feel"
 - o There are many other housing options elsewhere in Culver City
 - Homeowners in existing single-family neighborhoods moved there for single-family character and would negatively impact character

What is your vision for the city's commercial corridors?

- Use existing parking lots to accommodate growth
- Parking can be underground
- Improve walkability on corridors
- Increase building height
- Encourage large corporations moving to Culver City to produce housing
- More density around transit
- Opportunity sites:
 - o Honda, Toyota
 - Sepulveda corridor
 - o Paradise hotel
 - Target site
- Support for mixed use along corridors
- Don't allow too much population along corridors this could create congestion
- Use public land for housing
- Keep as is
- Densify corridors
- Corridors aren't built out because some developers own land but haven't developed it yet
- Some buildings should be housing only.

What is your vision for the city's industrial areas?

- Allow live-work in industrial areas
- Not heavy industrial now, mostly creative uses
- Phase out heavy industry
- Build housing in the Hayden Tract
- Build housing along Ballona Creek

Land Use Alternatives Survey

Concurrent with the Land Use Alternatives Workshops, the City launched a 29 question community survey to gather information about community members vision for residential neighborhoods, commercial corridors, and industrial areas. The survey gathers



information on respondent views on building scale and new development, benefits / concerns associated with **incremental infill**, and building height. The survey closed on June 13 and collected respondents' demographic and socio-economic information.

Section 5: Guide to Key Terms

- Accessory Dwelling Unit: Accessory dwelling units (ADU) and junior ADUs are complete independent living facilities for one or more persons.
- Capture Rate: The percentage of projected job growth in LA County expected to be in Culver City.
- Competitive Market Area: The specific geographic area which contains residential/commercial development likely to be considered by potential homebuyers/consumers as an alternative to similar development in Culver City.
- Density: The maximum number of dwelling units allowed per acre (du/ac) in residential areas.
- Growth Projection: The predicted amount of development that will likely occur in a specified time period. For the GPU, the time period is through 2045.
- Incremental Densification: Development occurs incrementally throughout the plan horizon through 2045, with residential areas developing at densities up to six units on a lot, and most development requiring demolitions of existing buldings to accommodate new development.
- Incremental Infill: Development occurs incrementally throughout the plan horizon through 2045, with residential areas developing at densities up to four units on a lot, and most development allowing existing units to remain with new units added.
- Infill: The act of repurposing formerly developed land for new development.
- Intensity: The ratio of building floor area to total lot area in commercial areas, or floor area ratio (FAR).
- Junior Accessory Dwelling Unit (JADU): See Accessory Dwelling Unit.
- Land Use Map: A citywide map that illustrates the future intended use of land, a "land use designation."
- Land Use Designation: The range of land uses and the density or intensity allowed on each parcel.

Section 6: Additional Resources

This meeting will not cover existing conditions, so below are materials on land use in Culver City and from previous materials. Links to this information are below:

- General Plan Update Land Use and Community Design Existing Conditions Report:
 - https://static1.squarespace.com/static/5d950bfaae137b5f0cbd75f5/t/5f936f995f4c6062f85b1d27/1603498031880/LUECR Web.pdf
- GPAC Meeting #7 Materials (Land Use, Design, and Housing): https://www.pictureculvercity.com/events-activities/gpac-meeting-7



- GPAC Meeting #8 Materials (Areas of Change):
 https://www.pictureculvercity.com/events-activities/gpac-meeting-8
- GPAC Meeting #10 Materials (Areas of Change Part II): https://www.pictureculvercity.com/events-activities/gpac-meeting-10
- GPAC Meeting #15 Materials (Land Use Alternatives): https://www.pictureculvercity.com/events-activities/gpac-meeting-15

Should you have any questions before the meeting, please feel free to reach out. Thank you, and we look forward to seeing you on June 23, 2021.

- The GPU Team