



City of Avalon

Santa Catalina Island, CA

February 10, 2022

California Department of Housing and Community Development
Division of Housing Policy Development
2020 West El Camino Ave, Suite 500
Sacramento, CA 95833

Dear Ms. Ochoa,

We are pleased to submit to the California Department of Housing and Community Development the adopted 2021-2029 City of Avalon Housing Element. This Housing Element describes the City's updated plan for addressing the housing needs of its residents through October 15, 2029. As stated in the Department's letter dated February 1, 2022, the draft housing element submitted on December 3, 2021 addressed many statutory requirements; however, revisions were necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The City has made the necessary revisions and the City Council adopted the 2021-2029 Housing Element on February 10, 2022. Please find the adopted element (with modifications to the draft illustrated in track changes) and City Council Resolution No. 22-04 attached. We are also including the HCD sites workbook.

The City is committed to working with the California Department of Housing and Community Development (HCD) to continue to implement the housing element, to ensure the legal adequacy of the general plan, and to preserve local control of land use decisions.

We have greatly appreciated the Department's assistance throughout.

Sincerely,

David Maistros
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Principal
De Novo Planning Group
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Attached:

City of Avalon Adopted 2021-2029 Housing Element
HCD Sites Workbook
City Council Resolution No. 22-04
City Response Summary Matrix



2021-2029 HOUSING ELEMENT

Adopted February 10, 2022

City of Avalon

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ADOPTED



Prepared For:

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2021-2029 HOUSING ELEMENT

Adopted February 10, 2022

Prepared By:

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RESOLUTION NO. 22-04

AN RESOLUTION OF THE CITY COUNCIL OF THE CITY OF AVALON, ADOPTING GENERAL PLAN AMENDMENT GPA 21-01 (2021-2029 HOUSING ELEMENT UPDATE)

WHEREAS, the California Government Code requires that cities review and update their Housing Elements every eight (8) years, according to a schedule set forth by the State Department of Housing and Community Development ("HCD"); and

WHEREAS, the Housing Element sets forth the housing policies for the City, facilitates the preservation and development of housing, and establishes programs to accommodate the City's share of the regional housing needs in Southern California; and

WHEREAS, the City of Avalon has been assigned an allocation of 27 new housing units as its share of the regional housing needs assessment ("RHNA") in Southern California; and

WHEREAS, in accordance with State Law, the City of Avalon has prepared a Draft Housing Element for the 6th Cycle covering 2021-2029 period in accordance with California Government Code Sections 65580-65589.8 attached hereto as Exhibit A; and

WHEREAS, the Housing Element (2021-2029) complies with the requirements of State law and conforms to the purposes, intent and provisions of all the Elements of the City's General Plan; and

WHEREAS, Staff has reviewed and considered the Final Environmental Impact Report ("FEIR") for the General Plan certified by the City Council (State Clearinghouse No. 2011091042), including the impacts and mitigation measures identified therein. In compliance with CEQA Guidelines Section 15164 an Addendum to the General Plan FEIR has been prepared which concludes that the proposed updates to the General Plan Housing Element do not result in any new or greater environmental impacts than were previously analyzed, disclosed, and mitigated. None of the conditions in CEQA Guidelines Section 15162 are present to require the preparation of a subsequent EIR, and no additional environmental review is required; and

WHEREAS, on December 3, 2021, pursuant to Government Code section 65585(b)(1), the City submitted the draft 2021-2029 Housing Element to the State of California Department of Housing and Community Development ("HCD"); and

WHEREAS, the California Department of Housing and Community Development must review and provide comments on the Public Draft Housing Element and the City must update the Public Draft Housing Element in response to those comments in order to comply with State Housing Law; and

WHEREAS, on January 19, 2022, the Planning Commission held a duly-noticed public hearing on the subject Amendment, at which all those in attendance were given the opportunity to speak on the General Plan Amendment (Housing Element Update); and

WHEREAS, the Planning Commission considered all the written and oral testimony presented at the public hearing in making its decision to recommend adoption to the City Council via Resolution No. PC 22-03; and

WHEREAS, on February 10, 2022, the City Council held a duly-noticed public hearing on the subject Amendment, at which all those in attendance were given the opportunity to speak on the General Plan Amendment (Housing Element Update); and

WHEREAS, based on substantial evidence provided in the Housing Element Background Report, the City Council finds that the existing uses on the site identified to accommodate the City's RHNA do not impede additional residential development during the period covered by the housing element; and

WHEREAS, the City Council has considered the Planning Commission's recommendation, the staff report and supporting documents, public testimony, and all appropriate information that has been submitted with the Ordinance; and

WHEREAS, all legal prerequisites to the adoption of the Ordinance have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF AVALON DOES ORDAIN AS FOLLOWS:

- Section 1.** The Planning Commission recommends that the City Council adopt General Plan Amendment GPA 21-01 (2021-2029 Housing Element Update), formalized and in substantially similar form as that attached hereto as Exhibit A, subject to any required, incorporated revisions requested by HCD.
- Section 2.** The Planning Commission finds that adoption of this Resolution is exempt from the California Environmental Quality Act ("CEQA") pursuant to Section 15164. An Addendum to the General Plan FEIR has been prepared which concludes that the proposed updates to the General Plan Housing Element do not result in any new or greater environmental impacts than were previously analyzed, disclosed, and mitigated. None of the conditions in CEQA Guidelines Section 15162 are present to require the preparation of a subsequent EIR, and no additional environmental review is required.

PASSED, APPROVED AND ADOPTED at a special meeting of the City Council of the City of Avalon on this 10th day of February, 2022 by the following vote:

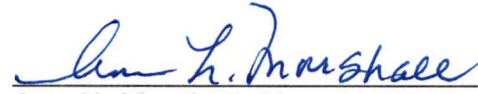
AYES: Mayor Marshall, Councilmembers DeLaRosa, Lavelle and Ponce

NOES: None

ABSENT: Mayor ProTem MacGugan-Cassidy

ABSTAIN: None

City of Avalon



Ann H. Marshall, Mayor

ATTEST:



Denise A. Radde, City Clerk

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2021-2029 Housing Element Organization

Part 1: Housing Plan

Part 1 of the 2021-2029 Housing Element is the City's "Housing Plan", which includes the goals, policies, and programs the City will implement to address constraints and needs. The City's overarching objective is to ensure that decent, safe housing is available to all current and future residents at a cost that is within the reach of the diverse economic segments which comprise Avalon.

Part 2: Background Report

Part 2 of the 2021-2029 Housing Element is the "Background Report" which identifies the nature and extent of Avalon's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housings, resources, and constraints, the City can then determine a plan of action for providing adequate housing, as presented in Part 1: Housing Plan. In addition to identifying housing needs, the Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

Appendix A: Housing Sites Inventory

The Housing Element must include an inventory of land suitable and available for residential development to meet the City's regional housing need by income level.

Appendix B: Public Engagement Summary

As part of the Housing Element Update process, the City hosted numerous opportunities for the community and key stakeholders to provide feedback on existing housing conditions, housing priorities, priority areas for new residential growth, and topics related to fair housing. Public participation played an important role in the refinement of the City's housing goals and policies and in the development of new housing programs, as included in Part 1: Housing Plan. The public's input also helped to validate and expand upon the contextual information included in Part 2: Background Report. The City's efforts to engage the community in a meaningful and comprehensive way are summarized in Appendix B.

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ADOPTED



PART 1: HOUSING PLAN

Adopted February 10, 2022

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ADOPTED

1. Housing Plan Introduction

The Background Report of the Housing Element establishes the housing needs, opportunities, and constraints in the City of Avalon. The Housing Plan presented in this section sets forth the City's goals, policies and programs to address Avalon's identified housing needs.

2. Goals and Policies

The following goals and policies focus on the maintenance and provision of a variety of housing in terms of type, affordability, and style. The Housing Plan sets forth goals and policies to address the following issue areas:

- V.A Conservation of the existing supply of housing
- V.B Assistance in the development of affordable housing;
- V.C Provision of adequate housing sites;
- V.D Removal of governmental constraints; and
- V.E Provision of equal housing opportunities.

V.A CONSERVATION OF THE EXISTING SUPPLY OF HOUSING

Goal V.A: Maintain and enhance the quality of residential neighborhoods.

Policy V-1: Advocate the rehabilitation of substandard residential properties by homeowners and landlords.

Policy V-2: Continue to utilize the City's code enforcement program to bring substandard units into compliance with City codes and to improve overall housing quality and conditions.

Policy V-3: Discourage the demolition or conversion of existing year-round housing units and encourage the provision of similar replacement units when demolition or conversion results in the reduction of the City's year-round or affordable housing inventory.

Policy V-4: Educate the public regarding the need for property maintenance and rehabilitation, code enforcement, neighborhood conservation and beautification, and other related issues.

Policy V-5: Pursue a combination of public and private actions to rehabilitate and maintain the existing stock of housing~~Educate the public regarding the need for property maintenance and rehabilitation, code enforcement, neighborhood conservation and beautification, and other related issues.~~

Policy V-6: Monitor "at-risk" affordable housing and proactively address potential conversion of affordable units to market rate units prior to their transition.

Policy V-7: Implement monitoring program for existing affordable housing and funding sources.

V.B ASSISTANCE IN THE DEVELOPMENT OF AFFORDABLE HOUSING

- Goal V.B:** Support increased affordable housing opportunities that are adequately served with infrastructure and services.
- Policy V-8:** Support innovative public, private, and nonprofit efforts in the development and financing of affordable and/or special needs housing.
- Policy V-9:** Support strategies that promote home ownership options for lower, moderate, and middle income households
- Policy V-10:** Encourage energy-efficient building methods and promote energy conservation measures.
- Policy V-11:** Offer housing rehabilitation assistance for lower and moderate income households for home repairs and energy conservation measures.
- Policy V-12:** Advocate for and support strategies that increase resiliency and expand fresh water availability to address projected housing needs and public safety requirements.
- Policy V-13:** Collaborate with local, regional, and State utility providers to help creatively address the City's infrastructure needs.
- Policy V-14:** Prioritize water allocation for affordable housing for lower and moderate income households as required by State law.

V.C PROVISION OF ADEQUATE HOUSING SITES

- Goal V.C:** Provide for the development of a variety of housing types in Avalon, and attain dignified, safe, and affordable housing opportunities within decent living environment for households of all socioeconomic segments in Avalon.
- Policy V-15:** Maintain adequate capacity to accommodate the City's unmet Regional Housing Needs Allocation (RHNA) for all income categories throughout the planning period.
- Policy V-16:** Provide a variety of residential development opportunities in the City, including year-round housing and seasonal employee housing.
- Policy V-17:** Address the housing needs of lower, moderate, and middle income households, as well as households with special needs.
- Policy V-18:** Pursue State and federal funding sources to maintain the supply of affordable housing in Avalon.
- Policy V-19:** Support the plans of private landowners to develop housing affordable to lower, moderate, and middle income households at Company-owned property.
- Policy V-20:** Promote the development of accessory dwelling units and junior accessory dwelling units as a viable opportunity to expand the City's existing housing stock.

- Policy V-21: Allow by-right approval for housing developments proposed for non-vacant sites included in one previous housing element inventory and vacant sites included in two previous housing elements, provided that the proposed housing development consists of at least 20 percent lower income and affordable housing units.

V.D REMOVAL OF GOVERNMENTAL CONSTRAINTS

- Goal V.D:** Ensure that government actions, policies, and regulations do not adversely impact the provision of year-round affordable and market-rate housing, seasonal employee housing, and special needs housing.
- Policy V-22: Encourage the use of density bonuses and provide other regulatory concessions to facilitate affordable housing development.
- Policy V-23: Expedite project review of residential developments with an affordable housing component.
- Policy V-24: Review and modify as necessary and appropriate City policies and regulations to facilitate housing development.

V.E PROVISION OF EQUAL HOUSING OPPORTUNITIES

- Goal V.E:** Promote equal opportunity for all residents to reside in housing of their choice.
- Policy V-25: Promote fair housing practices in the sale or rental of housing with regard to race, color, national origin, ancestry, religion, disability, sex, age, marital status, familial status, source of income, and sexual orientation.
- Policy V-26: Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Zoning Ordinance.
- Policy V-27: Assist in affirmatively furthering and enforcing fair housing laws by providing support to organizations that provide outreach and education regarding fair housing rights, receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
- Policy V-28: Continue to solicit public input from all economic segments of the community in the City's housing policies and activities.

3. Housing Programs

This section describes the programs that will implement Housing Element goals and policies. The housing programs define the specific actions the City will undertake in order to achieve the goals for the current planning period. Pursuant to State law, the programs address the following issue areas:

1. Conserve and improve the existing housing stock
2. Develop housing
3. Minimize the impact of constraints on housing production
4. Assure equal housing opportunity for all residents.

Conservation of the Existing Supply of Housing Programs

1. Housing Rehabilitation Program

The Avalon Housing Authority reinstated the Housing Rehabilitation Loan program in 2011. The program provides rehabilitation assistance to low and moderate income households up to \$40,000 (but not less than \$5,000) for code corrections, lead-based paint abatement, asbestos removal, accessibility improvements, and energy conservation improvements.

Responsible Agency: Planning and Building Department

Financing: Redevelopment Housing Set-Aside funds (balance as available)

Program Objectives: Disseminate information via City website and newsletter to homeowners regarding rehabilitation standards and the Housing Rehabilitation Program.

Provide housing rehabilitation assistance to lower and moderate income households, including extremely low income households.

Pursue additional funding from State and federal programs.

Assist 2 extremely very low, 2 very low, 2 low, and 2 moderate income households with rehabilitation.

Schedule: [Update City website with current program information by October 2022; include program information in City newsletter at least once annually; pursue available State and federal funding by submitting applications at least annually; assist at least one household per year; Ongoing implementation and annual reporting during the planning period](#)

2. Code Enforcement

The Planning and Building Department handles the enforcement of the City's zoning regulations and building and housing codes. Complaints received are investigated for possible violations and compliance is handled first by direct person to person visit or by telephone to discuss the violations and obtain voluntary compliance. The Building Department also works with other City departments and outside State and County agencies.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Investigate 100% of possible code violations.

Disseminate information on housing rehabilitation assistance available to address code violations and other housing issues.

[Conserve one unit per year for a total of eight units during the planning period.](#)

Schedule: [Review Code Enforcement complaints quarterly and identify areas for targeted outreach the following quarter; Ongoing implementation and annual reporting during the planning period](#)

3. Nontransient Rental Inspection Program

The City will continue to implement its Nontransient Rental Inspection Program to ensure all nontransient rentals comply with minimum property maintenance requirements, preserve the City's housing stock, encourage proactive and preventive maintenance of properties, protect vulnerable tenants, and promote the health, safety, and welfare of the people of Avalon.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Investigate 100% of possible violations.

Schedule: [Review Nontransient Rental Inspection Program annually to evaluate effectiveness and modify the program, as necessary, to achieve City objectives; Ongoing implementation and annual reporting during the planning period](#)

4. Preservation of At-Risk Units

Pursuant to the Housing Element law, the at-risk housing analysis covers a ten-year period from the start date of the Housing Element cycle. No deed-restricted affordable units are at-risk of conversion to market rate units during the next 10 years. The earliest date of conversion for any project is 2033 for the Tremont Street Apartments, which provides 62 affordable units; this project's Section 8 contract was extended in 2016 and the City will continue to proactively work with the property owner to support extension of the contract.

Responsible Agency:	Planning and Building Department; Avalon Housing Authority
Financing:	Redevelopment Set-Aside funds (balance as available); Housing Trust Fund; Proposition 1C funds
Program Objectives:	Monitor status of all affordable housing units by maintaining contact with property owners and HUD Multi-Family Housing division. Work with property owners intending to opt out of the affordability covenants to ensure tenants receive adequate notice.
Schedule:	Ongoing implementation and reporting during the planning period

Assistance in the Development of Affordable Housing

5. First-Time Homebuyers Assistance

The City's existing program provides "silent second" mortgage assistance, downpayment and closing cost assistance. The current program is limited to households at 120 percent of AMI or less, with a maximum assistance of \$250,000 per household.

Responsible Agency:	Planning and Building Department
Financing:	Housing Trust Fund; CalHFA; Redevelopment Housing Set-Aside funds (balance as available)
Program Objectives:	Disseminate information to homeowners on the First-Time Homebuyers Assistance Program via City website and newsletter. Provide homeownership assistance to lower and moderate income households. Pursue additional funding sources such as CalHFA (California Housing Finance Agency).
Schedule:	Update City website with current program information by October 2022; include program information in City newsletter at least once annually; pursue available funding by submitting applications at least annually; Ongoing implementation and annual reporting during the planning period

6. Housing Trust Fund

In 2004, the City Council approved the creation of a Housing Trust Fund reserved for the production of affordable housing. In the past, the Council has shifted a fraction of the Transient Occupancy Tax (TOT) for affordable housing, which is deposited into the Housing Trust Fund.

Responsible Agency: Planning and Building Department

Financing: Housing Trust Fund

Program Objectives: Identify the appropriate sources of funds (such as inclusionary housing in-lieu fees and Transient Occupancy Tax) to replenish the Housing Trust Fund.

Identify eligible programs/activities to be funded.

Schedule: [On a quarterly basis, review the Housing Trust Fund balance; at least annually, evaluate potential sources of funding to replenish the Housing Trust Fund and take action if necessary to maintain an appropriate Housing Trust Fund balance; identify eligible programs/activities to be funded at least annually; Ongoing implementation and annual reporting during the planning period](#)

7. Temporary Summer Housing

The greatest demand for employees is during the summer season when housing is least available. Setting up seasonal housing makes it possible for employers to hire temporary workers that can move in and out as required. The City will continue working [proactively](#) with the Santa Catalina Island Company [and other affordable housing developers](#) regarding the development of seasonal employee housing. Additionally, the City will continue implementing requirements for hotels, motels, and resort uses and new commercial development to provide rental space for at least 50% of the number of peak season employees at the time all required City entitlements have been granted. This program will benefit lower income employees, including extremely low income employees.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Pursue seasonal employee housing with the Company and other resort, commercial, and retail business owners [and affordable housing developers](#).

Schedule: [Meet bimonthly with the Company to discuss ongoing programs and activities to address the community's affordable housing needs; prior to the summer season \(i.e., in February of each year\) meet with the Company to review plans for temporary summer housing and work collaboratively to address the needs of short-term tenants; at least annually, reach out to affordable housing developers to discuss the community's unique summer housing needs and advertise opportunities for the development of affordable housing; at least annually, proactively reach out to hotels, motels and resort uses and new commercial development to confirm availability of space to accommodate temporary summer workers; on an annual basis or as](#)

[funding is available, apply for funding to support the development, maintenance, and improvement of affordable housing; ongoing implementation and annual reporting during the planning period](#)

Provision of Adequate Housing Sites

8. Affordable Housing Development

The City, through its Housing Authority, will continue to pursue funding for affordable housing development and acquisition, rehabilitation, and resyndication. The City will work [protectively](#) with the Company and other qualified developers to pursue appropriate funding. City involvement may include:

- Review of pro forma analyses;
- Provision of demographics and other background data for preparation of funding applications;
- Review and comment on draft funding applications;
- Provision of letters of support;
- Assistance in monitoring compliance with funding program regulations; and
- As necessary and financially feasible, provision of local match funds.

The City's website will be used to promote housing programs and assistance available to residents and property owners.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Issue NOFAs to solicit housing developers with experience in projects receiving State and Federal funding.

Provide information on incentives and funding available to facilitate affordable housing development. Prioritize funding allocation to affordable housing projects that include extremely low income units.

Evaluate the opportunity for pursuing affordable housing funds through the State Department of Housing and Community Development (e.g., Proposition 1C funds) and HUD.

Publicize City programs and assistance available on City website and monthly newsletter.

Schedule: [Issue NOFAs on a biennial basis or as often as needed to support the development of housing affordable to lower income households, in consultation with the Company; proactively provide information on City incentives and funding available to the development community on an annual basis; on an annual basis identify and pursue State and federal funding; at least once annually, publicize city programs and assistance via the City's monthly newsletter; update the City's website with current program information by October 2022; ongoing implementation and annual reporting during the planning period](#)

9. Inclusionary Housing Program

The City amended its Inclusionary Housing Program in 2020 in compliance with State law and continues to implement the program.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Continue to implement the inclusionary housing ordinance and monitor its implementation.

Schedule: [Annual review of Inclusionary Housing Program for compliance with State law](#); Ongoing implementation and reporting during the planning period

10. Identification of Adequate Sites

The City has a 2021-2029 projected RHNA need of 27 housing units including 16 housing units for extremely low, very low, and low income households. The City will continue to work with property owners, specifically the Santa Catalina Island Company, to maintain an inventory of adequate sites appropriate to meet its RHNA.

Responsible Agency: Planning and Building Department; Santa Catalina Island Company

Financing: General Funds

Program Objectives: Adequate sites to accommodate 4 extremely low income units; 4 very low income units, 5 low income units; 3 moderate income units; and 11 above moderate income units.

Schedule: Ongoing implementation and reporting during the planning period

11. Adequate Sites Monitoring Program

To ensure that the net future housing capacity is maintained to accommodate the City's RHNA, the City will create an updated inventory of adequate housing sites for each income category. This inventory will detail the amount, type, size and location of vacant land (if any), and recyclable properties and parcels that are candidates for consolidation to assist developers in identifying land suitable for residential development. In addition, the City will continuously monitor the sites inventory and the number of net units constructed in each income category. If the inventory indicates a shortage of adequate sites to accommodate the remaining RHNA, the City will identify alternative sites so that there is no net loss of residential capacity pursuant to Government Code Section 65863.

To facilitate annual evaluation, the City will implement a formal ongoing project-by-project procedure pursuant to Government Code Section 65863 which will evaluate identified capacity in the sites inventory relative to projects or other actions potentially reducing density and identify additional sites as necessary. This procedure and annual evaluation will address residential or mixed-use zoned land to determine whether these sites are being developed for uses other than for housing. If a shortfall in sites capacity occurs, the City will identify replacement sites within six months.

Responsible Agency: Planning and Building Department; Santa Catalina Island Company

Financing:	General Funds
Program Objectives:	By the end of 2022, develop a formal ongoing procedure to evaluate capacity and identify additional sites as necessary. Continue to perform project-by-project evaluation to determine if adequate capacity remains for the remaining RHNA.
Schedule:	Develop formal procedure to monitor availability of sites by December 2022; Ongoing implementation and reporting during the planning period

12. Density Bonus Program

The City will provide for density bonuses consistent with State law, including density bonuses and incentives for projects that contain 100% very low- and low-income units. The City will monitor State law updates which impact density bonuses and will update local plans and programs as necessary.

Responsible Agency:	Planning and Building Department
Financing:	General Funds
Program Objectives:	Amend the Zoning Ordinance to be consistent with State Density Bonus law and to list specific incentives and regulatory concessions that will be offered by the City. Market density bonus program to developers by providing information on density bonus, incentives, and regulatory concessions available to facilitate affordable housing development.
Schedule:	Amend the Zoning Ordinance to be consistent with State Density Bonus law by December 2022; on at least an annual basis, proactively advertise the City's density bonus provisions to the development community; at least annually, monitor State legislation for updates to the Density Bonus law and, as necessary, update the City's Zoning Ordinance to be consistent with future updates Ongoing, 2023

13. Replacement of Affordable Units

Consistent with the requirements of Government Code Section 65583.2(g), development projects on sites in the housing inventory (Appendix A) that have, or have had within the past five years preceding the application, residential uses restricted with rents affordable to low- or very low-income households or residential uses occupied by low- or very low-income households, shall be conditioned to replace all such units at the same or lower income level as a condition of any development on the site, and such replacement requirements shall be consistent with Section 65915(c)(3).

Responsible Agency:	Planning and Building Department
Financing:	General Fund
Program Objectives:	For all project applications, identify need for replacement of affordable housing units and ensure replacement, if required, occurs.

Schedule: Ongoing implementation and annual monitoring and reporting throughout the planning period

14.4 Accessory Dwelling Units

Accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) help meet the City's housing needs for all income levels and also provide a housing resource for seniors and low- and moderate-income households throughout the entire community, not just in any single geographic area. The City will continue to apply Zoning Ordinance regulations that allow accessory units (also known as second units or granny flats) by right in all residential zones, in accordance with State law. The City of Avalon will continue to amend the ordinance based on future changes to State law and work with HCD to ensure continued compliance with State law. The City will also continue to monitor the extent of ADU production to ensure that the ordinance modifications are successful and that the Housing Element goals can be met.

Responsible Agency: Planning Department

Financing: General fund

Program Objectives: [Update the City's existing ADU and zoning ordinances to comply with State law. Collect information on rental rates for ADUs.](#)

Survey and evaluate potential methods to encourage ADU development throughout the community and adopt appropriate procedures, policies, and regulatory provisions.

Monitor State law for future updates to ADU regulations and update the City's Development Code to be consistent with future updates as needed.

Continue educating the community on the opportunity to develop ADUs and promote the development of ADUs affordable to lower-income households.

Continue to provide information about ADUs on the City's website and on public counters.

Schedule: [Update ADU and zoning ordinances by December 2022; review ADU production and affordability every two years, and if ADU production does not keep pace with projections identified in the Housing Element, confirm that the City maintains adequate capacity to accommodate its RHNA and if a shortfall exists, identify replacement sites concurrent with the biennial ADU production and affordability review; update the City's ADU application to request information on rental rates by October 2022; Ongoing-ongoing implementation and annual monitoring and reporting throughout the planning period](#)

15. Adequate Sites for Lower Income Households on Nonvacant and Vacant Sites Previously Identified

The City of Avalon will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the City will rezone the 1.52-acre nonvacant site located at Tremont Street (APN 7480002072) previously identified in the 5th cycle housing element.

Responsible Agency: Planning Department

Financing: General fund

Program Objectives: Create opportunity for at least 30 units of rental housing for lower income households.

Schedule: Site rezoned by October 2023.

Removal of Governmental Constraints

1516. Monitoring Potential Constraints

The City will periodically review City regulations, procedures and fees to identify any potential constraints to the development and maintenance of housing. The City will outreach to the development community to assist in this review. If the City finds that regulations, procedures and/or fees are a constraint to housing, the City will revise requirements or policies as necessary.

Responsible Agency: Planning Department

Funding: General Fund

Program Objectives: Review and revise the zoning and development standards if needed.

Schedule: On a biennial basis, review, in consultation with the development community, the City's regulations, procedures and fees to identify any potential constraints to the development and maintenance of housing; host a biennial developers roundtable to discuss housing opportunities in Avalon and identify potential government constraints to housing that can be modified or removed; Ongoing implementation and annual monitoring and reporting throughout the planning period

1617. Monitoring— Reasonable Accommodation Procedures

The City will update its reasonable accommodation findings to improve approval certainty and will, moving forward. evaluate adopted reasonable accommodation procedures annually and revise as appropriate to ensure consistency with fair housing requirements.

Responsible Agency: Planning Department

Funding: General Fund

Program Objectives: Update existing reasonable accommodating findings to improve approval certainty and Review and revise reasonable accommodation procedures if needed.

Schedule: Annually—Update existing findings by December 2023 and review reasonable accommodation procedures annually

1718. Zoning Code Updates - Remove Constraints

The City shall update the Zoning Code to remove constraints to a variety of housing types and ensure the City's standards and permitting requirements are consistent with State law. The update shall address the following.

1. Low barrier navigation centers: The Development Code shall be updated to define and permit low barrier navigation centers consistent with the requirements of Government Code Sections 65660 through 65668, including treating low barrier navigation centers as a use by right in areas zoned for mixed use and nonresidential zones permitting multifamily uses.
2. Agricultural worker housing: The Development Code will be updated to define agricultural worker housing and to identify that any agricultural worker housing consisting of no more than 36 beds in a group quarters or 12 units or spaces shall be deemed an agricultural land use and permitted in the same manner as agricultural uses consistent with Health and Safety Code Section 17021.6. The Development Code will also be updated to provide for streamlined, ministerial approval of agricultural worker housing that meets the requirements of Health and Safety Code Section 17021.8.
3. Streamlined and ministerial review for eligible affordable housing projects: The Development Code will be updated to ensure that eligible multifamily projects with an affordable component are provided streamlined review and are only subject to objective design standards consistent with relevant provisions of SB 35 and SB 330 as provided by applicable sections of the Government Code, including but not limited to Sections 65905.5, 65913.4, 65940, 65941.1, 65950, and 66300. State law defines objective design standards as those that “involve no personal or subjective judgement by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant and public official prior to submittal.”
4. Emergency shelter parking: The Development Code will be updated to require sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone, in compliance with AB 139.
5. Transitional and Supportive Housing. The Development Code will be updated to define and regulate Transitional and Supportive Housing in accordance with State law.
6. Residential Care Facilities. The Development Code will be updated to define and regulate Residential Care Facilities in accordance with State law; specifically, the City will permit group homes (six or fewer and seven or more persons) in residential zones with objectivity

- to promote approval certainty without constraints on housing for persons with disabilities.
7. Employee Housing. The Development Code will be updated to comply with Health and Safety Code Section 17021.5 which requires that employee housing for six or fewer employees be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.
- 6-8. Permanent Supportive Housing. The Development Code will be updated to comply with government Code section 65651 which states that supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Revise the Development Code in accordance with this program by October [20242023](#).

Schedule: Development Code adoption in [20242023](#)

4819. Prohousing Designation Program

Increasing the availability of housing statewide is critical to bettering the quality of life of all Californians and to ending homelessness. The 2019-2020 Budget Act provided a spectrum of support, incentives, and accountability measures to meet California's housing goals, and provided for the establishment of the Prohousing Designation Program. The Prohousing Designation Program provides incentives to cities and counties in the form of additional points or other preference in the scoring of competitive housing, community development, and infrastructure programs. The California Department of Housing and Community Development established the Prohousing Designation Program to administer these incentives.

Local governments can receive a designation when implementing Prohousing policies and receive an advantage when applying for several funding programs including:

- Affordable Housing & Sustainable Communities (AHSC)
- Infill Infrastructure Grant (IIG)
- Transformative Climate Communities (TCC)

Other programs may be added to the list after HCD engages with stakeholders and partner agencies on adding Prohousing points to other housing and non-housing programs.

The City of Avalon will pursue the Prohousing Designation to memorialize the City's commitment to helping promote more affordable housing options. HCD is expected to assess the City's Prohousing Policies using the following four scoring categories: Favorable Zoning and Land Use; Acceleration of Housing Production Timeframes; Reduction of Construction and Development Costs; and Providing Financial Subsidies. The City must demonstrate that it has enacted or proposes at least one policy that significantly contributes to the Acceleration of Housing Production in each of the four categories. A Prohousing Designation requires a total score of 30 points or more across all four categories (as of November 2021). As part of the application process, the City will identify those strategies that it already implements (i.e., establishment of streamlined, program-level CEQA analysis and certification of general plans) and identify additional strategies for implementation in order to further promote housing development in Avalon and achieve the required score to receive the Prohousing Designation.

The City will work with HCD's ongoing technical assistance team to submit an application by the end of 2022 with the objective of receiving the designation by March 2023.

Responsible Agency:	Planning Department.
Financing:	General fund; grants
Program Objectives:	Achieve Prohousing Designation by HCD
Schedule:	Submit application to HCD by December 2022 and receive designation by March 2023

1920-: Water Availability

Water availability is perhaps the most critical issue limiting residential development. Fresh water for drinking is supplied by Southern California Edison and saltwater is used for sanitary purposes and fire protection. Avalon has a limited alluvial groundwater supply and thus obtains most of its present needs through local reservoirs.

Because water is such a limited resource on Catalina Island, the Southern California Edison has fresh water allocation policies which govern the issuance of new water permits and water rationing in periods of drought. Given the limited water supply, developers must receive water allocations from the Southern California Edison (SCE) prior to receiving City approval of new development. Recognizing the importance of affordable housing, SCE reserves water supply allocation for low and moderate income housing.

The City of Avalon is committed to [proactively](#) do what it can to support Edison's ability to 1) improve the existing domestic water system and 2) expand its capacity. The City and Edison have collaborated on this program and have identified two key ways the City can help address the topic of water availability. First, City will continue to maintain regular contact with Edison to coordinate elements of Edison's Water Master Plan with elements of the City's General Plan so that they can complement one another; [this coordination will happen at least annually](#). Additionally, to support future capacity increases, the City will [proactively](#) communicate its support directly to the Authority Having Jurisdiction, as appropriate, during the public comment periods of proposed projects. This includes the City communicating support for increased allocations to the California Public Utility Commission (CPUC) to promote additional development in the City.

[The City will also, on an annual basis, identify funding \(State and federal funding and grants\) available to support system upgrades and expansions and proactively share this information with SCE and discuss ways that the City can help support a successful application. This could include the City Council adopting a Resolution in support of specific funding opportunities or planned improvements. The City Council will continue to request regular updates from SCE \(approximately quarterly\) and will identify, collaboratively, new or unique approaches available to improve the existing system and expand capacity.](#)

Responsible Agency:	Planning Department
Funding:	General Fund
Program Objectives:	Meet with Edison annually to collaborate on water availability
Schedule:	~~Annually~~ On an annual basis, the City will proactively identify funding opportunities and provide this information to SCE; SCE will

provide regular (generally quarterly) updates to the City Council; the City will adopt Resolutions, provide letters of support, and other in-kind services to support SCE's maintenance and improvement plans on at least an annual basis.

21. Priority Water and Sewer Service

Water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Given that the City is the sewer provider (maintenance of the system is contracted out), the City will establish a written procedure to comply with Gov. Code, § 65589.7 early in the planning period.

Responsible Agency: Planning Department

Funding: General Fund

Program Objectives: Establish a written procedure to grant priority sewer service to development of units affordable to lower-income households.

Schedule: December 2023

22. Sewer Service

The City of Avalon owns the wastewater conveyance system within City and contracts with a third-party professional for operation and maintenance. The City's overall wastewater collection system is regulated under the jurisdiction of the Regional Water Quality Control Board, the State Water Resources Control Board, and the U.S. Environmental Protection Agency. Within Avalon, there are approximately 10.2 miles of sewer ranging in diameter from 6-24 inches. Avalon's sewer pipelines are old and leaks have been identified throughout the system, contributing to the degradation of water quality in Avalon Bay. Accordingly, the City has taken action by completing a comprehensive inspection of the entire sewer collection system to assess the condition of each pipeline within the system.

The results of this comprehensive inspection culminated in the Sewer Collection System Capital Improvement and 20-Year Financial Plan (Capital Improvement and Financial Plan), adopted in 2013. The Capital Improvement and Financial Plan identifies facility and equipment requirements for sustaining, restoring, and modernizing the facilities and infrastructure that support the wastewater collection and treatment. It also prioritizes and schedules them for funding and implementation through a multi-year plan. The Sewer System Management Plan, updated in 2014, includes mitigation measures to address the issues identified through the comprehensive inspection and the City is in the process of updating the capital improvement plan to remove deficiencies in the wastewater system.

According to comprehensive inspection, the local sanitary sewer system has adequate capacity to accommodate development associated with General Plan buildout projections, which includes the RHNA. Nonetheless, individual developments would be reviewed prior to project approval to determine if sufficient sewer capacity exists to serve the proposed development. The City charges fees for connecting to the sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. The fees are required to construct new sewer infrastructure and/or incremental expansions to the existing sewerage system to accommodate individual development.

The City is in the process of updating its Sewer Collection System Capital Improvement and 20-Year Financial Plan (Capital Improvement and Financial Plan); this update is expected to be completed in 2022. This update will best position the City to provide and maintain an adequate sewer system and

perform upgrades and expansions as necessary to accommodate its RHNA.

Responsible Agency: Planning Department

Funding: General Fund

Program Objectives: Maintain a current the Sewer Collection System Capital Improvement and 20-Year Financial Plan (Capital Improvement and Financial Plan).

Pursue available funding to improve and update the existing sewer system.

Collect fees associated with new development.

Schedule: Update the Sewer Collection System Capital Improvement and 20-Year Financial Plan (Capital Improvement and Financial Plan) by 2022; at least annually, pursue available funding for system upgrades or expansion; as part of the development review process, collect fees as required to construct new sewer infrastructure and/or incremental expansions.

Provision of Equal Housing Opportunities

2023. Fair Housing

The City enforces the State and Federal Fair Housing laws within its jurisdiction. As a participating jurisdiction of the Los Angeles County CDBG program, the City is served by the Housing Rights Center and Fair Housing Foundation.

Responsible Agency: Planning and Building Department

Financing: General Funds

Program Objectives: Provide fair housing information via City website and public counters.

Ensure multi-lingual materials from the fair housing service providers are available to residents.

Schedule: Ongoing implementation and annual monitoring and reporting throughout the planning period

2424. Section 8 Housing Choice Vouchers

The Housing Choice Voucher program (formerly Section 8) extends rental subsidies to very low-income households, including families, seniors, and the disabled. The program offers a voucher that pays the difference between the current fair market rent (FMR) as established by the U.S. Department of Housing and Urban Development (HUD) and what a tenant can afford to pay (i.e., 30 percent of household income). The voucher allows a tenant to choose housing that costs above the payment standard, providing the tenant pays the extra cost. A portion of the vouchers is reserved for household with extremely low incomes.

The Los Angeles County Housing Authority administers the Housing Choice Voucher program on behalf of the City of Avalon Housing Authority. Given the continued need for rental assistance for very low income households, the City will continue to promote this program through dissemination of brochures at public counters, providing information on the City's web-site, and referring residents and property owners to the Los Angeles County Housing Authority.

Responsible Agency:	Planning Department; Los Angeles County Housing Authority
Financing:	HUD Section 8 allowance
Program Objectives:	Continue to promote the Housing Choice Voucher program to residents and property owners through dissemination of brochures at public counters, providing information on the City's web-site, and referring residents and property owners to the Los Angeles County Housing Authority.
Schedule:	Ongoing implementation and annual monitoring and reporting throughout the planning period

2225. Coordination on Homeless Issues

The City will coordinate with local organizations and the County of Los Angeles to address homeless issues in the City. Given that access to regional facilities for persons experiencing homelessness in Avalon is limited, the local community partners play a key role in providing services in emergency situations. The Catalina Bible Church and the Avalon Community Church provide emergency assistance for those in need. The Catalina Bible Church provides emergency shelter for up to two people for a maximum of two days (in emergency situations, all the churches on the Island allow homeless individuals to sleep on floors). The Catalina Bible Church also operates a Food Ministry, which provides a week of food (20 to 25 lbs) for at a low cost. The Avalon Community Church provides emergency food as well as emergency housing. The Avalon Community Church typically accommodates up to three persons each night on a couch or pull-out mattress at the Teen Center after the Center is closed for the day. There is no limit on the length of stay but individuals must leave the facility in the morning. At this time, the Church only has capacity to accommodate males in need. The Church continues to explore other arrangements for women in need.

Responsible Agency:	Planning, County of Los Angeles; Faith-Based Organizations
Financing:	General Fund
Program Objectives:	Address homeless issues
Schedule:	Ongoing implementation and annual monitoring and reporting throughout the planning period

2326. Affirmatively Furthering Fair Housing Outreach and Coordination Program

To comply with California Government Code Sections 8899.50, 65583(c)(5), 65583(c)(10), 65583.2(a) (AB 686), the City will develop a plan to Affirmatively Further Fair Housing (AFFH). The AFFH Plan shall take actions to address significant disparities in housing access and needs for all persons regardless of race, color, religion, sex, gender, sexual orientation, marital status, national origin, ancestry, familial status, source of income, or disability, and any other characteristic protected by the California Fair Employment and Housing Act (Part 2.8, commencing with Section 12900, of Division 3 of Title 2), Government Code Section 65008, and any other state and federal fair housing and planning law. Programs which assist in affirmatively furthering fair housing are included throughout this Housing Plan; where they are reiterated here, the specific program in the Housing Plan should be referenced for more discrete objectives and timeframes. Specific actions include:

Fair Housing Education and Outreach

- **Annual** training of City staff, including through coordination with local advocacy groups, on how to receive, log, refer, and follow-up on fair housing complaints. If resolution was not obtained for any complaints, refer complaint to HCD to ensure that affordable housing laws are actively enforced.
- **Biennial** fair housing update to the City Council.
- Meet with developers **annually** to identify special housing needs in the City (i.e., housing for seniors or persons with disabilities) and encourage development of special needs housing that accesses the population of Avalon.
- Work with local organizations **annually** to encourage, expand, and publicize fair housing requirements as part of programs that provide rental assistance to lower income households.

Housing and Mobility Enhancement

- Actively recruiting residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies as positions are made available due to the regular appointment process or vacancies, on at least a **biennial** basis.
- Provide education to the community on the importance of participating in the planning and decision-making process and completing Census questionnaires **at least annually** through the City's monthly newsletter.
-

New Housing Choices and Affordability in High Opportunity Areas

- Maintain an adequate inventory of available sites to accommodate the City's remaining RHNA
- Promote the development of ADUs and JADUs throughout the City
- Coordinate with SCE to improve existing water system and expand capacity to accommodate new development of housing for lower income households

Place-Based Strategies for Community Preservation and Revitalization

- On a **quarterly** basis ~~Target~~ community revitalization efforts to areas with higher code enforcement issues and with lower opportunities levels and develop strategies, **annually**, to enhance mobility and reduce displacement
- On an ongoing basis, and at least **annually**, review land use and planning proposals to ensure that the City is replacing segregated living patterns with integrated and balanced living patterns, where applicable and feasible, and working to transform racially and ethnically

concentrated areas of poverty into areas of opportunity without displacement.

•

Displacement Protection

- Continue to implement the City's nontransient rental inspection program

Integration/Segregation

- ~~Work with local organizations to encourage, expand, and publicize fair housing requirements as part of programs that provide rental assistance to lower income households.~~
- ~~On an ongoing basis, and at least annually, review land use and planning proposals to ensure that the City is replacing segregated living patterns with integrated and balanced living patterns, where applicable and feasible, and working to transform racially and ethnically concentrated areas of poverty into areas of opportunity without displacement.~~

Assess to Opportunity

- ~~Target community revitalization efforts to areas with lower opportunities levels and develop strategies to enhance mobility and reduce displacement~~
- ~~Actively recruiting residents from neighborhoods of concentrated poverty to serve or participate on boards, committees, and other local government bodies as positions are made available due to the regular appointment process or vacancies.~~
- ~~Provide education to the community on the importance of participating in the planning and decision making process and completing Census questionnaires.~~

Responsible Agency: Planning Department; Los Angeles County Housing Authority

Financing: CDBG funds

Program Objectives: Improve fair housing opportunities and response to complaints through implementing above actions. Follow-up on 100% of complaintsAffirmatively further fair housing.

Timing: Timelines associated with specific actions are included in the description of the program or programs references elsewhere in this Housing Plan; Ongoing implementation and annual monitoring and reporting throughout the planning period.

4. Quantified Objectives

State law requires the Housing Element to include quantified objectives for the maximum number of units that can be constructed, rehabilitated or conserved. Policies and programs in the Housing Element establish the strategies to achieve these objectives. The City's quantified objectives are described under each program, and represent the City's best effort in implementing each of the programs. Assumptions are based on past program performance and funding availability, construction trends, land availability, and future programs that will enhance program effectiveness and achieve full implementation of the City's housing goals.

The primary obstacle to the development of new housing units in Avalon, at any income level, is the availability of domestic water. As discussed thoroughly in the Housing Element Background Report, there is a waiting list to receive a water allocation to serve the needs of new units in Avalon. The City will continue to work closely with Edison to strongly support the expansion of water availability in the City. It is the City's objective to support expansion of the City's affordable housing stock and support the development of all of its 27-unit RHNA allocation for 2021-2029. However, it must be recognized that the City's influence on these decisions is limited, and the City itself cannot control the increase in water allocations to the Island. Historic patterns of development indicate that despite having sufficient vacant land available for development, and a supportive development partner in the Santa Catalina Island Company, availability of water will limit development in the City to levels below its RHNA.

The new construction objectives shown in the table below represent a portion of the City's overall RHNA for the 2021-2029 planning period for all income levels. The objective identified for each income level is based on historic trends and patterns of development; units affordable to lower-income households are historically more difficult to develop due to extremely limited available funding for affordable housing projects. Moderate- and above-moderate income units are more likely to be developed by the private market. All new development is limited by the ability to secure a sufficient water allocation.

The table below summarizes the City's quantified objectives for housing during the 2021-2029 planning period.

TABLE 1: QUANTIFIED HOUSING OBJECTIVES: 2021-2029

	New Construction	Rehabilitation	Conservation/ Preservation**
Extremely Low Income	2	2	<u>-2</u>
Very Low Income	2	2	<u>-2</u>
Low Income	4	2	<u>-2</u>
Moderate Income	4	2	<u>-2</u>
Above Moderate Income	11*	-	-
Total	23	8	<u>-8</u>

*All 11 new above-moderate income units are located at Hamilton Cove, already entitled, and have received water allocations

** ~~There are no affordable units at risk of conversion to market rate units during the next 10 years. There are no above-moderate income units in need of conservation or preservation assistance.~~

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PART 2: BACKGROUND REPORT

Adopted February 10, 2022

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1. 2021-2029 HOUSING ELEMENT BACKGROUND REPORT INTRODUCTION

The City of Avalon (City) is a unique, tourist-oriented community located on the island of Santa Catalina, 22 miles southwest of the Los Angeles and Long Beach Harbors. Santa Catalina Island is 76 square miles in area, with approximately 88 percent of the land comprised of a conservancy area maintained in its natural state in perpetuity. Incorporated in 1913, the community of Avalon has a unique and colorful history. While the tiny island had been inhabited for nearly 7,000 years by original Native Americans, it was not until the 1800s that large-scale development of Avalon occurred.

Changing hands a number of times during the late 1800s and early 1900s, the Island has belonged to the Wrigley family since 1919. Early settlers on Catalina Island raised sheep and cattle in the mid-1800s. This introduced a ranching industry that continued in some form until the mid-1950s. Mining and the occasional use of the island by the U.S. government during wartime had also colored its history. Most importantly for its future, in the late 1880s, owner George Shatto embarked on a campaign to turn Catalina Island into a tourist destination, planning and building the town of Avalon as the focal point of the island and hub of this activity.

Successive owners continued to nurture his idea, constructing hotels, golf courses, and new tourist attractions and encouraging hunting, fishing, and other outdoor pursuits. In 1975, the Santa Catalina Island Conservancy, a non-profit operating foundation, took ownership of approximately 42,139 acres of Catalina, 88 percent of the Island's 76 square miles. Today, Avalon remains Catalina Island's principal tourist attraction.

The City's primary economic base is built upon the tourist industry. Lodging, restaurants, retails, and other tourist activities/services employ a large number of employees. Traditionally, retail and service employees earn low wages, and many of them cannot afford decent homes in the City. Given the high costs of housing, even moderate- and middle-income workers such as teachers, hotel/restaurant managers, and city and other civic employees have difficulty affording in the City. Many employers face the challenge of attracting and retaining management level workers. Educational resources on the Island are also limited, which poses a further challenge when recruiting a trained and skilled workforce.

Housing in Avalon offers a variety of housing types. Of the total housing stock, the majority of homes in Avalon (67.5%) consist of multifamily homes, with 37.4% being comprised of 2-4 unit multifamily homes (i.e., duplex, triplex, and fourplex structures), and approximately 30.1% consisting of 5-or-more-unit multifamily homes. The majority of residential development occurred in the City prior to 1940s and between 1970 and 2010. As the economy recovered between 2000 and 2006, the housing market in Avalon also improved, with major developments being constructed. However, the market downturn at the end of the 2000s, combined with water scarcity on the island, yet again substantially impacted housing growth in the City.

State Housing Law (Government Code Section 65583) requires that a "housing element shall consist of an identification and analysis of existing and projected housing needs and a statement of goals, policies, quantified objectives, financial resources, and scheduled programs for the preservation, improvement, and development of housing. The housing element shall identify adequate sites for housing, including rental housing, factory-built housing, and mobile homes, and shall make adequate provision for the existing and projected needs of all economic segments of the community." This report is an update of the City's 2013-2021 Housing Element (5th Cycle), adopted in July 2013 as part of a comprehensive General Plan Update.

The assessment and inventory must include all of the following:

- Analysis of population and employment trends, documentation of projections, and a quantification of the locality's existing and projected housing needs for all income levels. Such existing and projected needs shall include the locality's share of the regional housing need in accordance with Section 65584 of the Government Code.
- Analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition.
- An inventory of land suitable for residential development, including vacant sites and sites having potential for redevelopment, and an analysis of the relationship between zoning, public facilities, and city services to these sites.
- Analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels and for persons with disabilities, including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, local processing and permit procedures, and any locally adopted ordinances that directly impact the cost and supply of residential development.
- Analysis of potential and actual non-governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, requests to develop housing at densities below the minimum densities in the inventory of sites, and the length of time between receiving approval for a housing development and submittal of an application for building permits that hinder the construction of a locality's share of the regional housing need.
- Analysis of any special housing needs, such as those of the elderly, disabled, including developmentally disabled, large families, farmworkers, families with female heads of households, and families and persons in need of emergency shelter.
- Analysis of opportunities for energy conservation with respect to residential development.
- Analysis of existing assisted multifamily rental housing developments that are eligible to change from low-income housing to market-rate during the next 10 years.

The Background Report of this Housing Element identifies the nature and extent of Avalon's housing needs, including those of special populations, potential housing resources (land and funds), potential constraints to housing production, and energy conservation opportunities. By examining the City's housing needs, resources, and constraints, the City can determine a plan of action for providing adequate housing. This plan is presented in the Housing Plan, which is the "Policy Document" component of the Housing Element. In addition to identifying housing needs, this Background Report also presents information regarding the setting in which these needs occur. This information is instrumental in providing a better understanding of the community, which in turn is essential for the planning of future housing needs.

Since the update of the City's prior Housing Element in 2013, statutory changes have occurred that must be included in the 2021-2029 Avalon Housing Element (6th Cycle). These laws have been incorporated in the appropriate sections throughout this Background Report as well as in its accompanying Housing Plan.

2. ACCOMPLISHMENTS UNDER 5TH CYCLE HOUSING ELEMENT

The following section reviews and evaluates the City's progress in implementing the 2013-2021 Housing Element. It reviews the results and effectiveness of programs, policies, and objectives from the previous Housing Element planning period, which covered 2013 through 2021. This section also analyzes the difference between projected housing need and actual housing production.

2A. Review of 2013-2021 Housing Element

The 2013-2021 Housing Element program strategy focused on the implementation of policies and programs to conserve and improve the condition of the existing housing stock; assist in the development of adequate housing to meet the needs of all residents; identify adequate housing sites made available through appropriate zoning and development standards to facilitate and encourage the development of a variety of housing types for all residents; remove, to the extent feasible, constraints to the development, improvement, and preservation of housing; and assure equal housing opportunity for all residents. The 2013-2021 Housing Element identified the following goals:

Goal 1: Conservation of the Existing Supply of Housing

Maintain and enhance the quality of residential neighborhoods.

Goal 2: Assistance in the Development of Affordable Housing

Provide increased affordable housing opportunities for all residents, and ensure that new development is compatible with the existing character and is adequately served with infrastructure and services.

Goal 3: Provision of Adequate Housing Sites

Provide for the development of a variety of housing types in Avalon, and attain dignified, safe, and affordable housing opportunities within decent living environment for households of all socioeconomic segments in Avalon.

Goal 4: Removal of Governmental Constraints

Ensure that government actions, policies, and regulations do not adversely impact the provision of year-round affordable and market-rate housing, and seasonal employee housing.

Goal 5: Provision of Equal Housing Opportunities

Promote equal opportunity for all residents to reside in housing of their choice.

2B. Housing Production During 5th Cycle RHNA Period

The City's 5th Cycle Housing Element addressed housing needs for Avalon from October 15, 2013 through October 15, 2021. Note, however, that the 5th Cycle Regional Housing Needs Allocation (RHNA) projection period adopted by the Southern California Association of Governments (SCAG) began on January 1, 2014 and concludes on October 1, 2021. Hence, there was a slight offset between the 5th Cycle Housing Element planning period and the 5th Cycle RHNA projection period.

Table 2-1 shows the total number of housing units built in the City during the 5th Cycle RHNA period and compares these units with the units required to be accommodated pursuant to the City's Regional Housing Needs Allocation.

During the 2014-2021 RHNA period, 8 units were constructed in the City, all of which are affordable to above-moderate income households. Despite the inclusion of meaningful programs to address the City's housing needs, housing development in Avalon is severely constrained by limited resources - specifically water allocations.

TABLE 2-1: REGIONAL HOUSING NEEDS ALLOCATION - 5TH CYCLE PROGRESS

Status	Extremely Low	Very Low	Low	Moderate	Above Moderate	TOTAL
RHNA Allocation	8	12	12	14	34	80
Built	0	0	0	0	8	8
<i>Remaining Allocation</i>	8	12	12	14	26	72

Sources: City of Avalon 2013-2021 Housing Element; 2020 General Plan Annual Progress Report

2C. Appropriateness and Effectiveness of 2013-2021 Housing Element

While the majority of goals, policies, and programs included in the 2013-2021 Housing Element continue to be appropriate to address the City's housing needs, the Housing Plan has been updated to provide clearer guidance and more specific direction to encourage affordable and special needs housing production. The Housing Plan has also been updated to streamline programs and facilitate implementation.

As part of its Housing Element update effort, the City carefully evaluated the effectiveness of its existing housing programs, as discussed in Table 2-2. Based on this evaluation and community input, the City has found that most of the housing programs in the 2013-2021 Housing Element have been effective and will be included in the 2021-2029 Housing Plan, with revisions to address specific housing needs, constraints, or other concerns identified as part of this update, and to affirmatively further fair housing. The City implemented many of the housing programs in the last several years and anticipates that the revisions included in the Housing Plan will further encourage affordable and special needs housing production.

Since adoption of the previous Housing Element in 2013, the City has used various funding sources, including CDBG and HOME funds, for housing rehabilitation programs and to provide fair housing services as well as services to special needs and at-risk populations (homeless, persons at risk of homelessness). During the planning period, the City provided 56 housing rehabilitation loans to lower income households. Due to the limited amount of funds available on an annual basis, it can require several years of accrued funds to assist a single project.

Overall, new development in Avalon is extremely limited, primarily due to a lack of available fresh water to serve new development. New extremely low and very low-income housing and special needs housing development did not occur, in part due to issues related to water availability, and in part due to a lack of available local and state funds to encourage or incentivize the development of such housing and the lack of access to critical infrastructure to facilitate new development. State and federal funds for lower income housing are very limited and extremely competitive to receive.

The Housing Plan, a policy document outlining goals, policies, and programs included in this 2021-2029 Housing Element Update, includes modifications to make existing programs more effective, clarify objectives, and ensure that the programs are implementable.

While the City took several significant steps to promote housing during the prior planning period, the experience of most communities throughout the state demonstrates the difficulty local governments face to meet their fair share housing goals, especially for lower and moderate-income housing (i.e., the RHNA allocation) when working independently. All cities, including Avalon, have limited financial and staffing resources and require substantial state and/or federal assistance, which has not been available at the levels necessary to support the City's housing needs, or for-profit and non-profit housing developers and agencies. Moreover, given its location on an island, the City faces *particularly unique challenges* associated with construction, including increased costs, availability of supplies and labors, and water, and impacts from seasonal tourism. As discussed below, the City has evaluated the success of existing programs to support the development of affordable housing, and has added new programs to the Housing Plan to address this objective.

Cumulative Efforts to Address Special Housing Needs

Government Code Section 65588 requires that local governments review the effectiveness of the housing element goals, policies, and related actions to meet the community's special housing needs (e.g., low income households, elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). As shown in Table 2-2, during the 2014-2021 RHNA period, the City worked diligently to continuously promote housing for special needs groups in a variety of ways by:

- Continuing to enforce the City's inclusionary housing ordinance and seasonal employee housing to expand housing opportunities for **low- and extremely low-income households**;
- Assisting **low income and elderly residents** that apply for Section 8 rental assistance;
- Amending the Municipal Code to permit single resident occupancy type-units (SROs), emergency shelters, and residential care facilities, thereby expanding housing opportunities for **low- and extremely low-income households and persons experiencing homelessness seeking shelter**;
- Adoption of an Accessory Dwelling Unit Ordinance to allow for the development of a unique housing option well-suited to meet the needs of the City's **lower-income and elderly populations**;
- Continuing to support and provide resources for individual homeowners requesting exemptions to zoning and development standards in order to accommodate a disability thereby assisting **persons with disabilities**.

The City has considered the cumulative efforts to address special housing needs and finds that the City's existing programs to address the community's special housing needs, particularly for lower income households, the elderly, persons experiencing homelessness, and persons with disabilities, continue to be relevant and will be continued in the next planning period. Through this review, the City has identified the need to amend specific Housing Programs to more thoroughly address the needs of large households, female headed households, and farmworkers. Programs 1, (Housing Rehabilitation Program), 3 (Nontransient Rental Inspection Program), 4 (Preservation of At-Risk Units), 7 (Temporary Summer Housing), 12 (Density Bonus Program), 14 (Accessory Dwelling Units), 16 (Monitoring Potential Constraints), 17 (Reasonable Accommodation Procedures), 18 (Zoning Code Updates - Remove Constraints), 24 (Section 8 Housing Choice Vouchers), 25 (Coordination on Homeless Issues), and 26 (Affirmatively Furthering Fair Housing Outreach and Coordination Program) have been added or amended to further address the community's special housing needs. The City will continue to review progress towards addressing these needs as part of each Housing Element Annual Progress Report.

TABLE 2-2: EVALUATION OF THE 2013-2021 HOUSING PROGRAMS

Program	Accomplishments
1. Conservation of the Existing Supply of Housing	
Program 1: Housing Rehabilitation Program: The Avalon Housing Authority reinstated the Housing Rehabilitation Loan program in 2011. The program provides rehabilitation assistance to low- and moderate-income households up to \$40,000 (but not less than \$5,000) for code corrections, lead-based paint abatement, asbestos removal, accessibility improvements, and energy conservation improvements. Since reinstatement of the program, the City has assisted two low and moderate income households. Objectives: • Disseminate information via City website and newsletter to homeowners regarding rehabilitation standards and the Housing Rehabilitation Program. • Provide housing rehabilitation assistance to lower and moderate income households, including extremely low income households. • Pursue additional funding from State and federal programs.	Result/Evaluation: Program considered successful and is ongoing. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 2: Code Enforcement: The Planning and Building Department handles the enforcement of the City's zoning regulations and building and housing codes. Complaints received are investigated for possible violations and compliance is handled first by direct person to person visit or by telephone to discuss the violations and obtain voluntary compliance. The Building Department also works with other City departments and outside State and County agencies. Objectives: • Disseminate information on housing rehabilitation assistance available to address code violations and other housing issues.	Result/Evaluation: Program considered successful and is ongoing. The City has two code enforcement officers who investigate all possible code violations and assist with the dissemination of housing rehabilitation assistance. The City also adopted a nontransient rental inspection program in January 2020 to ensure all nontransient rentals comply with minimum property maintenance requirements, preserve the City's housing stock, encourage proactive and preventive maintenance of properties, protect vulnerable tenants, and promote the health, safety, and welfare of the people of Avalon. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 3: Preservation of At-Risk Units: Pursuant to the Housing Element law, the at-risk housing analysis covers a ten-year period from the start date of the Housing Element cycle. Since the Housing Element Technical Appendix covers two Housing Element cycles (2008-2013 and 2013-2021), the at-risk housing analysis must extend ten years from 2013 (i.e., through 2023). Of the City's 127 affordable units, only one project, the Tremont Street Apartments, with 50 very low and low income units, is at-risk due to an expiring Section 8 contract. The Section 8 contract for the project is due to expire in August of 2016. The project includes 10 one-bedroom units, 37 two-bedroom units, and 15 three-bedroom units.	Result/Evaluation: Program considered successful and is ongoing. The City works with property owners of affordable housing units and the HUD Multi-Family Housing Division. The ACIA affordable housing covenants have since expired on the Tremont Street Apartments. However, the project is also subsidized by CalHFA and Section 8 Project Based Vouchers. The CalHFA promissory note was repaid by Hamilton Cove many years ago, but the Section 8 Project Based Vouchers were renewed in 2013 and will remain in effect until April 30, 2033 for 62 units restricted to low income households. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Program	Accomplishments
Objectives: • Monitor status of all affordable housing units by maintaining contact with property owners and HUD Multi-Family Housing division. • Work with property owners intending to opt out of the affordability covenants to ensure tenants receive adequate notice. • Pursue special Section 8 vouchers from HUD, which are reserved for very low income households displaced by the expiration of project-based Section 8 assistance.	
2. Assistance in the Development of Affordable Housing	
Program 4: First-Time Homebuyers Assistance: The City's existing program provides "silent second" mortgage assistance, downpayment and closing cost assistance. The current program is limited to households at 120 percent of AMI or less, with a maximum assistance of \$250,000 per household. Objectives: • Disseminate information to homeowners on the First-Time Homebuyers Assistance Program via City website and newsletter. • Provide homeownership assistance to lower and moderate income households. • Pursue <u>additional funding sources such as</u> CalHFA (California Housing Finance Agency).	Result/Evaluation: Program considered successful and is ongoing. The City funded seven First Time Homebuyer purchases between 2013 - 2014. The program is currently in abeyance while the City pursues development of a multifamily housing project. Continue/Modify/Delete: This program has been discontinued and is no longer included in the Housing Plan.
Program 5: Housing Trust Fund: In 2004, the City Council approved the creation of a Housing Trust Fund reserved for the production of affordable housing. In the past, the Council has shifted a fraction of the Transient Occupancy Tax (TOT) for affordable housing, which is deposited into the Housing Trust Fund. Objectives: • Identify the appropriate sources of funds (such as inclusionary housing in-lieu fees and Transient Occupancy Tax) to replenish the Housing Trust Fund • Identify eligible programs/activities to be funded.	Result/Evaluation: Program considered successful and is ongoing. The City maintains the Housing Trust Fund and has identified eligible programs/activities. Previously, the City has used the funds for down payment assistance for moderate income families. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 6: Temporary Summer Housing: The greatest demand for employees is during the summer season when housing is least available. Setting up seasonal housing may make it possible for employers to hire college students or other singles employees that do not have families and can move in and out as required. The City is currently in	Result/Evaluation: Program considered successful and is ongoing. The City has requirements that any hotel/motel/resort or new commercial development provides rental space for at least 50% of the number of peak season employees at the time all required City entitlements have been granted. Continue/Modify/Delete: Program continues to be appropriate and will

Program	Accomplishments
discussions with the Company regarding the development of seasonal employee housing. This program will benefit lower income employees, including extremely low income employees. Objectives: Pursue seasonal employee housing with the Company and other resort, commercial, and retail business owners.	be kept for the 2021-2029 planning period.
3. Provision of Adequate Housing Sites	
Program 7: Affordable Housing Development: The primary funding source for affordable housing in Avalon was the Redevelopment Housing Set-Aside funds, which will generate no future revenue due to the dissolution of redevelopment agencies in California. The City will pursue additional funding for affordable housing development and acquisition/rehabilitation. The City will work with the Company and other qualified developers to pursue appropriate funding. City involvement may include: - Review of pro forma analyses; - Provision of demographics and other background data for preparation of funding applications; - Review and comment on draft funding applications; - Provision of letters of support; - Assistance in monitoring compliance with funding program regulations; and - As necessary and financially feasible, provision of local match funds. The City's website will be used to promote housing programs and assistance available to residents and property owners. Objectives: - Issue NOFAs to solicit housing developers with experience in projects receiving State and Federal funding. - Provide information on incentives and funding available to facilitate affordable housing development. Prioritize funding allocation to affordable housing projects that include extremely low income units. - Evaluate the opportunity for pursuing affordable housing funds through the State Department of Housing and Community Development (e.g., Proposition 1C funds) and HUD. - Publicize City programs and assistance available on City website and monthly newsletter.	Result/Evaluation: Program considered successful and is ongoing. The City's Housing Authority worked with a developer to rehabilitate and resyndicate two non-contiguous housing developments totaling approximately 2.29 acres (Beacon Hill and Bird Park). The developer was awarded 4% tax credits administered by the California Debt Limit Allocation Committee. The project has a total of 36 housing units and two unrestricted manager units. The affordability mix restricts 18 units to households with incomes less than 50% and 18 units to households with incomes less than 60% of the Area Median Income (AMI) based on California Tax Credit Allocation Committee limits. The project is occupied by both seniors and families. The developer has agreed to enter into a new Regulatory Agreement that would, at a minimum, require units in the project be restricted to rental to households earning no more than 80% of AMI, based on the limits established by the State Department of Housing and Community Development, through 2077. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.

Program	Accomplishments
Program 8: Inclusionary Housing Program: The City recently amended the inclusionary housing program to include housing for middle income households and to extend inclusionary housing requirements to all new commercial developments. The amended program also offers a flexibility income distribution for the inclusionary units to be determined at the time of project approval. An in-lieu fee option is also offered. These options allow the program to respond to changing market conditions in a timely manner and therefore enhance project feasibility. Objectives: Continue to implement the inclusionary housing ordinance and monitor its implementation.	Result/Evaluation: Program considered successful and is ongoing. The City adopted an inclusionary housing program in 2010 and amended the program in January 2020 to bring the program into compliance with recent state guidelines and statutes. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 9: General Plan Update: As part of the Comprehensive General Plan Update, the City is proposing to redesignate 4.87 acres on Tremont Street from Low Density Residential (10 units per acre) to High Density Residential (at 40 units per acre). With the increase in density, the City anticipates accommodating 156 units on site. Objectives: Redesignation of 10.82 acres at Bird Park Canyon from LD-R to HD-R	Result/Evaluation: Program was successful. Redesignation of the 4.87 acres between Tremont Street and Country Club Drive from Low-Density-Residential to High-Density-Residential was completed. Continue/Modify/Delete: This program was successfully completed and is no longer needed
Program 10: Adequate Sites Monitoring Program: The City of Avalon General Plan provides for a range of residential land use designations, such as single-family residential, multi-family residential, manufactured homes, condominiums, and mixed-use housing. The General Plan identifies adequate sites to accommodate the City's Regional Housing Needs Allocation (RHNA) for both Housing Element cycles. Most of the community's remaining sites available for development are owned by the Company. The City will work cooperatively with the Company to monitor the sites inventory and its obligation toward accommodating the RHNA. Objectives: - Provide adequate sites for the City's Regional Housing Needs Allocation (RHNA) - Update a vacant and underutilized land inventory. - Make the land inventory available to interested developers. - Monitor and guide the development of remaining vacant sites to ensure adequate land is reserved for addressing the housing needs of the community.	Result/Evaluation: Program considered successful and is ongoing. The City continues to provide adequate sites for the City's Regional Housing Needs Allocation and maintains an updated inventory of vacant and underutilized land. The inventory is available to all interested and potential developers. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 11: Density Bonus Program: Current state law requires jurisdictions to provide density bonuses and	Result/Evaluation: Program considered successful. Avalon's density bonus program was first adopted in May 2010 and its density bonus

Program	Accomplishments
development incentives to all developers who propose to construct affordable housing on a sliding scale, where the amount of density bonus and number of incentives/regulatory concessions vary according to the amount of affordable housing units provided. The existing Avalon density bonus provisions are not consistent with the State density bonus law in that no incentives/concessions are included. Objectives: • Amend the Zoning Ordinance to be consistent with State Density Bonus law and to list specific incentives and regulatory concessions that will be offered by the City. • Market density bonus program to developers by providing information on density bonus, incentives, and regulatory concessions available to facilitate affordable housing development.	provisions were most recently amended in March 2019 to bring the program into compliance with recent State guidelines and statutes. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
4. Removal of Governmental Constraints	
Program 12: Extremely Low Income and Special Needs Housing: Extremely low income households and households with special needs have limited housing options in Avalon. Housing types appropriate for these groups include: emergency shelters, transitional housing, supportive housing, and single-room occupancy (SRO) units. The City of Avalon Zoning Ordinance does not specifically address the provision of such housing types. Pursuant to State law, the City will amend the Zoning Ordinance to address these housing options. Objectives and Timeframe: • <i>Emergency Shelters:</i> The City will amend its Zoning Ordinance to permit homeless shelters by right, without discretionary review, within the Commercial and Special Commercial zones. • <i>Residential Care Facilities:</i> The City will amend its Zoning Ordinance to permit small residential care facilities serving six or fewer persons (including adult and senior residential facilities, as well as small family homes) in all residential zones. Large residential care facilities serving more than six persons will be conditionally permitted in the HD/flats, C, and SC zones. • <i>Transitional/Supportive Housing:</i> The City will amend its Zoning Ordinance to address the provision of transitional/supportive housing. Pursuant to State law, transitional/supportive housing meeting the State Health and Safety Code definitions (Section 50801(i) and Section 50675.14(a)(B)(2),	Result/Evaluation: Program considered successful and is ongoing. The City continues to monitor the implementation of the zoning ordinance regarding provisions to special needs housing. The City amended the zoning ordinance in August 2014 to allow for single resident occupancies, emergency shelters, and residential care facilities. Additionally, the City monitors State and federal funding for housing for applicable projects. Continue/Modify/Delete: Program continues to be largely appropriate and will be updated with additional code updates required by State law, and kept for the 2021-2029 planning period.

Program	Accomplishments
respectively) should be considered regular housing and be permitted as a residential use and subject to the same permitting processes and requirements as other similar housing in the same zones. • <i>Single Room Occupancy Units (SROs)</i>: The City will amend its Zoning Ordinance to facilitate the provision of SROs, consistent with AB 2634 enacted in 2007. SROs will be permitted with a Conditional Use Permit (CUP) in the HD/flats-R- CH zone. • <i>Second Units</i>: The City will amend the Zoning Ordinance to address the provision of second units pursuant to State law. • Monitor the implementation of the Zoning Ordinance regarding the provisions for special needs housing to ensure the effectiveness and appropriateness of City regulations. • Pursue State and federal funding for housing for persons with special needs and families with lower incomes, especially for those with extremely low incomes.	
Program 13: Clarify Parking Requirement: The City requires one standard parking space per residential unit. However, the City's Zoning Ordinance is unclear regarding the size of a standard parking space. Historically, the City interpreted the requirement as one conventional parking space (eight feet by 17 feet) space and permitted the substitution with an autoette space (six feet by ten feet) via the approval of a variance. However, because the number of allowable conventional automobiles in the City is limited and the waiting list to bring an additional conventional automobile onto the island is at least ten years long, the City's policy has changed. The current City Council policy is to require one autoette parking space per unit in the downtown area. The City will amend the Zoning Ordinance to clarify its parking standards. Specifically, the City will establish the autoette as the minimum parking requirement citywide, thereby removing the need to process a variance. Objectives and Timeframe: • Amend the Zoning Ordinance to clarify the parking requirements.	Result/Evaluation: Program was successful. The City amended the Zoning Ordinance to reduce required parking from full size parking spaces to autoette spaces. Continue/Modify/Delete: This program was successfully completed and is no longer needed.
5. Provision of Equal Housing Opportunities	
Program 14: Fair Housing: The City enforces the State and Federal Fair Housing laws within its jurisdiction. As a participating jurisdiction of the Los Angeles County CDBG program, the City is served by the Housing Rights Center and	Result/Evaluation: Program considered successful and is ongoing. The City provides fair housing information on the City's website and public counters, and makes available multi-lingual materials from fair housing service providers.

Program	Accomplishments
Fair Housing Foundation. Objectives and Timeframe: • Provide fair housing information via City website and public counters. • Ensure multi-lingual materials from the fair housing service providers are available to residents.	Continue/Modify/Delete: This program was successful. The City continues to provide fair housing information via the city's website and public counters. Material is available in English and Spanish. Continue/Modify/Delete: Program continues to be appropriate and will be kept for the 2021-2029 planning period.
Program 15: Reasonable Accommodation: The Fair Housing Act, as amended in 1988, requires that cities and counties provide reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities. While fair housing laws intend that all people have equal access to housing, the law also recognizes that people with disabilities may need extra tools to achieve equality. Reasonable accommodation is one of the tools intended to further housing opportunities for people with disabilities. Reasonable accommodation provides a means of requesting from the local government flexibility in the application of land use and zoning regulations or, in some instances, even a waiver of certain restrictions or requirements because it is necessary to achieve equal access to housing. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be "reasonable" based on fair housing laws and the case law interpreting the statutes. The City currently has no established reasonable accommodation process in place. The City is densely built out and because of its topography, extensive accessibility improvements to existing individual homes are difficult to accomplish, if not impossible. Such requests are rare and are typically handled on a case-by-case basis. Objectives and Timeframe: • Amend the Zoning Ordinance to implement a reasonable accommodation procedure to address reasonable accommodation requests.	Result/Evaluation: Program was successful. The City adopted a reasonable accommodation ordinance in 2011 and amended in 2014 to bring the program into compliance with State guidelines and statutes. Continue/Modify/Delete: This program was successfully completed and has been modified to focus on continued implementation.

3. HOUSING NEEDS ASSESSMENT

3A. Introduction and Background

The purpose of the Housing Needs Assessment is to describe housing, economic, and demographic conditions in Avalon, assess the demand for housing for households at all income levels, and document the demand for housing to serve various special needs populations. The Housing Needs Assessment also addresses whether assisted housing projects are at risk of converting to market-rate projects. The Housing Needs Assessment is intended to assist Avalon in developing housing goals and formulating policies and programs that address local housing needs.

Several sources of data were used to describe existing demographic and housing conditions, including the following:

- Local Housing Data package for the City of Avalon developed by the Southern California Association of Governments (SCAG) and pre-certified by the California Department of Housing and Community Development (HCD) for use in 6th cycle housing elements.
- Data from the 2010 U.S. Census, 2014-2018 U.S. Census American Community Survey (ACS), California Department of Finance (DOF), California Employee Development Department (EDD), and U.S. Department of Housing and Urban Development (HUD) is included to provide information on population, household, housing, income, employment, and other demographic characteristics.
- Regional information from the Housing Rights Center (HRC).
- Other sources of economic data such as information from the websites Zillow.com, Apartments.com, Rent.com, and Rentcafe.com, and other published data are used where current Census, ACS, DOF, HUD, and other standard data sources do not provide relevant data.
- Interviews with key agencies and organizations were conducted to obtain information on housing needs and, in particular, needs of populations with special housing needs.
- Research and data related to fair housing, including Census Scope, Social Science Data Analysis Network, the UC Davis Center for Regional Change and Rabobank, N.A., and the California Fair Housing Task Force.

Due to the use of multiple data sources (with varying dates), there are slight variations in some of the information, such as total population and total household numbers, presented in this document. However, these variations do not significantly affect the discussion of overall housing trends and changes.

3B. Population Trends and Characteristics

Population Growth

Table 3-1 shows population growth for Avalon and other jurisdictions in the region from 2010 through 2020. According to data prepared by the California DOF, the population of Avalon in 2020 was 3,929 persons, an increase of approximately 5.4% from 3,728 in 2010. Avalon's growth outpaced countywide growth and that of neighboring jurisdictions during the 2010 through 2020 period, as shown in Table 3-1.

TABLE 3-1: POPULATION TRENDS - AVALON AND NEIGHBORING JURISDICTIONS

Jurisdiction	2010	2020	Change	% Change
Avalon	3,728	3,929	201	5.4%
Dana Point	33,351	33,146	-205	-0.6%
Laguna Beach	22,723	22,343	-380	-1.7%
Seal Beach	24,168	24,992	824	3.4%
San Juan Capistrano	34,593	36,318	1,725	5.0%
Manhattan Beach	35,135	35,250	115	0.3%
Los Angeles County	9,818,605	10,135,614	317,009	3.2%

Source: US Census 2010; DOF 2020

Age

Changes in age groups can indicate future housing needs. [Table 3-2](#) compares Avalon's age cohort sizes in 2018 with Los Angeles County's. In Avalon, children under 15 comprise 22.9% of the City's population, teens and young adults (15 - 24) represent 8.2%, and adults in family-forming age groups (25 - 44) comprise 26.9%. Adults aged 45 to 64 represent 28.4% of the population and seniors (65 and over) comprise 13.7%. In 2018, the median age in Avalon (39.8 years) was more than three years higher than that of Los Angeles County and the statewide median age (36.2 years and 36.3 years respectively).

TABLE 3-2: POPULATION BY AGE (2018)

Age	Avalon		Los Angeles County	
	Number	Percent	Number	Percent
Under 5 Years	146	3.9%	624,745	6.2%
5 to 9	157	4.2%	607,905	6.0%
10 to 14	557	14.8%	626,594	6.2%
15 to 19	275	7.3%	654,903	6.5%
20 to 24	32	0.9%	738,416	7.3%
25 to 34	473	12.6%	1,609,935	15.9%
35 to 44	538	14.3%	1,387,454	13.7%
45 to 54	451	12.0%	1,369,838	13.6%
55 to 64	617	16.4%	1,178,985	11.7%
65 to 74	329	8.7%	734,393	7.3%
75 to 84	133	3.5%	384,700	3.8%
85 and Over	55	1.5%	180,184	1.8%
TOTAL	3,763	100%	10,098,052	100%

Source: US Census, 2014-2018 ACS

Race and Ethnicity

[Table 3-3](#) shows the ethnic composition of Avalon's population. The majority of the City's population identify as White (75.7%). The next largest racial group is "Some Other Race" (17.8%), followed by "Two or More Races" (6.5%). One person (less than 0.1%) identified as Black or African American, and one person (less than 0.1%) identified as Native Hawaiian and Pacific Islander. Over half of the population (59.0%) is of Hispanic origin.

TABLE 3-3: RACE AND ETHNICITY (2018)

Race/Ethnicity	Avalon		Los Angeles County	
	Number	Percent	Number	Percent
White	2,847	75.7%	5,186,859	51.4%
Black and African American	1	0.0%	823,987	8.2%
American Indian and Alaskan Native	0	0.0%	70,527	0.7%
Asian	0	0.0%	1,469,968	14.6%
Native Hawaiian and Pacific Islander	1	0.0%	27,929	0.3%
Some Other Race	669	17.8%	2,121,102	21.0%
Two or More Races	245	6.5%	397,680	3.9%
TOTAL	3,763	100.0%	10,098,052	100.0%
Hispanic Origin (of any race)	2,219	59.0%	4,893,603	48.5%

Source: US Census, 2014-2018 ACS

Employment

An assessment of the needs of the community must take into consideration the type of employment held by residents. Incomes associated with different jobs and the number of workers in a household determines the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

One of the factors that can contribute to an increase in demand for housing is expansion of the employment base. [Table 3-4](#) shows the employment and unemployment rates for persons 16 years and older that were in the labor force in 2010 and 2018. The number of employed residents decreased by 100 from 2010 to 2018, in step with the decrease in the labor force, which was down by 197 workers over the same period. In 2018, ACS data indicated that the unemployment rate in Avalon was approximately 0.6%, a decrease from 4.8% in 2010. According to the labor report data compiled by the California EDD, Los Angeles County's average annual unemployment rate in 2018 was estimated at 4.7%, while California's was 4.3%.

TABLE 3-4: JOB GROWTH AND EMPLOYMENT STATUS

	2010		2018	
	Number	Percent	Number	Percent
Total Persons in Labor Force	2,298	100%	2,101	100%
Employed	2,188	95.2%	2,088	99.4%
Unemployed	110	4.8%	13	0.6%

Source: US Census ACS, 2006-2010; US Census ACS, 2014-2018

Industry and Occupation

The 2014-2018 ACS data identified 2,088 employed persons in the Avalon labor force. Table 3-5 shows 2018 employment by industry for the City. Of Avalon's employed residents, the "Arts, entertainment, and recreation, and accommodation and food service" industry employed the most people at 31.5%. The second largest employment sector was the "Professional, scientific, and management, and administration and waste" and industry, which had 10.6% of the total employed persons in Avalon.

The City's workforce holds a variety of types of jobs as shown in Table 3-6, with the largest sector (28.5%) working in service occupations, followed by 26.7% in management, business, science, and arts occupations. Employment and occupation trends play an important role in defining housing needs. This relationship extends beyond the impact of employment growth on housing demand in the City and includes how wage levels and median earnings affect the type of housing affordable to workers and households in Avalon. There is a significant gap, for example, between the median earnings of a resident employed in management and a resident employed in a service occupation, and this translates into the type of housing that is needed in the City.

TABLE 3-5: JOBS BY INDUSTRY (2018)

Industry	Number	Percent
Agriculture, forestry, fishing and hunting, and mining	0	0.0%
Construction	51	2.4%
Manufacturing	52	2.5%
Wholesale trade	0	0.0%
Retail trade	201	9.6%
Transportation and warehousing, and utilities	221	10.6%
Information	40	1.9%
Finance and insurance, and real estate and rental and leasing	204	9.8%
Professional, scientific, and management, and administration and waste	222	10.6%
Educational services, and health care and social assistance	206	9.9%
Arts, entertainment, and recreation, and accommodation and food service	657	31.5%
Other services, except public administration	185	8.9%
Public administration	49	2.3%
TOTAL	2,088	100%

Source: US Census, 2014-2018 ACS

TABLE 3-6: JOBS BY OCCUPATION (2018)

Occupation	Number	Percent	Median Earnings*
Management, business, science, and arts occupations	558	26.7%	\$67,845
Service occupations	596	28.5%	\$28,472
Sales and office occupations	516	24.7%	\$29,722
Natural resources, construction, and maintenance occupations	259	12.4%	\$40,288
Production, transportation, and material moving occupations	159	7.6%	\$29,267

*Median earnings in previous 12 months prior to survey

Source: US Census, 2014-2018 ACS

Travel to Work

Approximately 57% of Avalon workers 16 years and over travel less than 10 minutes to work. Comparatively, only 2.9% of workers travel more than 20 minutes to work. Most Avalon workers, 49.9%, walk to work and 25.6% drive alone. Table 3-7 identifies travel time to work and Table 3-8 identifies commute methods for Avalon workers in 2018.

TABLE 3-7: TRAVEL TIME TO WORK (2018)

	Number	Percent
Less than 10 minutes	1,080	57.1%
10-19 minutes	756	40.0%
20-29 minutes	17	0.9%
30-44 minutes	37	2.0%
45-59 minutes	0	0.0%
60 + minutes	0	0.0%

Source: US Census, 2014-2018 ACS

TABLE 3-8: COMMUTE METHOD (2018)

	Number	Percent
Drive Alone	496	25.6%
Carpooled	89	4.6%
Public Transportation	0	0.0%
Walk	969	49.9%
Other	336	17.3%
Work at Home	51	2.6%

Source: US Census, 2014-2018 ACS

3C. Household Characteristics

According to the Census, a **household** is defined as all persons living in a housing unit. This definition includes families (related individuals living together), unrelated individuals living together, and individuals living alone.

A **housing unit** is defined by the Census as a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall. The occupants may be a single family, one person living alone, two or more families living together, or any other group of related or unrelated persons who share living arrangements.

People living in retirement homes or other group living situations are not considered “households” for the purpose of the U.S. Census count. The household characteristics in a community, including household size, income, and the presence of special needs households, are important factors in determining the size and type of housing needed in the City.

Table 3-9 below identifies the ages of householders in Avalon and Los Angeles County in 2018 based on ACS data from 2014-2018. Homeowner households are generally headed by residents of retirement age, with 44.7% of homeowner households headed by a resident 65 years of age or older; however, 40.6% of homeowner households are headed by someone early- to middle-age (35 to 59 years of age). Households who rent their homes trend slightly younger; approximately 67.9% of renter households are headed by a person aged 25-54.

TABLE 3-9: HOUSEHOLDS BY TENURE AND AGE (2018)

	Avalon		Los Angeles County	
	Number	%	Number	%
<i>Total:</i>	1,493	--	3,306,109	--
Owner Occupied:	434	100% (29.1% of total households)	1,514,629	100% (45.8% of total households)
Householder 15 to 24 years	0	0.8%	6,793	0.2%
Householder 25 to 34 years	0	8.4%	98,051	3.0%
Householder 35 to 44 years	27	15.3%	237,630	7.2%
Householder 45 to 54 years	71	25.4%	345,823	10.5%
Householder 55 to 59 years	78	10.5%	189,466	5.7%
Householder 60 to 64 years	64	12.8%	173,987	5.3%
Householder 65 to 74 years	78	14.8%	260,621	7.9%
Householder 75 to 84 years	66	8.7%	137,785	4.2%
Householder 85 years and older	50	3.3%	64,473	2.0%
Renter Occupied:	1,059	100% (70.9% of total households)	1,791,480	100% (54.2% of total households)
Householder 15 to 24 years	23	3.2%	80,999	2.4%
Householder 25 to 34 years	238	25.2%	432,847	13.1%
Householder 35 to 44 years	217	23.9%	414,261	12.5%
Householder 45 to 54 years	264	22.3%	356,758	10.8%
Householder 55 to 59 years	142	8.7%	139,235	4.2%
Householder 60 to 64 years	95	6.4%	114,579	3.5%
Householder 65 to 74 years	80	7.0%	143,073	4.3%
Householder 75 to 84 years	0	2.8%	74,203	2.2%
Householder 85 years and older	0	0.5%	35,525	1.1%

Source: US Census, 2014-2018 ACS 5-Year Data Profile (Table B25007)

Table 3-10 identifies the household sizes by housing tenure. In 2018, the majority of households consisted of 2 to 4 persons, which is consistent with the County's profile. Large households of 5 or more persons made up 11.6% of the total households in Avalon, also fairly consistent with the County's profile. The average household size was 2.51 persons, lower than Los Angeles County's (3.0 persons). Additionally, the average household size in 2018 for an owner-occupied unit was 1.97 persons per household and 2.73 persons per household for a renter-occupied unit.

TABLE 3-10: HOUSEHOLD SIZE BY TENURE (2018)

	Avalon		Los Angeles County	
	Number	%	Number	%
Owner Households	434	100.0%	1,514,629	100.0%
Householder living alone	123	28.3%	289,505	19.1%
Households 2–4 persons	303	69.8%	988,958	65.3%
Large households 5+ persons	8	1.8%	236,166	15.6%
Average Household Size	1.97 persons		3.19 persons	
Renter Households	1,059	100.0%	1,791,480	100.0%
Householder living alone	356	33.6%	557,451	31.1%
Households 2–4 persons	538	50.8%	992,800	55.4%
Large households 5+ persons	165	15.6%	241,229	13.5%
Average Household Size	2.73 persons		2.84 persons	
Total Households	1,493	100.0%	3,306,109	100.0%
Householder living alone	479	32.1%	846,956	25.6%
Households 2–4 persons	841	56.3%	1,981,758	59.9%
Large households 5+ persons	173	11.6%	477,395	14.4%
Average Household Size	2.51 persons		3.00 persons	

Source: U.S. Census Bureau, 2014-2018 ACS 5-Year Data Profile

3D. Income

Household Income

From 2010 to 2018, the median household income increased by 45.8% to \$69,440 and the per capita income increased by 49.1% to \$35,894. Table 3-11 identifies the per capita and median household incomes.

TABLE 3-11: MEDIAN HOUSEHOLD AND PER CAPITA INCOME

	2010	2018
Median Household Income	\$47,634	\$69,440
Per Capita Income	\$24,077	\$35,894

Source: US Census, 2006-2010 ACS and 2014-2018 ACS

In 2018, the majority (62.8%) of Avalon's households earned in excess of \$50,000 per year. The incidence of households earning less than \$35,000 per year was significantly higher among renter households (31.0%) than owner households (17.3%). Table 3-12 identifies household income by tenure. As shown in Table 3-12, the median income of owner households was greater than twice that of renter households. Compared to the County, median household incomes in Avalon were higher for both owner and renter households.

TABLE 3-12: HOUSEHOLD INCOME FOR ALL HOUSEHOLDS AND BY TENURE (2018)

Income	All Households		Owner Households		Renter Households	
	Number	Percent	Number	Percent	Number	Percent
Less than \$5,000	102	6.8%	26	6.0%	76	7.2%
\$5,000 to \$9,999	0	0.0%	0	0.0%	0	0.0%
\$10,000 to \$14,999	25	1.7%	25	5.8%	0	0.0%
\$15,000 to \$19,999	74	5.0%	24	5.5%	50	4.7%
\$20,000 to \$24,999	78	5.2%	0	0.0%	78	7.4%
\$25,000 to \$34,999	124	8.3%	0	0.0%	124	11.7%
\$35,000 to \$49,999	153	10.2%	34	7.8%	119	11.2%
\$50,000 to \$74,999	295	19.8%	42	9.7%	253	23.9%
\$75,000 to \$99,999	207	13.9%	36	8.3%	171	16.1%
\$100,000 to \$149,999	282	18.9%	138	31.8%	144	13.6%
\$150,000 or more	153	10.2%	109	25.1%	44	4.2%
Median Household Income – Avalon	\$69,440		\$111,379		\$64,018	
Median Household Income – LA County	\$64,251		\$95,132		\$45,786	

Source: US Census, 2014-2018 ACS

Households by Income Group

A special aggregation of 2014-2018 ACS data performed by HUD - the Comprehensive Housing Affordability Strategy (CHAS) data - provides a breakdown of households by income group by tenure. The number of households in extremely low, very low, low, and moderate/above moderate-income groups is shown in Table 3-13. Just over half of all households (790 households or 52.8%) are below median income. However, there is a stark difference between households who own and households who rent, particularly among households in the moderate to above moderate-income group (74.7% for owners and 38.7% for renters). The HUD CHAS data indicates that the extremely low-income group represents 17.7% of households and a roughly similar proportion are renters (17.9%) and owners (17.2%). The very low-income group represents 12.4% of households, with more renters (16.5%) than owners (2.3%), and the low-income group represents 20.7% of households, similarly with more renters (26.9%) than owners (5.7%).

The City's 6th cycle RHNA (see Table 3-27) identifies the City's share of regional housing needs for extremely low, very low, and low-income households, as well as for moderate and above moderate-income households. As shown in Table 3-13, there is a larger proportion of renters in the extremely low, very low, and low-income groups, while there is a larger proportion of moderate and above moderate-income groups in owner households. The high incidence of lower income households is of particular significance as housing costs in Avalon exceed the level of affordability for 47% of all lower income households (see Table 3-25).

TABLE 3-13: HOUSEHOLDS BY INCOME GROUP (2018)

Income Group	Total		Owner		Renter	
	Households	Percent	Households	Percent	Households	Percent
Extremely Low (<30% AMI)	265	17.7%	75	17.2%	190	17.9%
Very Low (30–50% AMI)	185	12.4%	10	2.3%	175	16.5%
Low (50–80% AMI)	310	20.7%	25	5.7%	285	26.9%
Moderate and Above Moderate (>80% AMI)	735	49.2%	325	74.7%	410	38.7%
TOTAL	1,495	100.0%	435	100.0%	1,060	100.0%

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

Available: <https://www.huduser.gov/portal/datasets/cp.html>

Poverty Levels

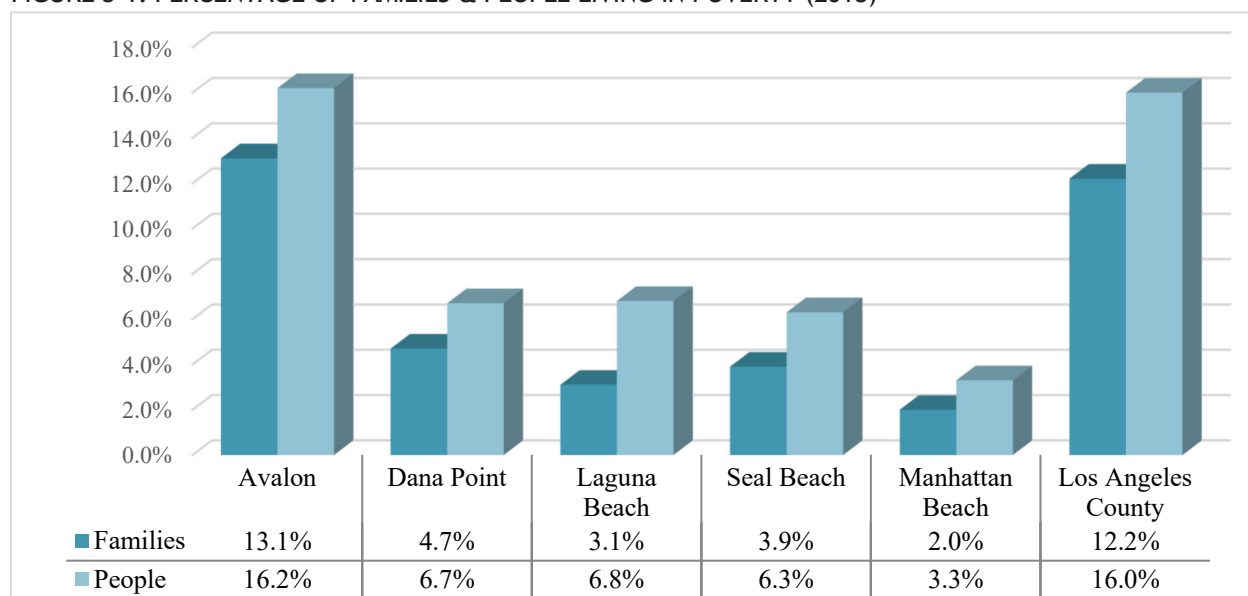
The 2014-2018 ACS data indicates that 131 (13.1%) of all Avalon families and 605 individuals (16.2%) had incomes at or below the poverty level in 2019. Approximately 12.2% of all Los Angeles County families and 16.0% of individuals were classified at or below the poverty level.

It should be noted that the City asserts that its median household income is actually less than that identified by the US Census. According to the City of Avalon Community Wide Income Survey, commissioned in 2016, the City has a median household income closer to \$42,000. The City undertook this survey as a result of the fact that the US Census American Community Survey sample data is not attuned to capturing accurate data from such a small population, resulting in ACS data not being reflective of actual incomes on the island (the Census MHI margin of error ranged from \$17,815 in 2010 to \$8,755 in 2016). Per the California Air Resources Board Priority Population mapping tool, the City of Avalon is an AB 1550 Low-Income community, meaning that the City has a median household income below 80 percent of the State median.—The LA County LAFCO has designated the entire unincorporated part of the island as Disadvantaged Unincorporated Community.

The level of poverty in a jurisdiction often influences the need for housing to accommodate those persons and families in the very low and low-income categories. The U.S. Census Bureau measures poverty by using a set of money income thresholds that vary by family size and composition of who is in poverty. If a family's total income is less than the family's threshold, then that family and every individual in it is considered in poverty. For example, the poverty threshold for a family of two with no children would be \$16,815, a household of two with a householder aged 65 or older and no children has a poverty threshold of \$15,178, and the poverty threshold of a family of four with two children under the age of 18 would be \$25,465. (U.S. Census Bureau, 2018).

Poverty rates in Avalon and in neighboring cities within Los Angeles County and Orange County are shown in Figure 3-1, which compares the number of families and individuals living in poverty. The City of Avalon had the highest percentage of families and individuals under the poverty line while the City of Manhattan Beach had the least in both categories.

FIGURE 3-1: PERCENTAGE OF FAMILIES & PEOPLE LIVING IN POVERTY (2018)



Source: US Census, 2014-2018 ACS (Tables S1701 and S17012)

Extremely Low-Income Households

Extremely low-income (ELI) households are defined as those earning up to 30% of the area median household income. For Los Angeles County, the area median household income in 2020 was \$77,300. For ELI households in Los Angeles County (including those in the City of Avalon), this results in an income of \$33,800 or less for a four-person household or \$23,700 for a one-person household. ELI households have a variety of housing situations and needs. For example, most families and individuals receiving only public assistance, such as social security disability insurance or disability insurance, qualify as ELI households.

Pursuant to Government Code Section 65583(a)(1), 50% of the City's very low-income regional housing needs assigned by HCD are extremely low-income households. As a result, from the very low-income need of eight units (see Table 3-27), the City has a projected need of four units for extremely low-income households (i.e. households earning 30% or less of the area median income). Based on current figures, extremely low-income households will most likely be facing overpayment, overcrowding, or substandard housing conditions. Some extremely low-income households could include individuals with mental or other disabilities and special needs. To address the range of needs of ELI households, the City will implement several programs including the following programs (refer the Housing Element Housing Plan for more detailed descriptions of these programs):

- Program 1: Housing Rehabilitation Program
- Program 4: Preservation of At-Risk Units
- Program 6: Housing Trust Fund
- Program 8: Affordable Housing Development
- Program 13: Replacement of Affordable Units
- Program 187: Zoning Code Updates - Remove Constraints
- Program 244: Section 8 Housing Choice Vouches

3E. Housing Characteristics

Housing Type

Table 3-14 identifies the types of housing units in Avalon in 2020 as reported in the Department of Finance, E-5 Report. The table summarizes total housing stock according to the type of structure. As shown in the table, the majority of housing in Avalon is multifamily 2-4 unit (i.e., duplex, triplex, and fourplex structures) housing, which accounted for 37.4% of units in 2020. Multifamily 5+ unit housing represented 30.1% of housing units and single-family detached homes accounted for 26.4% of housing units. Single-family attached homes (6.1%) rounded out the housing stock. There were no mobile homes.

TABLE 3-14: HOUSING STOCK BY TYPE AND VACANCY (2020)

	Total	Single Family		Multifamily		Mobile Homes	Occupied	Vacant
		Detached	Attached	2 – 4	5+ Units			
Units	2,296	607	140	859	690	0	1,572	724
Percent	100%	26.4%	6.1%	37.4%	30.1%	0%	68.5%	31.5%

Source: DOF E-5 Report 2020

Vacancy Rate

Table 3-14 also shows the number and percentage of occupied units and the percentage of vacant units. It is important to note that these counts include all vacant units, including those units that are newly constructed but not yet occupied, as well as units that are held for weekends or occasional use throughout the year (i.e., second homes or vacation homes). Avalon's vacancy rate has fallen over the past decade from 35.0% in 2010 to 31.5% in 2020. In order for the housing market to function properly in a city there should always be some level of housing vacancy, otherwise rents or housing prices could skyrocket. The 31.5% vacancy in Avalon is considered high (the historical equilibrium in California is 5.5% for rental vacancy and 1.2% for homeownership vacancy);¹ however, as shown by Table 3-15 below, many of these units may be occupied by persons who have a usual residence elsewhere.

The 2014-2018 ACS data indicates that there were 837 vacant units in 2018. As shown in Table 3-15, of the total vacant units in 2018, 109 were for rent, 18 were for sale, 76 were rented or sold but not yet occupied, none were for migrant workers, 80 were classified as other vacant, and 554 were for seasonal, recreational, or occasional use. The overall vacancy rate in the City in 2018 was 32.2%.

TABLE 3-15: VACANCY BY TYPE (2018)

Vacancy Type	Number	Percent
For rent	109	13.0%
Rented or sold, not occupied	76	9.1%
For sale only	18	2.2%
For seasonal, recreational, or occasional use	554	66.2%
For migrant workers	0	0.0%
Other vacant	80	9.6
TOTAL	837	100%

Source: US Census, 2014-2018 ACS

Housing Conditions

The U.S. Census provides only limited data that can be used to infer the condition of Avalon's housing stock. In most cases, the age of a community's housing stock is a good indicator of the condition of the housing stock. Moreover, many federal and state programs also use the age of housing as one factor in

¹ "California's low residential vacancy rates signal more construction," *first tuesday Journal* (February 15, 2021).

determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include plumbing, roof repairs, electrical repairs, foundation rehabilitation, or other significant improvements.

The 2014-2018 ACS data indicates that over half (51.2%) of the housing in the City is greater than 50 years old (i.e., built before 1970). Another 8.5% of units were built between 1970 and 1979. The age of the housing stock indicates that the need for maintenance and rehabilitation assistance may grow during this planning period. Units built prior to 1970 may require aesthetic and maintenance repairs including roof, window, and paint improvements and some units in this age range may also require significant upgrades to structural, foundation, electrical, plumbing, and other systems.

When examining a housing stock to figure out what condition it is in, there are certain factors that the Census considers. For example, older units may have plumbing that isn't fully functional or substandard. Table 3-16 indicates that no owner-occupied units and rental units lacked complete plumbing facilities in 2018.

TABLE 3-16: HOUSING STOCK CONDITIONS (2018)

Year Structure Built	Owner-Occupied		Renter-Occupied		Total	
	Number	Percent	Number	Percent	Number	Percent
2014 or later	0	0.0%	0	0.0%	0	0.0%
2010 to 2013	64	14.7%	29	2.7%	93	6.2%
2000 to 2009	0	0.0%	236	22.3%	236	15.8%
1990 to 1999	43	9.9%	94	8.9%	137	9.2%
1980 to 1989	53	12.2%	82	7.7%	135	9.0%
1970 to 1979	40	9.2%	87	8.2%	127	8.5%
1960 to 1969	14	3.2%	29	2.7%	43	2.9%
1950 to 1959	13	3.0%	57	5.4%	70	4.7%
1940 to 1949	32	7.4%	84	7.9%	116	7.8%
1939 or earlier	175	40.3%	361	34.1%	536	35.9%
TOTAL	434	100%	1,059	100%	1,493	100%
Plumbing Facilities (Occupied Units)						
Units with Complete Plumbing Facilities	434	100%	1,059	100%	1,493	100%
Units Lacking Complete Plumbing Facilities	0	0%	0	0%	0	0%

Source: US Census, 2014-2018 ACS (Tables B25036 and B25016)

As noted, the City's housing stock is aging with 59.7% of dwelling units in Avalon (892) having been constructed prior to 1980, and as such, structural deterioration and maintenance problems may be prevalent. The age of the City's housing stock indicates a potentially significant need for continued code enforcement, property maintenance, and housing rehabilitation programs to stem housing deterioration. The Based on the age of housing stock, the City estimates that approximately 15% of Avalon's housing stock is deteriorated and between 200 and 250 units are dilapidated and require replacement.

To supplement the Census information regarding housing conditions, the City of Avalon included specific questions pertaining to the quality of the City's housing stock in its Housing Element Update community survey, which was posted on the City's website from November 5 to 30, 2021 and received 46 responses (this is further detailed in Appendix B). When asked to rate the physical condition of the residence they lived in, the majority (41%) responded that their home shows signs of minor deferred maintenance such as peeling paint or chipped stucco while 23.1% indicated that their home was in excellent condition. Another 17.9% of respondents indicated that their home was in need of a modest repair (like a new roof or windows) and 12.8% of respondents reported that their home needs extensive major repairs or

[renovation. Community members were also asked to report the type of home improvements they have considered making to their homes. The response “None” received the most responses \(51.4%\), while kitchen or bathroom remodels and painting were also popular choices.](#)

[Based on the community survey and the City’s understanding of conditions on the ground, approximately 191 units are in need of rehabilitation and replacement. The City will continue to implement its Housing Rehabilitation Program \(Program 1\) using Redevelopment Housing Set-Aside funds to help qualified homeowners rehabilitate substandard housing.](#)

Overcrowding

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. Table 3-17 summarizes overcrowding data for Avalon. It should be noted that kitchenettes, strip or Pullman kitchens, bathrooms, porches, balconies, foyers, halls, half-rooms, utility rooms, unfinished attics, basements, or other space for storage are not defined as rooms for Census purposes.

Overcrowded households are usually a reflection of the lack of affordable housing available. Households that cannot afford housing units suitably sized for their families are often forced to live in housing that is too small for their needs, which may result in poor physical condition of the dwelling unit. In 2018, 173 housing units (11.6% of the total occupied units) were overcrowded, which represented 0% of owner units and 16.3% of renter units.

TABLE 3-17: OVERCROWDING BY TENURE (2018)

Persons per Room	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
1.00 or less	434	100.0%	886	83.7%	1,320	88.4%
1.01 to 1.50	0	0.0%	80	7.6%	80	5.4%
1.51 or more	0	0.0%	93	8.8%	93	6.2%
<i>TOTAL</i>	434	100%	1,059	100%	1,493	100%
Overcrowded	0	0%	173	16.3%	173	11.6%

Source: US Census, 2014-2018 ACS

As shown in Table 3-18, the average household size in Avalon was 2.51 persons in 2018. The average household size was higher for renters (2.73 persons); owner households had an average size of 1.97 persons. The most commonly occurring household size is of two people (32.6%) and the second-most commonly occurring household size is of one person (32.1%). Table 3-19 identifies bedrooms by tenure. The proportion of larger homes (4 or more bedrooms) is significantly higher for owner households (11.5% versus 0% for renter households).

TABLE 3-18: HOUSEHOLD SIZE BY TENURE (2018)

Household Size	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
1-person	123	28.3%	356	33.6%	479	32.1%
2-person	262	60.4%	225	21.2%	487	32.6%
3-person	13	3.0%	200	18.9%	213	14.3%
4-person	28	6.5%	113	10.7%	141	9.4%
5-person	0	0.0%	128	12.1%	128	8.6%
6-person	8	1.8%	37	3.5%	45	3.0%
7-or-more-person	0	0.0%	0	0.0%	0	0.0%
TOTAL	434	100% (29.1% of total)	1,059	100% (70.9% of total)	1,493	100%
Average Household Size	1.97		2.73		2.51	

Source: US Census, 2014-2018 ACS

TABLE 3-19: NUMBER OF BEDROOMS BY TENURE

Bedroom Type	Owner		Renter		Total	
	Number	Percent	Number	Percent	Number	Percent
No bedroom	26	6.0%	152	14.4%	178	11.9%
1-bedroom	42	9.7%	310	29.3%	352	23.6%
2-bedroom	156	35.9%	416	39.3%	572	38.3%
3-bedroom	160	36.9%	181	17.1%	341	22.8%
4-bedroom	50	11.5%	0	0.0%	50	3.3%
5 or more bedroom	0	0.0%	0	0.0%	0	0.0%
TOTAL	434	100%	1,059	100%	1,493	100%

Source: US Census, 2014-2018 ACS

3F. Housing Costs

For Sale Housing

As shown in [Figure 3-2222Figure 3-2](#), median housing prices in Avalon peaked at approximately \$800,000 around the time of the Great Recession, and have risen over the last eight years from approximately \$400,000 in 2010 to nearly \$600,000 in 2018.

In November 2021, there were 10 homes listed for sale on *Zillow.com* with prices ranging from \$699,888 to \$2,788,000. Of these homes, there was one detached single-family home with a sales price of \$5,595,000. As shown in Table 3-20, the majority of homes for sale are in the \$700,000+ price range, with 10% of homes in the \$600,000 to \$699,999

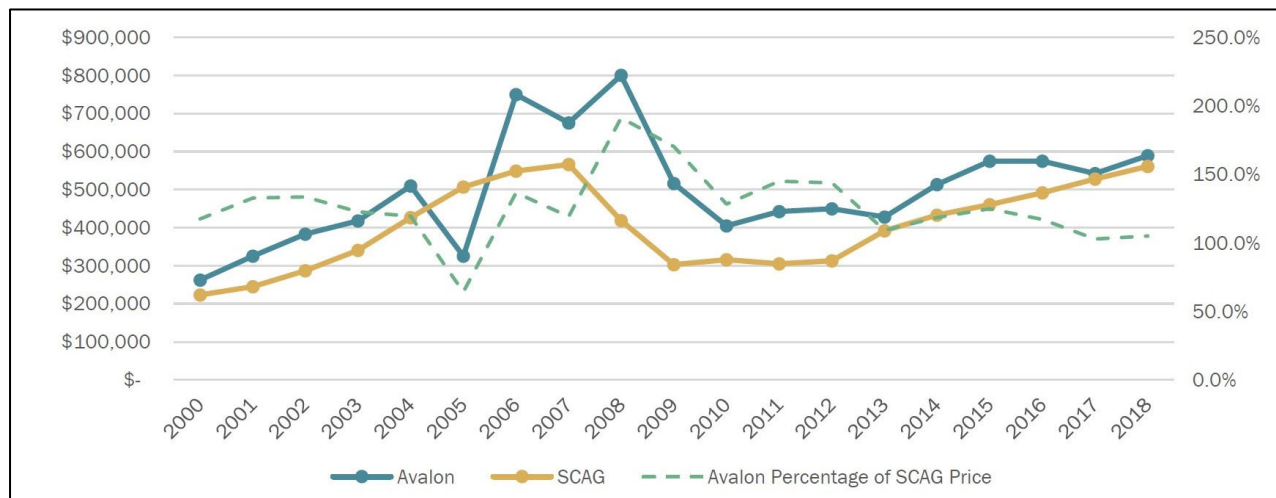
range. [According to Zillow, the typical home value in Avalon was \\$800,000 in November 2021.](#) While the median sales price is not affordable to lower and moderate-income households (see Table 3-24), the City's home sales prices are comparable to the SCAG area (Counties of Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura).

TABLE 3-20: HOMES FOR SALE (NOVEMBER 2021)

Price	Homes	% of Homes for Sale
\$700,000 and more	10	90%
\$600,000 - \$699,999	1	10%
\$500,000 - \$599,999	0	0%
\$400,000 - \$499,999	0	0%
\$300,000 - \$399,999	0	0%
\$200,000 - \$299,999	0	0%
\$0 - \$199,999	0	0%

Source: Zillow.com, November 2021

FIGURE 3-2222: MEDIAN HOME PRICE TRENDS AVALON



Note: SCAG median home sales price calculated as household-weighted average of county medians.

Source: SCAG Local Profiles, Core Logic/Data Quick

Rental Housing

Table 3-21 summarizes rents paid in Avalon in 2018 by rental range. There were 308 units (30.7%) renting for less than \$1,000 dollars per month while the majority of units rented between \$1,000 and \$2,000 (54.7% or 550 units). Almost one-fifth of rentals (14.6%) were \$2,000 or more per month. The median rent in Avalon in 2018 was \$1,451. Table 3-22 summarizes median rental rates citywide by bedrooms in 2018.

In November 2021, a search of *Zillow.com*, *Apartments.com*, and *Rent.com* located only one rental unit available to rent in Avalon (a studio), for \$1,450 a month.

TABLE 3-21: RENTAL COSTS (2018)

Rent Range	Number	% of Units Paying Rent
Less than \$500	69	6.9%
\$500 to \$999	239	23.8%
\$1,000 to \$1,499	221	22.0%
\$1,500 to \$1,999	329	32.7%
\$2,000 to \$2,499	147	14.6%
\$2,500 to \$2,999	0	0.0%
\$3,000 or more	0	0.0%
Median (dollars)	\$1,451	

Source: US Census, 2014-2018 ACS

TABLE 3-22: MEDIAN RENT BY BEDROOMS (2018)

Bedroom Type	Median Rent
No Bed (Studio)	\$1,060
1 bed	\$1,093
2 bed	\$1,744
3 bed	\$937
4 bed or more	N/A

Source: US Census, 2014-2018 ACS

Income Groups

The California Department of Housing and Community Development (HCD) publishes household income data annually for areas in California. Table 3-23 shows the maximum annual income level for each income group adjusted for household size for Los Angeles County. The maximum annual income data is then utilized to calculate the maximum affordable housing payments for different households (varying by income level) and their eligibility for housing assistance programs.

- *Extremely Low-Income Households* have a combined income at or lower than 30% of area median income (AMI), as established by the State Department of Housing and Community Development (HCD).
- *Very Low-Income Households* have a combined income between 30 and 50% of AMI, as established by HCD.
- *Low-Income Households* have a combined income between 50 and 80% of AMI, as established by HCD.
- *Moderate-Income Households* have a combined income between 80 and 120% of AMI, as established by HCD.
- *Above Moderate-Income Households* have a combined income greater than 120% of AMI, as established by HCD.

TABLE 3-23: STATE INCOME LIMITS - LOS ANGELES COUNTY (2020)

Income Group	1 Person	2 Person	3 Person	4 Person	5 Person	6 Person	7 Person	8 Person
Extremely Low	\$23,700	\$27,050	\$30,450	\$33,800	\$36,550	\$39,250	\$41,950	\$44,650
Very Low	\$39,450	\$45,050	\$50,700	\$56,300	\$60,850	\$65,350	\$69,850	\$74,350
Low	\$63,100	\$72,100	\$81,100	\$90,100	\$97,350	\$104,550	\$111,750	\$118,950
Moderate	\$64,900	\$74,200	\$83,500	\$92,750	\$100,150	\$107,600	\$115,000	\$122,450
Above Moderate	\$64,900+	\$74,200+	\$83,500+	\$92,750+	\$100,150+	\$107,600+	\$115,000+	\$122,450+

Source: HCD 2020 Los Angeles County Income Limits

Housing Affordability

Table 3-24 shows the estimated maximum amount that a household can pay for housing each month without incurring a cost burden (overpayment). This information can be compared to current housing prices and market rental rates to better understand what types of housing options are affordable to different types of households. Affordability is based on a household spending 30% or less of their total household income for shelter. Affordability is based on the maximum household income levels established by HCD (Table 3-23). The annual income limits established by HCD are like those used by the U.S. Department of Housing and Urban Development (HUD) for administering various affordable housing programs. Maximum affordable sales price is based generally on the following assumptions: 4% interest rate, 30-year fixed loan, and down payments that vary with income level, as described in Table 3-24.

Comparing the maximum affordable housing costs in Table 3-24 to the rental rates in Tables 3-21 and 3-22, rental rates in Avalon are generally unaffordable to low, moderate, and above moderate-income households. With the exception of 3-bedroom units affordable to larger 6-person, extremely low-income households, the median rental rates reported by the 2014-2018 ACS (Table 3-22) were not affordable to extremely low-income households. According to *Rentcafe.com*, the average rent in Avalon in October 2021 was \$1,900 per month across unit sizes.

Based on a comparison of Tables 3-20 and 3-24, homes for sale in the City are affordable to only above moderate-income households. Moreover, indicators suggest that rents and home prices will continue to rise in Avalon during the planning period.

TABLE 3-24: HOUSING AFFORDABILITY BY INCOME GROUP

Income Group	1-Person		2-Person		4-Person		6-Person	
	Max. Purchase Price	Max. Monthly Rent	Max. Purchase Price	Max. Monthly Rent	Max. Purchase Price	Max. Monthly Rent	Max. Purchase Price	Max. Monthly Rent
Extremely Low	\$85,791	\$589	\$96,112	\$655	\$121,715	\$841	\$142,388	\$977
Very Low	\$150,968	\$980	\$172,817	\$1,120	\$210,683	\$1,399	\$245,011	\$1,626
Low	\$246,968	\$1,568	\$274,237	\$1,743	\$342,514	\$2,240	\$397,325	\$2,602
Moderate	\$261,442	\$1,607	\$297,728	\$1,839	\$370,104	\$2,303	\$428,044	\$2,674
Above Moderate	\$261,442+	\$1,607+	\$297,728+	\$1,839+	\$370,104+	\$2,303+	\$428,044+	\$2,674+

*Maximum affordable sales price is based on the following assumptions: 4.0% interest rate, 30-year fixed loan; down payment: \$5,000 - extremely low, \$10,000 - very low; \$15,000 - low, \$25,000 - moderate; property tax, utilities, and homeowners insurance as 30% of monthly housing cost. Homes sales prices are rounded to nearest \$100.

Source: HCD 2020 Los Angeles County Income Limits; De Novo Planning Group, 2021

Extremely Low-income Households

As previously described, extremely low-income households earn less than 30% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$589 and \$977 per month and homes priced at \$85,791 to \$142,388. As of November 2021, there were no rental homes listed on *Zillow.com*, *Apartments.com*, and *Rent.com* that would be affordable to extremely low-income households. Extremely low-income households are similarly unable to afford to purchase a home in Avalon based on current sales prices.

Very Low-income Households

Very low-income households earn between 31% and 50% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$980 to \$1,626 per month and homes priced at \$150,968 to \$245,011. As of November 2021, the only available rental unit (a studio) listed on *Zillow.com*, *Apartments.com*, and *Rent.com* would be unaffordable for very low-income households, with the exception of a six-person very low-income household. Very low-income households are unable to afford to purchase a home in Avalon based on current sales prices.

Low-income Households

Low-income households earn between 51% and 80% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,568 to \$2,602 per month and homes priced at \$246,968 to \$397,325. As of November 2021, the only available rental unit (a studio) listed on *Zillow.com*, *Apartments.com*, and *Rent.com* would be affordable to low-income households. Low-income households are unable to afford to purchase a home in Avalon based on current sales prices.

Moderate-income Households

Moderate-income households earn between 80% and 120% of the County Area Median Income (AMI). Depending on the household size, these households can afford rents between \$1,607 and \$2,674 per month and homes priced at \$261,442 to \$428,044. As of November 2021, the only available rental unit (a studio) listed on *Zillow.com*, *Apartments.com*, and *Rent.com* was affordable to moderate-income households. Still, moderate-income households are unable to afford to purchase a home in Avalon based on current sales prices.

Overpayment

In Avalon, as with most communities in Los Angeles County, housing is not affordable for all income levels, particularly the extremely low, very low, and low-income households. As shown in Table 3-25, 32% of renters in Avalon and 40% of homeowners overpay for housing. The majority of renters that overpay are in the lower income groups, with 82% in the extremely low-income group and 37% in the very low-income group overpaying for housing (over 30% of their monthly income). Comparatively, 100% of extremely low-income owners and 0% of very low-income owners are overpaying. Therefore, overpayment is an issue for both renter and owner households. More than a third (34%) of all households in Avalon overpay for housing.

TABLE 3-25: HOUSEHOLDS BY INCOME LEVEL AND OVERPAYMENT (2018)

Household Overpayment	Owners	Renters	Total	% of Income Category
Extremely Low-Income Households	75	190	265	100%
With Cost Burden >30%	75 / 100%	155 / 82%	230	87%
With Cost Burden >50%	75 / 100%	155 / 82%	230	87%
Very Low-Income Households	10	175	185	100%
With Cost Burden >30%	0 / 0%	65 / 37%	65	35%
With Cost Burden >50%	0 / 0%	40 / 23%	40	22%
Low-Income Households	25	285	310	100%
With Cost Burden >30%	0 / 0%	65 / 23%	65	21%
With Cost Burden >50%	0 / 0%	25 / 9%	25	8%
Total Extremely Low, Very Low, and Low-Income Households Paying >30%	75 / 68%	285 / 44%	360	47% of lower income households
Moderate and Above Moderate-Income Households	325	410	735	100%
With Cost Burden >30%	100 / 31%	55 / 13%	155	21%
With Cost Burden >50%	40 / 12%	0 / 0%	40	5%
Total Households	435	1,060	1,495	100%
With Cost Burden >30%	175 / 40%	340 / 32%	515	34%
With Cost Burden >50%	115 / 28%	220 / 21%	335	22%

Note: Data is rounded to the nearest 5.

Source: HUD Comprehensive Housing Affordability Strategy (CHAS), 2014-2018

Affordable Housing Inventory

The City uses various funding sources to preserve and increase the supply of affordable housing through new construction and the acquisition and/or rehabilitation of renter-occupied units. Affordability covenants in Avalon include developments that hold federal subsidy contracts, received tax credits or mortgage revenue bonds, and/or were financed by redevelopment funds or non-profit developers.

Table 3-26 shows assisted units with covenants that require rents to be maintained at affordable levels for various agreed upon periods of time. In 2021, Avalon had 133 total deed-restricted affordable units.

A recorded deed restriction serves as an affordability covenant that restricts the income level of a person who occupies the property and ensures the property will remain available for low to moderate-income persons through the foreseeable future. The inventory of affordable units includes one senior housing project, and projects owned and operated by the Avalon Housing Authority.

TABLE 3-26: DEED RESTRICTED AFFORDABLE HOUSING UNITS

Project Name/Address	No. & Type of Affordable Units	Duration of Affordability
Tremont Street Apartments 343 Tremont St	62 total units; 50 affordable units; Family	2033
Eucalyptus Hill Gardens 34 Banning Street	80 total units; 40 affordable units Family	55 years (2047)
Bird Park 234 Bird Park Road	24 affordable units Family	(2077)
Beacon Hill 309 Beacon St	14 affordable units Seniors	(2077)
238 Descanso Avenue	Single-Family home	55 years 2051
311 Descanso Avenue	Single-Family home	55 years 2051
336 Triana Lane	Single-Family home	45 years 2055
338 Triana Lane	Single-Family home	45 years 2059
342 Triana Lane	Single-Family home	45 years 2060

Sources: City of Avalon, 2021; California Housing Partnership, 2021

Manufactured Housing and Mobile Homes

Manufactured housing and mobile homes offer an affordable housing option to many low and moderate-income households. According to the California Department of Finance, there are no mobile homes in the City.

3G. Future Housing Needs

A Regional Housing Needs Plan (RHNP) is mandated by the State of California (Government Code Section 65584) for regions to address housing issues and needs based on future growth projections for the area. The RHNP for Avalon is developed by the Southern California Association of Governments (SCAG), and allocates a “fair share” of regional housing needs to individual cities. The intent of the RHNP is to ensure that not only are local jurisdictions addressing the needs of their immediate areas, but also that the needs of the entire region are fairly distributed to all communities. A major goal of the RHNP is to ensure that every community provides an opportunity for a mix of affordable housing to all economic segments of its population.

As the regional planning agency, SCAG determines the City's fair share of housing through the Regional Housing Needs Allocation (RHNA) process. This Housing Element addresses SCAG's RHNA schedule for the 6th Cycle, from 2021 through 2029. The City will need to plan to accommodate 27 new units, which includes 4 extremely low-income units, 4 very low, 5 low, 3 moderate, and 11 above moderate-income units. Pursuant to Government Code Section 65583(a)(1), 50% of Avalon's very low-income regional housing needs assigned by SCAG are extremely low-income households, and hence the 4 ELI units. Table 3-27 summarizes Avalon's fair share, progress to date, and remaining units.

TABLE 3-27: REGIONAL HOUSING NEEDS ALLOCATION - 6TH CYCLE

Status	Extremely and Very Low-income (0-50% AMI)	Low-income (51-80% AMI)	Moderate-income (81-120% AMI)	Above Moderate-income (121%+ AMI)	Total
RHNA Allocation	8	5	3	11	27
Constructed, Under Construction, Permits Issued (Since 7/1/2021)	0	0	0	9	9
Units Approved/Entitled	0	0	0	7	16
Remaining Allocation	8	5	3	0	16

Sources: SCAG 6th Cycle Final RHNA Allocation Plan, 2021; City of Avalon, 2021

3H. Special Needs Groups

Government Code Section 65583(a)(7) requires a housing element to address special housing needs, such as those of the elderly; persons with disabilities, including a developmental disability, as defined in Section 4512 of the Welfare and Institutions Code; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. The needs of these groups often call for targeted program responses, such as temporary housing, preservation of residential hotels, housing with features to make it more accessible, and the development of four-bedroom apartments. Special needs groups have been identified and, to the degree possible, responsive programs are provided. A principal emphasis in addressing the needs of these group is to continue to seek State technical assistance grants to identify the extent and location of those with special needs and identify ways and means to assist them. Local government budget limitations may act to limit effectiveness in implementing programs for these groups. Please refer to Section 6E of this Element for a discussion of agencies and programs that serve special needs populations in Avalon.

Where data is available, estimates of the population or number of households in Avalon falling into each special needs group is presented. The special housing needs are a subset of the overall housing needs identified in Table 3-27, unless otherwise noted.

Seniors

Seniors are considered persons age 65 or older in this Housing Element. However, it must be noted that some funding programs have lower age limits for persons to be eligible for their senior housing projects. Seniors have special housing needs primarily resulting from physical disabilities and limitations, fixed or limited income, and health care costs. Additionally, senior households also have other needs to preserve their independence including supportive services to maintain their health and safety, in-home support services to perform activities of daily living, conservators to assist with personal care and financial affairs, public administration assistance to manage and resolve estate issues, and networks of care to provide a wide variety of services and daily assistance.

Various portions of the Housing Element describe characteristics of the senior population, the extent of their needs for affordable housing, housing designated for seniors, and City provisions to accommodate their need. Senior population and household growth in Avalon from 2010 to 2018 is shown in Table 3-28. The increase in elderly persons is likely due to aging in place of Avalon's residents. The senior population increased by approximately 30.6% from 2010 to 2018; however, the number of senior households decreased by 2.1% between 2010 and 2018. While seniors represent approximately 13.8% of the City's population, senior households represent approximately 18.4% of total households, which is primarily due to the smaller senior household size.

TABLE 3-28: SENIOR POPULATION AND HOUSEHOLDS (2010 & 2018)

Population	2010	2018
Number	396	517
Percent Change	-	30.6%
Annual Percent Change	-	3.8%
Households	2010	2018
Number	280	274
Percent Change		-2.1%
Annual Percent Change	-	-0.3%

Source: US Census, 2006-2010 ACS and 2014-2018 ACS

Table 3-29 summarizes senior households by age and tenure. Most senior households are homeowners, 194 or 70.8%. Approximately 29.2% of senior households, 80, are renters. Elderly renters may tend to prefer affordable units in smaller single-story structures or multi-story structures with an elevator, close to health facilities, services, transportation, and entertainment.

TABLE 3-29: HOUSEHOLDER AGE BY TENURE (2018)

Age Group	Owners		Renters	
	Number	Percent	Number	Percent
65-74 years	78	40.2%	80	100.0%
75-84 years	66	34.0%	0	0.0%
85 plus years	50	25.8%	0	0.0%
TOTAL	194	100% (13% of total)	80	100% (5.4% of total)

Source: US Census, 2014-2018 ACS (Table B25007)

During the planning period, senior households are anticipated to increase at a rate commensurate with overall population and household growth. Senior housing types can include market rate homes, senior single-family housing communities, senior apartments, and mobile homes.

The 2014-2018 ACS survey indicates that 4.6% of seniors in Avalon are below the poverty level. The median income of households with a head of household that is 65 years and over according to the 2015-2019 ACS Survey (results for seniors were unavailable for the 2014-2018 ACS survey) was \$115,144, significantly more than the total median household income of \$74,769.

Senior Housing

There is increasing variety in the types of housing available to the senior population. This section focuses on three basic types.

Independent Living - Housing for healthy seniors who are self-sufficient and want the freedom and privacy of their own separate apartment or house. Many seniors remain in their original homes, and others move to special residential communities which provide a greater level of security and social activities of a senior community.

Group Living - Shared living arrangements in which seniors live in close proximity to their peers and have access to activities and special services.

Assisted Living - Provides the greatest level of support, including meal preparation and assistance with other activities of daily living.

Multi-unit senior housing, identified as “rest home” in the Zoning Code, is considered a congregate housing project in Avalon and is permitted with a conditional use permit in the LD, MD, HD, and SC zones. According to the California Department of Social Services (CDSS), there are currently no State-licensed assisted living residential care facilities for the elderly in the City.

Several programs address the non-housing needs of seniors in Avalon. Additional support for senior residents is provided by the Community Services Department, which provides and coordinates senior services programs offered by the City and non-profits. Some of the programs and services offered by the City include nutrition/meal programs (lunches and/or Meals on Wheels) and recreational activities. The City also provides senior transportation services throughout Avalon with the Dial-A-Ride Transportation program.

Disabled Persons

A “disability” includes, but is not limited to, any physical or mental disability as defined in California Government Code Section 12926. A “mental disability” involves having any mental or psychological disorder or condition that limits a major life activity. A “physical disability” involves having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that affects body systems. In addition, a mental or physical disability limits a major life activity by making the achievement of major life activities difficult including physical, mental, and social activities and working. A “developmental disability” means “a disability that originates before an individual attains age 18 years, continues, or can be expected to continue, indefinitely, and constitutes a substantial disability for that individual.” This term includes an intellectual disability, cerebral palsy, epilepsy, autism, and disabling conditions found to be closely related to intellectual disabilities or to require treatment similar to that required for individuals with an intellectual disability, but does not include other handicapping conditions that are solely physical in nature.

Physical, mental, and/or developmental disabilities could prevent a person from working, restrict a person’s mobility, or make caring for oneself difficult. Therefore, disabled persons often require special housing needs related to potential limited earning capacity, the lack of accessible and affordable housing, and higher health costs associated with disabilities. Additionally, people with disabilities require a wide range of different housing, depending on the type and severity of their disability. Housing needs can range from institutional care facilities to facilities that support partial or full independence (i.e., group care homes). Supportive services such as daily living skills and employment assistance need to be integrated in the housing situation.

- Individuals with a mobility, visual, or hearing limitation may require housing that is physically accessible. Examples of accessibility in housing include widened doorways and hallways, ramps, bathroom modifications (i.e., lowered countertops, grab bars, adjustable shower heads, etc.) and special sensory devices including smoke alarms and flashing lights.
- Individuals with self-care limitations (which can include persons with mobility difficulties) may require residential environments that include in-home or on-site support services ranging from congregate to convalescent care. Support services can include medical therapy, daily living assistance, congregate dining, and related services.
- Individuals with developmental disabilities and other physical and mental conditions that prevent them from functioning independently may require assisted care or group home environments.
- Individuals with disabilities may require financial assistance to meet their housing needs because

a higher percentage than the population at large are low-income and their special housing needs are often more costly than conventional housing.

According to the 2014-2018 ACS, there were 121 persons with one or more disabilities in Avalon. Of the disabled population, 49.6% are aged up to 64 and 50.4% are aged 65 and over. Table 3-30 identifies disabilities by type of disability.

TABLE 3-30: DISABILITIES BY DISABILITY TYPE (2018)

Type of Disability	Persons Ages Up to 64		Persons Ages 65+		Total	
	Number	Percent	Number	Percent	Number	Percent
Hearing Difficulty	22	36.7%	61	100%	83	68.6%
Vision Difficulty	16	26.7%	19	31.1%	35	28.9%
Cognitive Difficulty	0	0%	0	0%	0	0%
Ambulatory Difficulty	38	63.3%	19	31.1%	57	47.1%
Self-Care Difficulty	22	36.7%	0	0%	22	18.2%
Independent Living Difficulty	22	36.7%	0	0%	22	18.2%
Total Persons with One or More Disabilities ¹	60	100% / 49.6% of disabled	61	100% / 50.4% of disabled	121	100%

¹A person may have more than one disability, so the total disabilities may exceed the total persons with a disability.

Source: US Census, 2014-2018 ACS

As shown in Table 3-31, the 2014-2018 ACS indicates that for individuals between the ages of 18 and 64, all people (100%) who had some form or type of disability were in the labor force, compared with 84% of the non-disabled population.

TABLE 3-31: DISABLED PERSONS BY EMPLOYMENT STATUS (2018)

	Ages 16 to 64	Percent
Employed with Disability	60	100%
Unemployed with Disability	0	0%
Not in Labor Force with Disability	0	0%
Total	60	100%

Source: US Census, 2014-2018 ACS

While recent Census data does not provide income levels or overpayment data for persons with a disability, the 2014-2018 ACS survey does report on indicators that relate to a disabled person's or household's income. The 2014-2018 ACS data indicates that zero persons with a disability are below the poverty level. The 2014-2018 ACS data indicates zero households receiving food stamps or similar assistance have a disabled member.

The persons in the "with a disability" category in Tables 3-31 and 3-32 include persons with developmental disabilities. While the US Census reports on a broad range of disabilities, the Census does not identify the subpopulation that has a developmental disability. The California Department of Developmental Services (DDS) maintains data regarding people with developmental disabilities, defined as those with severe, life-long disabilities attributable to mental and/or physical impairments. The DDS data is reported by zip code [so the data reflects a larger area than the City of Avalon. The DDS data indicates that between 23 and 34 developmentally disabled persons reside in Avalon. Table 3-32 breaks down the developmentally disabled population by residence type. Of these persons, the majority \(23\) live at home with a parent or guardian and fewer than 11 live independently. Most \(18\) are under the](#)

age of 18. The DDS/SCAG data indicates that data for developmentally disabled persons residing in zip code 90704 is unavailable. (Table 3-32).

According to DDS, the City of Avalon is served by the Harbor Regional Center, which provides services for persons with developmental disabilities in the Los Angeles County region.

TABLE 3-32: DEVELOPMENTALLY DISABLED PERSONS BY RESIDENCE TYPE (2018)

	Home of Parent/ Guardian	Independent/ Supported Living	Community Care Facility	Intermediate Care Facility	Foster/ Family Home	Other	TOTAL
Avalon*	23Unavaila ble	<11Unavailabl e	0Unavailabl e	0Unavailabl e	0Unavailable	0Unavailabl e	>230

*Data is for the Avalon zip code 90704

Sources: CA DDS, [Quarterly Consumer Report for the End of December 2021](#); SCAG 6th Cycle Data Package

Housing for Disabled Persons

Households with a disabled member will require a mixture of housing units with accessibility features, in-home care, or group care housing facilities. Some of these households will have a member with developmental disability and are expected to have special housing needs. Developmentally disabled persons may live with a family in a typical single family or multifamily home, but some developmentally disabled persons with more severe disabilities may have special housing needs that may include extended family homes, group homes, small and large residential care facilities, intermediate care, and skilled nursing facilities and affordable housing such as extremely low, very low, or low-income housing (both rental and ownership), Section 8/Housing Choice Vouchers, and single-room occupancy-type units.

In Avalon, multi-unit housing for persons with a disability would fall under the definition of congregate housing projects, which are permitted with a conditional use permit in the LD, MD, HD, and SC zones.

ACS 2014-2018 data indicates that for individuals between the ages of 5 and 64, approximately 2.7% of the total population of Avalon has an ambulatory difficulty, 0.9% have vision difficulty, 2.1% have a hearing difficulty, and 0.9% have a self-care difficulty. These types of disabilities may impede their ability to find suitable housing accommodations to meet their special needs. Therefore, many in these groups may be in need of housing assistance. Households containing physically handicapped persons may also need housing with universal design measures or special features to allow better physical mobility for occupants.

Large Family Households

Large family households are defined as households of five or more persons. Large family households are considered a special needs group because there is often a limited supply of adequately sized housing to accommodate their needs. The more persons in a household, the more rooms are needed to accommodate that household. Specifically, a five-person household would require three or four bedrooms, a six-person household would require four bedrooms, and a seven-person household would require four to six bedrooms.

In Avalon, 173 households, 11.6% of all households, have five or more persons as described in Table 3-18. Of the large households, 4.6% own their home and 95.4% rent. Typically, there are more owner-occupied large households that are cost burdened when compared to renter households and the population as a whole. However, the 2014-2018 ACS survey does not provide data regarding overpayment for large households. Table 3-33 compares the median income for households with five or more persons to the citywide median income for 2018. While the median income is slightly lower for five persons households (\$63,011 versus the citywide median of \$69,440), the median income is substantially higher for six person households.

TABLE 3-33: MEDIAN INCOME BY HOUSEHOLD SIZE (2018)

Size	Median Income
Five Person Households	\$63,011
Six Person Households	\$83,480
Seven or More Person Households	N/A
<i>Median Household Income (All Households)</i>	\$69,440

Source: US Census, 2014-2018 ACS

Large families can have a difficult time finding housing units large enough to meet their needs. In Avalon, there appears to be a sufficient amount of ownership housing available to provide units with enough bedrooms for larger households, but there is a shortage of adequately sized units for renter households with six or more persons. Table 3-34 identifies the number of large households by household size versus the number of large owner and rental units. Furthermore, while there are adequate units in Avalon to accommodate large owner and five-person renter households, it does not mean that there is a match between housing units that exist and large families. As described in Table 3-17, 16.3% of renter-occupied homes are overcrowded.

TABLE 3-34: HOUSEHOLD SIZE VERSUS BEDROOM SIZE BY TENURE (2018)

Tenure	3 BR Units	5 Person Households		4+ BR Units	6 Person and Larger Households	
		House-holds	Shortfall/ Excess		House-holds	Shortfall/ Excess
Owner	160	0	160	50	8	42
Renter	181	128	53	0	37	-37

Source: US Census, 2014-2018 ACS

Large households require housing units with more bedrooms than housing units needed by smaller households. In general, housing for these households should provide safe outdoor play areas for children and should be located to provide convenient access to schools and child care facilities. These types of needs can pose problems particularly for large families that cannot afford to buy or rent single-family houses. It is anticipated that approximately 16.3% of the regional housing needs allocation units will be needed to accommodate large households and an emphasis should be placed on ensuring rental units are available to large households.

Single Parent and Female-Headed Households

Single parent households are households with children under the age of 18 at home and include both male- and female-headed households. These households generally have a higher ratio between their income and their living expenses (that is, living expenses take up a larger share of income than is generally the case in two-parent households). Therefore, finding affordable, decent, and safe housing is often more difficult for single parent and female-headed households. Additionally, single parent and female-headed households have special needs involving access to daycare or childcare, health care, and other supportive services.

While the majority of households in Avalon are either two-spouse couples or single person households, 26.7% of family households are headed by a single male or single female. There are 68 male heads of household with no spouse present and 40 of these households have children under 18. There is a larger number of female householders with no spouse present - 198 households or 19.8% of family households - and 161 of these female-headed households have children under 18. Table 3-35 identifies single parent households by gender of the householder and presence of children.

TABLE 3-35: FAMILIES AND FEMALE HOUSEHOLDER WITH CHILDREN UNDER 18 (2018)

Category	Number	Percent
Total Families	998	100%
Male householder, no spouse present	68	6.8%
With children under 18	40	4.0%
Female householder, no spouse present	198	19.8%
With children under 18	161	16.1%

Source: US Census, 2014-2018 ACS

The median income of female-headed households (no spouse present) is \$35,648, significantly less than the median income of a male-headed, no spouse present family (\$84,797), and less than the median income of all households in the City (\$69,440). Approximately 13.1% of all households are under the poverty level; 47.1% of female-headed households with related children under 18 are under the poverty level.

As Avalon's population and households grow, there will be a continued need for supportive services for single parent households with children present. To address both the housing and supportive services needs of single parent households, additional multifamily housing should be developed that includes childcare facilities (allowing single parents to actively seek employment).

In addition, the creation of innovative housing for female-headed households could include co-housing developments where childcare and meal preparation responsibilities can be shared. The economies of scale available in this type of housing would be advantageous to this special needs group as well as all other low-income household groups. Limited equity cooperatives sponsored by non-profit housing developers are another financing structure that could be considered for the benefit of all special needs groups.

Farmworkers

Farmworkers traditionally are defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farmworkers work in the fields, processing plants, or support activities on a year-round basis. When workloads increase during harvest periods, the labor force is supplemented by seasonal or migrant labor. Farmworkers' special housing needs typically arise from their limited income and the unstable, seasonal nature of their employment, according to the California Institute for Rural Studies. Due to these factors, farmworker households have limited housing choices and are often forced to double-up to afford rents. However, the South Bay Area of Los Angeles County is a mostly developed urban/suburban region with a strong local economy that is not tied to an agricultural base, but rather to the manufacturing, technology, and service-oriented sectors.

According to the 2014-2018 ACS data, there were no Avalon residents employed in the "agriculture, forestry, fishing and hunting, and mining" industry in 2018. Avalon is an urbanized community with no parcels zoned for agricultural use. Because no residents are employed in agricultural occupations and there is little potential for this occupational category to expand within the City, the overall housing programs and policies to facilitate development of affordable housing can address the needs of Avalon residents employed in the agricultural occupations.

Homeless Persons

Government Code Section 65583(a)(7) requires that the Housing Element include an analysis of the needs of homeless persons and families. Homeless persons are defined as those who lack a fixed and adequate residence. People who are homeless may be chronically homeless (perhaps due to substance abuse or mental health issues) or situationally homeless (perhaps resulting from job loss or family strife). Homeless people face critical housing challenges due to their very low incomes and lack of appropriate housing. Thus, State law requires jurisdictions to plan to help meet the needs of their homeless populations.

The law also requires that each jurisdiction address community needs and available resources for special housing opportunities known as transitional and supportive housing. These housing types provide the opportunity for families and individuals to “transition” from a homeless condition to permanent housing, often with the assistance of supportive services to assist individuals in gaining necessary life skills in support of independent living.

Homeless Estimates

Counting the homeless population is problematic due to their transient nature; however, through the efforts of the Los Angeles Continuum of Care (LA CoC) estimates have been developed. The LA CoC is a consortium of individuals and organizations with the common purpose of developing and implementing a strategy to address homelessness in Los Angeles County. The LA CoC is responsible for managing U.S. Department of Housing and Urban Development (HUD) funds for homelessness, and is uniquely positioned to identify system needs and take steps to address them with the collaboration and partnership of community stakeholders. The Los Angeles Homeless Services Authority (LAHSA) is the lead agency for the LA CoC.

As the primary coordinating body for homeless issues and assistance for the entire County (excluding the cities of Glendale, Pasadena, and Long Beach), the LA CoC accomplishes a host of activities and programs vital to the County, including a biennial point-in-time “snapshot” survey to identify and assess the needs of both the sheltered and unsheltered homeless. Los Angeles CoC’s 2020 Homeless Count captures a picture of homelessness in Los Angeles County as it was in January 2020 and before the impacts of the COVID-19 pandemic could be felt, measured, or responded to through efforts such as Project RoomKey, rent freezes, and eviction moratoriums.

The 2020 Homeless Count identified 31.2 people in the City of Avalon experiencing homelessness, representing less than 0.1% of Los Angeles County’s total homeless count (66,436 individuals). As shown in Table 3-36, an estimated 28.2 (90.4%) of the 31.2 homeless individuals in Avalon were unsheltered and an estimated 3 (9.6%) were sheltered. Countywide, there has been an increase in the recorded homeless population since 2016, at least partly due to more accurate counting measures.

TABLE 3-36: HOMELESSNESS IN AVALON - 2018-2020

	Sheltered	Unsheltered	TOTAL
2020 Homeless Count	3.0	28.2	31.2
2019 Homeless Count	3.0	30.7	33.7
2018 Homeless Count	6.0	35.7	41.7
Change: 2018 to 2020	-3.0 / -50%	-7.5 / -21%	-10.5 / -25%

Source: Los Angeles Continuum of Care Homeless Count Data, 2018-2020

Although data [for Los Angeles County](#) is available regarding certain characteristics of the countywide homeless population, including data for subpopulations of the homeless (e.g., chronically homeless, severely mentally ill persons, persons with chronic substance abuse, and veterans), data is not available at the city-level. [As shown in Table 3-37, subpopulations of persons experiencing homelessness in Los Angeles County include the chronically homeless, severely mentally ill persons, persons with](#)

chronic substance abuse, and veterans. The largest subpopulations in Los Angeles County are chronically homeless (24,482 homeless), chronic substance abusers (15,203 homeless), and severely mentally ill (14,125 homeless), and veterans (3,681).

TABLE 3-37: HOMELESS POPULATION CHARACTERISTICS IN LOS ANGELES COUNTY (2020)

Characteristics	Sheltered	Unsheltered	Total
Chronically Homeless	2,425	22,057	24,482
Veterans	877	2,804	3,681
Chronic Substance Abuse	919	14,284	15,203
Mentally Ill	2,414	11,711	14,125
Household Type	Sheltered	Unsheltered	Total
Persons in households without children	3,635	1,359	4,994
Persons in households with at least one adult/one child	3,068	839	3,907
Unaccompanied Minors	25	44	69

Source: Greater Los Angeles Continuum of Care Survey, 2020.

Housing Accommodations

The City recently amended the Zoning Code to allow emergency shelters by right in the C and SC zones, subject to ministerial review and approval and compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4). The Housing Plan includes policies and programs directed to encourage the provision of housing and services for the homeless population as well as persons and households at risk of homelessness.

There are currently no emergency shelters operating in the City. However, Harbor Interfaith Services is the Lead Agency in LA CoC Service Provider Area (SPA) 8, which covers the South Bay and Harbor region. Harbor Interfaith Services operates two South Bay shelters for individuals and a separate family shelter. As well, St. Margaret's Center, located within the Lennox area of Los Angeles County, provides emergency and supportive services including hot lunches, case management, and food and hygiene supplies for the homeless and low-income families. St. Margaret's Center serves communities near LAX. It is not practical to assume that persons experiencing homelessness on the Island have access to these resources. As such, informal provides, specifically faith-based groups, serve the emergency needs for persons in Avalon experiencing homelessness.

Locally, the Catalina Bible Church and the Avalon Community Church provide emergency assistance for those in need. The Catalina Bible Church provides emergency shelter for up to two people for a maximum of two days. In emergency situations, all the churches on the Island allow homeless individuals to sleep on floors. The Catalina Bible Church also operates a Food Ministry, which provides a week of food (20 to 25 lbs) for at a low cost. The Avalon Community Church provides emergency food as well as emergency housing. The Avalon Community Church typically accommodates up to three persons each night on a couch or pull-out mattress at the Teen Center after the Center is closed for the day. There is no limit on the length of stay but individuals must leave in the morning. At this time, the Church only has capacity to accommodate men in need. The Church tries to find other arrangements for women in need.

The most recent inventory of resources available within Los Angeles County for emergency shelters, transitional housing, and permanent supportive housing units comes from the 2020 Housing Inventory reported to HUD by the Los Angeles CoC. [Table 3-38](#) shows the total beds offered by homeless facilities in the Los Angeles CoC area.

TABLE 3-383837: HOMELESS FACILITIES (2020)*

Facility Type	Los Angeles CoC Region			
	Family Units	Family Beds	Adult-Only Beds	Total Year-Round Beds
Emergency Shelter	2,861	8,650	6,069	14,719
Safe Haven	0	0	125	125
Transitional Housing	502	1,528	2,583	4,111
Permanent Supportive Housing	1,862	5,934	16,749	22,683
Rapid Re-Housing	1,236	4,372	1,673	6,045
Other Permanent Housing	260	752	1,278	2,030
TOTAL UNITS/BEDS	6,721	21,236	28,477	49,713

*Numbers are for the total Los Angeles Continuum of Care region for which Avalon is a participating member.

Source: HUD 2020 Continuum of Care Homeless Assistance Programs, Housing Inventory Count Report

- **Emergency Shelters** - An emergency shelter is defined as housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less. Furthermore, no individual or household may be denied emergency shelter because of an inability to pay.
- **Safe Haven** - A form of supportive housing that serves hard-to-reach homeless persons with severe mental illness who come primarily from the streets and have been unable or unwilling to participate in housing or supportive services.
- **Transitional Housing** - Sometimes referred to as “bridge” housing, provides housing accommodations and support services for persons and families, but restricts occupancy to no more than 24 months.
- **Permanent Supportive Housing** - Supportive housing has no limit on length of stay and is linked to onsite or offsite services that assist residents in retaining the housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.
- **Rapid Re-Housing** - Rapid re-housing provides short-term rental assistance and services. The goals are to help people obtain housing quickly, increase self-sufficiency, and stay housed.
- **Other Permanent Housing** - Consists of permanent housing with services (no disability required for entry) and permanent housing with housing only.

A network of local and regional service providers operates a number of programs to serve the needs of varied homeless subpopulations. [Table 3-39Table 3-39Table 3-38](#) provides a list of emergency and transitional shelters and available services for the homeless population in and around Avalon.

TABLE 3-393938: FACILITIES AND SERVICES FOR THE HOMELESS

Organization Name	Type of Service Provided	Homeless Population Served	Number of Beds
Catalina Bible Church	Emergency Assistance and Shelter	All	2
Avalon Community Church	Emergency Assistance and Shelter	Assistance for all Shelter for men	3

Assessment of Need

Based on the available information, there is a countywide homeless population of 66,436 persons but

only 49,713 beds, indicating an unmet demand for 16,723 homeless persons. It is noted that the 2020 Homeless Count identified 18,395 sheltered homeless persons and 48,041 unsheltered homeless persons (11 sheltered and 197 unsheltered for Avalon, respectively). The discrepancy between sheltered homeless persons and the County's total capacity to house homeless persons indicates a need for additional community services resources to assist and match the homeless population with the countywide shelter and housing resources.

3I. Units At-Risk of Conversion

Assisted Housing At Risk of Conversion

California housing element law requires jurisdictions to provide an analysis of low-income, assisted multifamily housing units that are eligible to change from low-income housing uses during the next ten years (2021-2031) due to termination of subsidy contracts, mortgage prepayment, or expiration of restrictions on use (Government Code 65583). These units risk the termination of various subsidy groups which could convert certain multifamily housing from affordable to market rate. State law requires housing elements to assess at-risk housing in order to project any potential loss of affordable housing.

TABLE 3-40: SUMMARY OF AT-RISK SUBSIDIZED HOUSING UNITS

Project/Address	No. & Type of Units	Type of Subsidy	Earliest Date of Conversion	Risk
Tremont Street Apartments 343 Tremont St	62 Family	HUD Section 8	2033	Low
Eucalyptus Hill Gardens 34 Banning Street	40 Family	LIHTC Housing Authority	55 years (2047)	Low
Bird Park 234 Bird Park Road	24 Family	USDA Section 515 LIHTC HOME Housing Authority	(2077)	Low
Beacon Hill 309 Beacon St	14 Senior	USDA Section 515 LIHTC HOME Housing Authority	(2077)	Low
238 Descanso Avenue	Single-Family home	Housing Authority	55 years 2051	Low
311 Descanso Avenue	Single-Family home	Housing Authority	55 years 2051	Low
336 Triana Lane	Single-Family home	CalHFA	45 years 2055	Low
338 Triana Lane	Single-Family home	CalHFA	45 years 2059	Low
342 Triana Lane	Single-Family home	CalHFA	45 years 2060	Low

Sources: California Housing Partnership, February 2021; SCAG 6th Cycle Data Package

Preservation Options

Depending on the circumstances of the at-risk projects, different options may be used to preserve or replace the units. The following discussion highlights ways that the City's at-risk units could be preserved as affordable housing. All of the presented alternatives are costly and beyond the ability of the City of Avalon to manage without large amounts of subsidy from federal and/or state resources. There are no units at-risk of conversion to market rate units in the next 10 years. The 62 affordable units at Tremont Street have an earliest date of conversion of 2033. The City will work with the property owner of Tremont Street Apartments during the planning period to proactively address this schedule.

Replacement Through New Construction

The construction of new lower income housing units is a means of replacing the at-risk units should they be converted to market rate. The cost of developing new housing depends on a variety of factors such as density, size of units, location and related land costs, and type of construction. Assuming an average development cost of \$400,000 per unit for multifamily rental housing, replacement of the 62 units (for example, Tremont Street Apartments) would require approximately \$24.8 million, excluding land costs, which vary depending upon location.

Purchase of Replacement Units

One preservation option is for a non-profit organization to purchase similar units. By purchasing similar units, a non-profit organization can secure lower-income restrictions and potentially enable the project to become eligible for a greater range of governmental assistance. The cost of purchasing similar units depends on a number of factors, including the market conditions at the time, occupancy rate, and physical conditions of the units to be acquired.

Current market value for the at-risk units is estimated on the basis of the units' potential annual income, and operating and maintenance expenses. There are no units at-risk of conversion and the market rate of units with conversion dates past 2031 is unknown.

Purchase of Affordability Covenants

Another option to preserve the affordability of at-risk projects is to provide an incentive package to the owners to maintain the projects as affordable housing. Incentives could include writing down the interest rate on the remaining loan balance, and/or supplementing the subsidy amount received to market levels.

To purchase the affordability covenant on these projects, an incentive package should include interest subsidies at or below what the property owners can obtain in the open market. To enhance the attractiveness of the incentive package, the interest subsidies may need to be combined with rent subsidies that supplement the HUD fair market rent levels.

Rental Assistance

Tenant-based rent subsidies could be used to preserve the affordability of housing. Similar to Housing Choice Vouchers, the City, through a variety of potential funding sources, could provide rent subsidies to very low-income households. The level of the subsidy required to preserve the at-risk units is estimated to equal the Fair Market Rent (FMR) for a unit minus the housing cost affordable by a very low-income household. There are no at-risk units in Avalon. Using Tremont Street Apartments as an example, approximately \$34,410 in rent subsidies would be required monthly (or \$412,920 annually). Assuming a 20-year affordability period, the total subsidy is about \$8.3 million.

3J. Estimates of Housing Need

Several factors influence the degree of demand, or “need,” for housing in Avalon. The major needs categories considered in this Element include:

- Housing needs resulting from the overcrowding of units
- Housing needs that result when households pay more than they can afford for housing
- Housing needs of “special needs groups” such as elderly, large families, female-headed households, households with a disabled person, farmworkers, and the homeless

State law requires that cities quantify existing housing need in their Housing Element. [Table 3-41](#) [Table 3-41](#) summarizes the findings.

TABLE 3-41: SUMMARY OF NEEDS

Summary of Households/Persons with Identified Housing Need	Percent of Total Population/Households
Households Overpaying for Housing:	
% of Renter Households Overpaying	32%
% of Owner Households Overpaying	21%
% of Extremely Low-income Households (0-30% AMI) Overpaying	87%
% of Very Low-income Households (0-30% AMI) Overpaying	35%
% of Low-income Households (0-30% AMI) Overpaying	21%
Overcrowded Households:	
Overcrowded Renter Households	16.3%
Overcrowded Owner Households	0%
All Overcrowded Households	11.6%
Special Needs Groups:	
Elderly Persons/Households	13.8% of pop. 18.4% of households
Disabled Persons	3.2% of pop.
Large Households	11.6% of households
Female-Headed Households	19.8% of households
Female-Headed Households with Children	16.1% of households
Farmworkers	0% of labor force
Homeless	31 persons (2020)
Affordable Housing Units At-Risk of Conversion to Market Rate Costs	0 units

Sources: US Census, 2014-2018 ACS; HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017

4. CONSTRAINTS

Constraints to housing development are defined as government measures or non-governmental conditions that limit the amount or timing of residential development.

Government regulations can constrain the supply of housing available in a community if the regulations limit the opportunities to develop housing, impose requirements that unnecessarily increase the cost to develop housing, or make the development process so arduous as to discourage housing developers. State law requires housing elements to contain an analysis of the governmental constraints on housing maintenance, improvement, and development (Government Code Section 65583(a)(4)).

Non-governmental constraints (required to be analyzed under Government Code Section 65583(a)(5)) may include land prices, construction costs, and financing. While local governments cannot control prices or costs, identification of these constraints can be helpful to Avalon in formulating housing programs.

4A. Governmental Constraints

Housing affordability is affected by factors in both the private and public sectors. Actions by the City can have an impact on the price and availability of housing in Avalon. Land use controls, site improvement requirements, building codes, fees, and other local programs intended to improve the overall quality of housing may also serve as a constraint to housing development. These governmental constraints can limit the operations of the public, private, and nonprofit sectors, making it difficult to meet the demand for affordable housing and limiting supply in a region. All City zoning regulations, development standards, specific plans, and fees are posted online and are available to the public, consistent with the requirements of AB 1483.

4B. Land Use Controls

Local land use policies and regulations impact the price and availability of housing, including affordable housing. This section discusses the General Plan land use designations and provisions in the Zoning Code relative to the types of housing allowed within Avalon as a potential governmental constraint.

General Plan

The General Plan Land Use Element establishes land use designations that specify the location, type, and intensity or density of permitted land uses in the City of Avalon. The Zoning Code (Title 9 of the Municipal Code) implements the General Plan by providing specific land use regulations and development standards for each zoning district. Table 4-1 shows General Plan residential land uses designations, the corresponding zoning designation(s), and permitted densities allowed for housing.

TABLE 4-1: GENERAL PLAN RESIDENTIAL LAND USE DESIGNATIONS

General Plan Designation	Description	Zone Symbol	Zoning Description
Low Density Residential (LD-R)	The LD-R designation accommodates detached single family detached housing.	LD	Low Density Residential and Low Intensity Recreation (Max. 10 du/ac)
Medium Density Residential (MD-R)	The MD-R designation accommodates detached single-family housing units and two dwelling units per lot or parcel.	MD	Multiple Residential, Medium Density (Max. 20 du/ac)
High Density Residential (HD-R)	The HD-R designation accommodates multi family dwelling units and single family dwelling units.	HD	Multiple Residential, High Density (Max. 40 du/ac)
High Density Residential – Community Housing (HD-R-CH)	The HD-R-CH designation accommodates only residential development, including multi family dwelling units and single family dwelling units.	HD	Multiple Residential, High Density (Max. 40 du/ac)
Commercial (C)	The C designation accommodates general retail and commercial services and offices.	C	Commercial
Special Commercial (SC)	The SC designation accommodates small scale residential uses, neighborhood retail and services, as well as structures which contain commercial uses on the ground floor and residential uses above. Appropriate uses include retail sales (excluding food and beverage), and personal and professional sales.	SC	Special Commercial
Resort Recreational High Density (RR-HD)	The RR-HD designation accommodates a variety of uses associated with the resort character of Avalon. Appropriate land uses include hotels, inns and lodges, as well as parks and mobile home parks.	R/R	Resort/Recreation
Resort Recreational Low Density (RR-LD)	The RR-LD designation accommodates a variety of uses associated with the resort character of Avalon and also accommodates single family housing units. Allowed uses include single family detached housing, hotels, inns and lodges, as well as parks and mobile home parks.	R/R	Resort/Recreation
Public (P)	The P designation is intended for areas vital to public services. Principal uses allowed include schools, hospitals, parks, libraries, parking lots and support housing.	P	Public

Sources: City of Avalon General Plan, 2013; City of Avalon Zoning Code, 2021

Local Coastal Plan

As an island community, the entire City falls within the coastal zone and is required to prepare a Local Coastal Program (LCP) in accordance with the California Coastal Act (Public Resources Code § 30000 et seq.). The City updated its Local Coastal Program (originally adopted and certified by the Coastal Commission in 1981 and subsequently updated in 1987) in 2013 as part of the General Plan update and has assumed coastal permit-issuing authority for most areas within the City. The Local Coastal Program does not yet include provisions for the upper Avalon Canyon area and the industrial Pebbly Beach area that the City annexed from Los Angeles County in 1998. The City is currently updating an amendment chapter to its Local Coastal Plan for adoption in March 2022.

Annual Growth Policy

Because the natural resources of Avalon have finite limits, which are not easily defined and may change from time to time (as is the case with water availability), the City limits construction activity in order to minimize significant impacts to the environment. The City established an Annual Growth Policy in 1979 which prohibits the approval of any development applications that propose the creation of additional housing units in November and December of any calendar year. The final two months of the year are reserved for the City Council, in conjunction with the Planning Commission, to review the growth permitted in the preceding ten months and review the effects and demands of such development and any additional development on the City's natural resources. After this period of review, the City Council will determine, by resolution, the amount and type of growth the City will permit in the succeeding year, as well as City priorities for growth. [Typical results of this annual policy include confirmation of water availability for the proposed project with Southern California Edison and limiting new development to:](#)

- [Residential repair or replacement, provided no additional bedrooms or dwelling units are added to existing residential structures other than inclusionary or density bonus units;](#)
- [Smaller \(five or fewer\) infill residential projects;](#)
- [Larger \(five or more\) residential tract developments that provide 20 percent of the units to year-round, non-transient, affordable housing;](#)
- [Infrastructure projects authorized by the City/Successor Agency;](#)
- [Projects which the Planning Commission determines will not have growth inducing effects; and](#)
- [Projects which are not infill in nature or involve existing residential or commercial structures but for which CEQA documents have been adopted and findings made that explain why the resulting growth is beneficial to the City and its residents.](#)

Given the limited housing construction in Avalon in recent years and limited capacity for additional housing, this policy has not and is not expected to constrain housing development in the City. The Growth Policy Resolution does not establish a limit on the number of units that can be constructed, but instead identifies the types of projects that will be permitted based on available resources.

Specific Plans

A specific plan is a comprehensive planning document that guides the development of a defined geographic area in a mix of uses including residential, commercial, industrial, schools, and parks and open space. Specific plans typically include more detailed information than the General Plan about land use, traffic circulation, development standards, affordable housing programs, resource management strategies, and a comprehensive infrastructure plan. Specific plans are also used as a means of achieving superior design by providing flexibility in development standards beyond those contained in the Zoning Code.

The General Plan identifies two potential future specific plans: the Pebbly Beach Specific Plan Overlay District (PB-SP) and the Lover's Cove-Specific Plan Overlay District (LC-SP). Neither specific plan has been adopted by City Council.

The PB-SP overlay identifies the Pebbly Beach area for eventual development of a specific plan. The area is currently utilized for light industrial purposes. In the near term, the area will continue to be used for industrial uses. However, if it is determined that such uses are no longer necessary or viable, a specific plan is to be developed to guide the possible eventual transition to other uses that take advantage of this area's coastal location. It is anticipated that new lands uses may include visitor-serving facilities such as a new public dock/ferry terminal, commercial retail, restaurants, hotels/motels, and/or recreational facilities that serve both residents and visitors.

The LC-SP overlay identifies the area above Lover's Cove and surrounding area for eventual development of a specific plan. This area is currently undeveloped. However, if development is anticipated in the future, a specific plan is to be developed to guide the possible eventual transition to other uses that take advantage of this area's views and proximity to visitor services. It is anticipated that the area may be utilized for visitor serving facilities such as a hotel, spa, or social and educational facility.

Zoning Code

Land use policies in the General Plan are implemented primarily through the Zoning Code. The Zoning Code provides for a range of densities and residential uses and is designed to protect and promote the health, safety, and general welfare of residents, which includes preserving the character and integrity of established residential neighborhoods. To that end, the City has established specific development standards that apply to residential construction in various districts. These may include, but are not limited to, density, lot coverage, building height, parking standards, and other applicable requirements.

Provisions for a Variety of Housing Types

State housing element law requires that jurisdictions facilitate and encourage a range of housing types for all economic segments of the community. This includes housing to meet the needs of different types of households with incomes ranging from low to above moderate. The Housing Element is the City's plan for achieving this objective.

As shown in Table 4-2, the City's Zoning Code accommodates a wide variety of conventional and special needs housing, including single-family dwellings, duplexes, multifamily, ADUs, manufactured housing, mobile home parks, residential care facilities (small and large), and transitional and supportive housing. Please note that the information contained in this table represents accurate information only at the time of the Housing Element's preparation; future amendments and modifications to the Zoning Code may change the information in this table. All interested parties should refer directly to the Zoning Code to ensure that the most accurate information is considered.

TABLE 4-2: PERMITTED RESIDENTIAL USES BY ZONE

Housing Type	Residential Zones				Commercial Zones			
	LD	MD	HD	L/M	C	SC	R/R	P
Conventional Housing								
Single-Family								
--Detached	P	P	P		--	CUP		
--Attached	CUP	CUP	P		--	CUP		
Two-Family Dwelling (Duplex)	--	P	--		--	--		
Multifamily	--	--	P		--	CUP		
Congregate Housing (Condominiums)	CUP	CUP	CUP		--	CUP	--	
Accessory Dwelling Unit (ADU)	P	P	P					
Mobile/Manufactured Housing	P	P	P		--	CUP	--	
Mobile Home Park	--	--	--	P	--	--	P	
Rooming House (includes Employee Housing)								
--Fewer than 4 units			CUP		P	CUP	P	CUP
--4 or more units	--	--	CUP		CUP	CUP	CUP	CUP
Mixed-Use Residential	--	--	--	--	CUP	--	--	CUP
Special Needs Housing								
Emergency Shelter	--	--	--	--	ESP	ESP	--	CUP
Single Room Occupancy (SRO)	--	--	CUP	CUP	--	CUP		

Source: City of Avalon Zoning Code, 2021

Notes: "P" = Permitted; "CUP" = Conditional Use Permit; "ESP" = Emergency Shelter Permit; and "--" = Not Permitted

1. Sanitariums, convalescent homes, and nursing homes allowed with a CUP.

Single-Family: Detached single-family dwellings and subdivisions are permitted by right within the LD, MD, and HD zones. Attached single-family dwellings, which are units that are attached horizontally or vertically, are allowed within the HD zones by right and in the LD, MD, and SC zones subject to a Conditional Use Permit (CUP). Single-family redevelopment projects that meet certain criteria are subject to a ministerial review. Single-family projects that are more complex, such as those proposing a major subdivision, are reviewed by the Planning Commission.

Two-Family Dwelling Unit (Duplex): A duplex is generally defined as a two-unit housing structure with separate entrances for each unit. Duplexes are allowed within the MD zone and are reviewed by the Planning Commission.

Multifamily: Multifamily developments are permitted in the HD zone by right. Multifamily projects are reviewed by the Planning Commission. In the SC zone, multifamily uses are permitted with approval of a CUP.

Accessory Dwelling Unit (ADU): Government Code Section 65852.2(a)(1) allows local agencies to designate areas within a city where accessory dwelling units (ADU) may be permitted and to impose development standards addressing issues such as unit size, height, setbacks, lot coverage, parking, landscaping, and architectural review. The City recently (2021) updated Chapter 9-5, Article 6 of its Municipal Code to be consistent with California Government Code Sections 65852.150 and 65852.2, which establish regulations for accessory dwelling units.

Avalon Municipal Code (AMC) Section 9-5.603 was amended to define an accessory dwelling unit as “an attached or a detached residential dwelling unit that provides complete independent living facilities for one or more persons and is located on a lot with a proposed or existing primary residence.” It also includes: an efficiency unit, as defined by § 17958.1 of the California Health and Safety Code; and a manufactured home, as defined by § 18007 of the California Health and Safety Code.

Construction of an ADU or JADU (junior accessory dwelling unit) is permitted on a lot in a residential or mixed-use zone that allows residential uses and includes a proposed or existing dwelling. A building permit is required for an ADU and JADU pursuant to compliance with the minimum requirements described below and in AMC Sections 9-5.604 - 9-5.606. Construction of ADUs shall be permitted on any residential or mixed-use zone that allows residential units, subject to the following criteria, which include (but are not limited to):

- Sites developed or proposed to be developed with a single-family residence shall not be permitted more than one ADU.
- Sites developed with a multifamily building may convert existing non-habitable square footage within the building to a minimum one ADU and a maximum that shall not exceed twenty-five percent of the number of units on the site. Sites developed with a multifamily building are also permitted to construct two ADUs or to convert detached accessory buildings, garages, carports, or covered parking structures to a maximum of two ADUs.
- A maximum of one JADU shall be permitted on a site developed or proposed to be developed with a single-family residence, unless the subject site proposes or contains an attached ADU. In such cases, a JADU shall not be permitted.

The approval process is ministerial in nature, and the City must approve or deny an application for a building permit to construct an ADU or JADU within 60 days after receiving a complete application. If a complete application for a building permit to construct an ADU or JADU is submitted in connection with an application to construct a new primary dwelling on a lot, the application may not be approved until the application is approved for the new dwelling. The application for the ADU or JADU must be processed ministerially regardless of the approvals required for the primary dwelling.

The City has included Program 14 to review its current ADU ordinance for compliance with State requirements and will work with the State to identify any necessary revisions to comply with State law.

Further, the ordinance sets forth the following development standards for ADUs:

TABLE 4-3: ADU AND JADU DEVELOPMENT STANDARDS

Specific Regulations	ADU		JADU	Additional Provisions
	Attached	Detached		
Minimum Size	220 sf	220 sf	220 sf	
Maximum Size	1,000 sf	1,000 sf	500 sf	(1) (2) (3)
Maximum Height	16 ft	16 ft	Same as primary building	
Minimum Side Yard Setback	4 ft	4 ft	Same as primary building	(4)
Minimum Rear Yard Setback	4 ft	4 ft	Same as primary building	(4)
Maximum Lot Coverage/Use Intensity	Same as zoning district	Same as zoning district	Same as zoning district	(5)
Minimum parking	1 space	1 space	-	(6)(7)(8)
Tandem Parking	Permitted	Permitted	Permitted	

Source: City of Avalon Zoning Code, 2021

1. The maximum size of a detached or attached ADU is 850 square feet for a studio or one-bedroom unit and 1,000 square feet for a unit with two bedrooms. An attached ADU that is created on a lot with an existing primary dwelling is further limited to 50% of the floor area of the existing primary dwelling. Application of other development standards, such as FAR or lot coverage, might further limit the size of the ADU, but no application of FAR, lot coverage, or open-space requirements may require the ADU to be less than 800 square feet.
2. Existing accessory structures may be converted into an ADU and may be expanded by up to 150 square feet of the existing footprint to accommodate ingress and egress only.
3. A junior accessory dwelling unit shall be constructed within the existing space of the proposed or existing single-family dwelling or accessory structure, however, an expansion of not more than 150 square feet beyond the same physical dimensions of the existing space of a single-family dwelling shall be permitted for purposes of accommodating ingress and egress.
4. No setback is required to construct an accessory dwelling unit within an existing structure that is converted to an accessory dwelling unit or a new structure constructed in the same location and the same dimension as an existing structure.
5. No ADU may cause the total FAR of the lot to exceed 45% or cause the total lot coverage of the lot to exceed 50%, except when this may require the ADU to be less than 800 square feet.
6. No parking for the ADU is required if one or more of the following applies:
 - a. The ADU is located within ½ mile walking distance of public transit.
 - b. The ADU is located within an architecturally and historically significant historic district.
 - c. The ADU is part of the proposed or existing primary residence or an accessory structure.
 - d. When on-street parking permits are required but not offered to the occupant of the ADU.
 - e. When there is a car share vehicle located within one block of the ADU.
7. When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an accessory dwelling unit or converted to an accessory dwelling unit, the city shall not require the replacement of off-street parking spaces.
8. The parking space may be provided in setback areas or as tandem parking.

Manufactured Housing: State law requires that manufactured housing, when constructed as a single-family dwelling on a permanent foundation, be treated as a conventional single-family home subject to the same development standards as a single-family residential dwelling on the same lot would require, except for architectural requirements limited to its roof overhang, roofing material, and siding material.

Manufactured homes may be placed on individual lots that allow single-family residential uses provided that the homes are attached to a foundation system in compliance with all applicable building regulations and Section 18551 of the Health and Safety Code and occupied only as a residential use. Manufactured homes are subject to all Zoning Code provisions applicable to residential structures.

Mobile Home Park: Mobile home parks, including manufactured home parks, that conform to the State Mobile Home Parks Act (Division 13, Part 2.1 of the California Health and Safety Code, commencing with Section 18200) or the implementing State guidelines (Title 25, Division I, Chapter 2 of the California Code of Regulations) and Section 18300 of the Health and Safety Code, are allowed in the L/M and R/R zones by right.

Rooming House (includes Employee Housing): Rooming houses include a lodging house or other building where sleeping or rooming accommodations are furnished to the public, whether with or without meals. This would include hotels, motels, and boarding houses, as well as employee housing as provided in Chapter 9-11 of the Zoning Code. Does not include rest homes or convalescent homes. Rooming houses with fewer than four units are allowed in the C and R/R zones by right and in the HD, SC, and P zones with a CUP. Rooming houses with four or more units are permitted in the HD, C, SC, R/R and P zones with a CUP.

Rest Homes: Rest homes provide housing or lodging to convalescents, invalids, or aged persons, but does not include surgery or the care of persons with contagious or communicable diseases. This includes convalescent home and home for the aged. In Avalon, rest homes are addressed under the definition of congregate housing project, which includes a residential condominium, community apartment house, or stock cooperative project, as the case may be.

Emergency Shelter: Emergency shelters are allowed in the commercial zones (C and SC) subject to ministerial review and approval and compliance with objective standards consistent with the requirements identified in Government Code Section 65583(a)(4). [The City's Zoning Code does not identify additional requirements or development standards for emergency shelters.](#)

[There are currently no emergency shelters located within Avalon. No emergency shelters are currently located within Avalon.](#) While all of the City's commercial parcels are developed (consistent with all other areas of the City), there are vacancies within existing buildings, allowing for potential adaptive reuse of existing space. [The City has identified four underutilized sites with C zoning \(totaling 3.07 acres\) and one underutilized site with SC zoning \(totaling 0.11 acres\) that are in developed areas and are suitable for emergency shelters. Water, sewer, and utilities are available in the roadways adjacent to these parcels. Assuming a gross floor area of 125 square feet per bed, all five of the sites identified, totaling 3.18 acres, would be adequate to accommodate the 32 emergency shelter beds needed to serve Avalon's unhoused population, based on the Los Angeles CoC's 2020 Homeless Count. These parcels are infill sites in developed areas and are suitable for emergency shelters. Water, sewer, and utilities are available in the roadways adjacent to these parcels.](#)

The C and SC zones are suitable for emergency shelters because:

- Shelters are compatible with a range of uses that are common in suburban communities and allowed in the commercial zones (e.g., grocery stores, medical clinics, office buildings, public buildings, etc.);
- The C and SC zones are located along major corridors with easy access to public transit;
- There is a mixture of existing uses in the commercial zones that include retail, office uses, public facilities, light industrial; and
- Although hazardous materials may be present and used on some of the properties within the C and SC zones, the majority of parcels are not known to be constrained by the presence of hazardous materials.

Low Barrier Navigation Center: A low barrier navigation center is a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. AB 2162 requires jurisdictions to further streamline approval of eligible low barrier navigation center applications in areas zoned for mixed-use and residential zones permitting multifamily uses, subject to specific criteria. The City's Zoning Code does not conform to these recent requirements; however, Program 187 in the Housing Plan requires the Zoning Code to be

updated to address AB 2162.

Transitional and Supportive Housing: Transitional housing is a type of housing used to facilitate the movement of homeless individuals and families to permanent housing. Transitional housing can take several forms, including group quarters with beds, single-family homes, and multifamily apartments and typically offers case management and support services to return people to independent living (usually between 6-24 months). The Zoning Code currently does not address transitional housing. Program 187 will update the Zoning Code to allow transitional housing consistent with Government Code Section 65582(j).

According to the National Housing Institute, supportive housing is permanent housing with a service component, which can be provided either on-site or off-site. The Zoning Code does not currently address supportive housing. Program 47-18 will update the Zoning Code to allow supportive housing consistent with Government Code Section 65582(g).

Senate Bill 2 provides that transitional housing and supportive housing that is a rental housing development constitutes a residential use. It requires zoning to treat such uses as a residential use and subject only to those restrictions that apply to other residential uses of the same type in the same zone. The Zoning Code does not currently allow transitional and supportive housing as a residential use. Program 187 will update the Zoning Code to allow transitional and supportive as a residential use, subject to the same permitting process and development standards as other residential uses in the residential and mixed-use zones.

Single-Room Occupancy (SRO): Single-room occupancy (SRO) facilities are a housing type that is considered suitable to meet the needs of extremely low, very low, and low-income households. With high housing costs, many communities in California are exploring the use of single-room occupancy housing to fulfill the affordable housing needs of certain segments of the community, such as seniors, students, and single workers. The Avalon Zoning Code defines SRO facilities as providing six or more dwelling units where each unit has a minimum floor area of 190 square feet and are operated on a monthly basis or longer. SROs are permitted in the HD, L/M, and SC zones subject to a CUP.

Housing for Disabled Persons: On January 1, 2002, SB 520 became effective and required local jurisdictions to analyze local government constraints on developing, maintaining, and improving housing for persons with disabilities. In accordance with SB 520 and Government Code 65583(a)(7), the City recognizes the importance of providing housing for persons with disabilities. Persons with disabilities have a number of specific housing needs, including those related to design and location. Design needs generally include the removal of architectural barriers that limit the accessibility of dwelling units and construction of wheelchair ramps, railings, etc. Location needs include accessibility to public transportation, commercial services, health care, and supportive services. Some persons with disabilities need group housing opportunities, especially those who are lower-income or homeless. The following discussion addresses these issues and determines that no specific City policy or regulation serves to impede the access that persons with disabilities have to housing that suits their specific needs.

Zoning and Land Use: The General Plan and Zoning Code provide for the development of multifamily housing in the HD zone by right. Traditional multifamily housing for persons with special needs, such as apartments for the disabled, are considered regular residential uses permitted in these zones. The City's land use policies and zoning provisions do not constrain the development of such housing.

Under the Lanterman Developmental Disabilities Services Act (Lanterman Act), small State-licensed residential care facilities for six or fewer persons must be permitted in all zones that allow single or multifamily uses, subject to the same permit processing requirements and development standards. The City of Avalon's Zoning Code currently does not comply with the Lanterman Act. Program 187 will update the Zoning Code to address residential care facilities and allow occupancy standards for residential care facilities are the same as occupancy standards for all other residential uses. The Zoning Code will also accommodate transitional and supportive housing in all residential zoning and mixed-use zoning districts and subject only to the same requirements for residential uses of the same type (e.g., single-family or multifamily) in the same zone. These facilities may serve persons with disabilities.

Building Code: Building construction and procedures within Avalon are required to conform to the 2019 California Building Code, as adopted in Title 8 of the City's Municipal Code. Standards within the Building Code include provisions to ensure accessibility for persons with disabilities. These standards are consistent with the Americans with Disabilities Act (ADA). No local amendments that would constrain accessibility or increase the cost of housing for persons with disabilities have been adopted and City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

Reasonable Accommodation: Both the federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a particular modification is reasonable depends on the circumstances and must be decided on a case-by-case basis.

Reasonable accommodation refers to flexibility in standards and policies to accommodate the needs of persons with disabilities. The City's zoning and building codes, as well as approach to code enforcement, allow for special provisions that meet the needs of persons with disabilities without the need for variances. The City's Reasonable Accommodation Ordinance is codified in Chapter 1-8 of the Municipal Code.

The City's ADA Coordinator has administrative/ministerial authority to hear and decide applications for reasonable accommodation to allow reasonable remedy from zoning and other land use regulations, policies, and procedures for individuals with physical or mental impairment. A request for reasonable accommodation may include a modification or exception to the rules, standards, and practices for the siting, development, and use of housing or housing-related facilities that would eliminate regulatory barriers and provide a person with a disability equal opportunity to housing of their choice.

Reasonable accommodation applications are not charged a fee for review and the reviewing authority must consider all of the following factors:

1. Whether the request for accommodation is reasonable and necessary to afford the applicant with equal opportunities as citizens who are not disabled;
2. Whether there are preferable and feasible alternatives to the requested accommodation that may provide an equivalent level of benefit;
3. The physical attributes of any proposed changes to properties and structures;
4. Whether the requested accommodation will require a fundamental alteration of the City's rules, regulations, policies, practices, or procedures;
5. Whether the requested accommodation will result in an undue financial or administrative burden to the City;
6. If zoning related, whether the requested accommodation would result in a detriment to the character of the neighborhood;
7. Whether the requested accommodation, under the specific circumstances, will result in a direct and significant threat to the health or safety of other individuals or property; and
8. Any other factors that may have bearing on the request.

Conclusion: Current planning policies and zoning regulations have mitigated potential constraints to the availability of housing for persons with disabilities. The City has analyzed its Zoning Code and procedures to ensure that it is providing flexibility in, and not constraining the development of, housing for persons with disabilities. Additionally, the City's definition of "family" includes "any group of persons not related by blood, marriage or adoption but inhabiting a dwelling unit," thereby providing maximum flexibility for persons with disabilities. The City has concluded that Findings 6 and 8 above could be considered a constraint to housing for persons with disabilities, although no reasonable accommodation request has been denied based on these findings. The City has included Program 17 to evaluate its reasonable accommodation findings to improve approval certainty.

Development Standards

Development standards directly shape the form and intensity of residential development by providing controls over land use, heights and volumes of buildings, open space on a site, etc. Site development standards also ensure a quality living environment for all household groups in the City, including special groups such as lower and moderate-income households and senior citizens. Table 4-4 summarizes development standards in the residential zones (LD, MD, HD, and L/M), including density, minimum lot size, setbacks, lot coverage, and building height, by zoning district. It is the City's intent to provide maximum development flexibility in the L/M zone to stimulate development of affordable units; to this end, the City finds that the lack of fixed development standards in the L/M zone does not present a constraint to development, but rather allows the development of affordable housing in such a way as to maximize unique site constraints to result in the maximum development capacity of the sites.

TABLE 4-4: BASIC RESIDENTIAL DEVELOPMENT STANDARDS

Development Standard		LD	MD	HD ²	L/M
Density Maximum (units per acre)		10 ¹	20	40	40
Minimum Lot Area (square feet)		4,400 ³ (single-family detached) N/A ⁴ (single-family attached)	4,400	2,200	None
Minimum Lot Width		50 feet		25 feet	None
Maximum Lot Coverage (% of gross lot area)		40%	50%	80% (Hillside and steep lots 70%)	None specified
FAR	<14° average slope	1-2 story 80%; 3 story 120%.	1-2 story 100%; 3 story 150%	1-2 story 130%; 3 story 180%	None specified
	Hillside and steep lots		1-2 story 70%; 3 story 120%	1-2 story 100%; 3 story 150%	
Setbacks (feet)		10 all sides	10 all sides	3-5 all sides	10
Maximum Dwelling Height		For lots with <14° average slope: 28 feet and two stories. For hillside lots: 14 feet above the upper lot line and 32 feet on any part of the lot's natural surface, and three stories. For steep hillside lots: 14 feet above the upper lot line and 40 feet above any part of the lot's natural surface. Number of stories determined by the applicable Building Code requirements.			(5)

Sources: City of Avalon Zoning Code, 2021; City of Avalon Design Guide for Highest Density Residential and Mixed Use Development, 2012

1. Maximum permitted density:

- a. Ten dwelling units per acre for slopes under 30°.
- b. Five dwelling units per acre for slopes from 30° to 50°.
- c. One dwelling unit per acre for slopes 50° or more.
- d. Clustered developments up to 10 dwelling units per acre for slopes under 30°.
- e. Density transfer can be permitted to a maximum density of 20 units per acre under a conditional use permit provided it does not exceed overall density of 10 units per acre.

2. Does not include premises in the HD zone located in the area bordered by Clemente Avenue northwest of Third Street to Tremont Street, Sumner Avenue northwest of Beacon and Tremont Street (southwest side only)

3. Minimum lots shall be multiplied by two for lots with slopes of 30° to 50°, and by 10 for lots with slopes of more than 50°.

4. No minimum, however, no more than 30 residential building lots per acre will be allowed, provided that overall project density does not exceed 10 dwelling units per acre for slopes under 30°.

5. Maximum permitted heights as follows:

a. For lots of 10° average slope or less: No portion of the building may exceed a height greater than 28 feet above the lot's natural surface and shall not be more than two stories;

b. For lots of 20° or greater: No portion of the building may exceed a height greater than 14 feet above the upper lot line and 40 feet on any part of the lot's natural surface;

c. For lots of 11° to and including 19° average slope: measurement of the applicable height envelope may be pursuant to (a) or (b).

Residential Parking Requirements

Parking standards are an important development regulation in communities. The City's parking requirements are intended to ensure that adequate off-street parking and loading facilities are provided in proportion to the need created by the type of use. Adequate parking for residential projects contributes to the value of a project, the safety of residents, and the quality of a project's appearance. However, excessive parking standards can pose a significant constraint to the development of housing because they can reduce the buildable area on a site and impact the funding available for project amenities or additional units.

TABLE 4-5: RESIDENTIAL PARKING REQUIREMENTS

Use	Requirement	Additional Regulations
Residential Uses	1 space per unit	--
HD Zone Designated Area	1 autoette space	1 autoette space is required if the development proposal consists of the addition of square footage equal to 50% or more of the square footage of the existing or previously existing structure
L/M Zone	To be determined by the Commission	--
Accessory Dwelling Unit	1 space per ADU¹ - No spaces required for JADU	No parking is required if ADU is: - Located within 0.5 mile walking distance of public transit - Located within an architecturally and historically significant historic district - Part of the proposed or existing primary residence or an accessory structure - When on-street parking permits are required but not offered to the occupant of the ADU - When there is a car share vehicle located within one block of the ADU
Emergency Shelter	1 off street parking space for employee parking	--
SRO	To be determined by the Commission	--

Sources: City of Avalon Zoning Code, 2021.

1. When a garage, carport, or covered parking structure is demolished in conjunction with the construction of an ADU or converted to an ADU, those off-street parking spaces are not required to be replaced.

The City has not received any meaningful feedback to suggest that the City's parking standards are a constraint on residential development of any type. The flexibility of parking standards in the L/M zone allows the City to work with affordable housing developers to ensure that parking is not a constraint to the development or cost of housing. The City has provisions to waive or reduce the parking requirements for projects that include affordable housing units, and also allows for parking reductions for senior housing developments. A parking reduction is also available through the CUP process for housing for persons with disabilities. Moreover, affordable housing developments that are eligible for a density bonus pursuant to Government Code Section 65915-65918 are eligible to use parking standards established by State Density Bonus law. The City continues to monitor parking requirements and provide flexibility, such as parking reductions for affordable housing projects, as needed.

On/Off Site Improvements

There are no subdivision level improvement requirements, such as minimum street widths, within the City. Since most residential development in the City occurs as infill, streets, sidewalks and curbs are typically already in place. Additionally, subdivisions are uncommon in Avalon due to the lack of privately owned land and smaller lot sizes. Therefore, on- and off-site improvements do not impact housing supply and affordability.

Consideration of Land Use Controls as Potential Constraint

As discussed throughout this section, the City has specifically considered the impact of its local land use controls on housing supply, costs, timing, and the ability to achieve maximum densities. The vast majority of development in the City happens in coordination with the Santa Catalina Island Company's Master Plan, which sets the stage for development of housing for lower- and moderate-income households. The City has found that the land use direction provided does not constraint housing supply, affordability, the time of a project's review/approval, or a developer's ability to achieve maximum densities. As discussed in the Resource section, the limited number of projects developed over the past two planning periods (Bird Park Apartments and Tremont Apartments, the City has seen development occur at the maximum (or above maximum) densities allowed. There have been no requests for projects to develop at densities below the maximum allowed. As discussed throughout the Housing Element, the most significant constraint to the development of additional housing is limited water availability.

4C. Development Review Process

The time and cost of permit processing and project review can be a constraint to housing development if significant development review is required. Project review and permit processing are necessary steps to ensure that residential construction complies with applicable codes and standards. The time required for project approval is often not so much a factor of the approval body (Director versus Planning Commission), but the complexity of the project and associated environmental review. Occasionally, small projects can be approved administratively and are generally less complex and take a shorter time to obtain appropriate approvals. However, even some smaller infill projects, as well as large and more complex projects subject to the California Environmental Quality Act (CEQA), require a public hearing before the Planning Commission. This is in part due to Coastal Development Permit requirements, which the City must comply with.

The City reviews all applications for development prior to issuance of building permits to ensure the construction of projects that contribute in a positive manner to the community and improve quality of life. Residential development projects typically undergo several types of approvals - ministerial, discretionary actions, and legislative actions. This section outlines the timeline for typical residential development review and describes the permitting requirements and procedures for Design Review, Conditional Use Permits (CUP), Subdivision Maps, etc. Based on the development activity during the 5th Cycle RHNA period, the City's processing and permitting procedures do not appear to unduly constrain the development of housing.

Timeframes

Processing times for applications in Avalon vary based upon the scope and type of project. The amount of time involved in processing applications depends on the type of project, the applicant's compliance with City ordinances, and the completeness of the applications. Certain types of applications/permits are discretionary and require a public hearing, while others are processed administratively. Through administrative approval, the applicant bypasses the public hearing requirement and shortens the processing time.

Some projects may take an extended period for final approval. However, these projects generally have significant environmental impacts, involve General Plan or specific plan amendments, rezoning, or need additional community workshops. Developers may be responsible for delays by failing to provide information or requesting continuances. Permit approval under these circumstances requires more time for public notice, public hearings, and negotiation of design modifications to resolve problems.

On average, the typical processing time for a single-family home ranges from 30-60 days, which assumes plan check and building permits with no additional entitlements required. These residential projects tend not to create substantial environmental impacts, thereby greatly reducing the time needed for review. The typical processing time for a multifamily project is 3-6 months, which assumes that additional entitlements are required, a moderate level of environmental analysis is necessary, and public hearings with the Planning Commission and/or City Council will occur.

Table 4-6 outlines the typical permit processing times and associated reviewing body by the type of approval or permit. It should be noted that many projects require multiple entitlements, which are often processed concurrently, thereby shortening the overall processing time. The City has established a list of standard permits that apply to residential development projects ranging from building permits to use permits.

TABLE 4-6: TYPICAL PERMIT PROCESSING TIMES AND REVIEWING BODY

Type of Approval or Permit	Review Authority				Processing Times
	Director	PC	CC	Public Hearing	
Site Plan Review (minor)	D	A	A	Appeals Only	30-60 days
Site Plan Review (major)	R	D	A	Yes	3-6 months
Coastal Development Permit	R	D	A	Yes	3-6 months
Conditional Use Permit	R	D	A	Yes	3-6 months
Variance	R	D	A	Yes	3-6 months
Zoning Amendment or Zone Change	R	R	D	Yes	6-12 months
General Plan Amendment	R	R	D	Yes	6-12 months
Tentative Map/Parcel Map	R	D	A	Yes	3-6 months
Reasonable Accommodation	D	A	A	Appeals Only	30-45 days

Source: City of Avalon, 2021

D = Deciding body whose decision is final unless appealed

R = Advisory body required to make recommendations

A = Appeal authority (Coastal Commission has appeal authority over projects within 300 ft of the shoreline)

Site Plan Review

If the project involves a minor renovation, such as a site plan review only, as would be the case for one single-family redevelopment project, the Director of Planning reviews and approves the application to ensure compatibility with the City's development standards, previously approved plans, and all criteria applicable to the proposed use. This is a ministerial action. All other projects requiring site plan review are reviewed for conformance with the Zoning Ordinance by the Planning Commission. Typically, the project is considered by the Planning Commission at one meeting. In order to approve a Site Plan Review, the Avalon Municipal Code requires that the Planning Commission make the three (3) findings under Avalon Municipal Code Section 9-8.203. These findings and corresponding explanations of the project's compliance with these findings are as follows:

- 1) Every use, development of land and application of development standards shall take place in compliance with all applicable provisions of this title.

As proposed, the project is an allowed use in the High-Density - Residential zone and complies with all applicable development standards.

- 2) Every use, development of land, and application of the development standards shall be considered on the basis of the suitability of the site for the particular use or development intended, and the total development, including the application of prescribed development standards, shall be so arranged as to avoid traffic congestion, insure the protection of public health, safety and general welfare, prevent adverse effects on neighboring property and shall be in general accord with the elements of the General Plan.

The site is suitable for the proposed use and contemplated remodel, and the use is consistent with existing and intended land use of the High-Density - Residential zone, as set forth in the General Plan.

- 3) Every use, development of land, application of development standards shall be considered on the basis of suitable and functional development design, but is not intended that such approval be interpreted to require a particular style or type or architecture.

The design of the proposed remodel is suitable for a residential structure. The project's description is to remodel and construct interior and exterior additions within the existing footprint of a single family dwelling.

Coastal Development Permit

Coastal Development Procedures are established to ensure that all public and private development in the City of Avalon is consistent with the City's certified Local Coastal Program. Coastal development permits are required for any development on tidelands or submerged lands, or public trust lands which require a permit from the Coastal Commission. The entire City of Avalon is within this zone. The issuance of a coastal development permit requires a public hearing.

Avalon has obtained authority from the Coastal Commission to locally issue Coastal Development Permits for most areas within the City, significantly reducing the time associated with multiple hearings before the Coastal Commission. As a result, residential projects typically can receive all the necessary approvals within three months.

Conditional Use Permit (CUP)

Title 9, Article 4 of the Zoning Code regulates the issuance of Conditional Use Permits (CUP). Land uses that require a CUP generally have a unique and distinct impact on the area in which they are located or are capable of impacts to adjacent properties unless given special review and conditions. The following residential uses require a CUP:

- Detached single-family in SC zone;
- Attached single-family in LD, MD, and SC zones;
- Congregate Housing in LD, MD, HD, and SC zones;
- Multifamily in SC zone;
- Mobile/manufactured home in SC zone;
- Rooming House with fewer than four units in HD, SC, and P zones;
- Rooming House with four or more units in HD, C, SC, R/R, and P zones;
- Mixed-use residential in C and P zones; and
- Single Room Occupancy (SRO) in HD, L/M, and SC zones.

The Planning Commission may approve, conditionally approve, or deny a CUP application unless the application includes concurrent processing of a permit that requires City Council action, in which case the Planning Commission makes a recommendation to the City Council. The approving body must make the following findings prior to approval, pursuant to Section 9-8.404 of the Zoning Code:

1. The proposed conditional use shall conform with and carry out the certified Land Use Plan for the area;
2. The nature, condition, and development of adjacent uses, buildings and structures shall be considered and no proposed conditional use shall be permitted where such use will adversely affect or be materially detrimental to said adjacent uses, buildings and structures;
3. The site for a proposed conditional use shall be adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this chapter or as required as a condition in order to integrate said use with the uses in the neighborhood;

4. The site for a proposed conditional use shall be served by highways and streets adequate in width and improved as necessary to carry the kind and quantity of traffic such use would generate; and
5. The proposed conditional use shall be consistent with and carry out the purpose and intent of the underlying zone.

These findings apply to all uses that require a CUP; no special or unique findings are required for residential uses.

Subdivisions

This review process applies to all residential land divisions within the City. Chapter 9-2 of the Zoning Code includes the standards and processes for subdivisions. It is based primarily on the State Subdivision Map Act. As it relates to residential development, the regulations apply to all land divisions that create lots for single-family homes and lots, or condominiums, for multifamily development. As part of the review process for subdivisions, the City reviews applications for compliance with lot size and shape standards, the general layout of the subdivision, and infrastructure requirements. If the project complies with the subdivision standards and General Plan density, the project can proceed through the approval process.

Reasonable Accommodation

The City's process for providing reasonable accommodation allows individuals, or their representatives, to make requests for reasonable accommodations for persons with disabilities as part of the permit process. No additional permits are required or additional fees charged by the City. Requests for reasonable accommodation to meet the needs of persons with disabilities are approved administratively, and a use permit is not required. City staff is available to provide assistance regarding the processing of requests for the construction of accessory structures intended to accommodate persons with disabilities. Information regarding the approval of these structures is included within all public notices and agendas, as applicable. Avalon's reasonable accommodation procedure complies with Housing Element law and provides an accessible way for disabled residents to make necessary changes to their properties.

Impact of Processing and Permit Procedures on Housing Supply and Affordability

The City has considered the totality of its processing and permit procedures and has concluded that they do not represent a significant constraint to housing supply or affordability. The City works proactively with applicants to encourage submittal of a complete application. Issues with project applications that cause significant delays are typically outside of the City's control (i.e., a change in the development plan, changes in materials or architectural styles, changes to request for concessions, etc.). The City will continue to work with developers of all housing products to ensure that the City's processing and permit procedures are clear and effective.

Facilitated Environmental Review

The City has adopted uniform procedures for complying with the requirements of the California Environmental Quality Act (CEQA) for assessing the potential environmental impacts of those development applications determined to be a "project" as defined by Public Resources Code 21000-21177. Environmental review is required for most discretionary actions including complex site plan review, Conditional Use Permits, Subdivision Maps, and legislative actions including General Plan amendments, zone changes, and code amendments. Environmental review occurs while the application is being processed. An environmental determination by City staff for a project is made in order to prepare the appropriate environmental document that can be considered by the decision-making authority with the legislative or discretionary application.

Developed Densities and Permit Times

The City has not received any requests during the prior planning period to develop housing at densities below those anticipated. Based on a typical residential project, the City estimates that the time between discretionary approval and submittal of an application for a building permit is about one week (assuming no corrections are required) after the appeal period is over (two weeks after decision). The City finds that this is a reasonable timeline and works diligently with applicants once they submit material for review.

Streamlining Approvals

Lower Income Sites Included in Previous Elements

While the site plan review process is not considered a constraint to housing, Policy 17 has been included to comply with Government Code Section 65583.2. This program will provide for ministerial approval (e.g., Planning Director approval of site plan review and entitlements other than a subdivision map) of housing projects with a minimum of 20% of units affordable to lower income households and will increase certainty for affordable and multifamily developers related to residential sites throughout the community, as identified in Appendix A.

Senate Bill (SB) 35

SB 35 (Government Code Sections 65400 and 65582.1) provides provisions for streamlining projects based on a jurisdiction's progress towards its RHNA allocation and timely submittal of the Housing Element Annual Progress Report. Jurisdictions that have made insufficient progress toward their above moderate-income RHNA and/or have not submitted the latest Housing Element Annual Progress Report are subject to the streamlined ministerial approval process for proposed developments with at least 10% affordability.

HCD reviews the annual progress report deadlines and RHNA progress on an annual basis. Avalon is currently subject to SB 35 streamlining provisions when proposed developments include at least 10% affordability. Program 187 in the Housing Plan has been provided to incorporate the mandatory streamlining provisions into the City's Zoning Code. These streamlining provisions will reduce approval requirements for projects that include a minimum of 10% of units affordable to lower income households and that meet the criteria specified by State law.

Flexibility in Development Standards

Development standards affect the financials of a residential project, both from the revenue side (through achievable density) and through the costs of accommodating specific development standards. However, there is no specific threshold that determines whether a particular standard or combination constrains the affordability or supply of housing. Many factors determine project feasibility. While prior sections discussed how to reduce development costs, the following describes ways that the Zoning Code offers flexibility in development standards.

Residential Density Bonus

In 2010, the City updated the Zoning Code to allow density bonuses for affordable and senior residential projects in accordance with State Density Bonus law (Government Code Sections 65915 - 65918). The City has included Program 12 to update its Density Bonus Ordinance consistent with current requirements. Chapter 9-11 of the Zoning Code requires density bonuses and other incentives for housing and/or child care facilities to be granted in accordance with the requirements of State law, including Government Code Title 7, Division 1, Chapter 4.3 (Density Bonuses and Other Incentives). The City is required to grant a density bonus on a sliding scale if a development provides a percentage of the units at rates that are affordable to very low-income and low-income households. For example, a density bonus of 20 percent above the maximum permitted density can be granted if at least 5 percent of the units are affordable to very low-income households or 10 percent of the units are affordable to low-income households. If 10 percent of condominium or planned development units are affordable to moderate-income households, then the project is eligible to receive a 5 percent density bonus. The sliding scale requires additional density bonuses above the 20 percent threshold (up to a maximum density bonus of 50 percent) as additional affordable units are provided.

Additionally, jurisdictions must grant concessions or incentives depending on the percentage of affordable units provided. Concessions and incentives include reductions in zoning standards, other development standards, design requirements, and mixed-use zoning among others. Any project that meets the minimum criteria for a density bonus is entitled to at least one concession and may be entitled to as many as four concessions.

Government Code Section 65915 et seq. also allows reduced parking standards for the entire development for projects eligible for a density bonus. These numbers are inclusive of guest parking and handicapped parking. Spaces may be tandem and/or uncovered.

- Zero to one bedroom: one onsite parking space
- Two to three bedrooms: one and one-half onsite parking spaces
- Four or more bedrooms: two and one-half parking spaces

The Government Code directs jurisdictions to offer incentives for projects that meet the density bonus affordable unit requirements, regardless of whether or not the project is actually utilizing a density bonus. The thresholds for incentives are shown below.

- One incentive or concession for projects that include at least 10 percent of the total units for lower income households, at least 5 percent for very low-income households, or at least 10 percent for persons and families of moderate income in a common interest development.
- Two incentives or concessions for projects that include at least 17 percent of the total units for lower income households, at least 10 percent for very low-income households, or at least 20 percent for persons and families of moderate income in a common interest development.
- Three incentives or concessions for projects that include at least 24 percent of the total units for lower income households, at least 15 percent for very low-income households, or at least 30 percent for persons and families of moderate income in a common interest development.
- Four incentives or concessions for projects meeting the criteria of subparagraph (G) of paragraph (1) of subdivision (b) (Government Code Section 65915 et seq.). If the project is located within one-half mile of a major transit stop, the applicant shall also receive a height increase of up to three additional stories, or 33 feet.

Inclusionary Housing

The City's inclusionary housing program, outlined in Chapter 9-11 of the Zoning Code, requires developers to provide or fund housing at specific affordability levels, and applies to residential developments with five or more units and commercial development.

- Any new residential development of five or more rental or purchasable units shall make available inclusionary housing units equivalent to 20 percent of the units constructed in any residential housing project for the exclusive year-round use of low- and moderate-income families. The mix of income categories will be determined at the time the project is approved.
- Any new hotel/motel/resort or new commercial development shall provide affordable rental space for at least 50 percent of the number of peak season employees projected to be employed by the development. All rentals must be for the period of not less than six months.

Incentives to developers for the building of inclusionary housing are considered on a case-by-case basis by the City. All units in an apartment development are required to be made available to members of the community for a period of not less than six months. No condominium conversions would be allowed and affordability must be maintained for at least 45 years for purchasable units and 55 years for rental units.

The inclusionary housing ordinance offers flexibility in the income distribution of the inclusionary units based on project feasibility. Furthermore, the majority of the remaining developable land is owned by the Company and slated for resort/visitor-serving uses and employee housing. Therefore, these inclusionary housing requirements have not been the constraining factors to housing development in Avalon.

Condominium Conversions

The conversion of apartments to condominiums can be one way to increase homeownership opportunities for families. However, since most condominiums in Avalon are not affordable to low- and moderate-income households, condominium conversion represents a potential net loss of affordable units. Therefore, Avalon has enacted a condominium conversion ordinance to preserve affordable rental housing.

Condominium conversions require a conditional use permit prior to conversion. Prior to approval, the Planning Commission must make findings that the conversion will not adversely affect the supply of rental housing, especially low- and moderate- income housing in the City. Relevant factors that the Commission may consider include:

- Citywide vacancy rate and the vacancy rate for low- and moderate-income units;
- Number of units being removed from the rental market by the proposed conversion;
- Number, quality, and location of alternative housing available to existing tenants;
- Cumulative effect of proposed conversion upon the availability of affordable housing; and
- Effect of the proposed conversion, if any, upon the City's tourist industry.

Should a conversion project be approved, the property owner must set aside 20 percent of the units as affordable to low- and moderate-income households, in compliance with the City's inclusionary housing ordinance. Moreover, the property owner must give tenants at least six months notice of termination of tenancy for a conversion, must grant tenants first right of refusal for a specified period, providing proper noticing, and in some cases provide a specified amount of relocation assistance. According to City staff, condominium conversions are rare, especially in light of the current housing market conditions. This demonstrates that the ordinance to regulate condominium conversions is reasonable to preserve rental housing opportunities, and does not present an unreasonable constraint on the production of ownership housing.

Short-Term Rentals

Chapter 3-1, Article 3 of the Municipal Code addresses short-term rentals. Section 3-1.302 requires an owner to obtain a transient rental license from the City before renting a dwelling unit as a short-term rental or advertising the availability of a short-term rental. [A transit occupancy tax \(ToT\) is collected and, because on City's tourism- and service-driven economy, makes up a significant portion of City budget.](#) There were 220 short-term rentals in Avalon listed on Vrbo.com in November 2021. Prices ranged from approximately \$140 to \$1,600 per night depending on number of bedrooms and location. A significant number of short-term rentals has the potential to affect the availability of housing stock. Therefore, this will be an issue that the City continues to monitor to ensure that it does not negatively impact permanent housing options in the City. [It is also noted that a portion of the ToT collected via short-term rentals is placed into the Housing Trust Fund to fund development of permanent affordable housing. The City has found that this balance between housing availability and economic sustainability is appropriate at this time but will continue to evaluate the impact of short-term rentals on the local economy on at least an annual basis.](#)

Building Codes and Enforcement

New construction in Avalon, including additions and remodels, must comply with the current edition of the California Building Code (CBC). The City continues to adopt the most recent CBC with all required updates. The CBC establishes construction standards necessary to protect public health, safety, and welfare, and the local enforcement of this code does not unduly constrain development of housing. The 2019 California Building Code, Title 24, Part 2, Volumes 1 and 2, published by the International Code Council, was adopted by the City by reference as Title 8 of the City's Municipal Code and subject to the amendments contained in that Title.

No local amendment to the CBC has been initiated or approved that directly impacts housing standards or processes. Code enforcement is conducted by City staff which is responsive to complaints from community members. The City maintains records of code complaints and works proactively in neighborhoods where violations are most prevalent to address potential issues before they become significant. The City enforces its code equitably and as necessary throughout the community. Program 1 in the Housing Plan has been included to help support homeowners with rehabilitating substandard housing. The Code Enforcement Division and the Building and Safety Department assist property owners with meeting State health and safety codes.

4D. Development Fees

The City of Avalon charges fees to process plans submitted for residential projects and to fund the provision of important services that are needed to accommodate housing and population growth. Fees and exactions are used to finance public facilities, roadways, water and sewer infrastructure, schools, and other community services. Nearly all these fees are assessed through a pro rata share system, based on the magnitude of the project's impact or the extent of the benefit that will be derived. Failure to adequately plan for residential development is a key reason why jurisdictions are so financially constrained today. In general, these fees can be a constraint on housing development and compromise market-rate affordability because the additional cost borne by developers contributes to overall increased housing unit cost. However, the fees are necessary to maintain adequate planning services and other public services and facilities in the City. For new residential projects, developers in Avalon may be required to pay one or more of the following fees depending on the location, type, and size of the project:

Planning, Building, and Environmental Fees: The City of Avalon charges developers standard plan check fees, fees for processing applications, building permits, tentative tract maps, environmental initial study, variance, conditional use permit, or other permits to pay for the cost of processing applications and conducting inspections for specific projects. This does not include additional fees paid by the developer for project-specific environmental impact reports.

City Impact Fees: The City charges impact fees to finance new or expanded infrastructure and public facilities required to serve residents. The fee must have a reasonable relationship to the infrastructure costs and represent the marginal cost of improvements required to serve residents of the new residential projects. The City charges fees to offset impacts to public streets, drainage facilities, solid waste, and protective services. Other fees and assessments may apply depending on the location.

Regional Impact Fees: Regional impact fees include school impact fees collected by the school districts as allowed by State law to finance the construction and expansion of schools to accommodate student enrollment. As of 2020, the Long Beach Unified School District charges between \$4.08 per square foot of development fees.² The school districts have the authority to set the fee levels; the City does not have any ability to adjust these fees.

Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications. Development impact fees are required to provide essential services and infrastructure to serve new residents. Impact fees are governed by State law to demonstrate a nexus between development and potential impacts. State law also requires the proportionality test to ensure the pro rata share of costs to provide services and infrastructure by individual developments is reasonable. The City recognizes that planning/permitting and development fees add to the cost of residential development. To mitigate the impact of planning/permitting and impact fees on the cost of residential development, the City uses HOME, CDBG, as well as other funding sources to gap-finance affordable housing development.

Table 4-7 details the City's Planning Department processing fees for development project entitlements. One or more of the entitlements would be required to process a residential project depending on the scale and complexity of the project and a building permit is required for each residential structure. [All fees apply to both single-family and multifamily projects.](#)

² "Developer Fees: Guide to School Facility Fees," *Long Beach Unified School District* (June 2020).

TABLE 4-7: DEVELOPMENT PROJECT PROCESSING FEES (EFFECTIVE 07/01/2020)

Entitlements	
Planning and Application Fees	
Site Plan Review (<25% of building)	\$1,107
Site Plan Review (>25% of building)	\$2,213
Conditional Use Permit – Condo Conversion	\$2,506
Conditional Use Permit – Bonus Density	\$2,506
Conditional Use Permit – All Others	\$1,670
Variance (<25%)	\$553
Variance (>25%)	\$1,107
Coastal Development Permit	\$1,059
Development Agreement	\$11,950 deposit + Cost + 20%
General Plan Amendment	\$2,089
Zone Change	\$4,175
Accessory Dwelling Unit Permit	\$412
Subdivisions	
Tentative Tract/Parcel Map	\$1,670
Final Tract/Parcel Map	\$4,182 deposit + Cost + 20%
Lot Line Adjustment	\$727
Environmental Review	
Categorical Exemption	\$467
Mitigated Negative Declaration (by Staff)	\$834
Mitigated Negative Declaration	\$2,987 deposit + Cost + 20%
Environmental Impact Report	\$12,018 deposit + Cost + 20%

Source: City of Avalon, 2021 (Note: This is only a partial list of typical Planning fees.)

Development impact fees for residential development are charged per square foot of floor area rather than per dwelling unit. This method reflects the likelihood that, in Avalon, the size of the house or apartment is a primary factor in the number of people that will occupy the housing and therefore contribute to the impact that the new housing will have on facilities. By using this method, the fee is proportional to the size of the unit rather than one fee rate applied to all units regardless of size. The residential building permit fees described in Table 4-8 are based on a hypothetical 1,500 square foot single-family detached dwelling unit and 1,000 square foot multifamily dwelling unit, which is representative of housing in Avalon. Total fees for a typical single-family detached dwelling unit would be approximately \$45,405; total fees for a typical multifamily dwelling unit would be approximately \$30,270. As described above, the typical home price in Avalon in November 2021 was \$800,000. Therefore, development fees for a typical single-family and multifamily house represent approximately 5.7 percent and 3.8 percent of median home values, respectively, and are not considered to be a significant constraint to housing development.

TABLE 4-8: EXPECTED RESIDENTIAL DEVELOPMENT IMPACT FEES

Residential Development Impact Fees		
	Single-Family	Multifamily
Development fee (\$10.39/sq. ft.)	\$15,585	\$10,390
Public Safety and Fire Protection (\$3.56/sq. ft.)	\$5,340	\$3,560
Circulation (\$1.32/sq. ft.)	\$1,980	\$1,320
Transportation (\$2.63/sq. ft.)	\$3,945	\$2,630
Landfill (\$2.88/sq. ft.)	\$4,320	\$2,880
Water Waste (\$5.41/sq. ft.)	\$8,115	\$5,410
School Fee (LBUSD) (4.08/sq. ft.)	\$6,120	\$4,080
Total	\$45,405	\$30,270

Source: City of Avalon, 2022; Long Beach Unified School District (LBUSD), 2020.

4E. Non-Governmental Constraints

Non-governmental constraints refer to market factors such as the demand for housing, the price of land, construction costs, availability of financing, and other factors that increase the cost of housing development.

Development Costs

Land Prices

The cost to develop housing is influenced by the cost of the raw land, the cost of holding the land during the development process, and the cost of providing services to meet City standards for development. The cost of raw land is influenced by variables such as scarcity, location, availability of public utilities, zoning, and unique features like trees and adjoining uses. In Los Angeles County, undeveloped land is limited and combined with a rapidly growing population land prices have generally increased. A review of lots for sale and recently sold, using Zillow and LoopNet listings, found no vacant lots zoned for residential use in Avalon.

A small number of underdeveloped parcels with a single-family unit that could be redeveloped with larger, single-family homes (with ADUs) or duplexes have been sold for \$612,000 to \$1,869,000 or approximately \$585 to \$683 per square foot, largely depending on size and location within the community.

It is difficult to ascertain the cost of raw land for multifamily development since there has been a limited number of recent multifamily sales in Avalon. An 8-unit property at 332 Clemente Avenue sold in May 2021 for \$1,800,000 or approximately \$309 per square foot (\$225,000 per unit) and a 2-unit property (duplex) at 150 Middle Terrace Road sold in December 2020 for \$2,300,000 or approximately \$756 per square foot (\$1,150,000 per unit).

Cost of Construction

Construction cost is determined primarily by the cost of labor and materials. The relative importance of each is a function of the complexity of the construction job and the desired quality of the finished product. As a result, builders are under constant pressure to complete a project for as low a price as possible while still providing a quality product. This pressure has led (and is still leading) to an emphasis on labor-saving materials and construction techniques.

The International Code Council (ICC) provides estimates for the average cost of labor and materials for typical Type VA protected, wood-frame housing. Estimates are based on “good-quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes.

In the 2018 edition of the Building Safety Journal, the ICC estimated that the average per square foot cost for good-quality housing in the Avalon area was approximately \$113 for multifamily housing and \$139 - \$206 per square foot for single-family homes. Although construction costs are a substantial portion of the overall development cost, they are consistent throughout the region and therefore are not considered a major constraint to housing production. The 2020 COVID-19 pandemic social distancing guidelines may increase construction costs for an unknown period. On the Island, construction costs can easily be 15-20% higher than industry standards for development on the mainland; it is reasonable to assume that the approximate construction cost for multifamily housing on the Island is closer to \$135 per square foot and \$230-\$250 per square foot for single-family homes.

Construction cost increases, like land cost increases, affect the ability of consumers to pay for housing. Construction cost increases occur due to the cost of materials, labor, and higher government-imposed standards (e.g., energy conservation requirements). The development community is currently producing market rate for-sale housing that is affordable to moderate and above moderate-income households.

Cost and Availability of Financing

Financing is critical to the housing market. Developers require construction financing and buyers require permanent financing. The two principal ways in which financing can serve as a constraint to new residential development are the availability and cost of construction financing and the availability and cost of permanent financing.

- If financing is not easily available, then more equity may be required for developing new projects and fewer homebuyers can purchase homes, since higher down payments are required.
- Higher construction period interest rates for developers result in higher development costs. For homebuyers, higher interest rates translate into higher mortgage payments (for the same loan amount), which therefore reduces the purchasing power of homebuyers.

On May 6, 2021, the reported average rate for a 30-year mortgage was 2.96% with 0.6 fees/points (Freddie Mac, 2021). From 2005 through 2021, average monthly mortgage rates have ranged from a high of 6.76% in July 2006 to today's record lows. For homebuyers, it is necessary to pay a higher down payment than in the recent past, and demonstrate credit worthiness and adequate incomes, so that loan applications meet standard underwriting criteria. While adherence to strict underwriting criteria was not required during the early and mid-2000s, the return to stricter standards is consistent with loan standards prior to 2001.

Approved and Built Densities

While the City's zoning regulations identify minimum and maximum densities that can be developed in Avalon, individual developers may opt to build at the lower, mid-range, or higher end of allowed densities. Recent projects in Avalon that are built or are under construction are consistent with the densities anticipated by the City's General Plan and Zoning Code and typically built within 5% of the maximum allowable density. The City has received feedback from the development community that the maximum density levels are realistic and achievable, and the City expects to continue to see projects built at or around the maximum allowable density.

Affordable Housing Development Constraints

In addition to the constraints to market rate housing development discussed above, affordable housing projects face other constraints. While there is a range of sites available for potential affordable housing projects, as well as projects that focus on special needs populations, financial assistance for the development of affordable housing is limited and highly competitive.

Multiple funding sources are typically needed to construct an affordable housing project since substantial

subsidies are required to make the units affordable to extremely low, very low, and low-income households. It is not unusual to see five or more funding sources assembled to make a project financially feasible. Each of these sources may have different requirements and application deadlines, and some sources may require that the project has already successfully secured financing commitments. Since financing is so critical and is also generally competitive, organizations and agencies that provide funding can often effectively dictate the type and size of projects. Thus, in some years senior housing may be favored by financing programs, while in other years family housing may be preferred. Target income levels can also vary from year to year.

This situation has worsened in recent years. Federal and state funding has decreased and limited amounts of housing funds are available. Tax credits, often a fundamental source of financing for affordable housing, are no longer selling on a one for one basis. In other words, once a project has received authorization to sell a specified amount of tax credits to equity investors, the investors are no longer purchasing the credits at face value but are purchasing them at a discount.

4F. Environmental Constraints

According to the City's 2019 Local Hazard Mitigation Plan, environmental hazards affecting residential development in the City include geologic and seismic conditions, which provide the greatest threat to the built environment, aircraft accidents, and hazardous materials release, including pipeline rupture. [To protect the health, safety, and welfare of residents in Avalon the City has adopted regulations that limit development within areas of high risk and/or require design standards that can withstand natural hazards. In preparing the City's inventory of vacant sites designated for residential development \(Appendix A\), the City considered the extent to which sites were constrained by hazards, and potential hazards are accounted for as part of the capacity study. There are no known environmental constraints or other constraints that would preclude housing development on identified sites in the planning period or reduce the potential capacity of a site to a level lower than what has been assumed in Appendix A.](#) The following hazards may impact development of residential units in Avalon.

Seismic Hazards

Similar to other southern California cities, the City of Avalon is located in an area of high seismic activity. Although no active or potentially active faults traverse the City, Avalon is located within 25 miles of six faults: the Palos Verdes Fault, Cabrillo Fault, San Diego Trough Fault, San Pedro Basin Fault, San Clemente Fault and Newport-Inglewood-Rose Canyon Fault. Surface rupture in Avalon is unlikely since no faults have been identified within City boundaries. However, the City is likely to experience ground shaking, the degree to which would be based on the fault from which the earthquake occurs, distance from the City, and the magnitude. Impacts of an earthquake include potential liquefaction, which occurs when the strength and stiffness of a soil is reduced by intense ground shaking. Structures particularly susceptible to earthquake damage include tilt-up structures, unreinforced masonry buildings, older buildings, and mobile homes. After the 1971 San Fernando earthquake, building codes and design criteria were updated to address seismic occurrences.

Tsunamis

Tsunamis, or seismic sea waves, are great oceanic waves that are generated by earthquakes or less commonly, by large submarine landslides. As tsunamis affect only coastal areas, and watercourses emptying into these areas, Avalon is susceptible to the danger of tsunamis. This danger is somewhat mitigated by the warning system set up by the National Weather Service West Coast and Alaska Tsunami Warning Center, administered by the National Oceanic and Atmospheric Administration. Warning times vary with distance from the source, but for most tsunamis approaching the California coast, several hours to many hours are available to evacuate to safe places and to make emergency preparations. The City of Avalon is relatively well-protected, with the rest of the Island to its west and the California coast to its west.

Pipeline Rupture/Hazardous Materials Release

According to the City's General Plan, hazardous materials are not a substantial concern in Avalon as there are no large-scale generators or users of hazardous materials in the City. Propane is barged over from the mainland to the Southern California Edison facility in Pebbly Beach. The propane is barged over in liquid form, then vaporized and cut with air to produce a gas that is domestically useful, similar to natural gas. Southern California Edison manages the transport of the propane. Safety measures follow Southern California Edison protocol and no incidents related to propane transport have occurred. Any future large-scale activities with the potential to generate or use hazardous materials in the City would be required to obtain a permit and comply with applicable federal, State, and local regulations.

Flood Hazard

Substantial areas of the City are within the Federal Emergency Management Agency (FEMA) Flood Zone AE, which is an area subject to inundation by a 100-year flood and for which base flood elevations have been determined. The flood zone covers all of Avalon Bay and the coastline north to Hamilton Cove. Within Avalon, the flood zone generally includes the area southeast of Sumner Avenue to Clemente Avenue, narrowing slightly as it extends through Avalon Canyon. A 100-year flood represents the level of flood water expected to be equaled or exceeded every 100 years on average, and can also be described as a 1% annual exceedance probability flood, since it is a flood that has a 1% chance of being equaled or exceeded in any single year. The City's General Plan Safety Element, in conjunction with the City's Municipal Code and existing federal and State regulations would somewhat mitigate the risk of flood hazards.

Fire Hazard

The entire Santa Catalina Island, including Avalon, is designated as a very high fire hazard zone by the California Department of Forestry and Fire Protection (CalFire). The City of Avalon Fire Department provides fire protection service within the Avalon City limits. The County of Los Angeles Fire Department is responsible for fire protection outside the Avalon city limits. Three facilities in the City support fire service: Avalon Fire Station (Avalon City Fire Department), Avalon Station #55 (CFPD), and Baywatch Avalon (CFPD). In addition, there are two saltwater reservoirs within the city limits that provide water for fire suppression. The City's General Plan Safety Element, in conjunction with the City's Municipal Code and existing State regulations would somewhat mitigate the risk of fire hazards.

4G. Infrastructure Constraints

Another factor adding to the cost of new construction is the provision of adequate infrastructure: major and local streets; curbs, gutters, and sidewalks; water and sewer lines; storm drains; and street lighting. All these improvements are required to be built or installed in conjunction with new development. In most cases, these improvements are dedicated to the City, which is then responsible for their maintenance. The cost of these facilities is borne by developers, added to the cost of new housing units, and eventually passed on to the homebuyer or property owner.

Senate Bill 1087 (enacted 2006) requires that water providers develop written policies that grant priority to proposed development that includes housing affordable to lower income households. The legislation also prohibits water providers from denying or conditioning the approval of development that includes housing affordable to lower income households, unless specific written findings are made. Senate Bill 1087 also mandates priority sewage collection and treatment service to housing developments providing units affordable to lower income households. The City will provide a copy of the Housing Element to its water and sewer providers in compliance with Government Code Section 65589.7 and SB 1087. As well, the Planning Department will continue to coordinate with the water and sewer providers to ensure priority service provision to affordable housing developments.

Water Availability

Water Resources: Water availability is perhaps the most critical issue limiting residential and commercial development. Fresh water for drinking is supplied by Southern California Edison and saltwater is used for sanitary purposes and fire protection. Avalon has a limited alluvial groundwater supply and thus obtains most of its present needs through local reservoirs.

Catalina Island and Avalon have a safe yield allocation of 600 acre-feet per year (af/yr) of fresh water from two sources. The primary source is groundwater that is pumped and stored in reservoirs for distribution. The secondary source is desalinization of saltwater, and is primarily used for water allocations for new development. Groundwater resources are less expensive but are limited to 515 af/yr to maintain the resource. Desalination's current safe yield allocation is 85 af/yr, but can be expanded by an additional 139 af/yr to a total of 224 af/yr if approved for allocation. However, desalinization is expensive.

The City's General Plan EIR states that SCE will be able to serve 100 percent of projected freshwater demands for the City of Avalon through 2030, with a projected 2030 demand of 477.075 acre-feet per year (AFY) and current supply of 600 AFY.³ However, there is currently a waiting list for water allocations and the provision of this allocation for fresh water is the primary limiting factor for development in Avalon.

Over the past eight years, the following Edison projects have taken place in coordination with the City. These activities primarily achieve greater resiliency of the existing system; although the study and planning-type documents also help identify or reinforce future projects to increase capacity.

- Desalination Plant 2 installation, and operation (2015-present)
- Catalina Desalination Feasibility Study (2017)
- Water Reliability Study (Phase 1) (2018-present)
- Drought Contingency Plan (2019-2021)
- Rule 14.1 Conservation & Rationing (2013-2019)

Over the next several years, the following Edison projects and programs are planned with similar coordination with the City. These primarily achieve greater resiliency of the existing system; although the Desal Enhancements (Phase 1) project is also anticipated to support future capacity increases. The water master plan will also identify or reinforce future projects to increase capacity.

- Desalination Enhancements (Phase 1)
- Drought Contingency Plan Recommendations
- Water Master Plan

Sewer Capacity

The City of Avalon owns the wastewater conveyance system within City and contracts with a third-party professional for operation and maintenance. A citywide network of gravity sewers and two lift stations and conveyed to the main sewer line below Crescent Avenue, where it is then pumped at the Catherine Lift Station and forced via a 16-inch pressure line to Pebbly Beach, where pumps lift the wastewater for processing at the Avalon Wastewater Treatment Facility (AWTF). Wastewater conveyed to the plant receives secondary treatment before it is released through an ocean outfall. The AWTF has a design capacity of 1.2 million gallons per day (mgd) and, as of 2012, processes an average daily flow of 0.44 mgd. The plant has a remaining capacity of about 0.76 gallons per day.⁴

The City's overall wastewater collection system is regulated under the jurisdiction of the Regional Water Quality Control Board, the State Water Resources Control Board, and the U.S. Environmental Protection

⁴ "2030 General Plan/Local Coastal Plan: Final Environmental Impact Report (EIR)," *City of Avalon* (May 2013).

Agency. Within Avalon, there are approximately 10.2 miles of sewer ranging in diameter from 6-24 inches. Avalon's sewer pipelines are old and leaks have been identified throughout the system, contributing to the degradation of water quality in Avalon Bay. Accordingly, the City has taken action by completing a comprehensive inspection of the entire sewer collection system to assess the condition of each pipeline within the system. The comprehensive inspection included:

- The System Evaluation and Capacity Assurance Plan (SECAP), which evaluated Avalon's sewer collection system and identified bottlenecks and capacity deficiencies;
- The Sewer Collection System Smoke Test Report, which evaluated areas susceptible to infiltration and inflow (I/I);
- The Complete Sewer System Condition Assessment, which evaluated the condition of the sewer mains by visual observation using closed circuit television (CCTV) video; and
- The Sewer Force Main and Pump Station Evaluation Report, which evaluated the two sewer lift stations and force mains (using CCTV and potholing).

The results of this comprehensive inspection culminated in the Sewer Collection System Capital Improvement and 20-Year Financial Plan (Capital Improvement and Financial Plan), adopted in 2013. The Capital Improvement and Financial Plan identifies facility and equipment requirements for sustaining, restoring, and modernizing the facilities and infrastructure that support the wastewater collection and treatment. It also prioritizes and schedules them for funding and implementation through a multi-year plan. The Sewer System Management Plan, updated in 2014, includes mitigation measures to address the issues identified through the comprehensive inspection addresses these leaks and the City is in the process of implementing updating athe capital improvement plan to remove deficiencies in the wastewater system.

According to comprehensive inspection, the local sanitary sewer system has adequate capacity to accommodate development associated with General Plan buildout projections, which includes the RHNA. Nonetheless, individual developments would be reviewed prior to project approval to determine if sufficient sewer capacity exists to serve the proposed development. The City charges fees for connecting to the sewerage system or increasing the existing strength and/or quantity of wastewater attributable to a particular parcel or operation already connected. The fees are required to construct new sewer infrastructure and/or incremental expansions to the existing sewerage system to accommodate individual development. With implementation of the actions discussed above, the City has determined that sewer infrastructure does not pose a potential constraint to housing development or affordability in the City.

Electric, Gas, and Telecommunications

Southern California Edison (SCE) provides electrical and natural gas services to residences and businesses throughout the City of Avalon. SCE provides electricity service to 15 million people over an approximately 50,000 square mile area throughout southern California.⁵ Infrastructure to deliver electricity and natural gas throughout Avalon is currently in place. SCE can generally can provide these services to newer development.

Telecommunications services in the City are provided by Catalina Broadband Solutions, which provides wired cable and internet access.⁶ Satellite internet is provided by HughesNet and Viasat. Infrastructure to deliver telecommunications is currently in place and can generally be provided to newer development upon request.

⁵ "About Us," Southern California Edison, <https://www.sce.com/about-us> (November 2021).

⁶ "Is There Mobile or Internet Service on Catalina Island?," Connect California, <https://www.connectcalifornia.com/internet-service/mobile-broadband-service-catalina-island-avalon> (December 2021).

5. RESOURCES

This section of the Housing Element describes resources available for housing development. Resources include land designated for housing development and financial resources to assist with the development of housing.

5A. Regional Housing Needs Allocation (RHNA)

The City of Avalon falls under the jurisdiction of the Southern California Association of Governments (SCAG). SCAG is responsible for developing a Regional Housing Needs Plan (RHNP) allocating the region's share of the statewide housing needs to lower-level councils of governments, which then allocate the needs to cities and counties in the region. The Regional Housing Need Assessment (RHNA) is a minimum projection of additional housing units needed to accommodate projected household growth of all income levels by the end of the Housing Element's statutory planning period.

This RHNA (6th Cycle) covers an 8-year planning period (2021 through 2029) and is divided into four income categories: very low, low, moderate, and above moderate. The City's 2021-2029 RHNA is 27 units, as shown in Table 5-1. Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% Area Median Income (AMI)). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation; therefore, the City's very low income RHNA of 8 units can be split into 4 extremely low income and 4 very low-income units.

Table 5-1: RHNA 2021-2029

Income Group	Total Housing Units Allocated	Percentage of Units
Extremely/Very Low	8	30%
Low	5	13.5%
Moderate	3	8%
Above Moderate	11	40.5%
Total	27	100%

Source: Southern California Association of Governments, 2021

Housing Element law does not require the City to ensure that the numbers of dwelling units identified in the RHNA are built within the planning period. The law does, however, require that the City provide an inventory of land suitably zoned and with available infrastructure and utilities to meet that need.

5B. Progress Towards the RHNA

Since the RHNA uses June 30, 2021 as the baseline for growth projections for the 2021-2029 planning period, jurisdictions may count housing units that have been developed, are under construction, and/or have received their building permits after June 30, 2021 and units that have been approved/entitled but are not yet built toward their RHNA obligation. These credits are described below.

Units Under Construction/Built Since July 1, 2021

Since this date, **9 single-family units** have been developed, are under construction, or have received building permits in Avalon (Table 5-2 [Table](#)). All 9 of these units are located at Hamilton Cove and will accommodate a portion of the City's above-moderate income RHNA.

Units Approved/Entitled to be developed during the planning period

Jurisdictions may also count projects that are approved/entitled but not yet built or under construction; there are an additional **7 units** at Hamilton Cove that are approved/entitled but not yet under construction. These units will also accommodate a portion of the City's above-moderate income RHNA.

Summary of Progress towards Meeting 6th Cycle RHNA

These credits towards meeting the City's RHNA obligation are specified in Table 5-2.

TABLE 5-2: CREDITS TOWARDS THE RHNA

Project	Extremely and Very Low income (0-50% AMI)	Low income (51-80% AMI)	Moderate income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
Units Constructed/Under Construction/Building Permits Issued since June 30, 2021					
Hamilton Cove Single Family Units	0	0	0	9	9
Subtotal	0	0	0	9	9
Approved/Entitled Units Not Yet Under Construction					
Hamilton Cove Single Family Units	0	0	0	7	7
Subtotal	0	0	0	7	7
Total	0	0	0	16	16

Source: City of Avalon, 2021

As of November 2021, the City has achieved approximately 60% of its overall RHNA obligation with housing units constructed, under construction, or approved/entitled (16 units). However, all of these units are affordable to above-moderate income households (a category for which the City has already exceeded its RHNA by 5 units). When considering the remaining RHNA by income category, the City has a remaining RHNA of 16 units as shown in Table 5-3 (8 extremely low/very low-income units, 5 low-income units, and 3 moderate-income units).

TABLE 5-3: REMAINING RHNA

Project	Extremely and Very Low income (0-50% AMI)	Low income (51-80% AMI)	Moderate income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
2021-2029 RHNA	8	5	3	11	27
Completed/Under Construction/Permits Issued	0	0	0	9	9
Units Approved/ Entitled	0	0	0	7	7
Subtotal	0	0	0	16	16
Remaining Allocation	8	5	3	0 (surplus of 5 units)	16

Source: City of Avalon, 2021, SCAG, 2021

5C. Strategy to Accommodate RHNA

Housing element law requires an inventory of land suitable for residential development (Government Code Section 65583(a)(3)). An important purpose of this inventory is to determine whether a jurisdiction has sufficient land allocated for the development of housing to meet the jurisdiction's share of the regional housing need, including housing to accommodate households of all income levels.

This section provides an analysis of the land available within the City for residential development. In addition to assessing the quantity of land available to accommodate the City's total housing needs, this section also considers the availability of sites to accommodate a variety of housing types suitable for households with a range of income levels and housing needs.

The City of Avalon's 6th Cycle residential capacity falls into two categories:

- 1) Accessory dwelling units;
- 2) Vacant Catalina Island Company-owned property zoned for residential development

As described throughout this section, the City has identified a strategy to accommodate its RHNA allocation at all income categories for the 2021-2029 planning period.

1. Accessory Dwelling Units

As of January 2020, newly adopted State of California legislation pertaining to Accessory Dwelling Units (ADUs) went into effect. The legislation changes specifically amended Government Code Sections 65852.2 and 65852.22. In response to these legislative changes, the City of Avalon updated its zoning ordinance to be consistent with State law. The details of the City's Zoning Ordinance relevant to ADUs are included in the Constraints section of this Background Report.

The City of Avalon did not approve any ADUs in 2018 or 2019. However, once the City updated and began implementing its ADU Ordinance, 3 ADUs were approved in 2020. The City recognizes that ADUs are an excellent opportunity to supplement the City's existing housing stock and provide more affordable housing choices in existing neighborhoods.

The City has assumed ~~an average of 1 ADU per year for the~~ production of four ADUs throughout the 8 year planning period, for a total projection of 8 ADUs (one ADU every two years). ~~Additionally, the income level of these ADUs has been assumed to be consistent with the findings of SCAG's ADU affordability study, and the income of these units are allocated consistent with SCAG's findings for LA County~~ Based on an analysis of the rental rates of existing ADUs, the City has determined that ADUs are affordable to lower- and moderate-income households, which is consistent with SCAG's ADU Affordability Research. Absent substantial evidence that a specific portion of future ADUs will be affordable to lower-income households, the City has credited the future production of four ADUs towards the City's moderate-income category. However, given the uniqueness of housing costs in Avalon compared to the rest of the region, it is important for the City to track and confirm the real rental rates as future ADUs are produced and occupied. The City has included Program 14 in the Housing Plan to survey ADUs to determine their affordability level upon occupancy and commit to evaluating production and affordability of ADUs every two years.

2. Vacant Catalina Island Company-Owned Property Zoned for Residential

The Catalina Island Company (“CICO”) is the primary land owner in Avalon. All sites identified below are all-considered near-term projects by the Company. In its Master Plan, CICO identifies multiple potential development sites suitable to accommodate housing affordable to lower- and moderate-income households. However, many of these sites do not meet the specific site suitability criteria established by the State Department of Housing and Community Development (for example, the site is easier less than 0.50 acres or more than 10 acres in size). The City proactively supports CICO’s development plans for all sites, however, in order to most clearly demonstrate the City’s ability to accommodate its remaining RHNA, the City has identified a single site it finds most suitable to accommodate its remaining RHNA while also recognizing that other development opportunities are available and could be developed during the planning period. This section discusses A) the RHNA Site (Tremont Street) and B) future opportunity sites (Bird Park Canyon and Country Club Drive) that are not included in the City’s strategy to accommodate its RHNA.

RHNA Site: Tremont Street: APNs 7480002072 and 7480002075

The Tremont Street property (APN 7480002072) is a partially developed 1.52-acre site located in town adjacent to existing single-family homes, near City Hall and the Avalon Kids Park, and walking distance to goods and services. The Tremont Street area, which consists of two parcels (the 1.52-acre site as well as an adjacent 0.37 acre site with APN 748002075) The Tremont Street area is currently partially developed with the 62-unit New Tremont Apartments, the 37-unit Old Tremont Apartments, four duplex units, two triplex units, and two four-plex bachelor units (for a total of 122 units). CICO has a plan to put additional affordable employee housing on the currently vacant portions of the site.

Parcel Details

APN:	<u>7480002072</u>
General Plan Designation:	<u>High Density Residential - Community Housing (max density of 40 du/ac)</u>
Zoning Designation:	<u>HD-R-CH (max density of 40 du/ac)</u>
Existing Uses:	<u>Partially developed with residential uses, partially vacant</u>

Site Suitability

The City has identified the 1.52-acre Tremont Street site as the most viable location to accommodate its remaining RHNA of 16 units for the following reasons:

- The size of the site is found to be appropriate to accommodate lower income housing
- It is located in a mixed-income area with housing affordable to lower-income, moderate-income, and above-moderate income households
- The site is relatively flat with no know environmental constraints that would preclude development
- The site is adjacent to existing water and sewer connections allowing for more cost-efficient expanded service
- The site is walking distance to goods and services including City Hall, parks, and employment opportunities
- The CICO Master Plan identifies development of the Tremont Street site as a short-term development opportunity and has a history of developing affordable housing on the developed portions of the site

- [The land use designation and zoning allows for a maximum density of 40 du/ac; consistent with Gov. Code, § 65583.2, subd. \(c\)\(3\), this default density is found to be appropriate to facilitate the development of housing affordable to lower income households](#)

[CICO has a plan to put additional affordable employee housing on the currently vacant portions of the site. The site is comprised of two parcels totaling 82,328 square feet. The eExisting development occupies approximately 50% of the 1.52-acre siteparcel. , or 41,000 square feet \(0.95 acres\), resulting in a current density of approximately 65 du/ac. The vacant portion of the site is approximately 41,00033,105 square feet and is designated as High Density Residential – Community Housing, which allows for development of up to 40 du/ac. As stated in its Master Plan, CICO intends to develop at the maximum density, consistent with CICO’s history of development of affordable housing projects in Avalon and the neighboring Tremont Street Apartments \(which is developed at a density of approximately 65 du/ac\). The Master Plan does not identify any issues that would preclude development of the property at the maximum density. In addition to development the other portions of Tremont Street to a density of 65 du/ac, CICO has developed other projects \(i.e., Bird Park Apartments and Bird Park Canyon\) consistent with the maximum densities allowed for those projects.](#)

[Realistic Capacity](#)

[Based on a maximum density of 40 du/ac, the vacant portion of the Tremont Street site could yield an additional ~~38~~30 units affordable to lower income households. The City has a remaining RHNA of 16 units. Based on the CICO Master Plan and the Company’s history of developing projects \(Tremont Street, Bird Park Apartments, and Bird Park Canyon\) to the maximum density allowed, the City expects that future development at Tremont Street will occur consistent with the maximum density. However, even if the site was to develop at a reduced capacity \(i.e., 80%\) the site could still yield capacity more than sufficient to accommodate the City’s remaining RHNA \(at 80% capacity, the site could 24 units\). In an abundance of caution, the City has credited 24 lower-income units towards accommodate its remaining RHNA.](#)

[Analysis of Nonvacant Sites](#)

[Given that a portion of the site is currently developed and a portion of the site is undeveloped, the City considers this site as “nonvacant”. However, future development is *only* considered on the vacant portion of the site. The City specifically finds that existing uses at the site do not represent a constraint to development given that development will only occur at the vacant portion of the site and no existing uses need to be removed or replaced in order to accommodate new development. Moreover, given the proximity of existing residential development, the City finds that the existing uses actually help facilitate development of the site by allowing for a more efficient and cost-effective option to connect to existing infrastructure facilities. In addition, as previously discussed, this site is listed as a short-term development site in the Company’s Master Plan suitable for infill development. The City’s finding that existing uses do not preclude development is consistent with the Master Plan.](#)

[Site Identified in Prior Housing Element\(s\)](#)

[The Tremont Street site was included in the City’s 5th Cycle Housing Element. Given that the site is nonvacant, it is subject to the provisions of Government Code section 65583.2\(i\). The City has included Program 15 in the Housing Plan to rezone the site to allow developments by right pursuant to Government Code section 65583.2\(i\) when 20 percent or more of the units are affordable to lower income households.](#)

Future Opportunity Site: Bird Park Canyon: APN 7480001026 (Portion)

The Bird Park Canyon site (zoned Low Density Residential) is an approximately 10.8-acre area located west of Avalon Canyon Road. This site is part of a very large parcel (300 acres) owned by the Company and utilized in a variety of ways. The Canyon itself is long and narrow and only 10 percent of the site has slopes less than 10 percent (six acres). The Canyon hillsides generally have a 30 to 50 percent slope. The original Bird Park facility on this site was extensive, but today only a few structures remain. The CICO has plans to put some housing on portions of this site, but the Bird Park gateway buildings, aviary, small cage, and winter house would be retained.

The CICO estimates that a total of 114 housing units can be accommodated on this site (including the 24-unit Bird Park Apartments 26 units at Bird Park Canyon). In 2002, the Bird Park Apartments, consisting of 24 two-, three- and four-bedroom units for very low income families, was completed. In 2011, 26 additional units were completed at Bird Park Canyon, including 10 inclusionary affordable housing units (two low income and eight moderate/middle income units) and 16 CICO employee housing units at moderate income level. Therefore, the remaining Bird Park Canyon site has a capacity for an additional 64 family units, according to the Catalina Island Company's Development Master Plan. Any future development at the site would be made affordable to lower or moderate income households, consistent with the CICO's intent to provide employee housing. Given that the maximum density at the site is 10 dwelling units per acre (du/ac), the there is an additional capacity for 64 units has been credited towards the City's moderate income RHNA that could serve the needs of moderate-income households. This site is not included in the City's strategy to accommodate its RHNA but represents a future development site that could contribute to the City's moderate-income housing stock.

Future Opportunity Site: Tremont Street: APNs 7480002072 and 7480002075

~~The Tremont Street area is currently partially developed with the 62-unit New Tremont Apartments, the 37-unit Old Tremont Apartments, four duplex units, two triplex units, and two four-plex bachelor units. CICO has a plan to put additional affordable employee housing on the currently vacant portions of the site. The site is comprised of two parcels totaling 82,328 square feet. The existing development occupies approximately 50% of the site, or 41,000 square feet (0.95 acres), resulting in a current density of approximately 65 du/ac. The vacant portion of the site is approximately 41,000 square feet and is designated as High Density Residential Community Housing, which allows for development of up to 40 du/ac. CICO intends to develop at the maximum density, consistent with CICO's history of development of affordable housing projects in Avalon. Based on a maximum density of 40 du/ac, the vacant portion of the Tremont Street site could yield an additional 38 units affordable to lower income households.~~

Country Club Canyon: APN 7480001026 (Portion)

This approximately 14-acre site is located north and adjacent to County Club Road and is also bordered by East Whittley Avenue, Las Lomas Avenue, and Camino Del Monte. This site is part of a very large parcel (300 acres) owned by the Catalina Island Company and utilized in a variety of ways. The site is currently undeveloped. The site is zone Low Density and will support up to 140 units. The City anticipates 48 lower density multifamily units to be feasible within the time frames of this Housing Element. CICO has submitted a request to Southern California Edison (the City and Catalina Island's utility water provider) for water allocation for 48 units and is currently second on the waiting list. This site is not included in the City's strategy to accommodate its RHNA but represents a future development site that could contribute to the City's lower-income housing stock. These 48 units are expected to be affordable to low and moderate income households.

Figure 5-1: Housing Element Sites



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ADOPTED

Adequacy of Sites Toward the RHNA

Including ADU projections (~~8~~4 units) and development of ~~three~~the Tremont Street site~~CICO-owned vacant sites~~, the sites inventory identifies capacity for at least ~~158~~28 units, ~~156~~all of which have been identified as being able to meet the City's remaining lower and moderate income RHNA. Together with the ongoing and remaining development capacity at Hamilton Cove, the City has demonstrated the ability to exceed its RHNA by ~~147~~17 units. Overall, the City has the ability to adequately accommodate the remaining RHNA at all income levels (Table 5-4).

TABLE 5-4: RHNA SITE INVENTORY

	Lower Income (0-80% AMI)	Moderate Income (81-120% AMI)	Above Moderate income (121%+ AMI)	Total
RHNA	13	3	11	27
Credits	0	0	16	16
Remaining RHNA after Credits Applied	13	3	0 (surplus of 5)	16
ADUs	~~50~~	~~14~~	~~20~~	~~84~~
~~Bird Park Canyon~~	~~0~~	~~64~~	~~0~~	~~64~~
Tremont Street	~~38~~ <u>24</u>	0	0	~~38~~ <u>24</u>
~~Country Club Canyon~~	~~24~~	~~24~~	~~0~~	~~48~~
Total Site Strategy Capacity	~~67~~ <u>24</u>	~~89~~ <u>4</u>	~~20~~	~~158~~ <u>28</u>
Total Capacity for the 6th Cycle (Credits and Sites)	~~67~~ <u>24</u>	~~89~~ <u>4</u>	~~48~~ <u>16</u>	~~174~~ <u>44</u>
Surplus	~~54~~ <u>11</u>	~~86~~ <u>1</u>	~~75~~	~~147~~ <u>17</u>

Source: City of Avalon, 2021

Availability of Wastewater Treatment and Water Supply

The City continues to make improvements to its wastewater treatment facilities and through the development review process will ensure adequate treatment facilities are available to serve the new development.

Water supply is an ongoing issue in Avalon and has been historically a constraint to new development growth. To assist in ensuring adequate water is available to accommodate the City's 6th Cycle RHNA obligations, the City is working collaboratively with Southern California Edison to add resiliency to the existing system and increase fresh water capacity through several strategies.

In January 2021, Southern California Edison ("SCE") submitted proposed changes to its Santa Catalina Island ("Catalina") water tariffs to the California Public Utilities Commission ("Commission").—SCE's water system includes four systems across the Island, of which, the City is served by main system (and also the largest) - the Middle Ranch-Avalon-Toyon Integrated Water System ("Middle Rancho-Avalon"). The proposed changes include taking steps to improve water availability for new water allocations, including regulatory and administrative updates, non-revenue water manager, water master planning, and water resource improvements.—Specifically, this includes modifications to the boundaries of the Integrated Fresh Water System, defining the methodology for determining water availability for allocation purposes as supply and demand conditions change over time, and allow historical usage levels to be considered in calculating the water requirement of a customer proposing to change their existing facilities and water allocation (Water Tariff Rule 3) by allowing SCE to expand consideration for new allocation requests with customers on the fresh water allocation wait list.

5D. Financial, Housing, and Administrative Resources

In light of the elimination of redevelopment agencies in the State of California, the City has limited access to funding sources for affordable housing activities.

Administrative Resources

Agencies with administrative capacity to implement programs contained in the Housing Element include the City of Avalon and local and regional non-profit private developers. The City of Avalon Planning and Building Department takes the lead in implementing Housing Element programs and policies. The City also works closely with non-profit developers to expand affordable housing opportunities in Avalon.

Planning and Building Department

The Planning and Building Department facilitates the orderly physical and economic development of the City consistent with adopted General Plan policies, including the Housing Element policies. The Department accomplishes this by administering advance planning, current planning, building permitting, and building inspection programs in compliance with local, state, and federal requirements. The Building Division provides reasonable controls for construction and occupancy of buildings and structures throughout the City through the enforcement of all building-related municipal ordinances.

Non-Profit Developers

Due to the high cost of housing development, many communities have found that partnerships with non-profit housing developers are an effective tool for creating affordable housing units. In Avalon, several affordable housing developments have been made possible through close coordination and partnership with non-profit housing developers. Nonprofits active in Southern California include Bridge Housing, Jamboree Housing, and TELACU.

Financial Resources

Housing Trust Fund

In 2004, the City Council approved the creation of a Housing Trust Fund reserved for the production of affordable housing. Funding for the Housing Trust Fund comes from a number of sources. Since 2004, the City Council has instituted a five percent Transient Occupancy Tax (TOT) for affordable housing, which was deposited into the Housing Trust Fund. Locally generated funding such as the TOT is not subject to the same State or federal income limits, and therefore may be used more flexibly to address community housing needs. The City also provides an in-lieu fee option for its inclusionary housing program. These fees also get deposited into the Housing Trust Fund.

Redevelopment Set-Aside Funds

Pursuant to AB1X26 and a subsequent California Superior Court decision on December 29, 2011, the Avalon Community Improvement Agency (ACIA) was dissolved as of February 1, 2012. The City has access to approximately \$4 million of its housing set-aside funds. The City of Avalon has established the Avalon Housing Authority as the Successor Agency to the former ACIA.

Proposition 1C Funds

Proposition 1C is a \$2.85 billion housing bond passed by California voters in November 2006 as part of the Governor's Strategic Growth Plan to provide housing and infrastructure investment. Programs funded with Proposition 1C funds include: 1) Multi-Family Housing; 2) Supportive Housing; 3) Downpayment Assistance (through CalHFA); 4) CalHome; 5) Building Equity & Growth in Neighborhoods (BEGIN); 6) Self-Help Construction Management; 7) Farmworker Housing; 8) Migrant Farmworker Housing; 9) Emergency Housing Assistance; 10) Transit-Oriented Development Implementation Program; 11) Infill Incentives Grant; 12) Affordable Housing Innovation Fund; and 13) Housing-Related Parks. Today, most of these funds have exhausted. However, some funding remains and the State Department of Housing and Community Development (HCD) periodically releases Notice of Funding Availability (NOFA) to invite applications for funding from local jurisdictions and housing developers/providers.

Housing Choice Voucher Assistance (Section 8)

The Housing Choice Voucher Program (formerly known as Section 8) is a federal program that provides rental assistance to very low income persons in need of affordable housing. The Housing Choice Voucher Program (HCVP) offers a voucher that pays the difference between the payment standard and what a tenant can afford to pay (e.g., 30 percent of their income). The voucher allows a tenant to choose housing that may cost above the payment standard, with the tenant paying the extra cost.

Energy Conservation Opportunities

Energy-related housing costs can directly impact the affordability of housing. While state building code standards contain mandatory energy efficiency requirements for new development, the City and utility providers are also important resources to encourage and facilitate energy conservation and to help residents minimize energy-related expenses.

Title 24 Compliance

The Warren-Alquist Act requires that all new buildings in California meet the energy efficiency standards contained in Title 24, Part 6 of the California Code of Regulations. All new residential construction must comply with the standards in effect on the date a building permit application is made (not when the building permit is issued). The California Energy Commission adopted new standards as mandated by the California Energy and Reliability Act of 2000, which were incorporated into model building codes adopted by each local agency.

Avalon enforces Title 24 as the primary means for ensuring that new residential construction incorporates the latest in energy efficient technologies. Under Title 24, developers can comply with such regulations by either: 1) adopting a prescriptive package whereby each component of the proposed building must meet a prescribed minimum energy requirement; or 2) adopting a performance method which evaluates the building as a whole, rather than individual components, to determine whether energy conservation targets are achievable. In addition, both approaches require certain mandatory energy conservation technologies.

Solar Community Initiative

Officially adopted by the City Council in 2003, Catalina's Vision 2020 Plan was created to outline a vision of what the City and its residents hoped their community would look like in the year 2020. This Vision Plan includes an exceptionally ambitious solar community initiative.

Other Initiatives: In addition to the solar initiative, the Vision 2020 Plan also seeks to recycle landfill waste as ethanol, reduce traffic, convert to zero-emission electric vehicles, create an energy efficient desalination plant for the island's water supply to help recycle liquid waste into irrigation water and process solid waste in the sewage system into hydrogen and other fuels using bacterial fuel cells.

Utility Providers Programs

Southern California Edison participates in the California Alternate Rates for Energy (CARE) program, which offers income-qualified customers a discount of 20 percent or more on their monthly electric bill. The Residential Multifamily Energy Efficiency Rebate Program offers property owners and managers incentives on a broad list of energy efficiency improvements in lighting, HVAC, insulation, and window categories. These improvements are to be used to retrofit existing multi-family properties of two or more units. Edison also operates the Energy Management Assistance (EMA) program, which helps income-qualified households conserve energy and reduce their electricity costs. Southern California Edison pays all the costs of purchasing and installing energy-efficient appliances and equipment, which are free to eligible customers. Services include weatherization, energy efficient lighting and cooling, and refrigerator replacement. And, finally, Edison has an Energy Assistance Fund (EAF), also known as the Rate Relief Assistance Program, in place designed to help low-income customers pay their electric bills. A maximum of \$150 is available to income-qualified customers once every 12-month period.

Additionally, the Southern California Gas Company offers various rebate programs for energy efficient appliances to its customers. The Comprehensive Mobile Home Program provides qualifying mobile home customers with no-cost energy conservation evaluations, installations of low-flow showerheads and faucet aerators, and gas energy efficiency improvements, such as duct test and seal of HVAC systems. The Designed for Comfort program provides energy efficiency design assistance, training, and incentives for housing authorities, owners of multifamily affordable and supportive housing projects (which offer homes to persons with special needs).

6. AFFIRMATIVELY FURTHERING FAIR HOUSING (AFFH)

As required by Assembly Bill (AB) 686, all housing elements due on or after January 1, 2021 must contain an analysis of fair housing consistent with the core elements of the analysis required by the federal Affirmatively Further Fair Housing (AFFH) Final Rule of July 16, 2015.⁷ Under state law, “affirmatively furthering fair housing” means “taking meaningful actions, in addition to combatting discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity”⁸ for persons of color, persons with disabilities, and other protected classes. In order to comply with AB 686, the City of Avalon has completed the following outreach and analysis.

6A. Outreach

As discussed in the Public Engagement Summary (Appendix B), the City has worked diligently to engage the public as part of the Housing Element Update. The community outreach and public input process are fundamental to the Housing Element Update. This process seeks meaningful and comprehensive feedback from the entire Avalon community, helping to ensure the Housing Element Update represents a shared vision of the community. Appendix B to the Housing Element provides a summary of the key comments received during the Housing Element update process, and how they have been considered and addressed in the Element. The City implemented the following public outreach program.

Community Open House

The City hosted a Housing Element Community Open House on November 6, 2021. The open house provided educational materials related to the Housing Element along with a survey (see below) which allowed participants to share their ideas and ask questions. Through this event, the City was able hear from residents about their housing priorities and educate the community regarding the City’s approach to meeting its fair share of the regional housing need. The event was noticed in English and Spanish, advertised on social media channels and at key physical locations around the community, and English and Spanish speakers were on-hand at the Open House to provide information and take and answer questions.

The Community Open House was held on a Saturday afternoon in recognition of the unique work schedule of Avalon residents and workers, many of whom are unavailable in the evening or during the week.—The meeting was held in-person and broadcast live through the City’s local cable access channel (via Catalina Broadband), the City’s website, and Facebook Live.

At the Community Open House, the City heard comments about constraints to development, including water allocations. Attendees also recognized the need to continue providing housing affordable to lower and moderate income households and to expand the City’s housing stock, to the extent possible, to address issues of overcrowding and overpayment.

Housing Element Survey

In addition to the Community Open House, residents were encouraged to complete an online survey. The survey asked for input on the community’s housing priorities and strategies to address the City’s future housing growth needs. A total of 46 individuals responded to the survey, which focused on issues of home maintenance, affordability, home type, living conditions, and community priorities related to housing. A summary of the key survey results is provided in the Housing Element Introduction section, with the complete results included in Appendix B. This survey included a focused section on Fair Housing, the key findings of which are summarized below:

⁷ California Department of Housing and Community Development, AB 686 Summary of Requirements in Housing Element Law (April 23, 2020).

⁸ Government Code Section 8899.50(a)(1).

- 100% of respondents answered that having housing they could afford was their number one priority
- 100% of respondents want to see more housing choices on the Island for all income levels, promote housing that is affordable for working families, and ensure that children who grow up in Avalon can afford to live in the City as an adult
- Nearly all respondents (95%) want to see existing housing rehabilitated, support fair/equitable housing opportunities, and believe that there should be more multifamily housing available

When asked what they thought the biggest problem with housing discrimination in Avalon was, respondents were most likely to identify familial status or race/ethnicity. For respondents who answered “other” (which was the most prevalent answer), respondents indicated that they were not aware of discriminatory behavior or that there could be discriminatory behavior based on whether an individual owns a pet.

Of note, 31% of respondents indicated that they had experienced or witnessed housing discrimination in Avalon. Of those that answered yes, most identified discrimination based on level/source of income, race/ethnicity, familial status, age, or citizenship status as the most likely. In addition, many individual (over half) responded that they knew of someone who had experienced housing discrimination in Avalon; the most common discriminatory practices identified were the refusal of a rental or sale agreement, not being shown all the housing options, or being falsely denied a housing option.

Advertisements

The City of Avalon maintains various social media accounts including Facebook, Instagram, and Twitter. Throughout the Housing Element Update project, the City posted updates to its social media platforms, as well as digital and physical billboards, advertising opportunities to provide input and alerting the public to upcoming meetings and workshops related to the project.—These advertisements were in English and Spanish. Hard copy flyers were also posted around the community and the Council was asked to share information about the project with friends, family, and community members.

6B. Assessment of Fair Housing Issues

This section presents an overview of available federal, state, and local data to analyze fair housing issues in Avalon. This data is supplemented with local knowledge of existing conditions in the community to present a more accurate depiction of fair housing issues in the City, and a more informed perspective from which to base goals, policies, and programs to affirmatively further fair housing.

Key Data and Background Information

Avalon is a participating city in the Los Angeles Urban County and is served by the Community Development Commission (CDC), which provides wide-ranging programs related to affordable housing and community and economic development including the Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) programs. The CDC prepared an Analysis of Impediments to Fair Housing Choice (AI) in 2018 to fulfill its HUD requirement and remove barriers to fair housing choice for all residents within the service area covered by the AI, including the City of Avalon. The AI examined policies, procedures, and practices within the Urban County that may limit a person’s ability to choose their residence free from discrimination. The AI provided an overview of laws, regulations, conditions, or other possible obstacles that may affect an individual or a household’s access to housing in the Urban County. It also presented local and regional demographic profiles, assessed the extent of housing needs among specific groups, identified existing barriers or impediments that may limit housing choice, and proposed actions to overcome those barriers. The AI is one source of information regarding fair housing issues in Avalon and the region.

The City’s demographic and income profile, household and housing characteristics, housing cost and availability, and special needs populations are discussed in previous sections of this Background Report. No barriers to fair housing choice specific to Avalon were identified in the 2018 AI. Supplemental data analysis was conducted to further understand potential fair housing issues, within the context of AFH topics, at the city-level. Avalon is comprised of two census tracts (5990 and 5991), although one (5991) covers the majority of the less developed (hills) of Avalon and the entire rest of the Island. The delineation of census tracts makes it extremely challenging to rely on tract-level (and even census bloc-level data) to identify patterns and trends. The City of Avalon is comprised of—uniquely different individual neighborhoods, sometimes focused around streets or key areas. To the extent feasible, this analysis is supplemented by local impresses, despite there being few statistically valid ways to quantify the findings.—Figure 6-1 shows the census tract boundaries.

As described in the Background Report’s Introduction, the City’s primary economic base is built upon the tourist industry. Lodging, restaurants, retails, and other tourist activities/services employ a large number of employees. Traditionally, retail and service employees earn low wages, and many of them cannot afford decent homes in the City. Given the high costs of housing, even moderate- and middle-income workers such as teachers, hotel/restaurant managers, and city and other civic employees have difficulty affording in the City.

Fair Housing Enforcement and Outreach Capacity

The Community Development Commission’s 2018 Analysis of Impediments to Fair Housing Choice (AI) was prepared in October 2017 and is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA).

To ensure the AI accurately reflected the Urban County’s needs, community participation was promoted through five main avenues: regional discussion groups; three sets of four focus groups each, aimed to address disability and access, education, employment and transportation, and healthy neighborhoods; Resident Advisory Board Meetings; community input meetings; and the 2017 Resident Fair Housing Survey.

The AI describes the departments and organizations that handle fair housing enforcement and outreach in the Urban County, in which Avalon is included. The California Department of Fair Employment and Housing (DFEH) investigates complaints of employment and housing discrimination. The Housing Rights Center (HRC) provides services to Avalon to ensure equal access to housing. The HRC’s services include outreach and education, homebuyer education, mortgage default counseling, landlord-tenant mediation, and limited low-cost advocacy. The Fair Housing Council investigates claims of housing discrimination and assists with referrals to DFEH.

The Housing Rights Center (HRC) provides services to Avalon residents for questions and inquiries regarding rights and responsibilities between landlords and tenants. Residents can contact HRC to get information on different fair housing services such as just cause protection, right to lease, and relocation assistance to better understand their rights as a tenant. Programs 230 and 22-26 have been included to work with fair housing enforcement organizations and agencies to track issues and identify patterns in the City.

The City of Avalon complies with fair housing laws and regulations as described in Table 6-1 shows the full list of indicators.

TABLE 6-1: COMPLIANCE WITH FAIR HOUSING LAWS

Law	Description	Compliance
<u>California Fair Employment</u>	<u>The Fair Employment and Housing Act (FEHA)</u>	<u>Compliance is achieved through strict</u>

and Housing Act (FEHA)	applies to public and private employers, labor organizations and employment agencies. It is illegal for employers of 5 or more employees to discriminate against job applicants and employees because of a protected category or retaliate against them because they have asserted their rights under the law. The FEHA prohibits harassment based on a protected category against an employee, an applicant, an unpaid intern or volunteer, or a contractor.— Harassment is prohibited in all workplaces, even those with fewer than five employees.	enforcement in hiring practices and regular training of and by Human Resources staff.
Government Code Section 65008	Covers actions of a city, county, city and county, or other local government agency, and makes those actions null and void if the action denies an individual or group of individuals the enjoyment of residence, landownership, tenancy, or other land use in the state because of membership in a protected class, the method of financing, and/or the intended occupancy. For example, a violation under Government Code section 65008 may occur if a jurisdiction applied more scrutiny to reviewing and approving an affordable development as compared to market-rate developments, or multifamily housing as compared to single family homes.	Compliance is achieved by uniform application of the City's codes, regulations, policies and practices, including development standards, design guidelines, application submittal requirements, fees and approval findings.
Government Code Section 8899.50	Requires all public agencies to administer programs and activities relating to housing and community development in a manner to affirmatively further fair housing and avoid any action that is materially inconsistent with its obligation to affirmatively further fair housing.	Compliance is achieved through consultations with community stakeholders and support agencies as part of program evaluating and funding decisions. The 6th Cycle Housing Element Housing Plan describes how each Program addresses fair housing issues and contributing factors.
Government Code Section 11135 et seq.	Requires full and equal access to all programs and activities operated, administered, or funded with financial assistance from the state, regardless of one's membership or perceived membership in a protected class.	Compliance is achieved through promotion/availability of activities and programs to all persons of all backgrounds to participate equally in community programs and activities.
Density Bonus Law (Gov. Code, § 65915.)	Density bonus law is intended to support the construction of affordable housing by offering developers the ability to construct additional housing units above an agency's otherwise applicable density range, in exchange for offering to build or donate land for affordable or senior units. Density Bonus Law also provides for incentives intended to help make the development of	Compliance is achieved by administration of Avalon Municipal Code Section 9-11.105, Density Bonus and Section 9-11.106, Density Bonus Unit Rental Administration, which provides for compliance with Government Code Section 65915 et seq. Additionally, the Housing Plan includes Program 12,

	<u>affordable and senior housing economically feasible.</u>	<u>Density Bonus Program, which will provide for density bonuses consistent with State law.</u>
<u>Housing Accountability Act (Gov. Code, § 65589.5.)</u>	<u>Provides that a local agency shall not disapprove a housing development project, for very low, low-, or moderate-income households, or an emergency shelter, or condition approval in a manner that renders the housing development project infeasible for development for the use of very low, low-, or moderate-income households, or an emergency shelter, including through the use of design review standards, unless it makes certain written findings, based upon a preponderance of the evidence in the record.</u>	<u>Compliance is achieved through the development review process with is completed consistent with the Housing Accountability Act. Additionally, the Housing Plan includes Program 187, Zoning Code Updates – Remove Constraints, which requires the City to update the Zoning Code to remove constraints to a variety of housing types and ensure the City’s standards and permitting requirements are consistent with State law. This includes allowing supportive housing by right, and updating the Zoning Code to ensure eligible multi-family projects with an affordable component are provided streamlined review.</u>
<u>No-Net-Loss Law (Gov. Code, § 65863)</u>	<u>Ensures development opportunities remain available throughout the planning period to accommodate a jurisdiction’s regional housing need assessment (RHNA) allocation, especially for lower- and moderate- income households.</u>	<u>The City’s draft Housing Element identifies a surplus of sites with a capacity to accommodate the City’s RHNA allocation. The City has also identified additional sites for accommodating any shortfall that may occur with respect to anticipated development density capacity, that may be added to the site list if necessary. Program 10 of the Housing Element Housing Plan requires City staff to annually monitor the City’s site inventory and continued ability to accommodate the remaining RHNA.</u>
<u>Least Cost Zoning Law (Gov. Code, § 65913.1)</u>	<u>Provides that, in exercising its authority to zone for land uses and in revising its housing element, a city, county, or city and county shall designate and zone sufficient vacant land for residential use with appropriate standards, in relation to zoning for nonresidential use, and in relation to growth projections of the general plan to meet housing needs for all income categories as identified in the housing element of the general plan.</u>	<u>Compliance is achieved through the implementation of Housing Element Housing Plan Program 10, Identification of Adequate Sites, which ensures that the City has sufficient land appropriately zoned to accommodate the City’s RHNA at all income levels for the duration of the planning period. Program 11, Adequate Sites Monitoring Program, will ensure that the net future housing capacity is maintained to accommodate the City’s RHNA.</u>
<u>Excessive Subdivision Standards (Gov. Code, § 65913.2.)</u>	<u>Provides that, in exercising its authority to regulate subdivisions a city, county, or city and county shall:</u> <u>(a) Refrain from imposing criteria for design, as</u>	<u>Compliance is achieved through the implementation of a fair and equitable development review process which is</u>

	<u>defined in Section 66418, or improvements, as defined in Section 66419, for the purpose of rendering infeasible the development of housing for any and all economic segments of the community. However, nothing in this section shall be construed to enlarge or diminish the authority of a city, county, or city and county under other provisions of law to permit a developer to construct such housing.</u> <u>(b) Consider the effect of ordinances adopted and actions taken by it with respect to the housing needs of the region in which the local jurisdiction is situated.</u> <u>(c) Refrain from imposing standards and criteria for public improvements including, but not limited to, streets, sewers, fire stations, schools, or parks, which exceed the standards and criteria being applied by the city, county, or city and county at that time to its publicly financed improvements located in similarly zoned districts within that city, county, or city and county.</u>	<u>administrated consistent with the Excessive Subdivision Standards Act.</u>

Actions Taken to Overcome Impediments

The Housing Rights Center (HRC) receives a multi-year grant from HUD to conduct systemic testing in areas within the Urban County where statistics point to any form of discrimination covered by applicable fair housing laws and, in particular, persistent housing discrimination based on race, national origin, familial status, and disability. As of 2014 (the year cited in the AI) the HRC had been awarded a grant in the amount of \$325,000 to perform these actions.

In addition to the HUD grant, the HRC has a contract with the Community Development Commission for a variety of services addressing private sector impediments, such as providing education and training to housing providers on fair housing, distributing 16,000 pieces of fair housing literature annually, and hosting no less than three special events per year to inform the public about fair housing matters.

According to the HRC's 4th Quarter Performance Report for Fiscal Year 2014-2015, there were a total of 3,490 clients to whom direct service was given and a total of 160,160 points of contact for outreach and education efforts. According to the HRC's report for the 2015-2016 Fiscal Year, the number of clients who were provided direct service fell slightly to 3,239, while the points of contact for outreach and education climbed to 191,229. Furthermore, the CDC continues the process of addressing impediments to fair housing in the public sector for the Urban County.

Patterns of Integration and Segregation

To inform priorities, policies, and actions, Avalon has included an analysis of integration and segregation, including patterns and trends, related to people with protected characteristics. Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area. Conversely, integration refers to a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability when compared to a broader geographic area. The following analyzes levels of segregation and integration for race and ethnicity, persons with disabilities, familial status, age, and

income to identify the groups in Avalon that experience the highest levels of segregation (if any).

Diversity

Tracking the diversity of cities and counties throughout California is crucial to understanding the shifting demographics of race and ethnicity in California and the United States. Esri's Diversity Index captures the racial and ethnic diversity of a geographic area in a single number, from 0 to 100. Scores less than 40 represent lower diversity in the jurisdiction while scores of greater than 85 represent higher diversity. Additionally, scores between 40-55 represent low diversity, 55-70 represent moderate diversity, and 70-85 represent high diversity. As shown in Figure 6-2, in 2018 the City of Avalon (and Catalina Island) had a uniform diversity index score of 70-85, indicating a high level of diversity within the community. As Avalon is unique given its location on Catalina Island, it is difficult to make a direct comparison to a surrounding region. Nonetheless, in the Southern California Association of Governments (SCAG) region, areas of higher diversity occur in the major cities of Los Angeles County and inland towards San Bernardino and Riverside counties. Avalon's population is also low compared to other jurisdictions in the SCAG region; still, the pattern of diversity in the City does not suggest segregation based on race and ethnicity. Figure 6-3 shows the diversity index scores for the City of Avalon and Catalina Island in 2010. Comparing Figure 6-2 and Figure 6-3, there have been a slight increase in the diversity index for the census tracts surrounding the City of Avalon.

Table 6-2 shows the demographic trends over time for the City and Los Angeles County. Since 1990, the percentage of population that are Hispanic residents has increased in the City from 40.1% to 59% compared to the County which has increased at a slower rate from 37.8% to 48.4%. In comparison to the County, there has been little change in the population of other racial and ethnic groups in the City from 1990 to current population.

TABLE 6-2: DEMOGRAPHIC TRENDS

Race/Ethnicity	1990	2000	2010	Current
Avalon				
White	98.5%	71.6%	62.0%	75.7%
Black or African American	0.1%	0.7%	0.5%	0.1%
American Indian or Alaska Native	0.4%	1.0%	0.6%	6.5%
Asian	0.6%	0.6%	1.3%	0.7%
Native Hawaiian and Pacific Islander	0.1%	0.2%	0.3%	0%
Some Other Race	-	20.4%	30.5%	17.8%
Two or More Races	-	5.4%	4.6%	6.5%
TOTAL	100%	100%	100%	100%
Hispanic or Latino (of any race)	40.1%	45.9%	55.7%	59.0%
Los Angeles County				
White	56.8%	48.7%	50.3%	51.4%
Black or African American	11.2%	9.8%	8.7%	8.2%
American Indian or Alaska Native	0.5%	0.8%	0.7%	0.7%
Asian	10.4%	11.9%	13.7%	14.6%
Native Hawaiian and Pacific Islander	0.3%	0.3%	0.3%	0.3%
Some Other Race	20.7%	23.5%	21.8%	21.0%
Two or More Races	-	4.9%	4.4%	3.9%
TOTAL	100%	100%	100%	100%

Hispanic or Latino (of any race)	37.8%	44.5%	47.7%	48.5%

[Source: US Census; 1990 US Census; 2000 US Census; 2010 US Census, 2014-2018 ACS](#)

Income and Race

~~A racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. In the SCAG region, there are several R/ECAPs located in major cities and unincorporated areas. However, there are no R/ECAPs located in the City of Avalon. While there are no R/ECAPs in Avalon, there are four census block groups where more than half of residents are of very low or low income. These areas are generally away from Avalon Bay and the more densely populated sections of the City, and into the foothills where there is little development. Figure 6-3 shows the pattern of very low and low income populations.~~

~~Although data for median household income is incomplete for Catalina Island, the pattern of median household income is somewhat consistent with the pattern for the very low and low income population in that higher income groups live in the census blocks closest to Avalon Bay (\$87,100 – \$125,000) while incomes are less in the census block groups away from Avalon Bay (\$55,000 – \$87,100). Figure 6-4 shows the pattern for median household income.~~

~~As discussed prior in the Background Report, the City asserts that it has a median household income closer to \$42,000, according to the 2016 City of Avalon Community Wide Income Survey (based on data from the US Census American Community Survey, the City would have a median household income of approximately \$69,440). The City undertook this survey as a result of the fact that the US Census American Community Survey sample data is not attuned to capturing accurate data from such a small population, resulting in ACS data not being reflective of actual incomes on the island (the Census MHI margin of error ranged from \$17,815 in 2010 to \$8,755 in 2016). Per the California Air Resources Board Priority Population mapping tool, the City of Avalon is an AB 1550 Low Income community, meaning that the City has a median household income below 80 percent of the State median.~~

~~The City's survey has been accepted by the California Department of Water Resources. The LA County Local Agency Formation Commission ("LAFCO") has designated the entire unincorporated part of the island as Disadvantaged Unincorporated Community.~~

~~For the purposes of this analysis, the City has considered the State approved data sources as provided in the HCD Data Viewer. However, it is the City's opinion that Census information does not portray an accurate picture of actual median household income, and the average median household income is significantly less than identified by the Census. As such, it is expected that median household income levels are lower than those described in Figure 6-4, and additional attention should be paid to accounting for this discrepancy.~~

~~In contrast to a R/ECAP, a racially concentrated area of affluence (RCAA) is defined as a census tract in which 80 percent or more of the population is White and has a median income greater than \$125,000 annually. There are no areas of Avalon that qualify as a RCAA. Most RCAAs in the SCAG region are located in coastal communities while inland suburban communities do not reflect this pattern.~~

Persons with Disabilities

As discussed in the Needs Assessment section of the Housing Element Background Report, approximately three percent of Avalon's population in 2018 had at least one disability and 50 percent of those individuals were seniors. This reflects the SCAG region. The rate of disability is uniform across the City at less than 10% ([Figure 6-5](#)[Figure 6-4](#)), indicating that the City of Avalon does not have a disproportionate

concentration of persons with disabilities or a smaller percentage of persons with disabilities that would indicate barriers to this population. Program 187 will amend the Zoning Ordinance to permit small residential care facilities serving six or fewer persons (including adult and senior residential facilities, as well as small family homes) in all residential zones. Large residential care facilities serving more than six persons will be conditionally permitted in the HD/flats, C, and SC zones.

Familial Status

Family makeup, including married couples (with or without children), persons over the age of 18 living alone and female headed households can provide insight into potential segregation issues in the community. As shown in Figure 6-5, there married couples located throughout the community in similar concentrations as other coastal communities. As seen in Figure 6-6 this pattern continues for married couples with children. Avalon is also home to a number of female-headed households located throughout the community (Figure 6-6Figure 6-7). In fact, there is a higher concentration of this familial type relative to the SCAG region. However, there are no known historic patterns of segregation by familial status, including by household gender, which the City finds as contributing factors to segregation in Avalon. Figure 6-6Figure 6-7 indicates that female-headed households are located across Census Tract 5990 with different incomes, access to opportunities, and resource levels.

Seniors

The community's older residents, persons 65 years of age or older, are likewise spread uniformly throughout the City (Figure 6-7Figure 6-8). Although older residents often choose to locate closer to goods, services, and transit in order to have easier access to these opportunities, this is not the case with Avalon since the City is on an island which by definition is isolated. The senior population in the census tracts is low (10-15%) compared to other communities in the SCAG region, which likely has more to do with the location of Avalon than any other factor including the type of housing product offered.

Median Household Income

Although data for median household income is incomplete for Catalina Island, the pattern of median household income is somewhat consistent with the pattern for the very low and low-income population in that higher income groups live in the census blocks closest to Avalon Bay (\$87,100 - \$125,000) while incomes are less in the census block groups away from Avalon Bay (\$55,000 - \$87,100). Figure 6-9 shows the pattern for median household income.

As discussed prior in the Background Report, the City asserts that it has a median household income closer to \$42,000, according to the 2016 City of Avalon Community Wide Income Survey (based on data from the US Census American Community Survey, the City would have a median household income of approximately \$69,440). The City undertook this survey as a result of the fact that the US Census American Community Survey sample data is not attuned to capturing accurate data from such a small population, resulting in ACS data not being reflective of actual incomes on the island (the Census MHI margin of error ranged from \$17,815 in 2010 to \$8,755 in 2016). Per the California Air Resources Board Priority Population mapping tool, the City of Avalon is an AB 1550 Low-Income community, meaning that the City has a median household income below 80 percent of the State median. The City's survey has been accepted by the California Department of Water Resources. The LA County Local Agency Formation Commission ("LAFCO") has designated the entire unincorporated part of the island as Disadvantaged Unincorporated Community.

For the purposes of this analysis, the City has considered the State-approved data sources as provided in the HCD Data Viewer. However, it is the City's opinion that Census information does not portray an accurate picture of actual median household income, and the average median household income is significantly less than identified by the Census. As such, it is expected that median household income levels are lower than those described in Figure 6-9, and additional attention should be paid to accounting

for this discrepancy. Comparing the City of Avalon to other coastal communities, the median income in Avalon is significantly less than other small coastal communities, such as Seal Beach, Hermosa Beach and Manhattan Beach, as illustrated in Figure 6-9.

Income and Race

A racially or ethnically concentrated area of poverty (R/ECAP) is an area in which 50 percent or more of the population identifies as non-White and 40 percent or more of residents are living in poverty. In the SCAG region, there are several R/ECAPs located in major cities and unincorporated areas. However, according to HCD's 2020 AFFH mapping tool, there are no R/ECAPs or areas of high segregation and poverty located in the City of Avalon. While there are no R/ECAPs in Avalon, there are four census block groups where more than half of residents are of very low or low-income. These areas are generally away from Avalon Bay and the more densely populated sections of the City, and into the foothills where there is little development. Figure 6-3¹⁰ shows the pattern of very low and low-income populations. Figure 6-11 provides an ethnicity analysis identifying the majority racial concentrations in the City. As shown, the City has a sizeable (10 to 50% gap) Hispanic majority within census tract 5990, which includes most of the population of City. Overall, however, it appears that the City does not exhibit significant patterns or trends of greater racial/ethnic concentrations correlating to increased poverty, unless viewed in the context of the larger region, as illustrated in Figure 6-11.

Although data for median household income is incomplete for Catalina Island, the pattern of median household income is somewhat consistent with the pattern for the very low and low-income population in that higher income groups live in the census blocks closest to Avalon Bay (\$87,100 – \$125,000) while incomes are less in the census block groups away from Avalon Bay (\$55,000 – \$87,100). Figure 6-4 shows the pattern for median household income.

As discussed prior in the Background Report, the City asserts that it has a median household income closer to \$42,000, according to the 2016 City of Avalon Community Wide Income Survey (based on data from the US Census American Community Survey, the City would have a median household income of approximately \$69,440). The City undertook this survey as a result of the fact that the US Census American Community Survey sample data is not attuned to capturing accurate data from such a small population, resulting in ACS data not being reflective of actual incomes on the island (the Census MHI margin of error ranged from \$17,815 in 2010 to \$8,755 in 2016). Per the California Air Resources Board Priority Population mapping tool, the City of Avalon is an AB 1550 Low-Income community, meaning that the City has a median household income below 80 percent of the State median.

The City's survey has been accepted by the California Department of Water Resources. The LA County Local Agency Formation Commission ("LAFCO") has designated the entire unincorporated part of the island as Disadvantaged Unincorporated Community.

For the purposes of this analysis, the City has considered the State-approved data sources as provided in the HCD Data Viewer. However, it is the City's opinion that Census information does not portray an accurate picture of actual median household income, and the average median household income is significantly less than identified by the Census. As such, it is expected that median household income levels are lower than those described in Figure 6-4, and additional attention should be paid to accounting for this discrepancy.

In contrast to a R/ECAP, a racially concentrated area of affluence (RCAA) is defined as a census tract in which 80 percent or more of the population is White and has a median income greater than \$125,000 annually. There are no areas of Avalon that qualify as a RCAA. Table 6-3¹¹ looks at the median household incomes of White, non-Hispanic residents in Avalon, as well as the Los Angeles County as a whole. As shown in Table 6-3, there is significantly less difference in median income between White,

[non-Hispanic households and all households in the City when compared to Los Angeles County. Most RCAAs in the SCAG region are located in coastal communities while inland suburban communities do not reflect this pattern.](#)

TABLE 6-3-3: MEDIAN HOUSEHOLD INCOME

Median Household Income	Avalon	Los Angeles County
White householders	\$74,405	\$83,847
All households	\$69,440	\$64,251
% of population that is White	39.6%	26.3%

Source: US Census, 2014-2018 ACS

[The Housing Plan includes programs to encourage increased diversity and housing opportunities in the City and to provide education related to fair housing rights.](#)

Access to Opportunity

The Department of Housing and Community Development together with the California Tax Credit Allocation Committee (TCAC) established the California Fair Housing Task Force to provide research, evidence-based policy recommendations, and other strategic recommendations to HCD and other related state agencies/departments to further the fair housing goals (as defined by HCD). The Task Force developed the 2021 TCAC/HCD Opportunity Area Maps to understand how public and private resources are spatially distributed. The Task Force defines opportunities as pathways to better lives, including health, education, and employment. Overall, opportunity maps are intended to display which areas, according to research, offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health.

The opportunity maps are made from composite scores of three different domains made up of a set of indicators. Based on these domain scores, census tracts are categorized as Highest Resource, High Resource, Moderate Resource, Moderate Resource (Rapidly Changing), Low Resource, or areas of High Segregation and Poverty. [Table 6-1](#) [Table 6-4](#) shows the full list of indicators.

TABLE 6-4: DOMAINS AND LIST OF INDICATORS BY FACTORS

Domain	Indicator
Economic	• Poverty • Adult education • Employment • Job proximity • Median home value
Education	• Math proficiency • Reading proficiency • High school graduation rates • Student poverty rates
Environmental	• CalEnviroScreen 3.0 pollution indicators and values

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020

[Table 6-5 identifies the resource levels by census tracts and corresponding scores for economic, educational, and environmental indicators. As shown in Table 6-5, two of the census tracts are high resource areas and two of the census tracts are the highest resource areas in the City of Avalon.](#)

TABLE 6-5: OPPORTUNITY RESOURCE LEVELS BY CENSUS TRACTS

Census Tracts	Resource Level	Economic Score	Environmental Score	Educational Score
5990.00.01	Highest	0.73	0.17	0.66
5990.00.02	Highest	0.95	0.17	0.66
5990.00.03	High	0.71	0.17	0.66
599.00.04	High	0.66	0.17	0.66

Source: California Fair Housing Task Force, Methodology for TCAC/HCD Opportunity Maps, December 2020

Economic Opportunity

As described above, the Fair Housing Task Force calculates economic scores based on poverty, adult education, employment, job proximity, and median home values. According to the 2021 Task Force map presented in [Figure 6-8](#)[Figure 6-12](#), economic scores improve based on proximity to Avalon Bay which is the focal point of the City. The census block group on the west side of the bay has a “More Positive Economic Outcome” (>0.75) while the adjacent census blocks within the City have moderate to high scores (0.50-0.75). Beyond Census Tract 5990, economic scores quickly drop to “Less Positive Economic Outcome” (<0.25). [As shown in Table 6-5, the overall economic scores in Avalon range from 0.66 to 0.95. As shown in Figure 6-13, the job proximity index is consistent across the City from, with job proximity scores of 60 to 80. The City follows a similar pattern of economic opportunity as other coastal cities, as illustrated in Figure 6-12 and 6-13.](#)

[According to the Southern California Association of Governments’ \(SCAG\) local profile for the City, approximately 5% of Avalon residents commuted to the City of Los Angeles for work in 2016. In contrast 90% of residents commuted within the City of Avalon⁹. The SCAG local profile of Avalon lists 2,580 total jobs in the City in 2017, an decrease of 38.3% from 2007. However, the percentage of leisure jobs increased from 9.6% to 33.4%. In 2017 the leisure sector was the largest job sector in Avalon. Other major sectors include education \(20.1%\), retail \(12.2%\), and transportation \(10.6%\).](#)

Educational Opportunity

[Avalon K-12 School is a part of Long Beach Unified School District, and is the only school on Santa Catalina. Elementary, middle and high school students share the same campus. The total enrollment for 2020-21 school year was 468 students: 213 elementary students \(TK-5\), 115 middle school students \(6-8\), and 140 high school students \(9-12\). The graduating class of 2020 was 36 students.¹⁰ According to the California Department of Education’s California School Dashboard, the ethnic/racial make-up of the Avalon K-12 School in 2019 was: 76.6% Hispanic, 21.4% White, 0.4% African American, and 1.1% two or more races. A total of 71.3% of the school’s students come from socioeconomically disadvantaged backgrounds and 14.9% are students with disabilities. The school has a graduation rate of 88.4%.¹¹](#)

The Fair Housing Task Force determines education scores based on math and reading proficiency, high school graduation rates, and student poverty rates. All around, the City performs well in regard to education scores using the Task Force’s metrics ([Figure 6-9](#)[Figure 6-14](#)), with the populated census blocks of the City receiving moderate to high scores (0.50-0.75) although the less populated areas have “Less Positive Education Outcomes” (<0.25). However, other data sources including the California Assessment for Student Performance and Progress identifies a significant proportion of Avalon’s K-12 students as not

⁹ Southern California Association of Governments, Profile of the City of Avalon, May 2019.

¹⁰ Avalon Schools, *Our Schools*, <https://lbavalon.schoolloop.com/historyschool>, accessed January 24, 2022.

¹¹ California Department of Education, California School Dashboard, <https://www.caschooldashboard.org/>, accessed January 24, 2022.

meeting or exceeding the standards for English Language (65%) and not meeting or exceeding the standards for Math (75%). This indicates that the Fair Housing Task Force's educational score determinations do not reflect location conditions or experiences, and perhaps take into account factors that paint an overly optimistic portrait of the educational opportunity scores in Avalon.

Environmental Opportunity

Environmental health scores are determined by the Fair Housing Task Force based on CalEnviroScreen 3.0 pollution indicators and values. The California Office of Environmental Health Hazard Assessment (OEHHA) compiles these scores to help identify California communities disproportionately burdened by multiple sources of pollution. In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviroScreen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. As shown in ~~Figure 6-10~~Figure 6-15, environmental health scores across Catalina Island, including Avalon, show "Less Positive Environmental Outcomes" or the lowest score (<0.25).

Transportation

Availability of efficient, affordable transportation can be used to measure fair housing and access to opportunities. The SCAG Avalon Local Profile states that in 2018, 24.3% residents drove alone to work and the mean travel time to work was 7.8 minutes. Between 2000 and 2018, the average travel time to work decreased by approximately 3 minutes. In comparison, the mean travel time to work in Los Angeles County was 30.91 minutes and 73.7% of residents drive alone to work. Walking and biking are common modes of transport in the City due to Avalon's small geographic area.

Public transportation in Avalon is provided by Avalon Transit, operated by Transportation Concepts. The Garibaldi community fixed route bus serving central Avalon from the Cabrillo Mole to Casino Way and up-canyon to the Wrigley Memorial and Botanic Garden. There is only one bus is in service and arrives at each stop approximately every 40 minutes from 8 am to 6 pm. Avalon Transit also provides Dial-A-Ride for seniors (55+) and individuals with disabilities. Avalon Access provides complementary para-transit services for individuals unable to ride the Garibaldi due to a disability.¹²

Overall Opportunity

Overall opportunity area map scores for Avalon census block groups are presented in ~~Figure 6-11~~Figure 6-16 along with the City's sites inventory. The Opportunity Areas Map is consistent with the domain scores in that opportunities improve with proximity to Avalon Bay. The City generally has high scores - Highest Resource and High Resource. As shown in Table 6-5, the educational and environmental opportunity scores are consistent across census tracts, and it is only the economic opportunity score which varies somewhat across census tracts depending on the proximity to Avalon Bay. It must be noted though that there is missing or insufficient data for areas in the foothills around Avalon and for the remainder of Catalina Island.

¹² City of Avalon Website, *Avalon Transit*, <http://www.cityofavalon.com/transit>, accessed on January 24, 2022.

Disproportionate Housing Need and Displacement Risk

Overcrowding and Overpayment

Typically, a housing unit is considered overcrowded if there is more than one person per room and severely overcrowded if there are more than 1.5 persons per room. As discussed in the Needs Assessment of the Housing Element, overcrowding is a significant issue in the City of Avalon with 11.6% of all households and 16.3% of renter households living in overcrowded conditions (i.e., more than one person per room). As shown in Table 3-18Table 3-18Table 3-18 in the Housing Needs Assessment, the average household size in Avalon was 2.51 persons in 2018. The average household size was higher for renters (2.73 persons); owner households had an average size of 1.97 persons. As Figure 6-12Figure 6-17 indicates, the more populated areas in the City show a high degree of overcrowding (>20%) while the less populated areas in the foothills and elsewhere on Catalina Island are below the statewide average for overcrowding (<8.2% of households).

Given the high percentage of multifamily housing and the smaller housing sizes for single family homes on the island, it follows that overcrowding would be prevalent. As previously discussed, housing costs in Avalon are very high and many service-industry employees do not have access to a housing unit and/or cannot pay the market rent without doubling-up (or more) with other occupants. Overcrowding typically means that either appropriately sized housing is unaffordable to current residents, or that the type of housing available does not meet the need resulting in an increased risk of displacement for households living in overcrowded situations. Compared to other coastal communities, Avalon has a much higher concentration of overcrowded households, as illustrated in Figure 6-17. In Avalon, it can be reasoned that the primary contributing factor is the limited housing stock. There are simply not enough units in the City to accommodate its workforce, and many individuals who work on the island must result to overcrowded living conditions to have a place to stay. In any case, overcrowding typically means there is a disproportionate need for more housing, more affordable housing, and potentially larger housing units. In the case of Avalon, homes on Catalina Island were historically second homes of the cottage variety for mainland residents. Moreover, development patterns in the City are of compact sites with small building footprints and small homes. Geography also places restrictions on development and the City is largely built out.

Like overcrowding, overpayment is also an issue in Avalon (like the rest of southern California). A household is considered cost burdened if the household pays more than 30% of its total gross income for housing costs. For renters, housing costs include rent paid by the tenant plus utilities. For home owners, housing costs include mortgage payment, taxes, insurance, and utilities. Renter households and owner households demonstrate similar patterns of overpayment (Figure 6-13Figure 6-18 and Figure 6-14Figure 6-19). In the SCAG region, overpayment has remained an issue among renters in recent years while decreasing among homeowners. For both groups, Census Tract 5990 has a percentage of the population overpaying in the 40-60% range. Overpayment increases the risk of displacing residents who are no longer able to afford their housing costs. To address displacement risks due to overpayment, the City will provide incentives to encourage affordable development and will develop a targeted program to connect lower income residents with affordable homeownership and rental opportunities within the City (Programs 5, 6 and 8). Additionally, the City will continue to work with the Santa Catalina Island Company regarding the development of seasonal employee housing and will continue implementing requirements for hotels, motels, and resort uses and new commercial development to provide rental space for at least 50% of the number of peak season employees at the time all required City entitlements have been granted.– This program will benefit lower income employees, including extremely low-income employees (Program 7).

Housing Condition

In addition to overpayment, over half (51.2%) of the housing stock in Avalon is older than 50 years and may need repairs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include plumbing, roof repairs, electrical repairs, foundation rehabilitation, or other significant improvements. While it is likely that some homeowners have conducted ongoing maintenance to maintain the value of their homes, it is likely that many of these homes need some degree of repairs. In some cases, the cost of repairs can be prohibitive, resulting in the owner or renter living in substandard housing conditions or being displaced if the house is designated as uninhabitable or during rehabilitation. According to Comprehensive Housing Affordability Strategy (CHAS) data compiled by the U.S. Census Bureau, approximately 40 percent of Avalon households have at least one housing problem, which may include overcrowding, lack of a complete kitchen, lack of complete plumbing, or cost burden. As identified above, many homeowners and renters in Avalon are cost burdened, and may represent a large portion of the 40 percent of households with a housing problem identified in CHAS. To prevent residents occupying or being displaced from substandard housing, the City will seek funding to assist homeowners with rehabilitation costs and will develop a code enforcement process that will prevent displacement or assist with relocation costs for lower income households. Program 1 has been added to the Housing Plan address this issue.

Persons Experiencing Homelessness

As discussed in the Housing Needs Assessment section of the Background Report, the 2020 Homeless Count identified 31.2 people in the City of Avalon experiencing homelessness, representing less than 0.1% of Los Angeles County's total homeless count (66,436 individuals). An estimated 28.2 (90.4%) of the 31.2 homeless individuals in Avalon were unsheltered and an estimated 3 (9.6%) were sheltered. Countywide, there has been an increase in the recorded homeless population since 2016, at least partly due to more accurate counting measures. As described under Program 25 in the Housing Plan, the City will coordinate with local organizations and the County of Los Angeles to address homeless issues in the City. Given that access to regional facilities for persons experiencing homelessness in Avalon is limited, the local community partners play a key role in providing services in emergency situations. The Catalina Bible Church and the Avalon Community Church provide emergency assistance for those in need. The Catalina Bible Church provides emergency shelter for up to two people for a maximum of two days (in emergency situations, all the churches on the Island allow homeless individuals to sleep on floors). The Catalina Bible Church also operates a Food Ministry, which provides a week of food (20 to 25 lbs) for at a low cost. The Avalon Community Church provides emergency food as well as emergency housing. The Avalon Community Church typically accommodates up to three persons each night on a couch or pull-out mattress at the Teen Center after the Center is closed for the day. There is no limit on the length of stay but individuals must leave the facility in the morning. At this time, the Church only has capacity to accommodate males in need. The Church continues to explore other arrangements for women in need

Displacement Risk

The annual rate of increase in average home value or rental prices compared with annual changes in the average income in the City also indicates an increased risk of displacement due to housing costs outpacing wage increase, a trend that is felt throughout the region, state, and nation. According to *Zillow.com*, the average home value in Avalon has increased steadily since 2010, increasing from \$400,000 to \$796,170 in October 2021. According to *RENTCafe.com*, the median rent in Avalon was \$1,900 per month (October 2021). The City acknowledges that information regarding rents in Avalon is limited; there are very few year-long rentals available for rent and the Santa Catalina Island Company maintains several properties that are subsidized for employee housing that are likely factored into average rental data. As such, local insight indicates that average monthly rental rates are likely much higher than \$1,900 a month, particularly for larger units (two+ bedrooms).

Figure 6-20 shows the census tracts in Avalon that are designated as "Sensitive Communities" that would

[potentially displace existing residents due to redevelopment. As shown in Figure 6-20, census tract 5990.00, which includes most of the population of the City of Avalon, is considered a “Sensitive Community” where residents may be particularly vulnerable to displacement in the event of increased redevelopment and shifts in housing costs. Communities were designated sensitive if they currently have populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost. Vulnerability is defined as share of very low-income residents is above 20% in 2017 and the tract meets one other criteria related to renters, diversity, and housing burden.](#)

In order to address affordability challenges, the City will encourage and incentivize development of affordable housing units and will develop a program to connect lower income residents with affordable housing opportunities. Displacement risk increases when a household is paying more for housing than their income can support, their housing condition is unstable or unsafe, and when the household is overcrowded. Each of these present barriers to stable housing for the occupants. In Avalon, all income groups are impacted by overpayment and the condition is not specifically linked to only areas with a lower median income. Taken together though, the risk of displacement is highest for lower income households, including those that are currently living in overcrowded conditions and/or overpaying for housing. With programs to incentivize new affordable development, and programs to support existing residents, the City will proactively work to address and prevent risks associated with displacement.

[To the extent that future development occurs in areas where there is existing housing, all housing must be replaced according to SB 330’s replacement housing provisions \(Government Code Section 66300\). SB 330 also provides relocation payments to existing low-income tenants. The State has also adopted “just cause” eviction provisions and statewide rent control to protect tenants from displacement.](#)

[Research has shown that low-income renter populations are disproportionately exposed to environmental hazards and that housing tenure is a telling determinant of social vulnerability to disasters. Renters bear the brunt of the existing affordable housing shortage, and their adaptive capacity to cope and recover from the impacts of environmental hazards may be reduced due to systemic inequities and limited resources. As discussed in the Constraints section under Environmental Constraints, environmental hazards affecting residential development in the City include geologic and seismic conditions, which provide the greatest threat to the built environment, aircraft accidents, and wildfires. Liquefaction and other seismic-related issues are addressed by the State Universal Building Code \(UBC\). The entire Santa Catalina Island, including Avalon, is designated as a very high fire hazard zone by the California Department of Forestry and Fire Protection \(CalFire\). The City’s General Plan Safety Element, in conjunction with the City’s Municipal Code and existing State regulations would somewhat mitigate the risk of fire hazards.](#)

Site Inventory Analysis

AB 686 requires that jurisdictions identify sites throughout the community in a manner that is consistent with its duty to affirmatively further fair housing. The site identification includes not only an analysis of site capacity to accommodate the RHNA (provided in the Housing Resources section), but also considers whether the identified sites serve the purpose of replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity. Including ADU projections (84 units) and development of three Tremont Street-CICO-owned vacant sites, the sites inventory identifies capacity for at least 15828 units, 156 of which have been identified as being able to meet the City's remaining lower and moderate income RHNA. Together with the ongoing and remaining development capacity at Hamilton Cove, the City has demonstrated the ability to exceed its RHNA by 14717 units (or 50%). As described in the Resources chapter of this Background Report, the City has identified Tremont Street as the site-best suited to accommodate its remaining RHNA, however, the City has also identified two other opportunity sites (all owned by CICO) that are short-term development sites that may develop during the planning period. For this reason, the City has mapped the location of the RHNA site (Tremont Street) and the opportunity sites on the exhibits prepared for this analysis. The intent is to describe the range of development options available, while recognizing that Tremont Street exhibits those qualities best-suited to accommodate the City's RHNA (including an appropriate size, access to infrastructure, adjacent to goods, services, and recreation amenities, and undeveloped portions of the site).

As previously stated, the City finds that there are no known historic patterns of segregation by race and ethnicity, persons with disabilities, familial status, age, or income. Nonetheless, as described throughout this Housing Element, the City is committed to supporting the development of housing to promote a balanced and integrated community. This is highlighted in Table 5-4 in the Housing Resources chapter, as the City has identified a surplus of sites and excess development capacity for housing for all income levels.

Figure 6-2 shows the sites identified to meet Avalon's RHNA allocation in relation to racial/ethnic diversity. As shown, proposed RHNA and opportunity sites are located throughout the community and are not concentrated in areas of low diversity. In fact, all sites are located in areas of high diversity, and no sites are located in areas of lower diversity.

Figure 6-4 shows the sites designated to meet Avalon's RHNA allocation in relation to the distribution of persons with disabilities. As shown, proposed RHNA and opportunity sites are located throughout the community and are not concentrated in areas with high proportions of persons with disabilities. The City of Avalon does not have a disproportionate concentration of persons with disabilities or a smaller percentage of persons with disabilities that would indicate barriers to this population. The locations of sites designated to meet the City's RHNA allocation are not expected to contribute to patterns of isolation or segregation for persons with disabilities.

Figure 6-7 shows the sites designated to meet Avalon's RHNA allocation in relation to female-headed households. As shown, proposed RHNA and opportunity sites are located throughout the community and are not concentrated in areas with high levels of female-headed households. The locations of sites designated to meet the City's lower income RHNA allocation are not expected to contribute to patterns of isolation or segregation for female-headed households.

Figure 6-8 shows the sites designated to meet Avalon's RHNA allocation in relation to the distribution of senior residents. As shown, proposed RHNA and opportunity sites are located throughout the community and are not concentrated in areas with high proportions of senior residents. As discussed above, Avalon

has a lower proportion of senior residents compared to the SCAG region, likely due to its more isolated location on an island. The locations of sites designated to meet the City's lower income RHNA allocation are not expected to contribute to patterns of isolation or segregation for senior households.

Figure 6-9 shows the sites designated to meet Avalon's RHNA allocation in relation to median household income. As shown, proposed RHNA and opportunity sites are located throughout the community and are not concentrated in areas with low median household income. However, as shown in Figure 6-10, sites are located in areas with higher concentrations of very-low and low-income populations, but the overall distribution is spread amongst block groups with varying levels of median household income. The Housing Plan also include Program 14, Accessory Dwelling Units to help meet the City's housing needs for all income levels and also provide a housing resource for low- and moderate-income households throughout the entire community, not just in any single geographic area. The location of new development to meet the City's lower income RHNA is not expected to contribute to patterns of isolation or segregation for lower income households.

The City examined the Opportunity Areas Map prepared by HCD and TCAC (~~Figure 6-11~~Figure 6-16). The Opportunity Areas Map identifies areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and environmental health outcomes for low-income families - particularly long-term outcomes for children.

Using the statewide Opportunity Areas Map and indicators of segregation, displacement risk, and access to opportunity as overlays to the City's site inventory, the City was able to identify if the sites identified in the inventory to accommodate the lower income Regional Housing Needs Allocation (RHNA) affirmatively further fair housing and combat any existing identified patterns. ~~The three RHNA site and opportunity sites identified to meet the City's remaining RHNA~~ are located at Company-owned property; consistent with past development, the Company intends to develop units affordable exclusively to lower- and moderate-income households to specifically address the issues of overcrowding and overpayment. These sites are largely undeveloped but adjacent to existing roads and infrastructure, and in the case of Tremont Street (the site identified to accommodate the City's remaining RHNA), represent opportunities for intensification/infill development at sites that are partially vacant. Additionally, the City has included a program to encourage additional development of lower income units throughout the community through its accessory dwelling unit program.

The City is committed to promoting the development of more affordable housing in Avalon, with a special emphasis on highlighting opportunities for employee/workforce housing. The Housing Plan includes programs such as Program 7, Temporary Summer Housing. The City will continue working with the Santa Catalina Island Company regarding the development of seasonal employee housing. Additionally, the City will continue implementing requirements for hotels, motels, and resort uses and new commercial development to provide rental space for at least 50% of the number of peak season employees at the time all required City entitlements have been granted. This program will benefit lower income employees, including extremely low-income employees. Additionally, aAll of the City's RHNA is expected to be accommodated at vacant sites within the vacant portion of Tremont Street, thereby reducing the potential to displace existing residents currently residing in affordable housing.

Based on a review of the site inventory proposed to accommodate the City's RHNA, the City finds that the location of these sites affirmatively furthers fair housing by promoting the development of new affordable projects, including higher density residential development, in vacant areas where new housing is needed to address existing patterns of overcrowding and overpayment.

6C. Analysis of Contributing Factors

As shown in [Table 6-6](#), the City has identified the risk of displacement as the primary contributing factor to fair housing in Avalon. The City has included actions to address the identified factors, as well as the other issues identified in this assessment, throughout the Housing Element programs and policies. Program 263 has been included to affirmatively further fair housing, per AB 686, and take meaningful actions that address significant disparities in housing needs and access to opportunities for all groups protected by state and federal law. Regional coordination efforts outlined in several programs will ensure that the City furthers patterns of integration and development of affordable housing in such a way that it will have a positive impact on residents of the City and region.

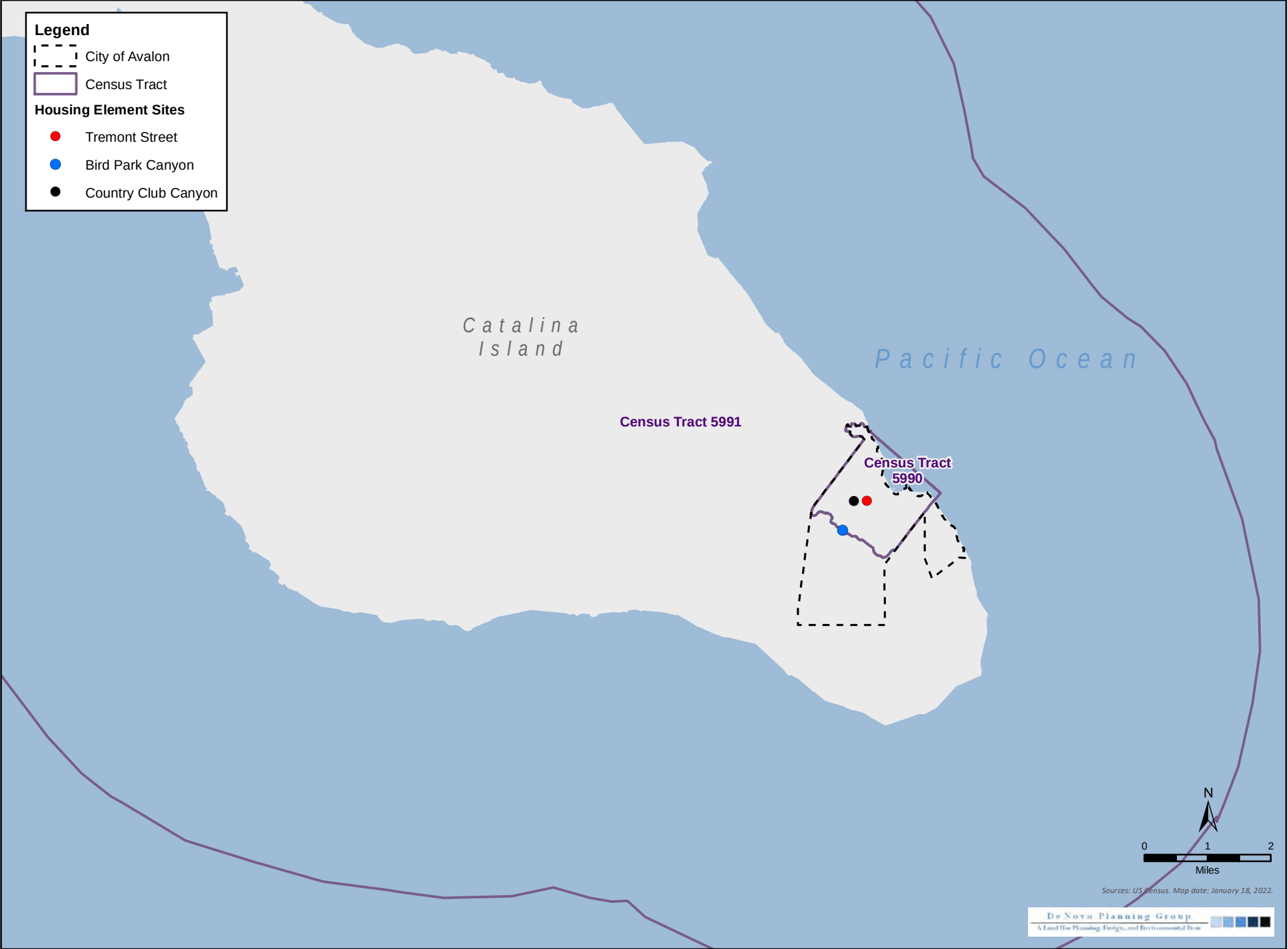
TABLE 6-6: FAIR HOUSING CONTRIBUTING FACTORS

AFH Identified Fair Housing Issue	Contributing Factors	Meaningful Actions
Lack of regional cooperation	The primary impediment to expanding the City's housing stock, including its affordable housing stock, is limited water availability. Without additional capacity it is not possible for Avalon to significantly expand its housing options. Decisions regarding the allocation of water resources are not within the City's purview; rather, the City must work with regional (local, regional, and state) providers to advocate for additional resources.	Program 2049: Water Availability
Displacement of residents due to economic pressures	There is a shortage of affordable rental and homeownership options. Much of the City's residents are employed in the service industry, which is typical low-paying. Additional affordable housing options are critical to support current and future residents.	- Program 7: Temporary Summer Housing - Program 8: Affordable Housing Development - Program 9: Inclusionary Housing Program - Program 198: Prohousing Designation Program
Deteriorated and abandoned properties	A significant portion of the City's housing stock was built in and around the 1930s; the City estimates that approximately 15-20% of homes in the community are in need of significant repair and rehabilitation. It can be very challenging to address these issues because the cost of construction on the Island is significantly higher than on the mainland, and access to goods, services, and labor is limited.	- Program 1: Housing Rehabilitation Program - Program 2: Code Enforcement - Program 3: Nontransient Rental Inspection Program

Moving forward, the City remains committed to providing a diversity of housing options for all income levels, encouraging development throughout the community to help overcome patterns of segregation, and fostering inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The respondents to the Housing Element Survey prioritized having affordable housing options and wanted to see existing housing rehabilitated, support fair/equitable housing opportunities, and believe that there should be more multifamily housing available. When asked what they thought the biggest problem with housing discrimination in Avalon was, respondents were most likely to identify familial status or race/ethnicity. The programs in Table 6-6 prioritize the development of affordable housing options as well as the development of more housing available. The programs also seek to affirmatively further fair housing. The majority of the City's Housing Programs designed to address fair housing are required to be implemented on an ongoing basis, with annual progress reports and program evaluations to ensure they are achieving the City's objectives.

To the extent that these programs represent ongoing work efforts (from the 5th Cycle Housing Element), these programs are evaluated for effectiveness in Section 2 of this Background Report. The City has undertaken a series of proactive amendments to its Zoning Code to address new requirements related to Density Bonus law and accessory dwelling units, and the City will continue to partner with local and regional stakeholders to affirmatively further fair housing.

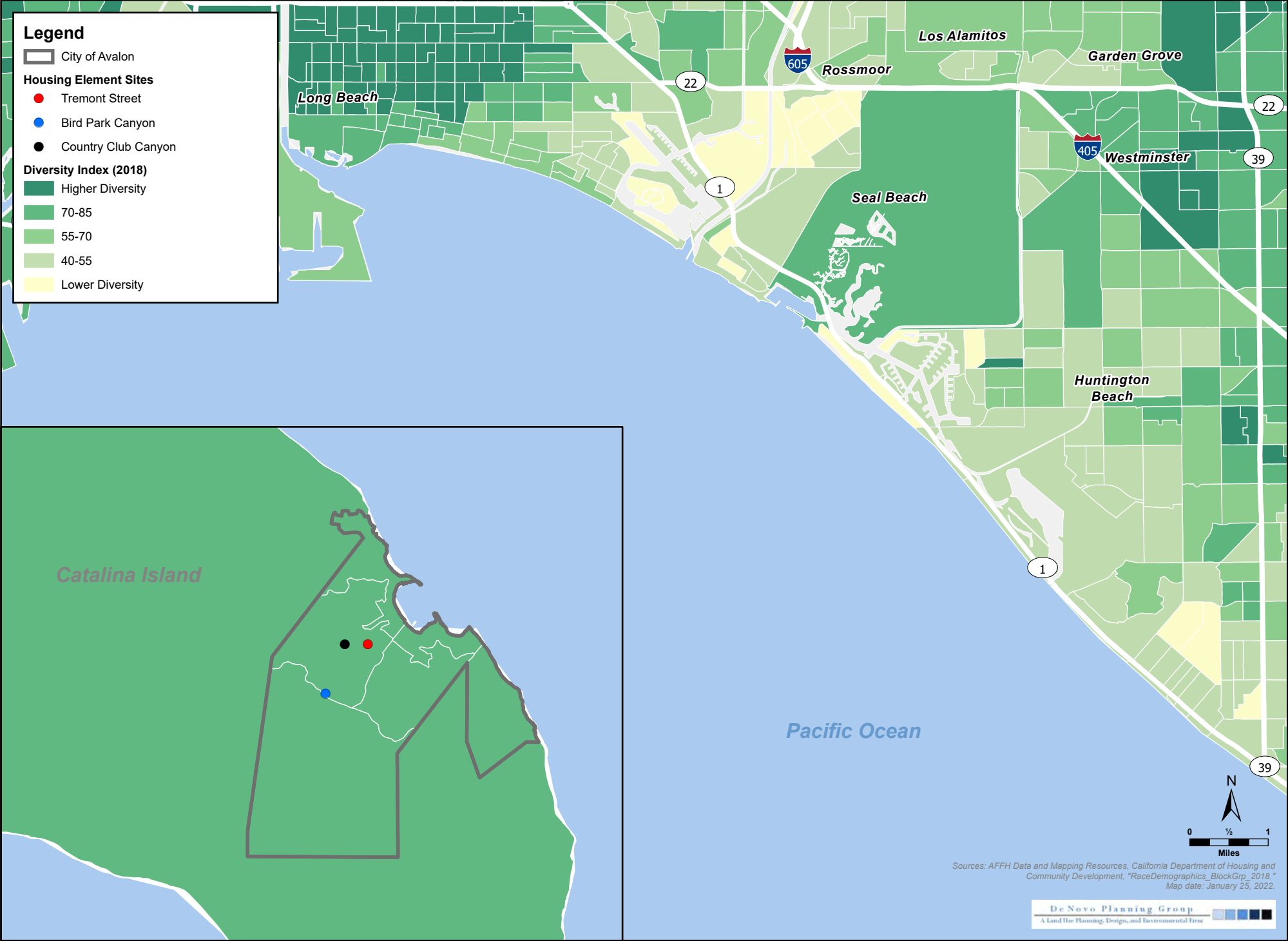
FIGURE 6-1. CENSUS TRACT BOUNDARIES



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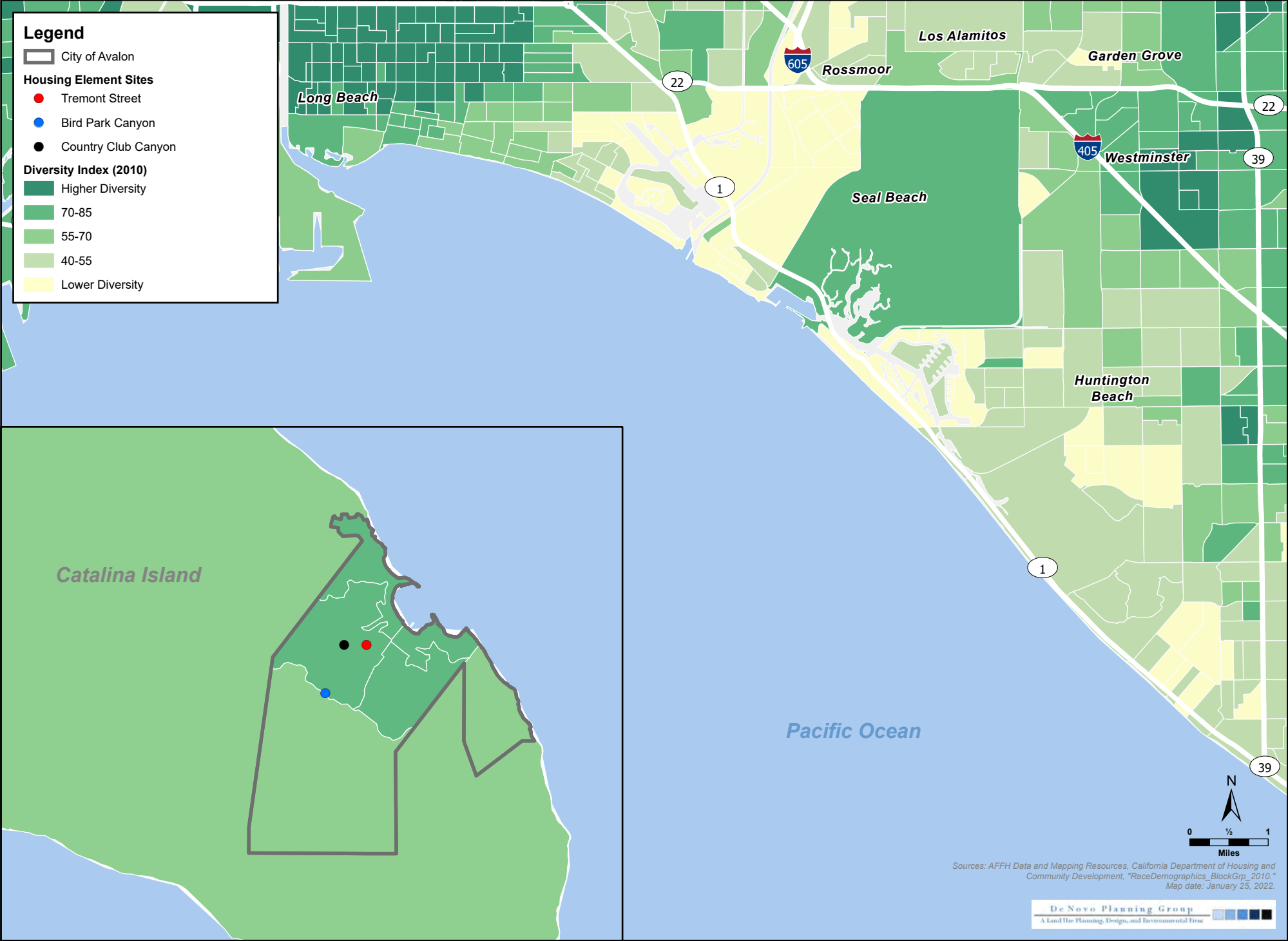
FIGURE 6-2. DIVERSITY INDEX BY CENSUS BLOCK GROUP 2018



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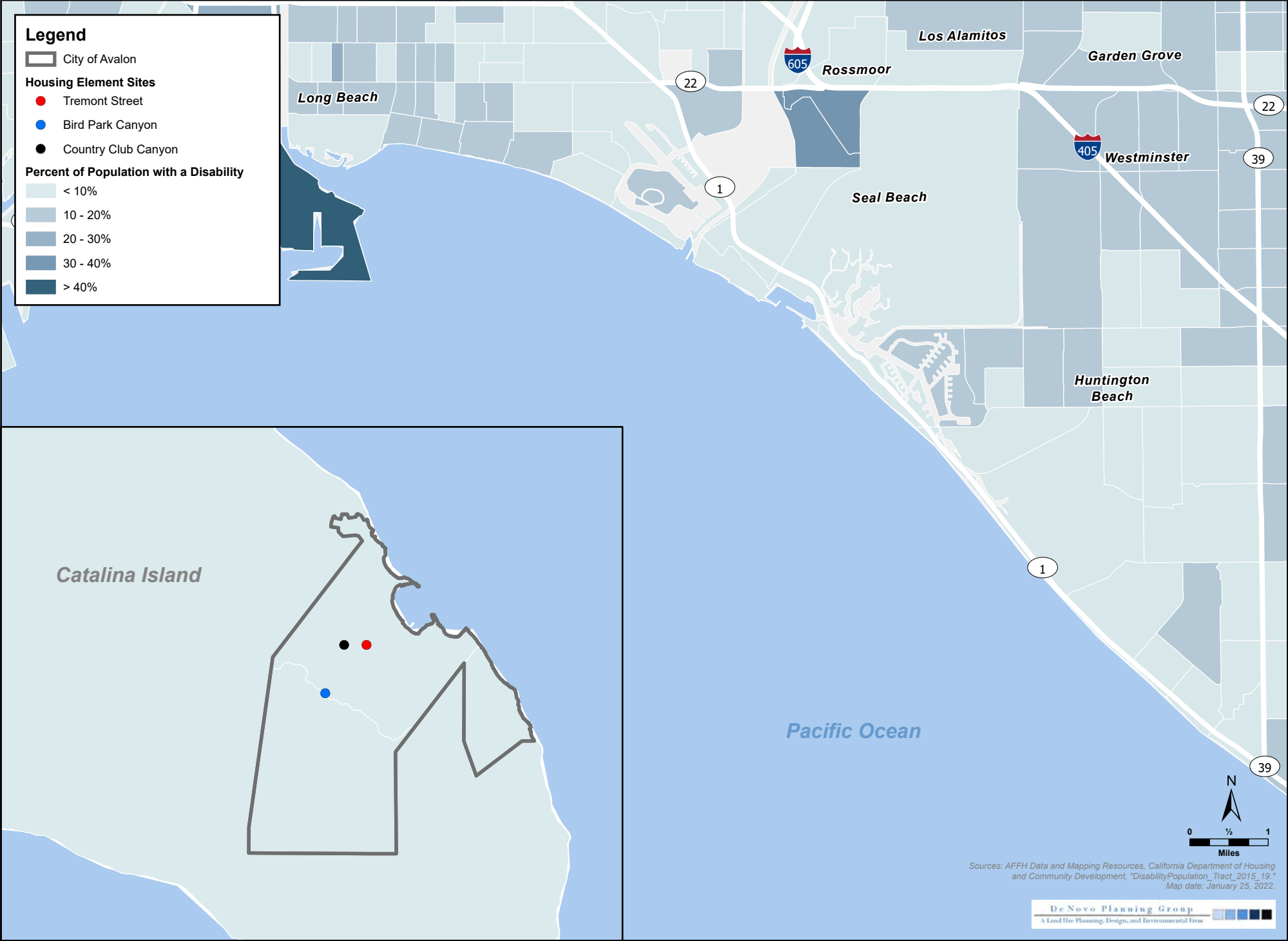
FIGURE 6-3. DIVERSITY INDEX BY CENSUS BLOCK GROUP 2010



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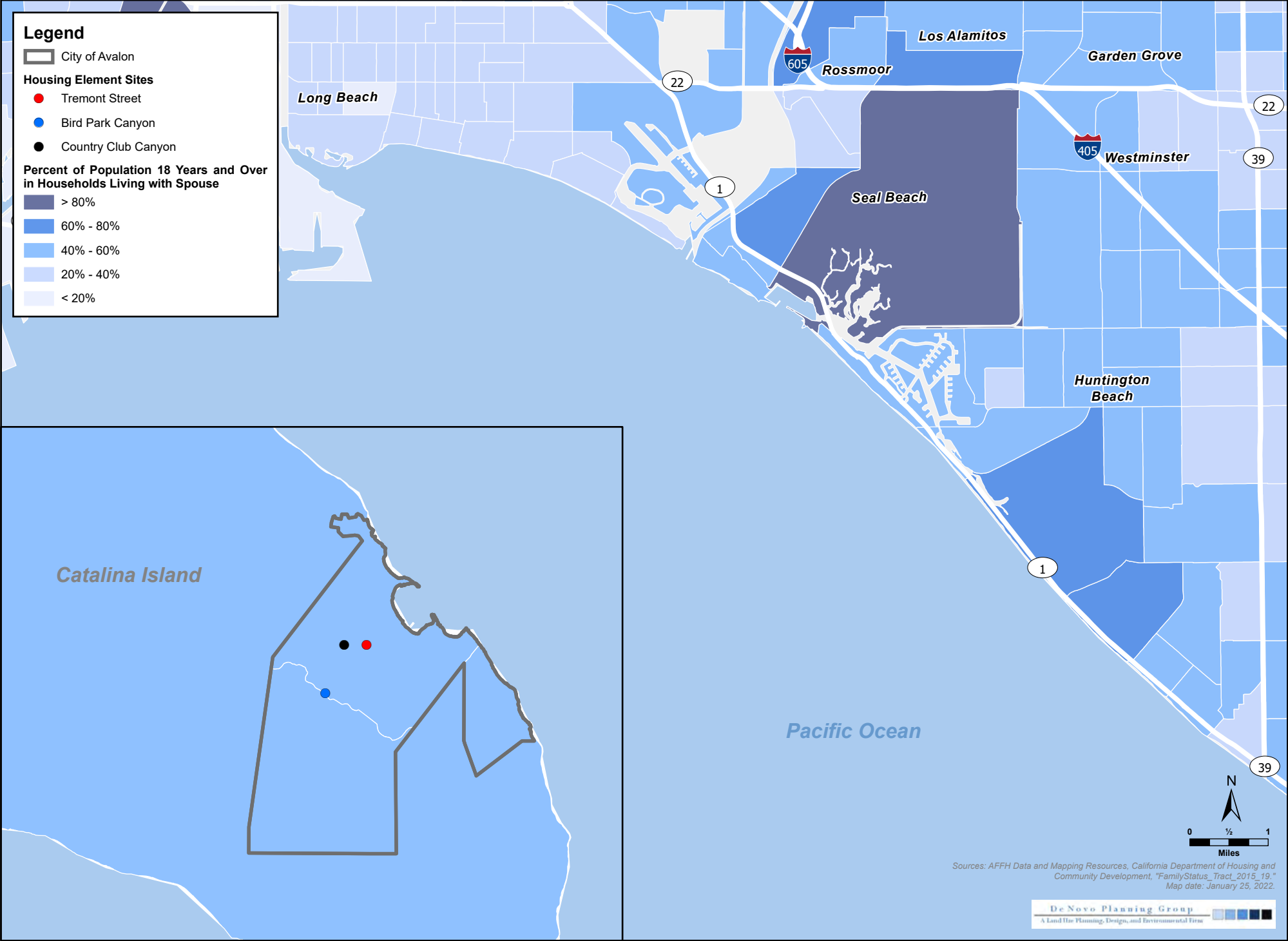
FIGURE 6-4. PROPORTION OF POPULATION WITH DISABILITIES BY CENSUS TRACT



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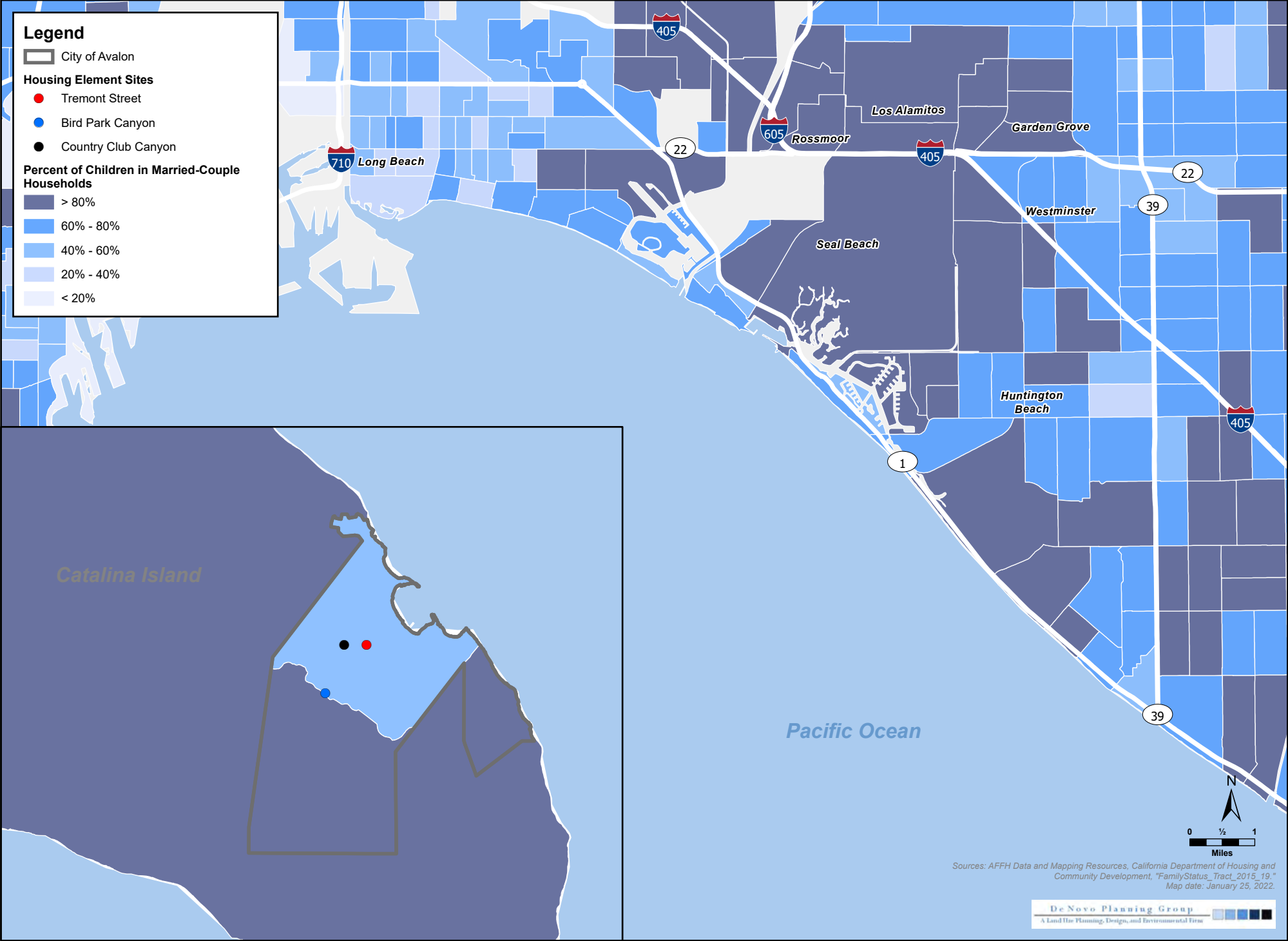
FIGURE 6-5. PERCENT OF POPULATION 18 YEARS AND OVER IN HOUSEHOLDS LIVING WITH SPOUSE



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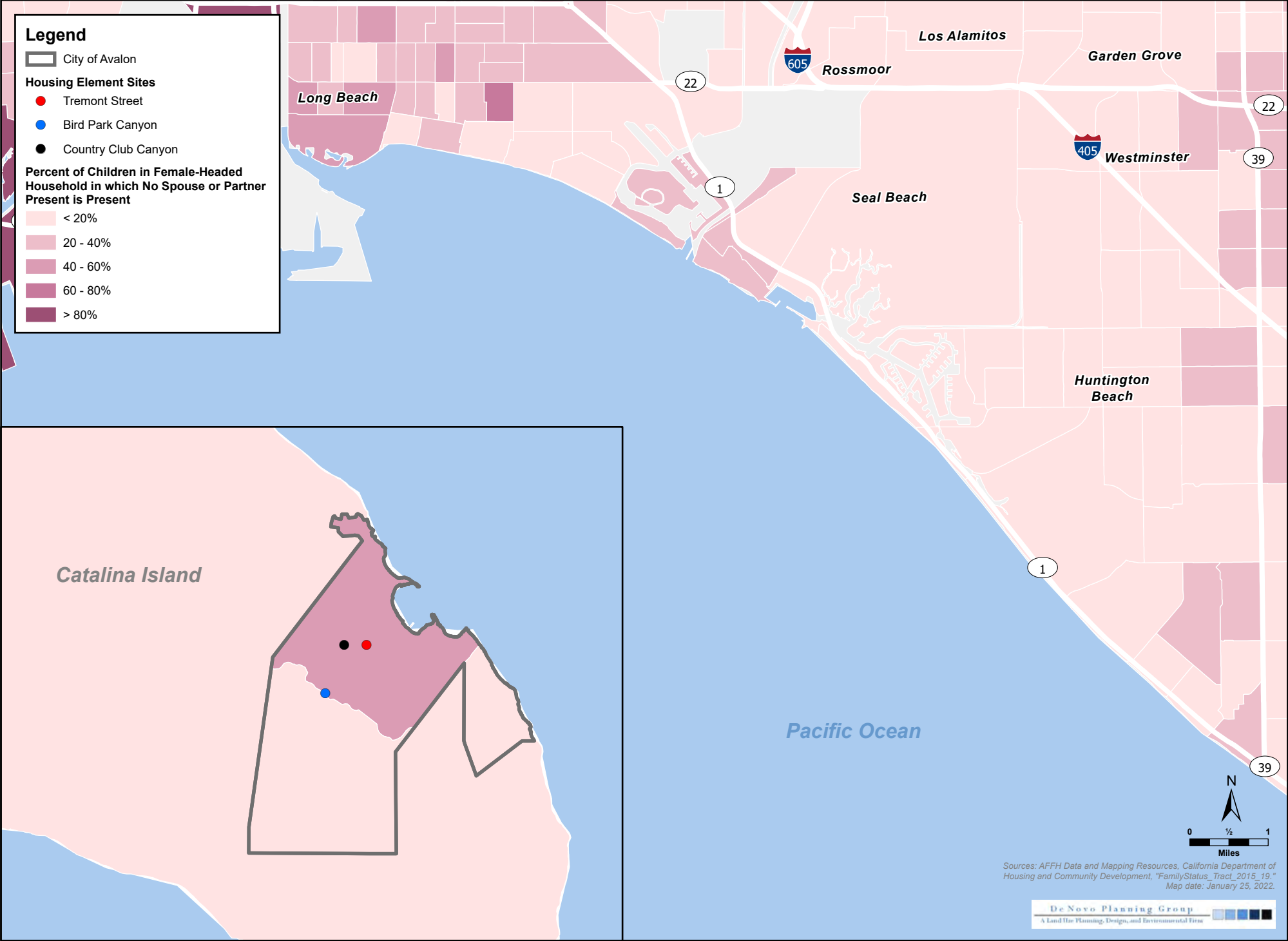
FIGURE 6-6. PERCENT OF CHILDREN IN MARRIED COUPLE HOUSEHOLDS



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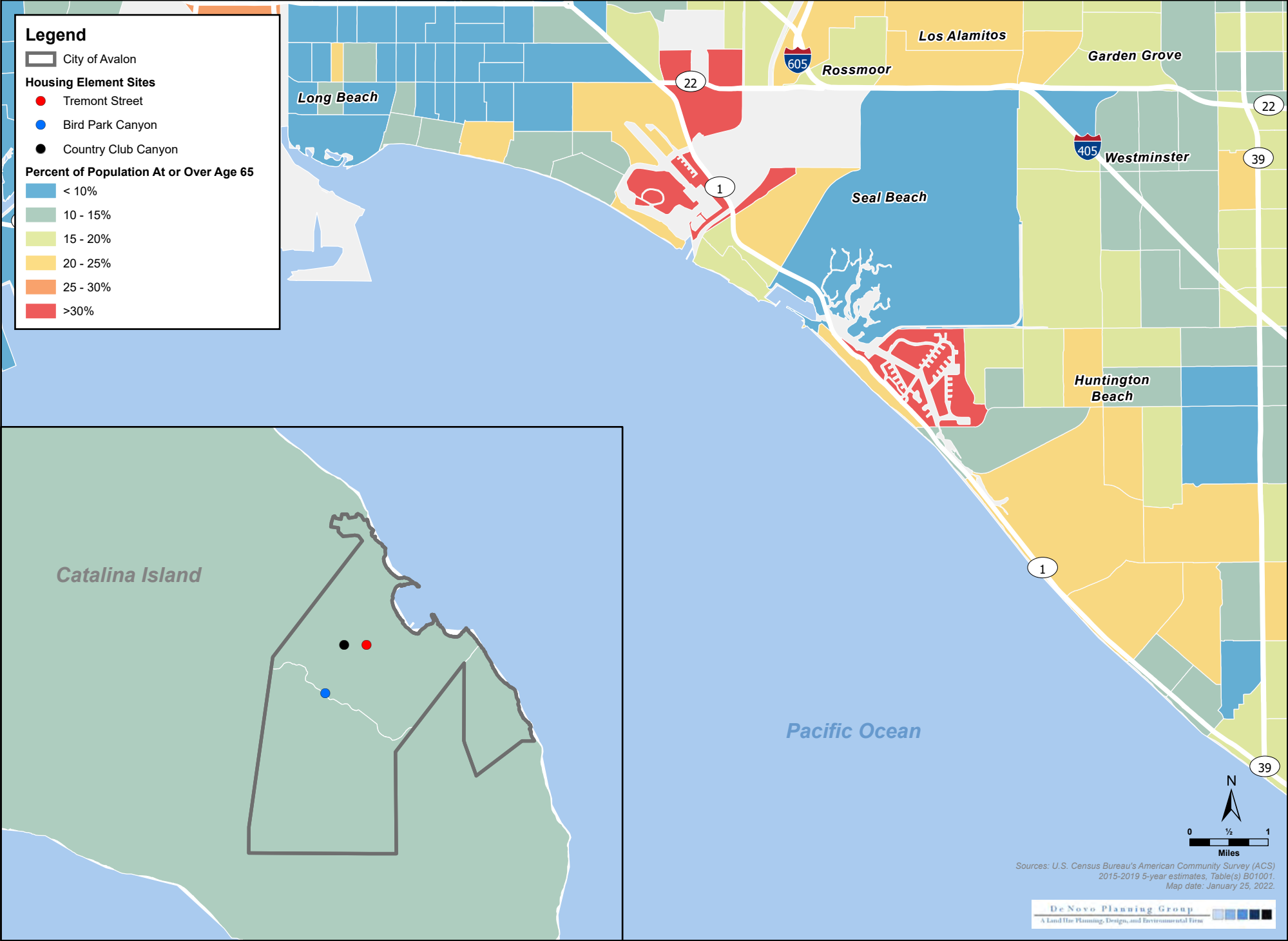
FIGURE 6-7. FEMALE-HEADED HOUSEHOLDS BY PROPORTION OF CHILDREN PRESENT BY CENSUS TRACT



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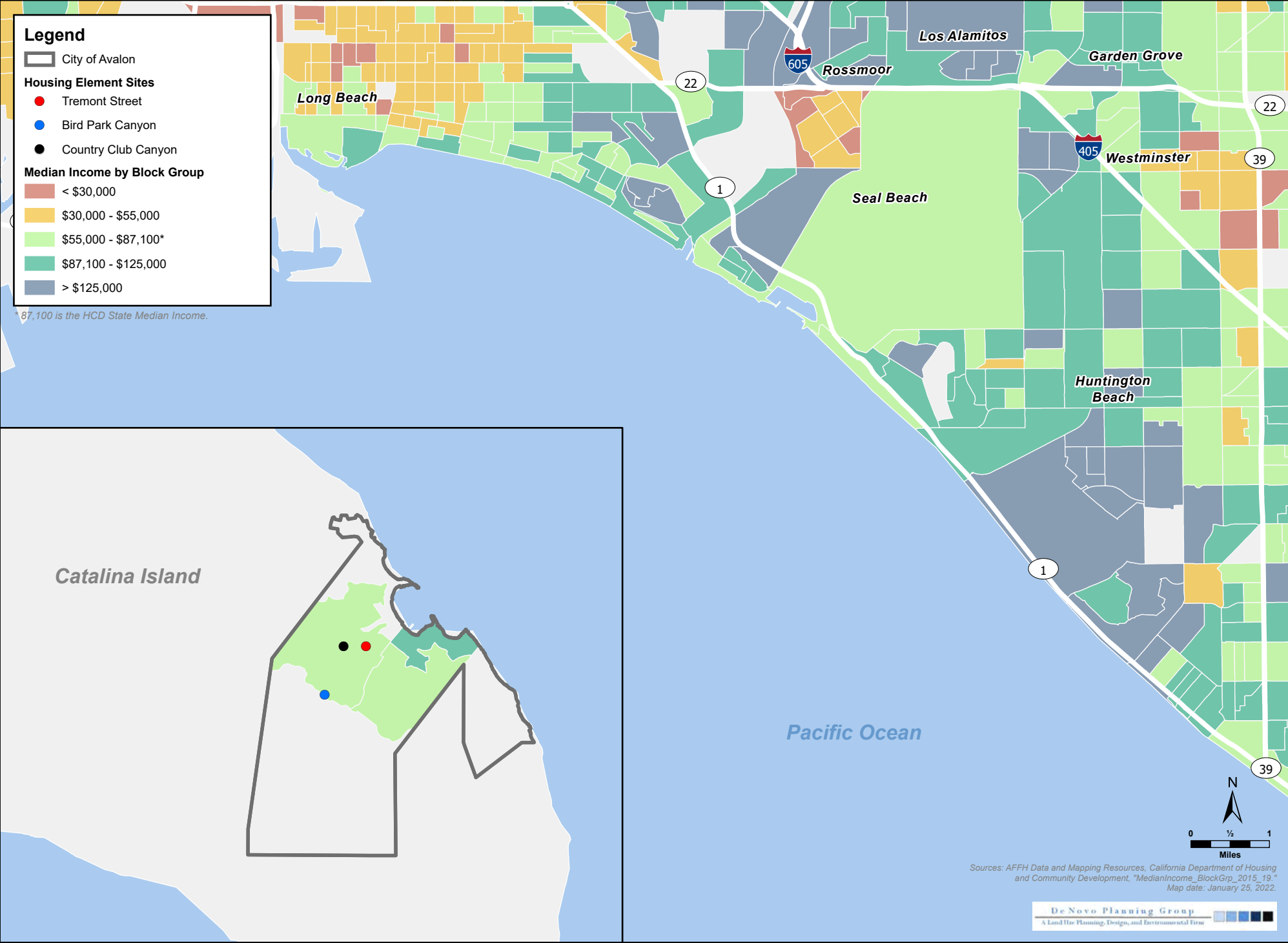
FIGURE 6-8: PROPORTION OF SENIOR RESIDENTS BY CENSUS TRACT



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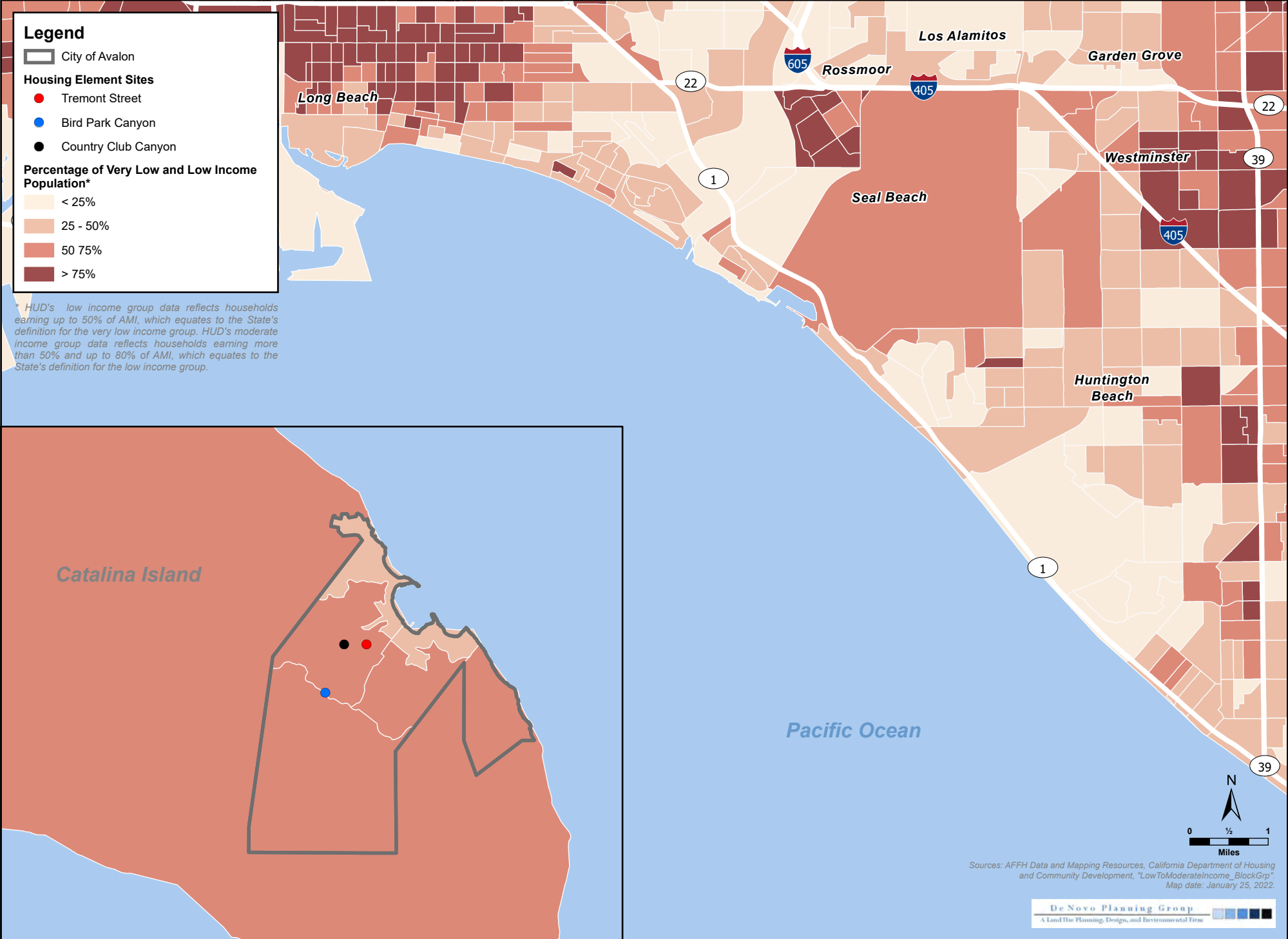
FIGURE 6-9: MEDIAN HOUSEHOLD INCOME BY BLOCK GROUP



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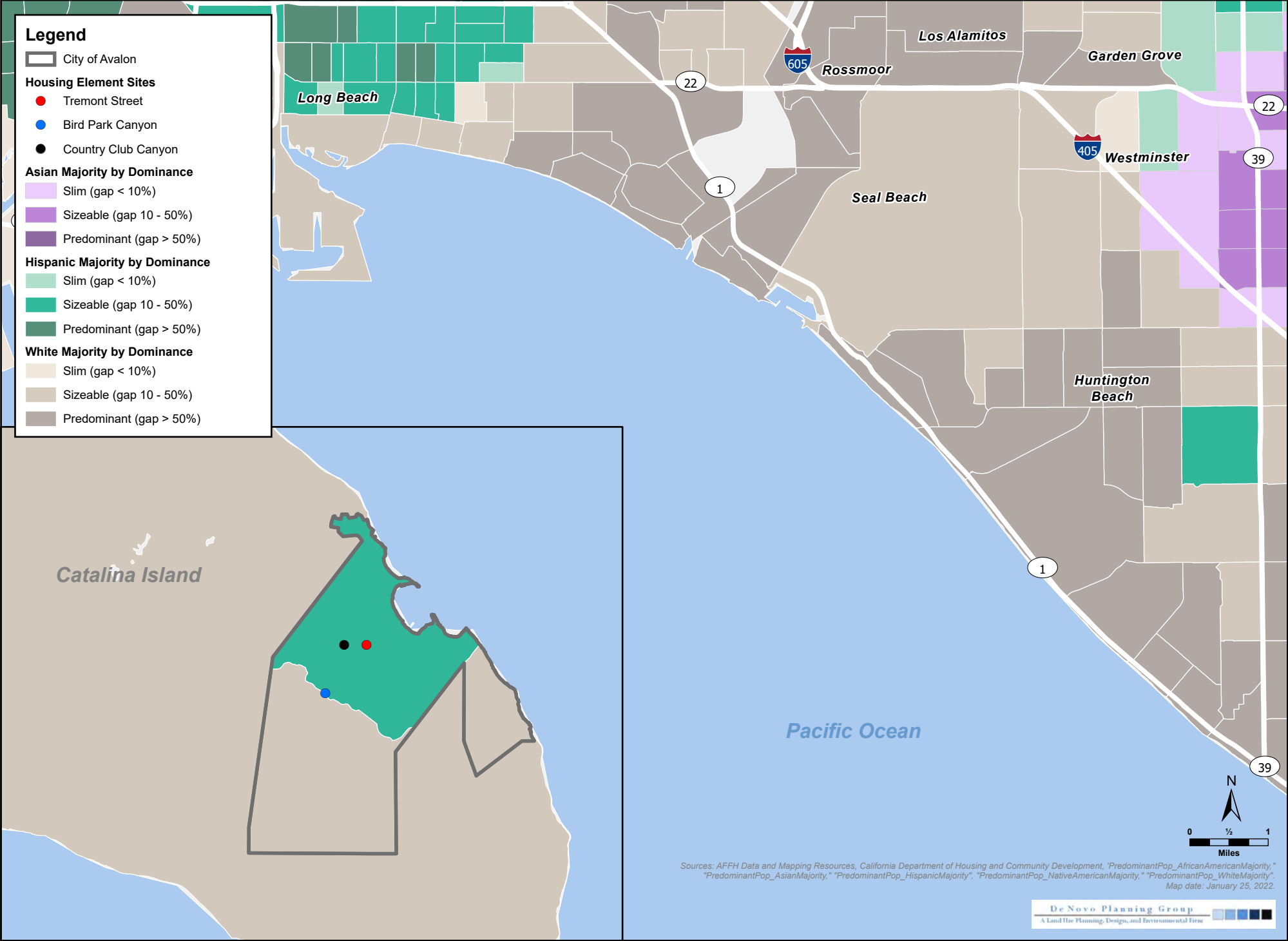
FIGURE 6-10: VERY LOW- AND LOW-INCOME POPULATION BY BLOCK GROUP



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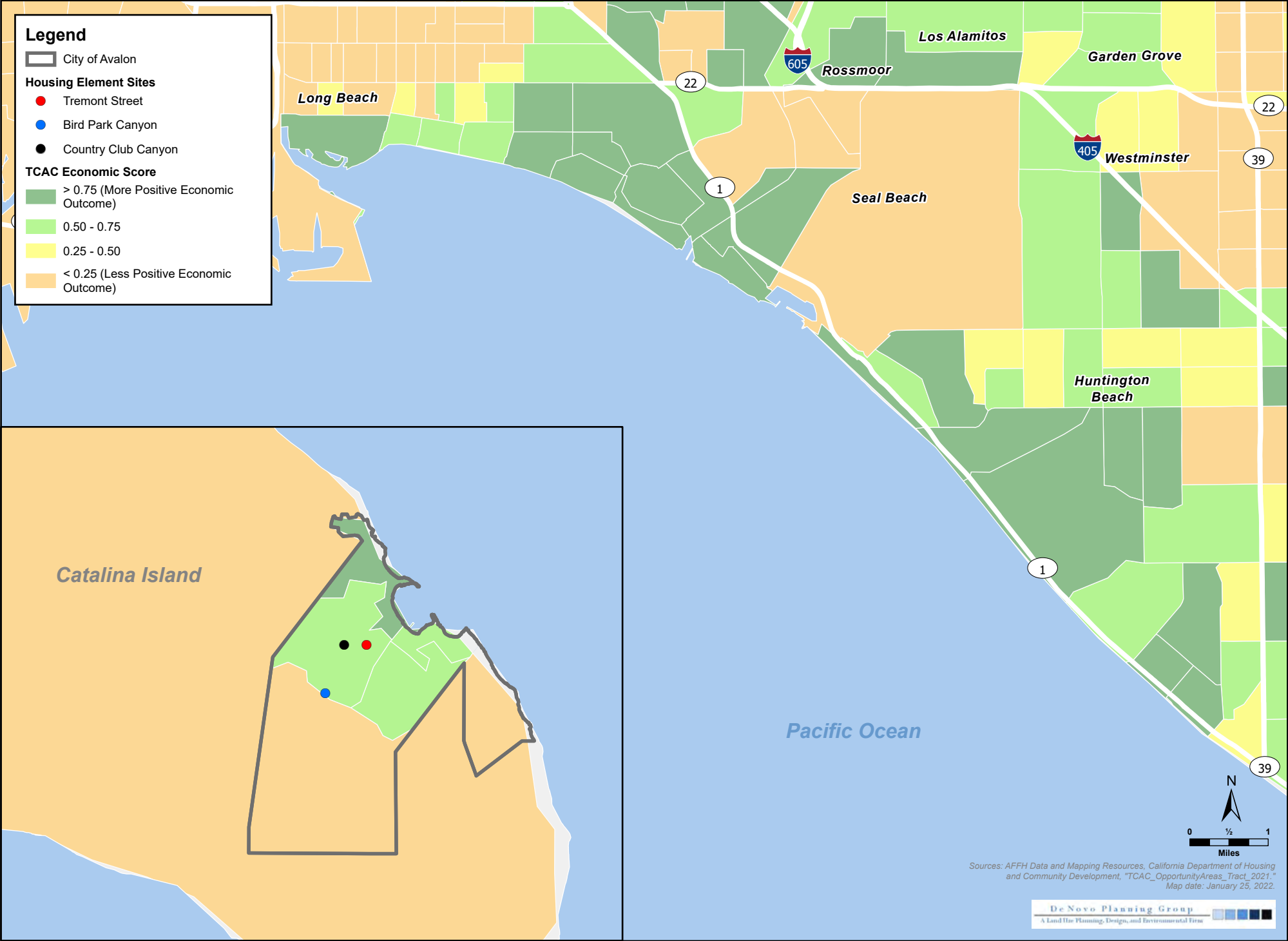
FIGURE 6-11: ETHNICITY ANALYSIS - RACIAL CONCENTRATIONS



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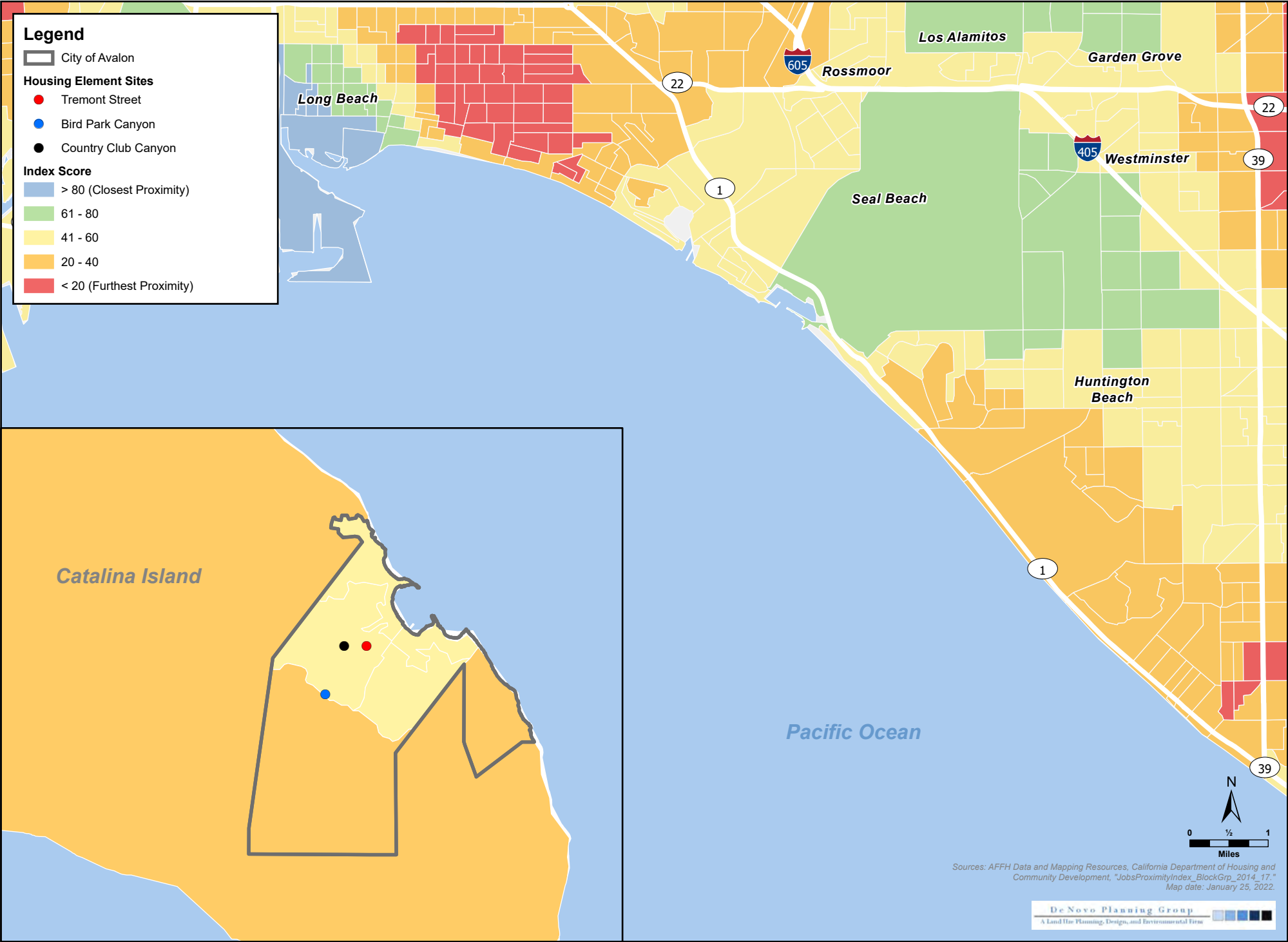
FIGURE 6-12: TCAC ECONOMIC SCORE BY CENSUS TRACT



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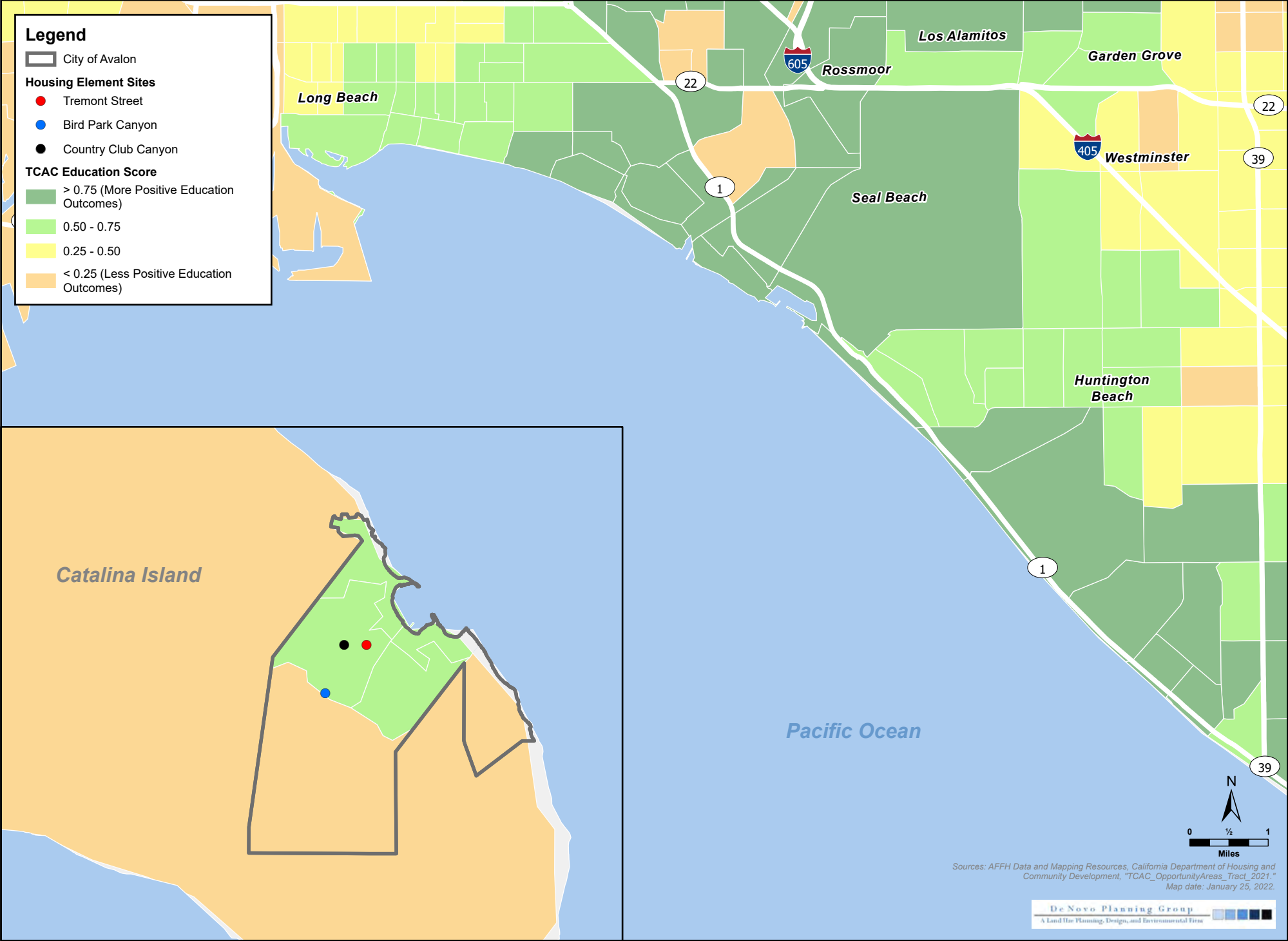
FIGURE 6-13. JOB PROXIMITY INDEX BY BLOCK GROUP



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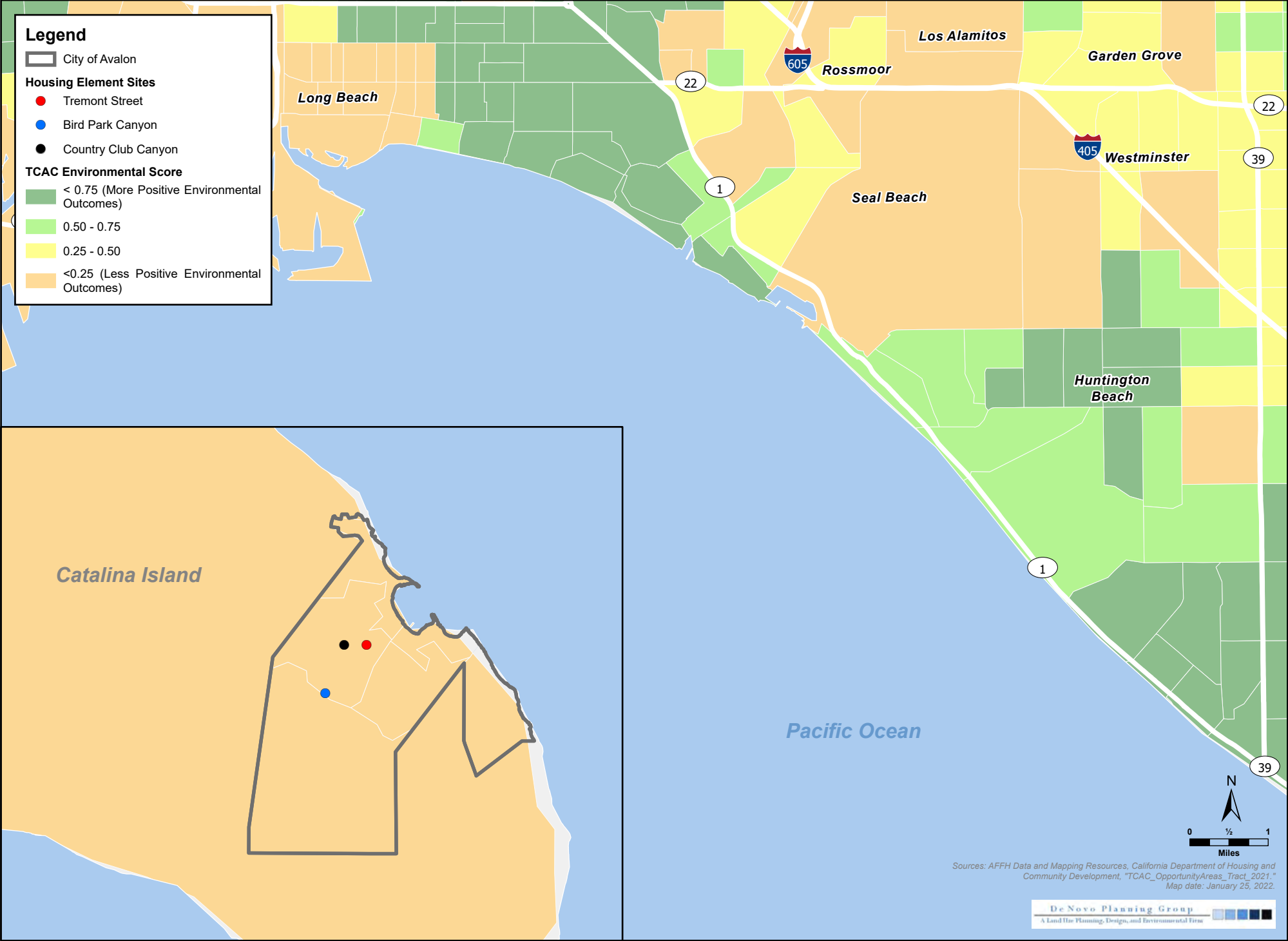
FIGURE 6-14: TCAC EDUCATION SCORE BY CENSUS TRACT



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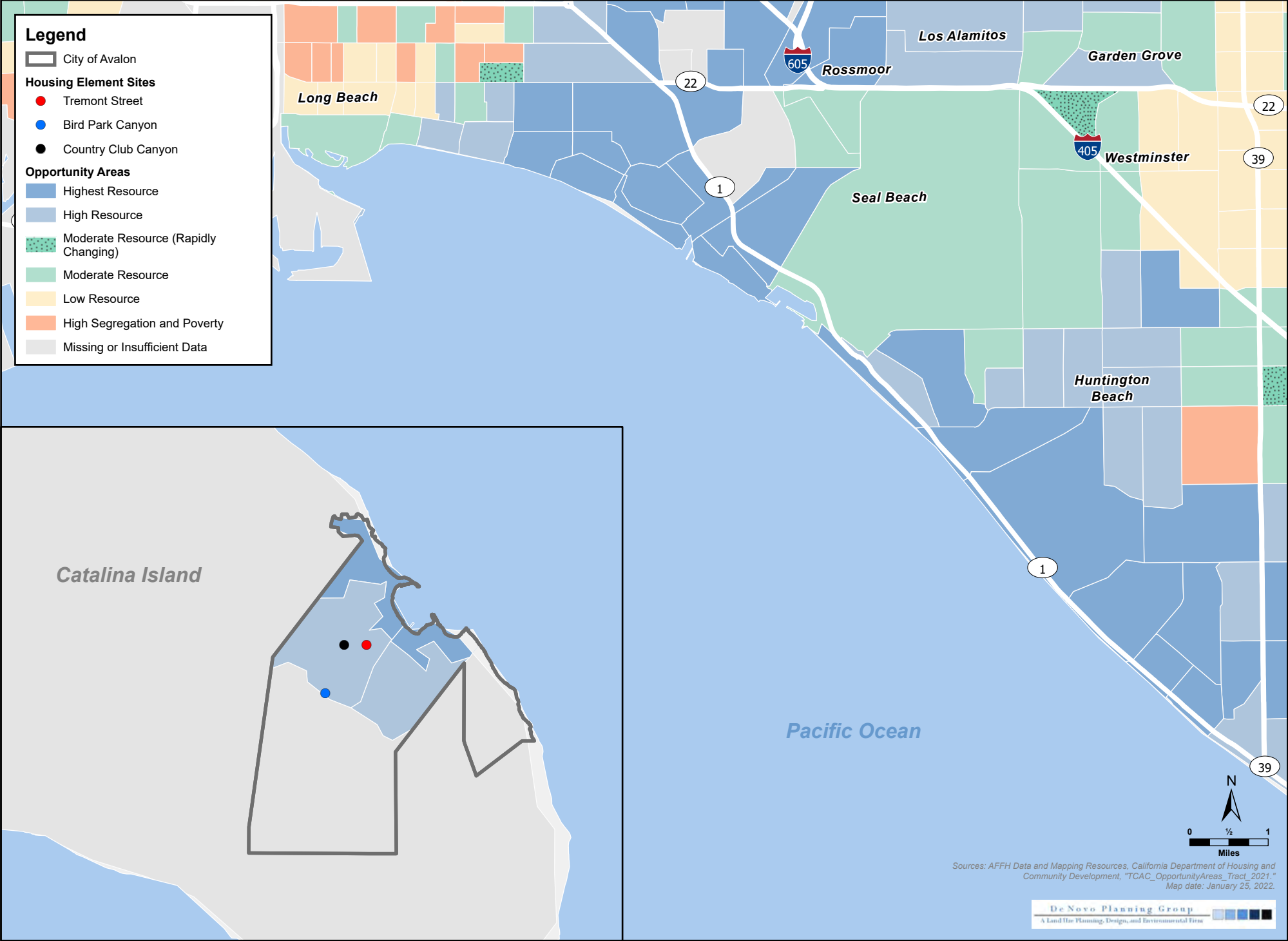
FIGURE 6-15: TCAC ENVIRONMENTAL SCORE BY CENSUS TRACT



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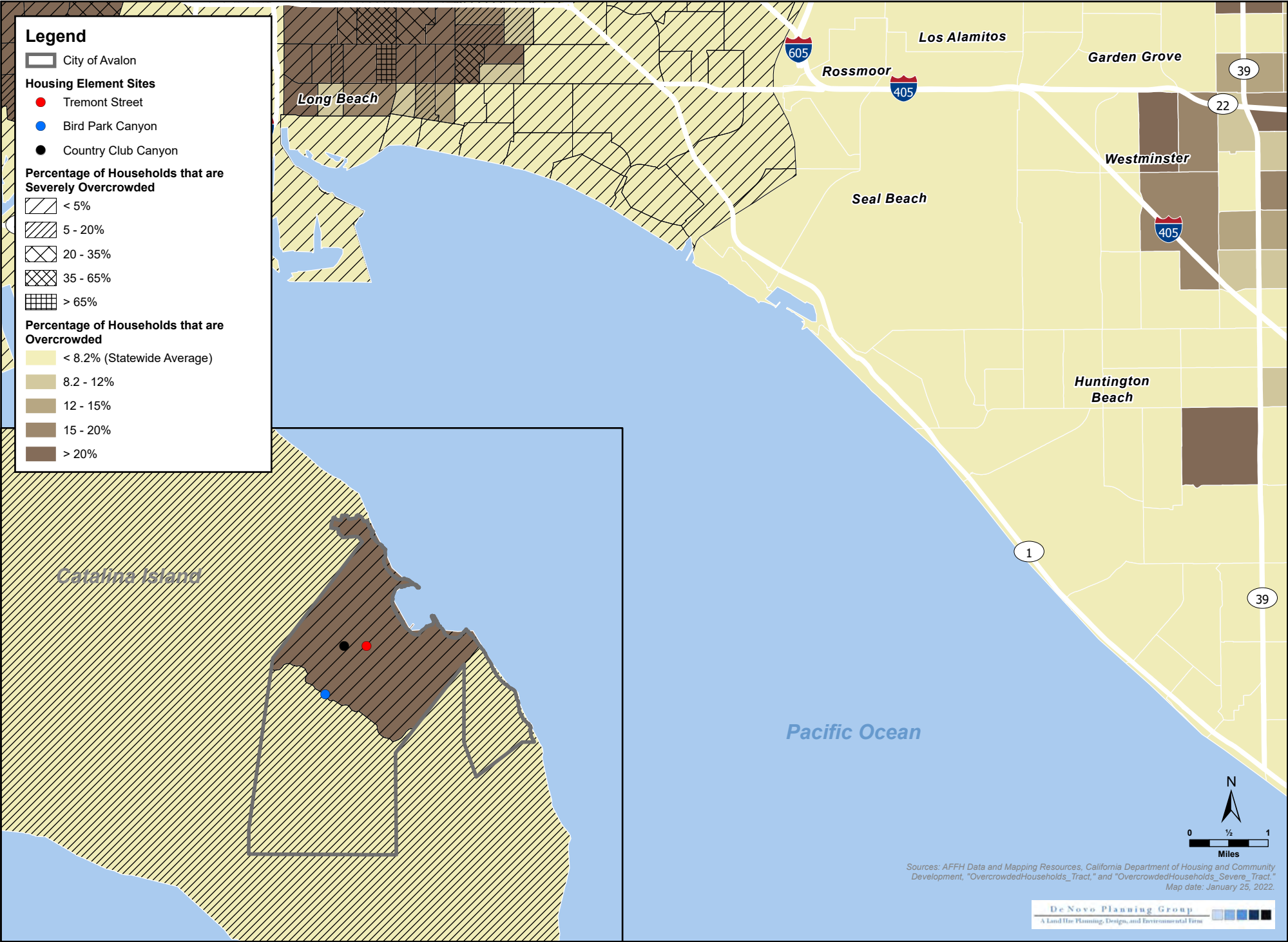
FIGURE 6-16: TCAC OPPORTUNITY AREAS BY CENSUS TRACT



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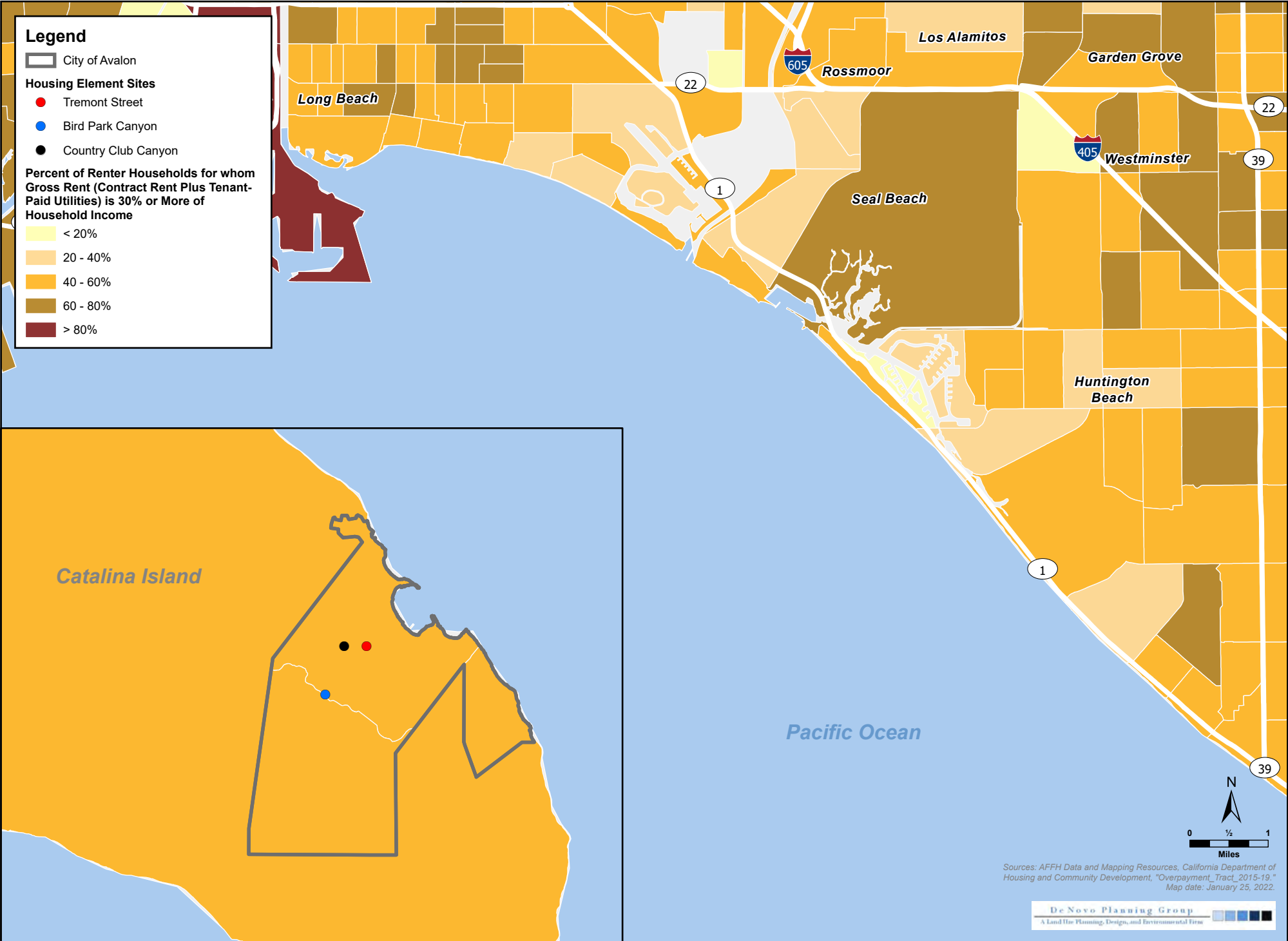
FIGURE 6-17: OVERCROWDED HOUSEHOLDS BY CENSUS TRACT



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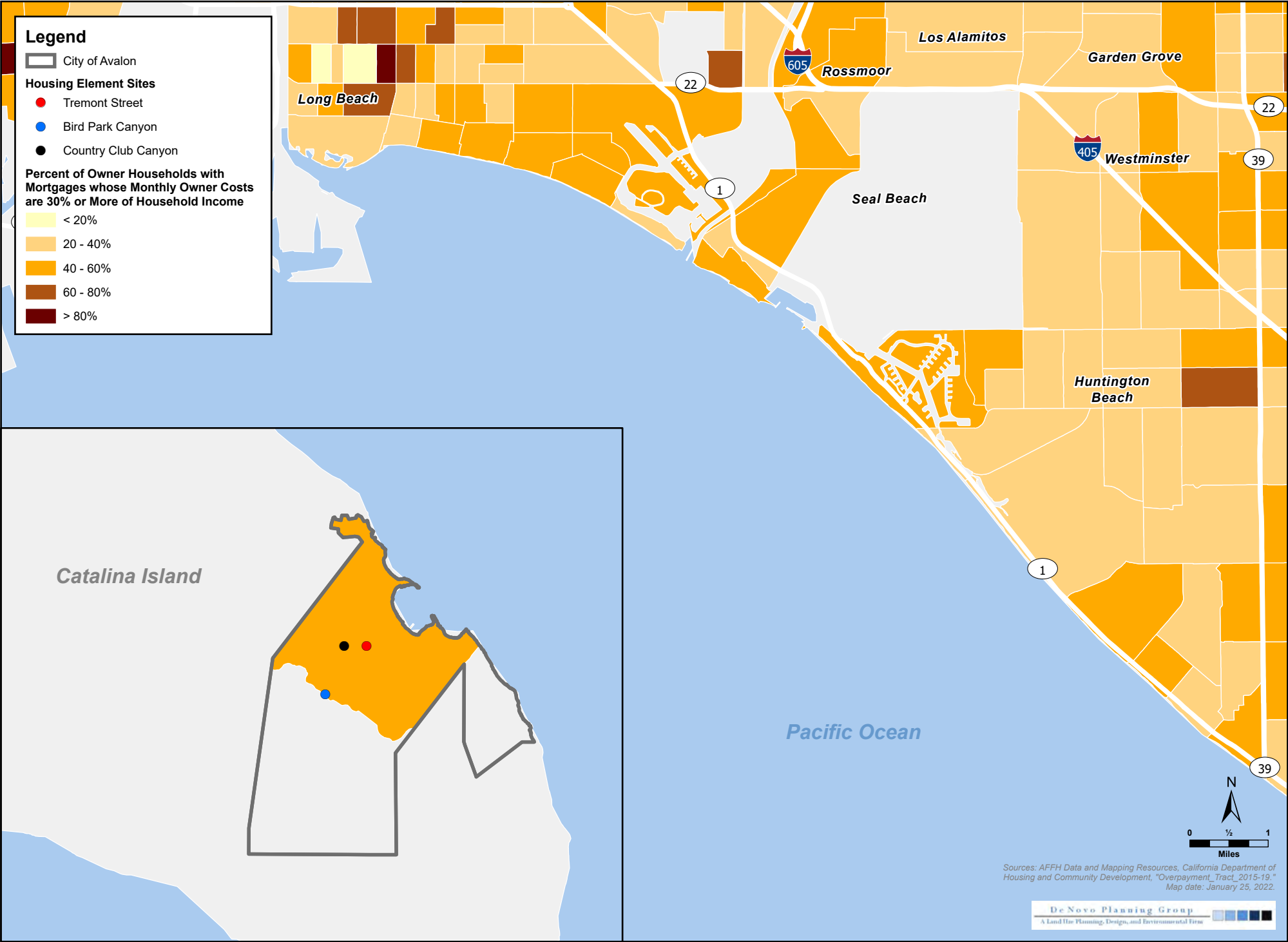
FIGURE 6-18: COST-BURDENED RENTER HOUSEHOLDS BY CENSUS TRACT



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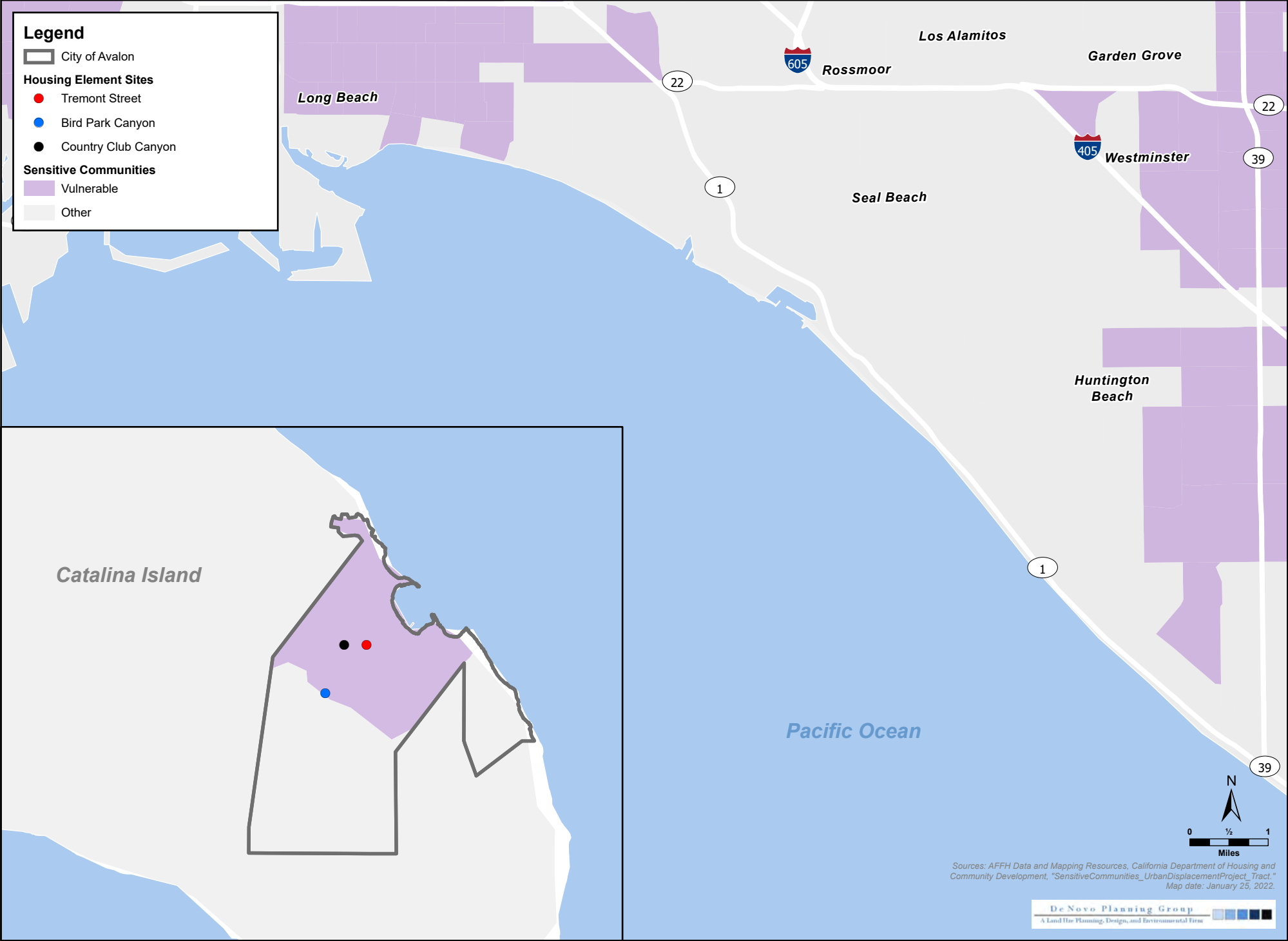
FIGURE 6-19: COST-BURDENED OWNER HOUSEHOLDS BY CENSUS TRACT



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FIGURE 6-20. SENSITIVE COMMUNITIES



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7. OTHER REQUIREMENTS

7A. Consistency with General Plan

Government Code Section 65300.5 states: “In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency.” Additionally, Government Code Section 65583(c)(7) requires the identification of “means by which consistency will be achieved with other general plan elements and community goals.”

The housing element of a general plan sets out a city’s overall long-range planning strategy for providing housing for all segments of the community. The California Government Code requires general plans to contain an integrated, consistent set of goals and policies. The housing element is, therefore, affected by policies contained in other elements of a general plan. The housing element is most intricately related to the land use element. The land use element establishes the framework for development of housing by laying out the land use designations for residential development and indicating the type and density permitted by a city.

Working within this framework, the City of Avalon’s Housing Element identifies priority goals, policies, and action programs for the 2021-2029 planning period that directly address the housing needs of Avalon’s existing and future residents. The policies contained in other elements of the City’s General Plan affect many aspects of life that residents enjoy such as the amount and variety of open space; the preservation of natural, historic, and cultural resources; permitted noise levels in residential areas; and the safety of the residents in the event of a natural or man-made disaster. The Housing Element has been reviewed for consistency with the City’s other General Plan elements and the policies and programs in this Element do not conflict with the policy direction contained in other parts of the General Plan. As portions of the General Plan are amended in the future, the Housing Element will be reviewed to ensure that internal consistency is maintained.

7B. Relationship to Other City Plans and Policies

The Housing Element identifies priority goals, objectives, policies, and action programs for the next eight years that directly address the housing needs of Avalon. The City’s other plans and policies, including its Municipal Code, Zoning Code, and Specific Plans must all remain consistent with the Housing Element. As revisions are considered to the City’s Zoning Code and various plans, each revision will be reviewed to ensure that no conflicts with the Housing Element occur.

7C. Priority for Water and Sewer

Per Chapter 727, Statutes of 2004 (SB 1087), upon completion of an amended or adopted housing element, a local government is responsible for immediately distributing a copy of the element to area water and sewer providers. Water and sewer providers must grant priority for service allocations to proposed developments that include housing units affordable to lower income households. As the responsible agency, the City of Avalon will supply a copy of the adopted Housing Element to Southern California Edison, as well as to all other water and sewer providers serving the City. The City is also preparing policy language to ensure that all lower income housing projects receive priority for water and sewer service, consistent with State law.

7D. Coastal Zone Housing Requirements

State law stipulates that local jurisdictions may not authorize the conversion or demolition of existing residential dwelling units occupied by low and moderate income households unless provisions for replacement housing are made. While the City of Avalon falls entirely within the coastal zone, demolition

activities in the City are not subject to this coastal housing requirement due to the several exceptions offered by State law. Specifically:

- Limited Remaining Vacant Residential Land: This requirement does not apply to the demolition or conversion of residential structures within the coastal area of a jurisdiction containing less than 50 acres of vacant, privately owned land available for residential development. The City is a compact and mostly developed town with much of the remaining land owned by the Santa Catalina Island Company for nonresidential uses. (While large pieces of land may be identified as potential development sites, due to topography, the effective buildable areas are usually just a fraction of the sites).
- Single-Family, Duplex, Triplex Units Exempted: This requirement does not apply to the demolition or conversion of a residential structure that contains fewer than three units. Given the City's built out character, most housing construction activities have been small infill projects. If demolition was involved, it was primarily the removal of single-family units to make room for the reconstruction of equal or increased number of units. Removal of single-family units is not subject to the coastal housing requirements. Since 1982, only one 11-unit multi-family housing structure was removed. The City purchased the property to make room for additional housing.
- Construction of Coastal-Dependent Uses Exempted: The demolition or conversion of residential structures for purposes of providing coastal-dependent uses such as visitor-serving commercial, hotels, recreation facilities, boating or harbor facilities are exempted from the coast housing requirement. The Santa Catalina Island Company is the primary land owner/developer on the island and much of its development is geared toward visitor-serving uses.

In 1996, the City purchased and demolished the deteriorating 22-unit Ida Court apartments. Given the building's condition, the tenants were all low and moderate incomes. The City is not subject to the coastal housing replacement requirement due to limited vacant residential land remaining in the community (see exemptions listed above). Since 1982, 11 scattered homes have been demolished but these have all been rebuilt. Single-family homes in Avalon are not typically affordable to lower and moderate income households. Demolition of scattered single-family homes is not subject to the replacement requirement.

Furthermore, the City has overseen major housing construction activities for affordable housing developments since 1982 and expects more throughout the planning period. Eucalyptus Hill Gardens, Tremont Street Apartments, Beacon Hill, and Bird Park Canyon, along with the units on Descanso Avenue and Triana Lane (see Table 3-40), offer a combined 145 units affordable to very low and low income households. Overall, the City has a net gain of 134 affordable housing units.



Appendix A: Site Inventory

Adopted February 10, 2022

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ADOPTED

**Please Start Here, Instructions in Cell A2,
Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	AVALON
Housing Element Cycle	6th
Contact Information	
First Name	Susanna
Last Name	Gutierrez (Savitt)
Title	Assistant City Planner
Email	sgutierrez@cityofavalon.com
Phone	(310) 510-0220
Mailing Address	
Street Address	<u>Canyon Road</u>
City	Avalon
Zip Code	90704

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

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Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
AVALON																					

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
HD-R-CH	Multifamily residential uses



Appendix B: Public Engagement Summary

Adopted February 10, 2022

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ADOPTED

Public Engagement Summary

City of Avalon Housing Element Update

~~December~~ February ~~2021~~

In partnership with De Novo Planning Group

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Introduction

The City of Avalon is updating its Housing Element as part of the 2021-2029 Housing Element Cycle (Cycle 6). Avalon is dedicated to meeting the future housing needs of its residents. The Housing Element Update process is a unique opportunity to connect with residents of Avalon and learn more about residents' values, priorities, concerns, and ideas.

The City has worked diligently to engage the public as part of the Housing Element Update. The community outreach and public input process are fundamental to the Housing Element Update. This process seeks meaningful and comprehensive feedback from the entire Avalon community, helping to ensure the Housing Element Update represents a shared vision of the community. Appendix B to the Housing Element provides a summary of the key comments received during the Housing Element update process, and how they have been considered and addressed in the Element. The City implemented the following public outreach program.

- Community Open House
- Housing Element Survey
- Advertisements
- Public Review of Draft 2021-2029 Housing Element

Community Open House

The City hosted a Housing Element Community Open House on November 6, 2021. The open house provided educational materials related to the Housing Element along with a survey (see below) which allowed participants to share their ideas and ask questions. Through this event, the City was able hear from residents about their housing priorities and educate the community regarding the City's approach to meeting its fair share of the regional housing need. The event was noticed in English and Spanish, advertised on social media channels and at key physical locations around the community, and English and Spanish speakers were on-hand at the Open House to provide information and take and answer questions.

The Community Open House was held on a Saturday afternoon in recognition of the unique work schedule of Avalon residents and workers, many of whom are unavailable in the evening or during the week. The meeting was held in-person and broadcast live through the City's local cable access channel (via Catalina Broadband), the City's website, and Facebook Live.

At the Community Open House, the City heard comments about constraints to development, including water allocations. Attendees also recognized the need to continue providing housing affordable to lower and moderate income households and to expand the City's housing stock, to the extent possible, to address issues of overcrowding and overpayment.

Housing Element Survey

In addition to the Community Open House, residents were encouraged to complete an online survey. The survey asked for input on the community's housing priorities and strategies to address the City's future housing growth needs. A total of 46 individuals responded to the survey, which focused on issues of home maintenance, affordability, home type, living conditions, and community priorities related to housing. A summary of the key survey results is provided as an attachment to this Appendix.

Advertisements

The City of Avalon maintains various social media accounts including Facebook, Instagram, and Twitter. Throughout the Housing Element Update project, the City posted updates to its social media platforms, as well as digital and physical billboards, advertising opportunities to provide input and alerting the public to upcoming meetings and workshops related to the project. These advertisements were in English and Spanish. Hard copy flyers were also posted around the community and the Council was asked to share information about the project with friends, family, and community members. This was a specific and intentional effort to encourage every community member, regardless of income or background, to participate in the planning process. The advertising campaign targeted all economic segments of the community, specifically lower-income households.

CITY OF AVALON	CIUDAD DE AVALON
	
2021-2029 HOUSING ELEMENT UPDATE	2021-2029 ACTUALIZACIÓN DEL ELEMENTO DE VIVIENDA
COMMUNITY OPEN HOUSE	SESIÓN ABIERTA A LA COMUNIDAD
The City of Avalon is updating its Housing Element! Come share your ideas about planning to meet the current and future housing needs of our residents.	La ciudad de Avalon está actualizando su elemento de vivienda. Venga a compartir sus ideas sobre la planificación para satisfacer las necesidades de vivienda actuales y futuras de nuestros residentes.
SAT NOV 6, 2021 1:00-2:00 PM Avalon City Hall 410 Avalon Canyon Road Avalon, CA 90704	SÁBADO NOV. 6, 2021 1:00-2:00 PM Ayuntamiento de Avalon 410 AVALON CANYON ROAD AVALON, CA 90704
 	 
FOR MORE INFORMATION, CONTACT: MICHAEL PARMER MPARMER@CITYOFAVALON.COM 310-510-0220 EX. 121 OR VISIT HTTP://WWW.CITYOFAVALON.COM/	PARA MAYOR INFORMACIÓN PÓNGASE EN CONTACTO CON: MICHAEL PARMER MPARMER@CITYOFAVALON.COM 310-510-0220 EX. 121 OR VISIT HTTP://WWW.CITYOFAVALON.COM/

Public Review of Draft Housing Element

The Public Review Draft 2021-2029 Housing Element was made available on December 3, 2021. The material was posted to the City's website and advertised at public hearings and to individuals registered for project notifications. The City also advertised the Public Review Draft and provided direction on how individuals could provide public comment via its social media challenges and to stakeholder engaged in housing services in and around Avalon. Invitations to review and comment on the draft Housing Element were sent directly to parties who had previously signed-up for notifications and the City advertised availability at meetings with the Planning Commission and City Council.

Interested parties were invited to submit public comments by providing written comments via mail to City Hall or emailing comments to the City's Housing Element Project Manager. The City received no public comments on the Public Draft 2021-2029 Housing Element during the 30-day public review period.

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Community Survey Results

**City of Avalon Housing
Element Update**

November 2021

In partnership with De Novo Planning Group

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Introduction

The City of Avalon is updating its Housing Element as part of the 2021-2029 Housing Element Cycle (Cycle 6). The Housing Element Update process is a unique opportunity to connect with residents of Avalon and learn more about residents' values, priorities, concerns, and ideas.

As part of the community outreach, a community survey was facilitated online using the SurveyMonkey platform. The survey gathered information on housing-related issues. The survey, which was posted on November 5, 2021 and closed on November 30, 2021, focused on existing conditions to better understand the characteristics of households in Avalon, identify the community's housing needs and priorities, and uncover real or perceived fair housing concerns in Avalon.

This report is a summary of the responses received and the general themes that emerged.

Executive Summary

- 69% of residents have lived in Avalon for 10+ years
- 52% of residents chose to live in Avalon because of proximity to family or friends
- 24% of respondents owned a home in Avalon. 65% of respondents who wish to own a home in Avalon but currently do not own one indicated they could not find a home within their target price range in Avalon
- Only 18% of respondents spend less than 30% of their income on housing
- 67% of respondents are very satisfied or somewhat satisfied with their current housing situation
- 100% of respondents think the range of housing options currently available in the City of Avalon does not meet the needs of the community

Issues that residents rated as most important to them include:

- Providing more housing for all income levels (100%)
- Promote affordable housing for working families (100%)
- Ensure that children who grow up in Avalon can afford to live in Avalon as adults (100%)
- Rehabilitate existing housing (97%)
- Support fair/equitable housing opportunities (97%)
- Build more multi-family housing such as apartments and condos (97%)

Community Survey: Existing Conditions and Fair Housing Issues

The Community Survey was comprised of 28 questions. It had a completion rate of 76% with 46 total responses. The survey responses reveal information about existing housing conditions and fair housing issues in Avalon. The results are organized into five categories: values and priorities; housing affordability; housing maintenance; housing fit; and fair housing.

Respondent Demographics

The survey contained seven questions related to demographics. The first question asked respondents if they live or work in Avalon. The answers to this question provide the following breakdown of response types by group:¹

- The majority of respondents (96%) are residents of Avalon. Of all respondents, 91% live and work within Avalon and 9% work somewhere else.
- One (2%) respondent works in Avalon but lives somewhere else.
- One (2%) respondent neither lives nor works in Avalon.

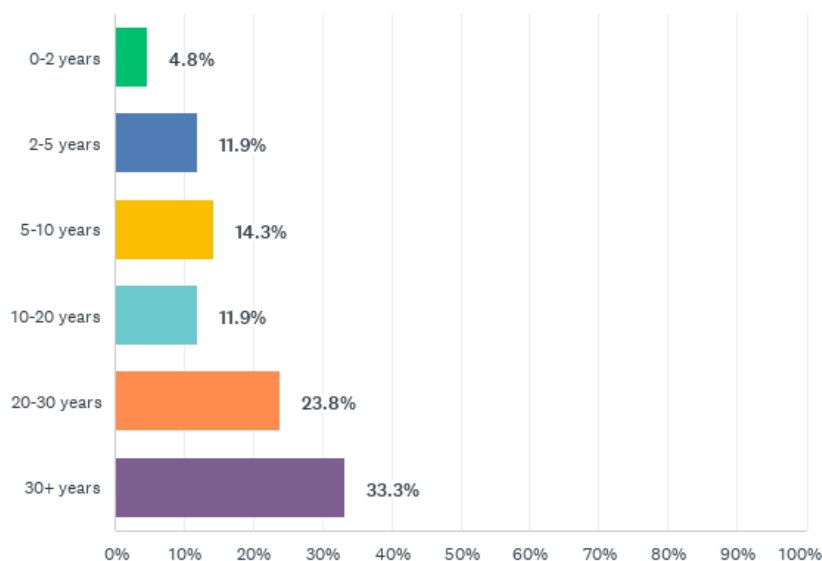
Of the other six demographic questions asked, one of those questions included an opportunity for users to sign-up for more information about the Housing Element update process. The other five questions highlighted the following about the respondents:

- Of those individuals who live in Avalon, most were long-time residents; one-third (33%) have lived here for 30+ years, with approximately 69% having lived here for 10+ years. The next highest response (14%) was 5-10 years, followed by 2-5 years (12%) and finally, fewer than two years (5%).²

¹ Question 1: Do you live and/or work in Avalon?

² Question 2: How long have you lived in the City?

Figure 1: How long have you lived in Avalon? (Residents Only)



- Most of the respondents rent their home (67%), followed by respondents who own their home (23%). Of remaining respondents, 8% neither own nor rent and 3% are currently without permanent shelter.³
- Most of the respondents (44%) live in a multi-family home, with the next highest category being duplex/townhome (26%), followed by single-family detached homes (18%). A small percentage (5%) live in accessory dwelling units, with 7% living in other types of units.⁴
- Of all the respondents surveyed, the most common types of households include couples (27%) and single-person households (27%), followed by couples with children younger than 18 (18%) and multi-generational household (18%). The remaining respondents were single parent with children under 18 (6%) and single person living with roommates (3%).⁵
- The respondents were primarily between the ages of 56-74 years old (39%), followed by 40-55 years old (24%), 24-39 years old (21%), 75+ years old (9%), and under 23 years old (6%).⁶

Values and Priorities

When resident respondents were asked, “What made you decide to live here? (Select all that apply)”⁷ the most common answers were:

- Proximity of family and/or friends (52%)

³ Question 4: Do you currently own or rent your residence?

⁴ Question 6: Select the type of housing that best describes your current home.

⁵ Question 24: Which of the following best describes your household type?

⁶ Question 27: What age range most accurately describes you?

⁷ Question 3: What made you decide to live here? (Select all that apply)

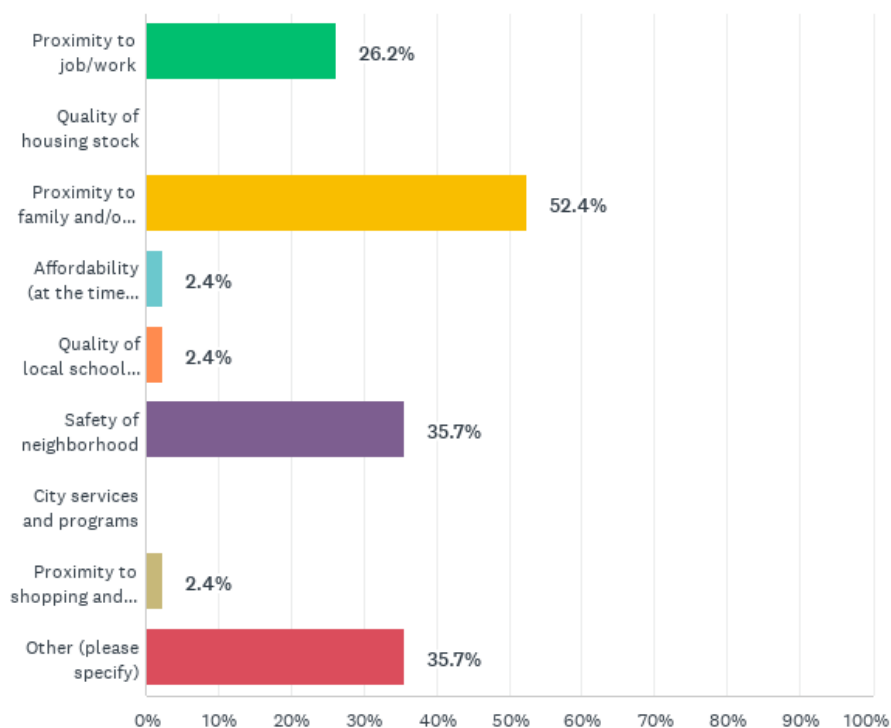
- Safety of neighborhood (36%)
- Other (36%)
- Proximity to job/work (26%)
- Quality of local school system (2%)
- Proximity to shopping and services (2%)
- Affordability (2%)

Some of the “other” responses included:

- Job market
- Born and raised
- General quality of life

It should be noted that this question was only answered by those respondents who live in Avalon. Those who do not live in Avalon were not asked this question.

Figure 1: What made you decide to live here? (Residents Only)



When responses are broken down further by demographic groups, the following differences occur:

Respondents who rent a home are more likely to cite proximity to family/friends as an important factor (50%) than those who own (44%). Safety of the neighborhood was listed as a higher priority for those who own (56%) than rent (31%).

There are also interesting differences between respondents of different ages. Proximity to family/friends (89%) was ranked as more important to Millennials and Generation Z (those 0-39 years old) than any other age group (for Gen X, proximity to family/friends received 25% and for Baby Boomers and the Silent Generation, 31%). For Gen X, half (50%) ranked proximity to job/work as most important, and for Boomers and the Silent Generation, 56% responded safety of neighborhood.

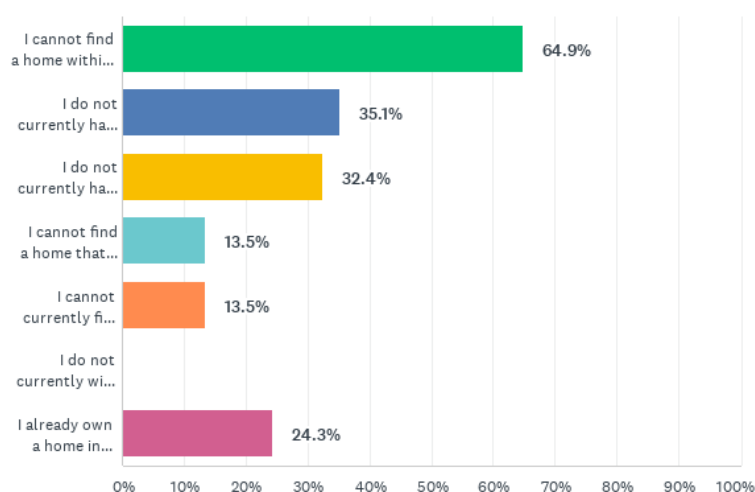
Housing Affordability

When respondents were asked, “If you wish to own a home in Avalon but do not currently own one, what issues are preventing you from owning a home at this time? (Select all that apply)”⁸ those who do not already own a home responded as summarized below.

24% of respondents already owned a home in Avalon. No residents expressed the opinion that they currently do not wish to own or rent in Avalon. Other responses included:

- I cannot find a home within my target price range in Avalon (65%)
- I do not currently have the financial resources for an appropriate down payment (35%)
- I do not currently have the financial resources for an adequate monthly mortgage payment (32%)
- I cannot currently find a home that suits my quality standards in Avalon (14%)
- I cannot find a home that suits my living needs in Avalon (housing size, disability accommodations) (14%)

Figure 2: If you wish to own a home in Avalon but do not currently own one, what issues are preventing you from owning a home at this time?



⁸ Question 5: If you wish to own a home in Avalon but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.



When responses are broken down further by demographic groups, the following differences occur:

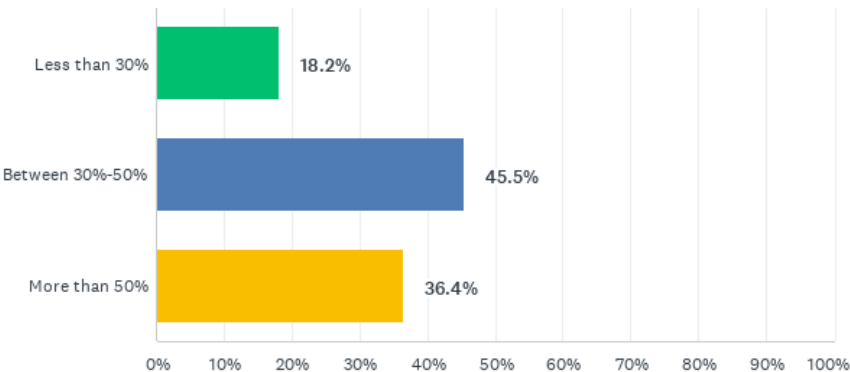
For those who rent, 81% stated that they cannot find a home within their target price range. 14% of all respondents stated they could not find a home that suits their quality standards in Avalon, but 19% of renters did express that they cannot find a home that suits their living needs (such as housing size, or disability accommodations).

When it comes to differences between respondents of different age groups, Millennials (age 24-39) had the highest financial barriers: 100% say there are no homes within their desired price range; 71% do not have a down payment; and 29% do not have enough for a mortgage payment. No Millennials (0%) stated that they already own a home in Avalon. For Gen X, 75% say there are no homes within their desired price range; 38% do not have a down payment; 50% do not have enough for a mortgage payment; and 13% already own a home. For Baby Boomers, 42% say there are no homes within their desired price range; 17% do not have a down payment; 25% do not have enough for a mortgage payment; and 42% already own a home.

When asked what percentage of their income they spend on housing,⁹ the vast majority (82%) were cost-burdened (spent more than 30% of their income on housing).

Almost half (45%) of respondents spent between 30% to 50% of their income on housing. More than one-third (36%) spent more than 50% of their income on housing. The remaining 18% spent less than 30% of their income on housing.

Figure 3: What percentage of your income do you spend on housing?



When responses are broken down further by demographic groups, the following differences occur:



⁹ Question 13: Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

For those who rent, 95% were cost burdened (paying more than 30% of monthly income on housing), with 43% paying more than 50% of their monthly income on housing (for owners, 44% were cost burdened and 11% paid more than 50% of their monthly income on housing).

When it comes to differences between respondents of different age groups, Millennials (age 24-39) were the most financially burdened, with 100% paying more than 30% of their monthly income on housing, and 86% paying more than 50% of their monthly income on housing. For Gen X (age 40-55), 88% were cost burdened, with 13% paying more than 50% of their monthly income on housing. For Boomers (age 56-74), 77% were cost burdened, with 23% paying more than 50% of their monthly income on housing.

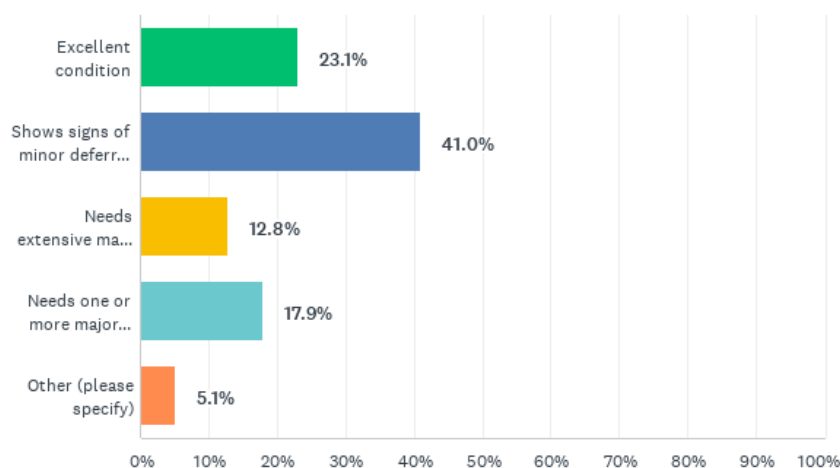
Housing Maintenance

When respondents were asked, “How would you rate the physical condition of the residence you live in?”¹⁰ most respondents (41%) answered that their residence was showing signs of minor deferred maintenance such as peeling paint or chipped stucco.

Approximately 23% of respondents answered that their residence was in excellent condition. Approximately 18% of residents indicated that their home needed one or more major systems upgrades such as a new roof or windows. Nearly 13% indicated that their residence was in need of major repairs or renovation, with the remaining 5% of responses being “Other (please specify).”

¹⁰ Question 11: How would you rate the physical condition of the residence you live in?

Figure 5: How would you rate the physical condition of the residence you live in?



Responses varied widely between renters and homeowners. Homeowners were much more likely to rate the physical condition of their residence as excellent (44%) than renters (12%). Conversely, 50% of renters answered that their residence was showing signs of minor deferred maintenance vs. 11% of homeowners. Renters were about twice as likely to answer that their residence needed one or more major repairs (23% of renters vs. 11% of homeowners), and homeowners were almost twice as likely to answer that their residence needed extensive major repairs or renovation (22% of homeowners vs. 12% of renters).

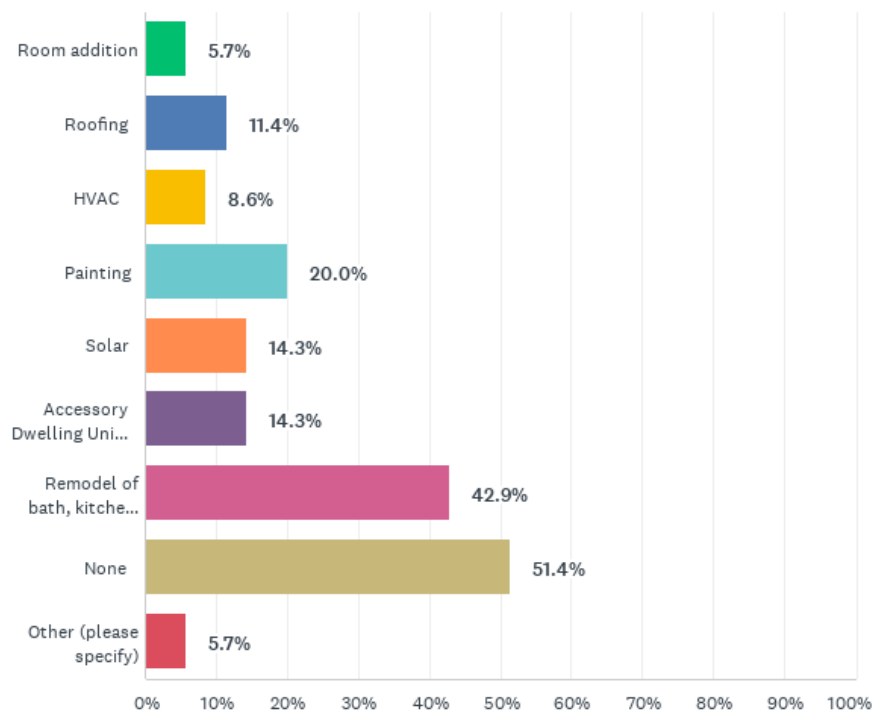
When asked, “Which of the following housing upgrades or expansions have you considered making on your home?”¹¹ the top responses included:

- None (51%)
- Kitchen or bathroom remodels (43%)
- Painting (20%)
- Solar (14%)
- Adding an accessory dwelling unit (ADU) (14%)
- Roofing (11%)
- Other (14%)
- HVAC (8%)
- Room addition (6%)

¹¹ Question 12: Which of the following housing upgrades or expansions have you considered making on your home?

The other responses included maintenance related to the interior of the home. Approximately 59% of renters responded none or that they were not able to make improvements to their rented property. 22% of homeowners responded none.

Figure 6: Which of the following housing upgrades or expansions have you considered making on your home?



Housing Fit

When asked, “How satisfied are you with your current housing situation?”¹² over two-thirds (67%) of all groups indicated that they were very satisfied or somewhat satisfied with their current housing. The top responses were:

- I am somewhat satisfied (39%)
- I am very satisfied (28%)
- I am dissatisfied (21%)
- I am somewhat dissatisfied (13%)

There were big differences in responses, however, between homeowners and renters. 56% of homeowners were “very satisfied” as opposed to only 19% of renters. Still, the majority of both

¹² Question 7: How satisfied are you with your current housing situation?

renters and homeowners were satisfied rather than dissatisfied with their current housing situation: 89% of homeowners and 61% of renters were either very or somewhat satisfied.

For those that were dissatisfied with their housing situation,¹³ the most common explanations given were:

- Rent is too high
- Housing units are too small

When asked, “Do you think that the range of housing options currently available in the City of Avalon meets the needs of the community?”¹⁴ the overwhelming consensus was that it did not. There were no affirmative responses to this question. Responses were:

- Yes (0%)
- No (100%)

When asked, “What types of housing are most needed in the City of Avalon? (Select all that apply)”¹⁵ the most common response was that apartments (multi-family rental homes) were most needed. Responses were:

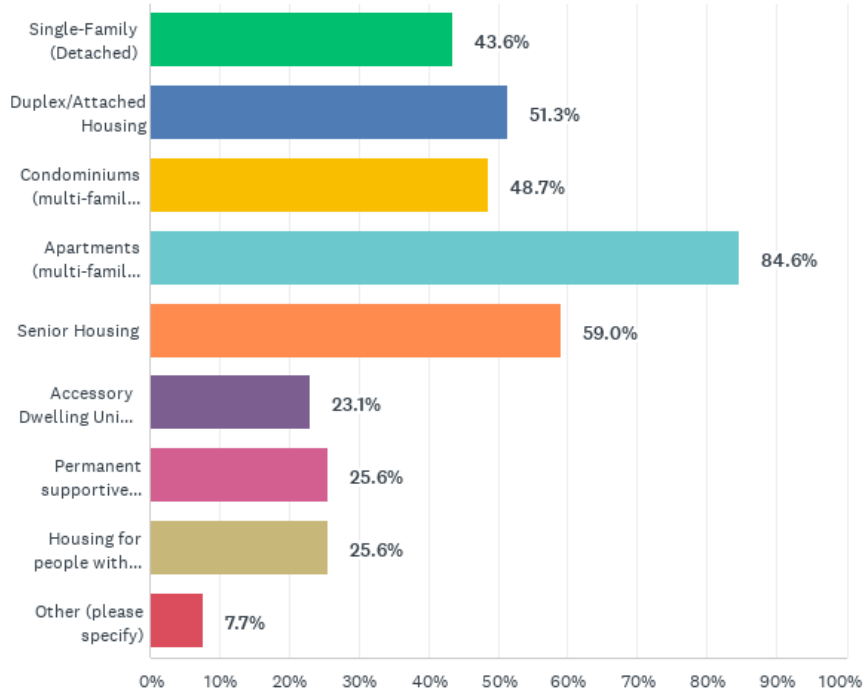
- Apartments (multi-family rental homes) (85%)
- Senior housing (59%)
- Duplex/Attached Housing (51%)
- Condominiums (multi-family ownership homes) (49%)
- Single-Family (Detached) (44%)
- Permanent supportive housing (for the homeless, transitional housing, etc.) (26%)
- Housing for people with disabilities (26%)
- Accessory dwelling unit (ADU) (23%)
- Other (8%)

¹³ Question 8: If you answered dissatisfied or somewhat dissatisfied to the prior question, please provide a reason below. (If not, please skip).

¹⁴ Question 9: Do you think that the range of housing options currently available in the City of Avalon meets the needs of the community?

¹⁵ Question 10: What types of housing are most needed in the City of Avalon? (Select all that apply).

Figure 7: What types of housing are most needed in the City of Avalon?



Some of the other responses included:

- Fewer vacation homes
- Fair rent prices
- Multiple options, too many CUPs issued taking up year-round housing

While the most common response for both renters and homeowners was that apartments were needed (85% of renters vs. 78% of homeowners), homeowners were more likely than renters to state that more duplexes/attached housing and condominiums were needed (78% and 67% vs. 46% and 46%, respectively).

When it comes to age comparisons, Baby Boomers (ages 56-74) were the least likely to state that more single family detached housing was needed (31% vs. 57% of Millennials and 50% of Gen X). Baby Boomers were also the least likely to state that apartments were needed (69% vs. 86% of Millennials and 100% of Gen X). 79% of respondents aged 40+ stated more senior housing was needed.

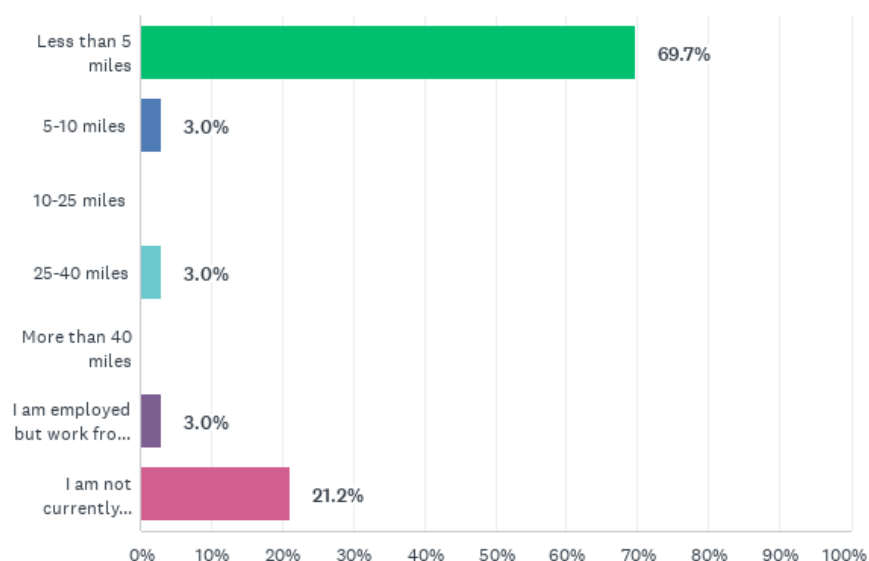
When asked, “If you are currently employed, approximately how long is your one-way commute to work?”¹⁶ most respondents had a short commute. Responses were:

- Less than 5 miles (70%)
- I am not currently employed (21%)
- 5-10 miles (3%)
- I am employed but work from home (3%)
- 25-40 miles (3%)

The responses indicate that while the majority of residents live and work in Avalon, at least one person works elsewhere. Of those not currently employed, the age group of respondents suggests that a portion may be retired.

It should be noted that answers are based on commute distance prior to the Coronavirus pandemic, which may have had an impact on travel patterns.

Figure 4: If you are currently employed, approximately how long is your one-way commute to work?



When asked if Coronavirus had impacted their housing situation¹⁷, the majority of respondents answered “No.” Responses were:

- Yes (24%)

¹⁶ Question 26: If you are currently employed, approximately how long is your one-way commute to work?

¹⁷ Question 25: Has the Coronavirus impacted your housing situation?

-
- No (76%)

Fair Housing

In basic terms, "fair housing" means the right to choose a home free from unlawful discrimination. The City is required to consider issues of fair housing as part of its Housing Element update.

When asked, "How important are the following factors in your housing choice?"¹⁸ respondents were most likely to identify the following factors as being very important or somewhat important:

- Housing I can afford (100%)
- Housing was available in the neighborhood I chose at the time I needed it (86%)
- Housing large enough for my household (79%)
- The amount of money I have/had for deposit (77%)

While still important for some individuals, respondents were less likely to identify the following factors as being very important or somewhat important:

- My credit history and/or credit score (48%)
- Housing that accommodates disability of household member (43%)
- Concern that I would not be welcome in that neighborhood (22%)

When asked, "How important are the following housing priorities to you and your household?"¹⁹ respondents were most likely to identify the following factors as being very important or somewhat important:

- Providing more housing for all income levels (100%)
- Promote affordable housing for working families (100%)
- Ensure that children who grow up in Avalon can afford to live in Avalon as adults (100%)
- Rehabilitate existing housing (97%)
- Support fair/equitable housing opportunities (97%)
- Build more multi-family housing such as apartments and condos (97%)
- Encourage more senior housing (85%)
- Provide ADA-accessible housing (84%)

¹⁸ Question 14: How important are the following factors in your housing choice?

¹⁹ Question 15: How important are the following housing priorities to you and your household?

-
- Integrate affordable housing throughout the community to create mixed-income neighborhoods (81%)
 - Build more single-family housing (81%)
 - Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs (77%)
 - Create mixed-use (commercial/office and residential) projects to bring different land uses closer together (73%)
 - Support programs to help maintain and secure neighborhoods that have suffered foreclosures (68%)

While still important for some individuals, respondents were less likely to identify the following factor as being very important or somewhat important:

- Provide housing for homeless (59%)

When asked to indicate their level of agreement or disagreement with a series of affirmative statements²⁰ respondents were most likely to strongly agree or somewhat agree with the following statements:

- There are grocery stores close to my neighborhood (94%)
- There is a public library close to my house (91%)
- There is a pharmacy close to my house (91%)
- There are banks and credit unions near where I live (84%)
- There are plenty of parks, playgrounds, or green space near me (69%)
- The streets and sidewalks near my home are well kept (61%)

Respondents were less likely to agree with the following statements:

- The streets and sidewalks in my neighborhood have adequate lighting (48%)
- I am satisfied with the schools in my area (47%)
- The condition of homes in my neighborhood are acceptable (45%)
- There are quality jobs in my neighborhood (42%)
- There is access to public transportation close to my neighborhood (42%)
- There is enough parking in my area of town (42%)
- There are plenty of other public spaces near my home (39%)

²⁰ Question 16: Please respond to each statement

When asked to identify what they thought the biggest problem with housing discrimination is in Avalon and the surrounding area,²¹ the majority of all respondents identified “Other (please specify)” as the most prevalent factor. The responses were:

- Other (please specify) (38%)
- Familial Status (31%)
- Race/Ethnicity (17%)
- Disability (10%)
- National Origin (3%)

Nobody indicated housing discrimination was due to color (physical appearance), religion, or sex.

Of the respondents who selected “Other (please specify),” about half specified that no problems with housing discrimination existed or that they are unaware of any problem. About half identified financial factors as the biggest problem in housing discrimination in Avalon. Other responses included discrimination based on whether the individual owns pets.

When asked whether they had experienced or witnessed housing discrimination in Avalon²² the majority of respondents answered “No.” The responses were:

Resident responses:

- Yes (31%)
- No (56%)
- I don’t know (13%)

Of those respondents that answered “yes” to the prior question, the discriminatory factors identified²³ (in order of affirmative responses) were:

- Level/source of Income (64%)
- Race/Ethnicity (36%)
- Familial status (36%)
- Age (27%)
- Citizenship status (27%)

²¹ Question 17: The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the biggest problem in housing discrimination in Avalon?

²² Question 18: Have you ever experienced or witnessed housing discrimination in the City of Avalon?

²³ Question 19: On what grounds do you believe you witnessed housing discrimination in Avalon?

-
- Criminal background (18%)
 - National Origin (18%)
 - Color (physical appearance) (18%)
 - English spoken as a second language (18%)
 - I have not witnessed housing discrimination (9%)
 - Marital status (9%)
 - Sex/gender/gender identity (9%)
 - Political ideas (9%)
 - Use of housing choice voucher or other assistance (9%)
 - Other (please specify) (9%)
 - Religion (0%)
 - Disability (0%)

When asked whether they knew of anyone in Avalon who experienced unfair real estate or lending practices²⁴ respondents provided the following responses:

Resident responses:

- The majority (48%) didn't know of anyone who had encountered these unfair practices
- 36% knew of someone who was unfairly refused a rental or sale agreement
- 21% reported knowing someone who was not shown all housing options
- 21% reported knowing someone who was falsely denied available housing options
- 12% knew of someone who was unfairly directed to a certain neighborhood or location
- 9% was not given reasonable accommodation for a disability
- 6% indicated they knew of someone who was offered unfair terms when buying or selling
- Nobody responded that they knew someone who was unfairly denied a mortgage

Many respondents (28%) would not know where to refer someone (or themselves) if they felt that their fair housing rights were violated²⁵. Of those who responded that they might know where to go, most would refer someone to the local, state or federal government or the California Department of Housing and Community Development. A large proportion of respondents were somewhat or unfamiliar with Fair Housing Laws: 55% stated they were somewhat familiar and 42% stated they

²⁴ Question 20: Do you know of anyone in Avalon who has faced the following: (select all that apply)

²⁵ Question 21: Where would you refer someone if they felt their fair housing rights had been violated?

were not familiar with fair housing laws.²⁶ Additionally, the majority (82%) responded “Yes” or “I don’t know” when asked if Federal and/or State Fair Housing Laws are difficult to understand or follow²⁷.

²⁶ Question 22: How familiar are you with Fair Housing Laws?

²⁷ Question 23: Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

Appendices

A: Survey Questions

B: Survey Responses

Avalon 2021-2029 Housing Element Update Survey

As required by State law, the City is in the process of updating the Housing Element of the General Plan for the 2021-2029 period. The Housing Element must be updated every 8 years. The Housing Element establishes policies and programs to address Avalon's existing and projected housing needs, including the City's "fair share" of the regional housing need (or "RHNA"). If you currently live in Avalon, your feedback will help us understand existing opportunities in our City. However, even if you live somewhere else, we still want to learn about your housing conditions and experiences so the City can do its part in planning to meet our region's housing needs.

Part 1 of this survey focuses on questions related to existing housing conditions and will help the City better understand the characteristics of households in Avalon and identify the community's housing needs and priorities.

Part 2 of this survey focuses on issues related to fair housing in order to understand real or perceived fair housing concerns in Avalon. In basic terms, "fair housing" means the right to choose a home free from unlawful discrimination.

This is an early step in the process. There will be additional opportunities for the community to comment on the Housing Element Update, including on the locations identified to accommodate our State-mandated Regional Housing Needs Allocation (RHNA) and the goals, policies, and implementation actions to be included in the Housing Element.

Your input will be used to inform preparation of the Housing Element so that it reflects our local priorities and objectives.

Part 1: Existing Conditions

The first part of this survey will assist us in better understanding existing housing conditions in Avalon.

1. Do you live and/or work in Avalon?

Note: If you currently live in Avalon, you will be asked a few follow-up questions about your current living situation on the following page. If you live somewhere else, you will skip these resident-specific questions and proceed to more general questions about your housing conditions. Whether or not you are a resident, your input will still help the City plan to meet our long-term housing needs.

- ☐ I live in Avalon but my job is located somewhere else (pre-pandemic conditions)
- ☐ My job is in Avalon (pre-pandemic conditions) but I live somewhere else
- ☐ I live and work in Avalon (pre-pandemic conditions)
- ☐ I do not live or work in Avalon

Avalon 2021-2029 Housing Element Update Survey

Questions for Avalon Residents

2. How long have you lived in the City?

☐ 0-2 years	☐ 10-20 years
☐ 2-5 years	☐ 20-30 years
☐ 5-10 years	☐ 30+ years

3. What made you decide to live here? (Select all that apply)

- ☐ Proximity to job/work
- ☐ Quality of housing stock
- ☐ Proximity to family and/or friends
- ☐ Affordability (at the time I moved here)
- ☐ Quality of local school system
- ☐ Safety of neighborhood
- ☐ City services and programs
- ☐ Proximity to shopping and services
- ☐ Other (please specify)

Avalon 2021-2029 Housing Element Update Survey

Questions for All Respondents (Residents and Nonresidents)

4. Do you currently own or rent your residence?

- ☐ I own my residence
- ☐ I rent my residence
- ☐ I live with another household (neither own nor rent)
- ☐ I am currently without permanent shelter

5. If you wish to own a home in Avalon but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.

- ☐ I cannot find a home within my target price range in Avalon
- ☐ I do not currently have the financial resources for an appropriate down payment
- ☐ I do not currently have the financial resources for an adequate monthly mortgage payment
- ☐ I cannot find a home that suits my living needs in Avalon (e.g., housing size, disability accommodations, floorplan)
- ☐ I cannot currently find a home that suits my quality standards in Avalon (e.g., interior maintenance, finishes, landscaping)
- ☐ I do not currently wish to own or rent a home in Avalon
- ☐ I already own a home in Avalon

6. Select the type of housing that best describes your current home.

- ☐ Single-Family Home (Detached)
- ☐ Duplex/Townhome
- ☐ Multi-Family Home (Apartment/Condominium)
- ☐ Accessory Dwelling Unit, Granny Flat, Guest House
- ☐ Mobile Home
- ☐ Currently without permanent shelter
- ☐ Other (please specify)

7. How satisfied are you with your current housing situation?

- ☐ I am very satisfied
- ☐ I am somewhat satisfied
- ☐ I am somewhat dissatisfied
- ☐ I am dissatisfied

8. If you answered dissatisfied or somewhat dissatisfied to the prior question, please provide a reason below.
(If not, please skip).

9. Do you think that the range of housing options currently available in the City of Avalon meets the needs of the community?

- ☐ Yes
- ☐ No

10. What types of additional housing are most needed in the City of Avalon? (Select all that apply)

- ☐ Single-Family (Detached)
- ☐ Duplex/Attached Housing
- ☐ Condominiums (multi-family ownership homes)
- ☐ Apartments (multi-family rental homes)
- ☐ Senior Housing
- ☐ Accessory Dwelling Unit, Granny Flat, Guest House
- ☐ Permanent supportive housing (for the homeless, transitional housing, etc.)
- ☐ Housing for people with disabilities (please specify in comment field below)
- ☐ Other (please specify)

11. How would you rate the physical condition of the residence you live in?

- ☐ Excellent condition
- ☐ Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)
- ☐ Needs extensive major repairs or renovation (teardown/rebuild)
- ☐ Needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.)
- ☐ Other (please specify)

12. Which of the following housing upgrades or expansions have you considered making on your home?

- ☐ Room addition
- ☐ Roofing
- ☐ HVAC
- ☐ Painting
- ☐ Solar
- ☐ Accessory Dwelling Unit, Granny Flat, Guest House
- ☐ Remodel of bath, kitchen or other facility
- ☐ None
- ☐ Other (please specify)

Part 2: Fair Housing

The second part of this survey is designed to help us understand fair housing issues facing our community.

Questions for All Respondents (Residents and Nonresidents)

13. Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

- ☐ Less than 30%
- ☐ Between 30%-50%
- ☐ More than 50%

14. How important are the following factors in your housing choice? (If a statement does not pertain to you, please leave blank.) (1-5 scale)

	Very Important	Somewhat Important	Neutral	Somewhat Unimportant	Unimportant
Housing I can afford	☐	☐	☐	☐	☐
Housing that accommodates disability of household member	☐	☐	☐	☐	☐
Housing large enough for my household	☐	☐	☐	☐	☐
My credit history and/or credit score	☐	☐	☐	☐	☐
The amount of money I have/had for deposit	☐	☐	☐	☐	☐
Housing was available in the neighborhood I chose at the time I needed it	☐	☐	☐	☐	☐
Concern that I would not be welcome in that neighborhood	☐	☐	☐	☐	☐

Other (please specify)

15. How important are the following housing priorities to you and your household?

	Very important	Somewhat important	Not Important	Don't know
Provide more housing for all income levels	☐	☐	☐	☐
Promote housing affordable to working families	☐	☐	☐	☐
Build more single-family housing	☐	☐	☐	☐
Build more multi-family housing (apartments, condos, etc.)	☐	☐	☐	☐
Rehabilitate existing housing	☐	☐	☐	☐
Encourage more senior housing	☐	☐	☐	☐
Provide ADA-accessible housing	☐	☐	☐	☐
Provide housing for homeless	☐	☐	☐	☐
Ensure that children who grow up in Avalon can afford to live in Avalon as adults	☐	☐	☐	☐
Create mixed-use (commercial/office and residential) projects to bring different land uses closer together	☐	☐	☐	☐
Integrate affordable housing throughout the community to create mixed-income neighborhoods	☐	☐	☐	☐
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	☐	☐	☐	☐
Support fair/equitable housing opportunities	☐	☐	☐	☐
Support programs to help maintain and secure neighborhoods that have suffered foreclosures	☐	☐	☐	☐

16. Please respond to each statement: (1-5 scale)

	Strongly agree	Somewhat agree	Neutral	Somewhat disagree	Strongly disagree
I am satisfied with the schools in my area	☐	☐	☐	☐	☐
There are quality jobs in my neighborhood	☐	☐	☐	☐	☐
There is access to public transit close to my neighborhood	☐	☐	☐	☐	☐
There is enough parking in my area of town	☐	☐	☐	☐	☐
There are plenty of parks, playgrounds, or green space near me	☐	☐	☐	☐	☐
There is a pharmacy close to my house	☐	☐	☐	☐	☐
There is a public library close to my house	☐	☐	☐	☐	☐
There are grocery stores close to my neighborhood	☐	☐	☐	☐	☐
There are banks and credit unions near where I live	☐	☐	☐	☐	☐
The condition of the homes in my neighborhood are acceptable	☐	☐	☐	☐	☐
The streets and sidewalks near my home are well kept	☐	☐	☐	☐	☐
There are plenty of other public spaces near my home	☐	☐	☐	☐	☐
The streets and sidewalks in my neighborhood have adequate lighting	☐	☐	☐	☐	☐

17. The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the biggest problem in housing discrimination in Avalon?

- ☐ Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)
- ☐ Color (physical appearance)
- ☐ National Origin (the country where a person was born)
- ☐ Religion
- ☐ Sex
- ☐ Familial Status
- ☐ Disability
- ☐ Other (please specify)

18. Have you ever experienced or witnessed housing discrimination in the City of Avalon?

(Reminder: Housing discrimination occurs when factors like a person's race, color, national origin, religion, sex, family status, and disability are used in making decisions related to in the sale, rental, or financing of housing).

- ☐ Yes
- ☐ No
- ☐ I don't know

Avalon 2021-2029 Housing Element Update Survey

19. On what grounds do you believe you witnessed housing discrimination in Avalon? (Select all that apply)

☐ Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)	☐ Disability
☐ Color (physical appearance)	☐ Political Ideas
☐ Age	☐ English Spoken as a Second Language
☐ Marital Status	☐ Citizenship Status
☐ Religion	☐ Level/Source of Income
☐ Sex/Gender/Gender Identity	☐ Use of Housing Choice Voucher or other assistance
☐ National Origin (the country where a person was born)	☐ Criminal Background
☐ Familial Status (Families with Children)	
☐ Other (please specify)	

- ☐ I have not witnessed housing discrimination

Avalon 2021-2029 Housing Element Update Survey

20. Do you know of anyone in Avalon who has faced the following: (select all that apply)

- ☐ Unfairly refused a rental or sale agreement
- ☐ Unfairly denied a mortgage
- ☐ Falsely denied available housing options
- ☐ Unfairly directed to a certain neighborhood and/or locations
- ☐ Not shown all housing options
- ☐ Not given reasonable accommodation for a disability
- ☐ Offered unfair terms when buying or selling
- ☐ Not applicable/None

21. Where would you refer someone if they felt their fair housing rights had been violated?

- ☐ I wouldn't know what to do
- ☐ Complain to the individual/organization discriminating
- ☐ A local nonprofit
- ☐ Local, state, or federal government
- ☐ The California Office of Housing and Community Development
- ☐ The U.S. Department of Housing and Urban Development
- ☐ A private attorney
- ☐ Other (please specify)

22. How familiar are you with Fair Housing Laws?

- ☐ Not familiar
- ☐ Somewhat familiar
- ☐ Very familiar

23. Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

- ☐ Yes
- ☐ No
- ☐ I don't know

Background Questions

Questions for All Respondents (Residents and Nonresidents)

24. Which of the following best describes your household type?

- ☐ Single person household
- ☐ Couple
- ☐ Couple with children under 18
- ☐ Single parent with children under 18
- ☐ Adult head of household (non-parent) with children under 18
- ☐ Adult living with parents
- ☐ Multi-generational family household (grandparents, children, and/or grandchildren all under the same roof)
- ☐ Single person living with roommates
- ☐ Family unit living with roommates
- ☐ Other (please specify)

25. Has the Coronavirus impacted your housing situation?

- ☐ Yes
- ☐ No
- ☐ If yes, how?

26. If you are currently employed, approximately how long is your one-way commute to work? (If your commute has changed due to the Coronavirus, please answer this question based on your commute before the pandemic's impact on your travel patterns).

- ☐ Less than 5 miles
- ☐ 5-10 miles
- ☐ 10-25 miles
- ☐ 25-40 miles
- ☐ More than 40 miles
- ☐ I am employed but work from my home (pre-pandemic)
- ☐ I am not currently employed

27. What age range most accurately describes you?

- ☐ 0-23 years old
- ☐ 24-39 years old
- ☐ 40-55 years old
- ☐ 56-74 years old
- ☐ 75+ years old

28. If you would like to be notified regarding upcoming project updates and public hearings, please register your email address below.

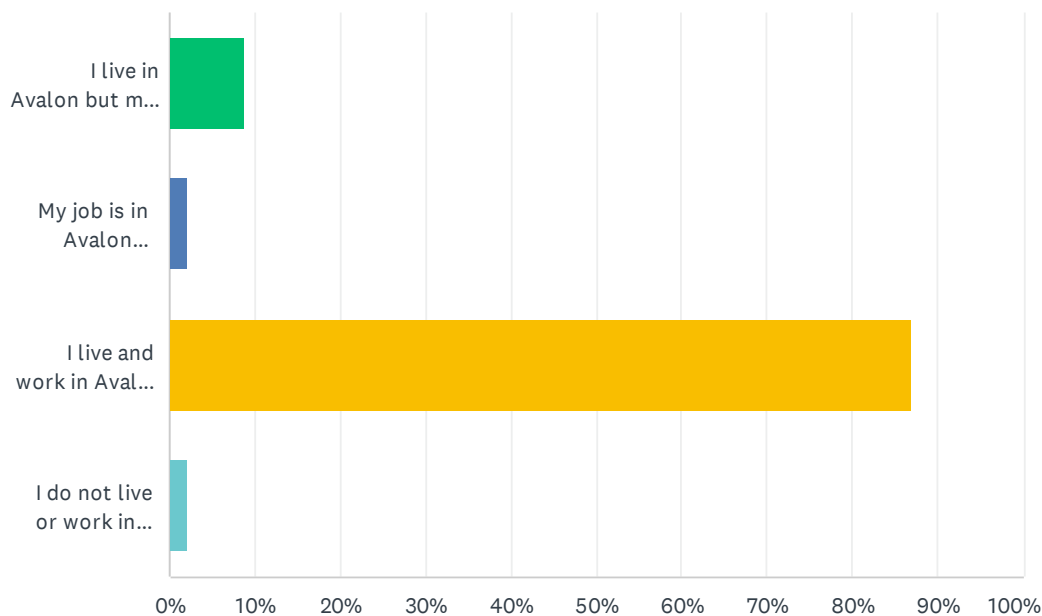
Name

ZIP/Postal Code

Email Address

Q1 Do you live and/or work in Avalon? Note: If you currently live in Avalon, you will be asked a few follow-up questions about your current living situation on the following page. If you live somewhere else, you will skip these resident-specific questions and proceed to more general questions about your housing conditions. Whether or not you are a resident, your input will still help the City plan to meet our long-term housing needs.

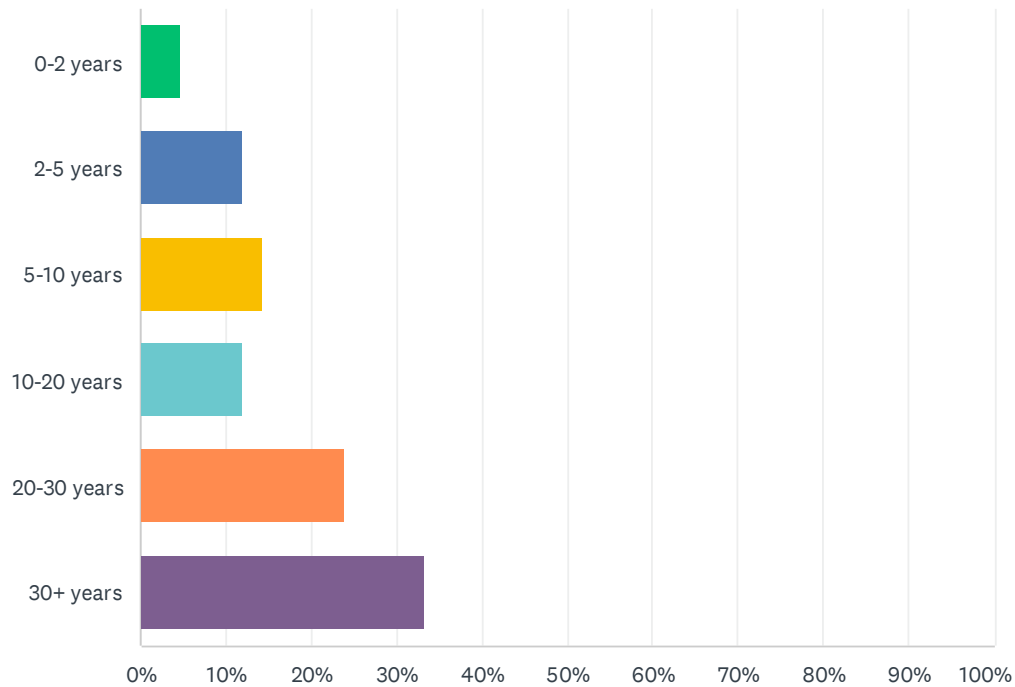
Answered: 46 Skipped: 0



ANSWER CHOICES	RESPONSES	
I live in Avalon but my job is located somewhere else (pre-pandemic conditions)	8.70%	4
My job is in Avalon (pre-pandemic conditions) but I live somewhere else	2.17%	1
I live and work in Avalon (pre-pandemic conditions)	86.96%	40
I do not live or work in Avalon	2.17%	1
TOTAL		46

Q2 How long have you lived in the City?

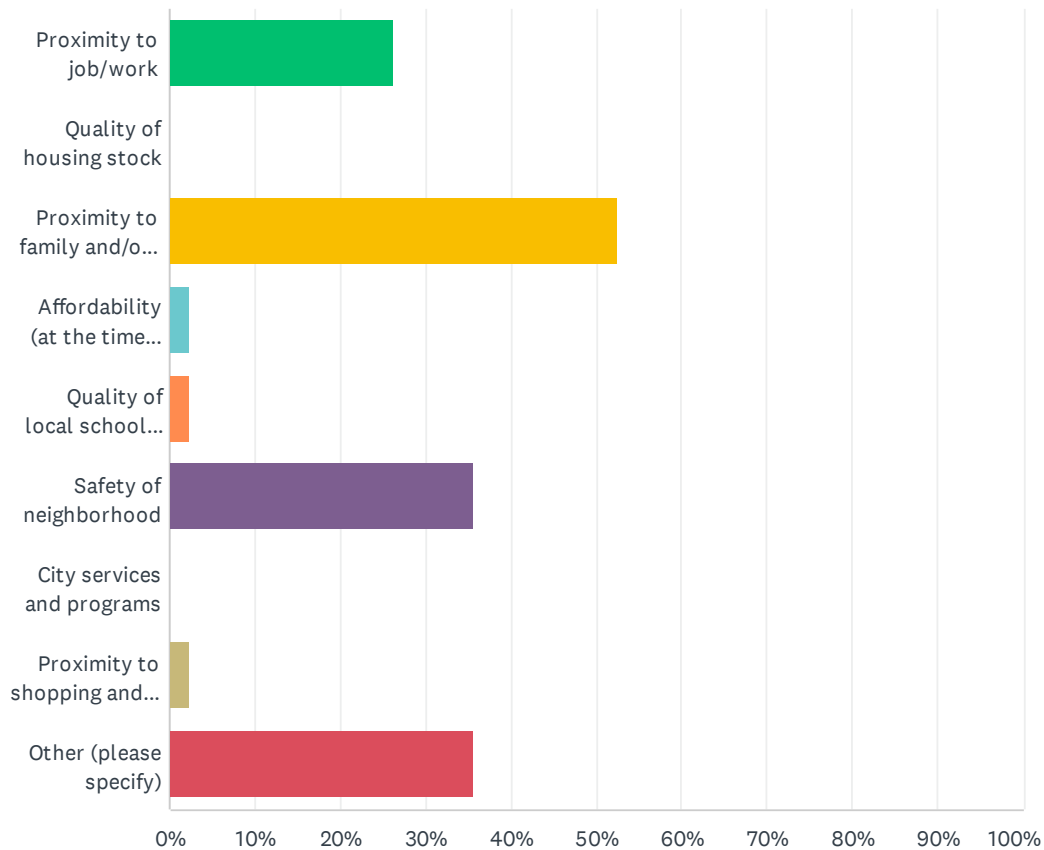
Answered: 42 Skipped: 4



ANSWER CHOICES	RESPONSES	
0-2 years	4.76%	2
2-5 years	11.90%	5
5-10 years	14.29%	6
10-20 years	11.90%	5
20-30 years	23.81%	10
30+ years	33.33%	14
TOTAL		42

Q3 What made you decide to live here? (Select all that apply)

Answered: 42 Skipped: 4



ANSWER CHOICES	RESPONSES	
Proximity to job/work	26.19%	11
Quality of housing stock	0.00%	0
Proximity to family and/or friends	52.38%	22
Affordability (at the time I moved here)	2.38%	1
Quality of local school system	2.38%	1
Safety of neighborhood	35.71%	15
City services and programs	0.00%	0
Proximity to shopping and services	2.38%	1
Other (please specify)	35.71%	15
Total Respondents: 42		

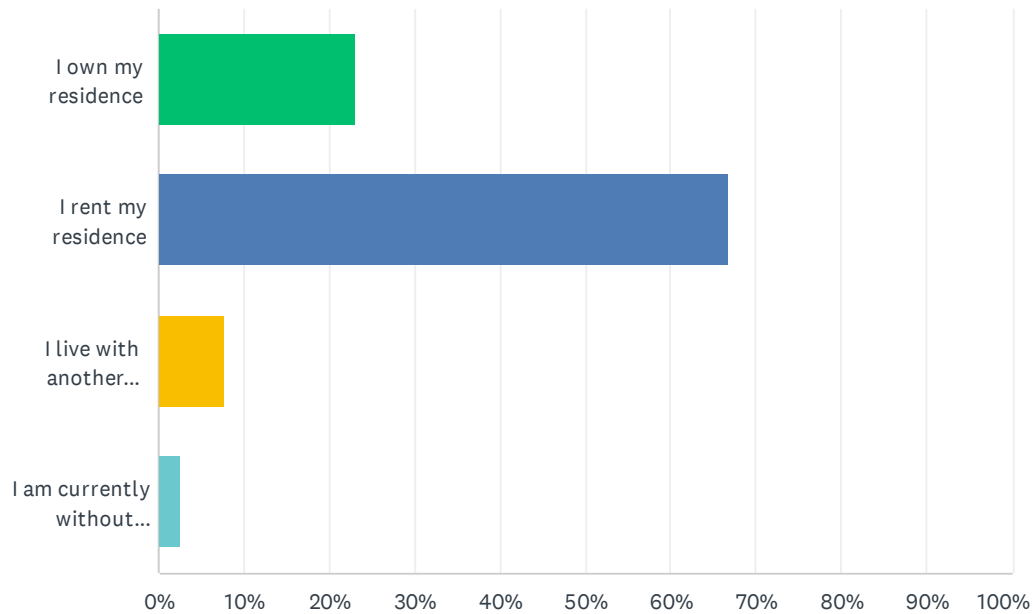
#	OTHER (PLEASE SPECIFY)	DATE
1	wanted to get out of So Cal area	11/13/2021 7:50 AM

Avalon 2021-2029 Housing Element Update Survey

2	General quality of life	11/11/2021 2:44 PM
3	I have owned a home here for many years and wanted to retire here	11/11/2021 12:49 PM
4	Job market	11/11/2021 7:28 AM
5	Born and raised	11/10/2021 8:24 PM
6	Because it's beautiful	11/10/2021 10:35 AM
7	Job offer	11/10/2021 7:49 AM
8	From here	11/10/2021 4:11 AM
9	Family	11/10/2021 2:50 AM
10	Love of the quaintness of the island	11/10/2021 1:04 AM
11	Raised in Avalon	11/9/2021 8:07 PM
12	boyfriend lived here	11/9/2021 4:44 PM
13	Catalina is a paradise	11/9/2021 4:35 PM
14	relocated for work	11/9/2021 1:19 PM
15	born and raised!	11/5/2021 4:03 PM

Q4 Do you currently own or rent your residence?

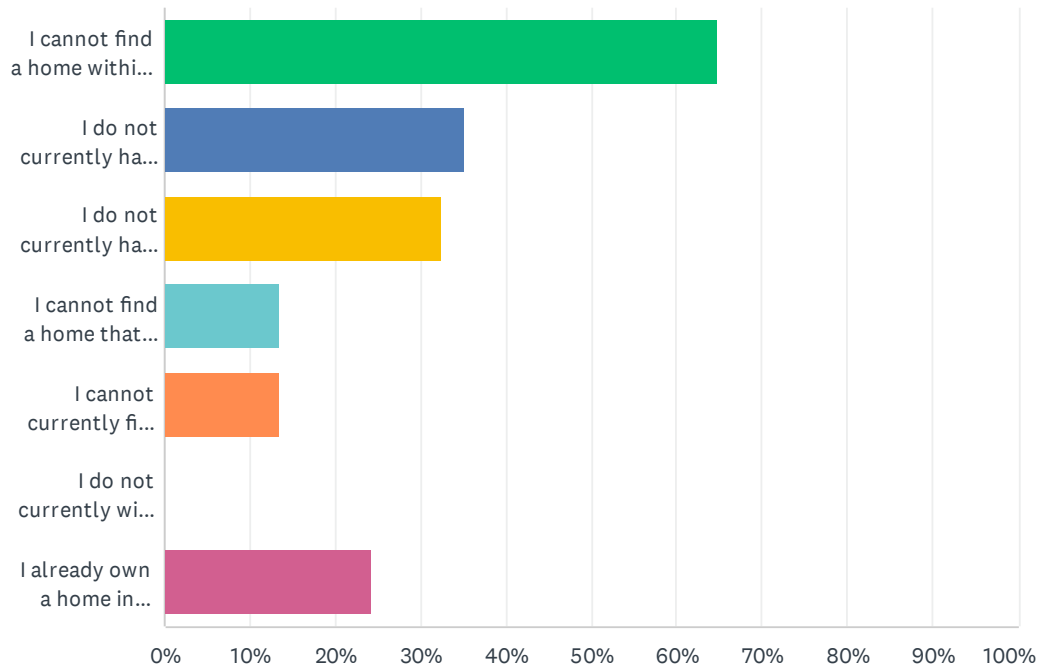
Answered: 39 Skipped: 7



ANSWER CHOICES	RESPONSES	
I own my residence	23.08%	9
I rent my residence	66.67%	26
I live with another household (neither own nor rent)	7.69%	3
I am currently without permanent shelter	2.56%	1
TOTAL		39

Q5 If you wish to own a home in Avalon but do not currently own one, what issues are preventing you from owning a home at this time? Select all that apply.

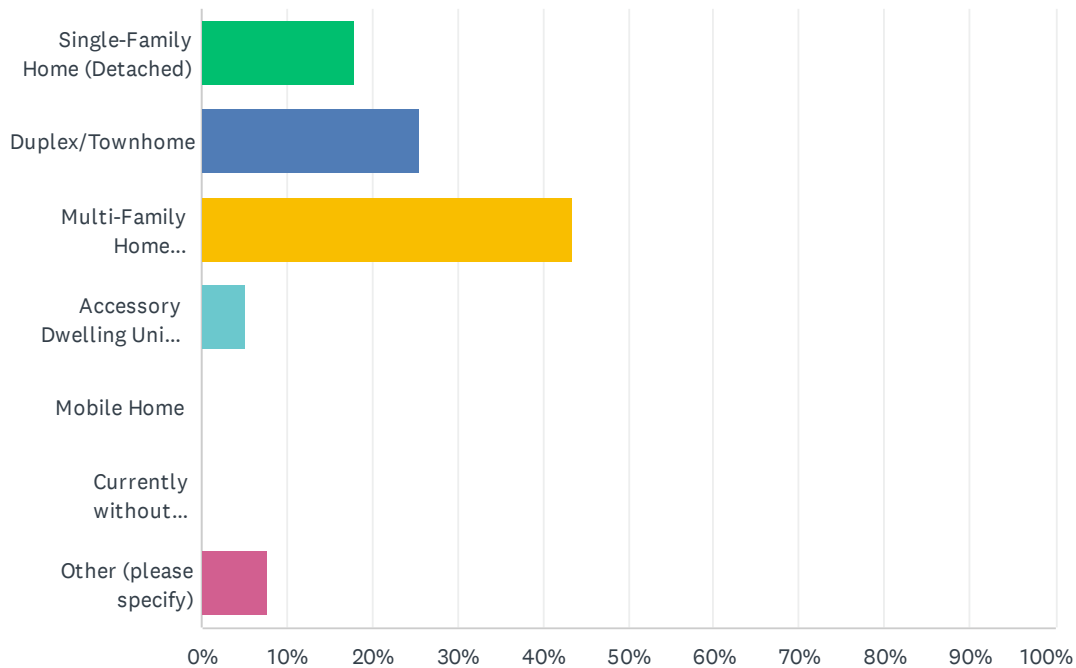
Answered: 37 Skipped: 9



ANSWER CHOICES	RESPONSES	
I cannot find a home within my target price range in Avalon	64.86%	24
I do not currently have the financial resources for an appropriate down payment	35.14%	13
I do not currently have the financial resources for an adequate monthly mortgage payment	32.43%	12
I cannot find a home that suits my living needs in Avalon (e.g., housing size, disability accommodations, floorplan)	13.51%	5
I cannot currently find a home that suits my quality standards in Avalon (e.g., interior maintenance, finishes, landscaping)	13.51%	5
I do not currently wish to own or rent a home in Avalon	0.00%	0
I already own a home in Avalon	24.32%	9
Total Respondents: 37		

Q6 Select the type of housing that best describes your current home.

Answered: 39 Skipped: 7

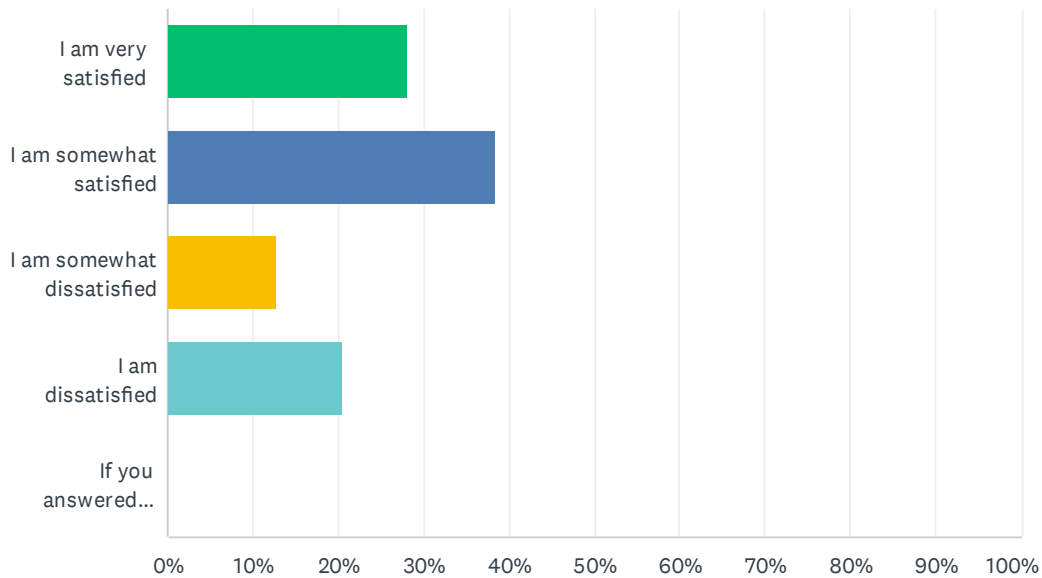


ANSWER CHOICES		RESPONSES	
Single-Family Home (Detached)		17.95%	7
Duplex/Townhome		25.64%	10
Multi-Family Home (Apartment/Condominium)		43.59%	17
Accessory Dwelling Unit, Granny Flat, Guest House		5.13%	2
Mobile Home		0.00%	0
Currently without permanent shelter		0.00%	0
Other (please specify)		7.69%	3
TOTAL			39

#	OTHER (PLEASE SPECIFY)	DATE
1	Too small studio apartment	11/11/2021 5:06 AM
2	30 day notice	11/10/2021 7:53 AM
3	Apartment	11/10/2021 12:00 AM

Q7 How satisfied are you with your current housing situation?

Answered: 39 Skipped: 7



ANSWER CHOICES		RESPONSES	
I am very satisfied		28.21%	11
I am somewhat satisfied		38.46%	15
I am somewhat dissatisfied		12.82%	5
I am dissatisfied		20.51%	8
If you answered somewhat dissatisfied or dissatisfied, please explain.		0.00%	0
TOTAL			39

#	IF YOU ANSWERED SOMEWHAT DISSATISFIED OR DISSATISFIED, PLEASE EXPLAIN.	DATE
	There are no responses.	

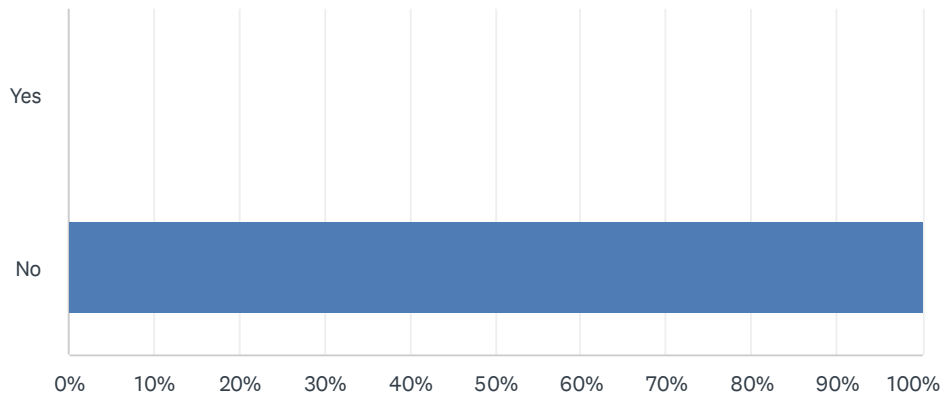
Q8 If you answered dissatisfied or somewhat dissatisfied to the prior question, please provide a reason below. (If not, please skip).

Answered: 13 Skipped: 33

#	RESPONSES	DATE
1	I'd like to be in a larger space. Not a studio. At least a one bedroom.	11/11/2021 7:37 AM
2	The space is too small for adequate furniture such as a desk, bed, shelves, etc	11/11/2021 5:06 AM
3	Crazy HIGH RENT	11/10/2021 6:19 PM
4	Financial	11/10/2021 7:53 AM
5	Rent is too high	11/10/2021 2:53 AM
6	Very small very expensive	11/9/2021 8:32 PM
7	It's difficult to find help for maintenance.	11/9/2021 5:16 PM
8	Small place with bathroom, kitchen bed in same room	11/9/2021 5:14 PM
9	Very small, no outdoor space, noise from neighbors and street, cannot afford to upgrade	11/9/2021 4:55 PM
10	Too small need a bigger place but no housing available	11/9/2021 4:50 PM
11	not enough room or storage	11/9/2021 4:45 PM
12	Rent is too expensive in town	11/9/2021 4:32 PM
13	\$1850/studio	11/5/2021 4:05 PM

Q9 Do you think that the range of housing options currently available in the City of Avalon meets the needs of the community?

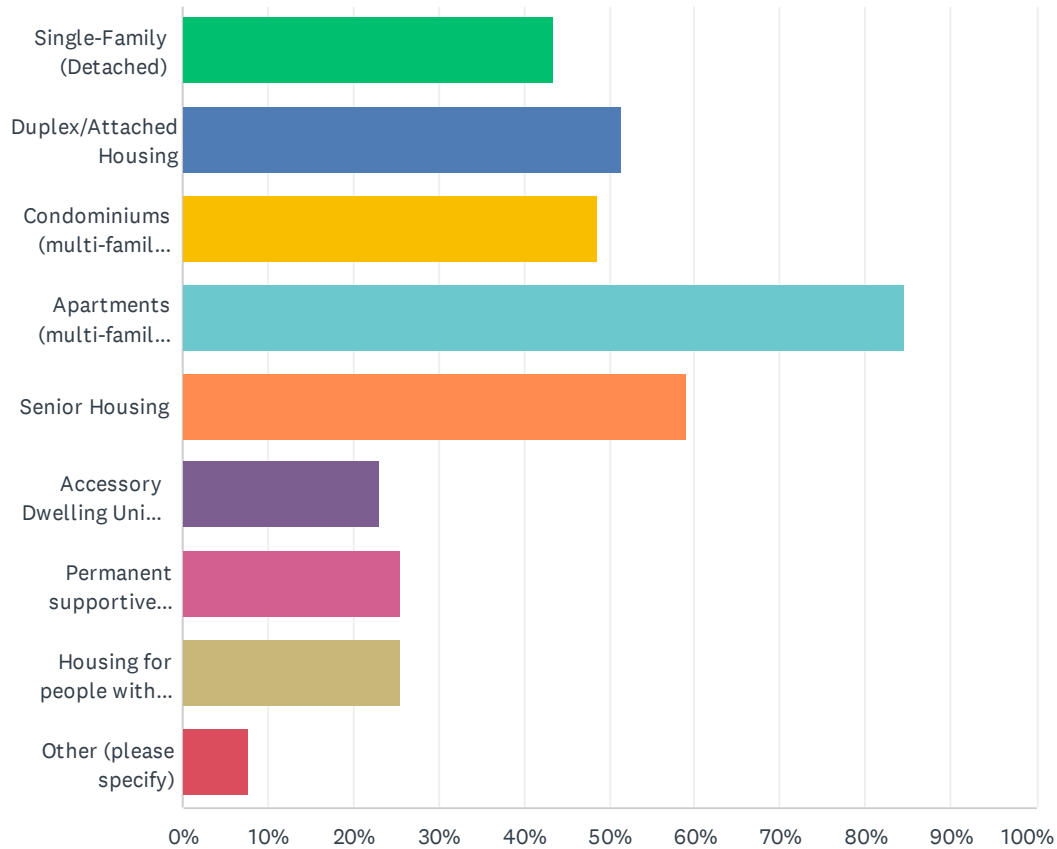
Answered: 38 Skipped: 8



ANSWER CHOICES		RESPONSES	
Yes		0.00%	0
No		100.00%	38
TOTAL			38

Q10 What types of additional housing are most needed in the City of Avalon? (Select all that apply)

Answered: 39 Skipped: 7



ANSWER CHOICES	RESPONSES	
Single-Family (Detached)	43.59%	17
Duplex/Attached Housing	51.28%	20
Condominiums (multi-family ownership homes)	48.72%	19
Apartments (multi-family rental homes)	84.62%	33
Senior Housing	58.97%	23
Accessory Dwelling Unit, Granny Flat, Guest House	23.08%	9
Permanent supportive housing (for the homeless, transitional housing, etc.)	25.64%	10
Housing for people with disabilities (please specify in comment field below)	25.64%	10
Other (please specify)	7.69%	3
Total Respondents: 39		

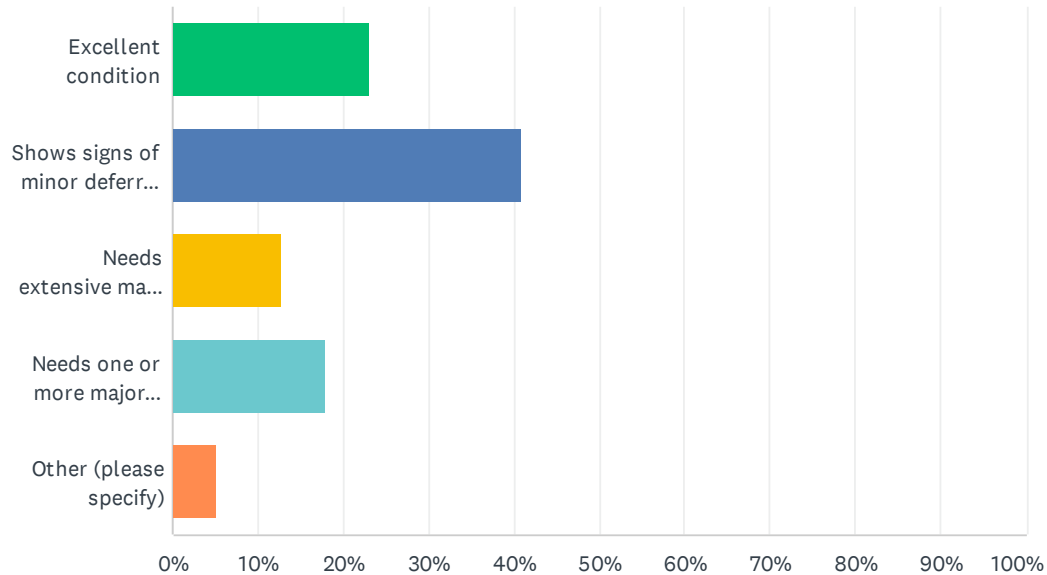
#	OTHER (PLEASE SPECIFY)	DATE

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1	multiple options, too many CUPs issued taking up year-round housing	11/13/2021 7:57 AM
2	Fair rent prices	11/10/2021 6:19 PM
3	Less vacation homes	11/9/2021 4:32 PM

Q11 How would you rate the physical condition of the residence you live in?

Answered: 39 Skipped: 7

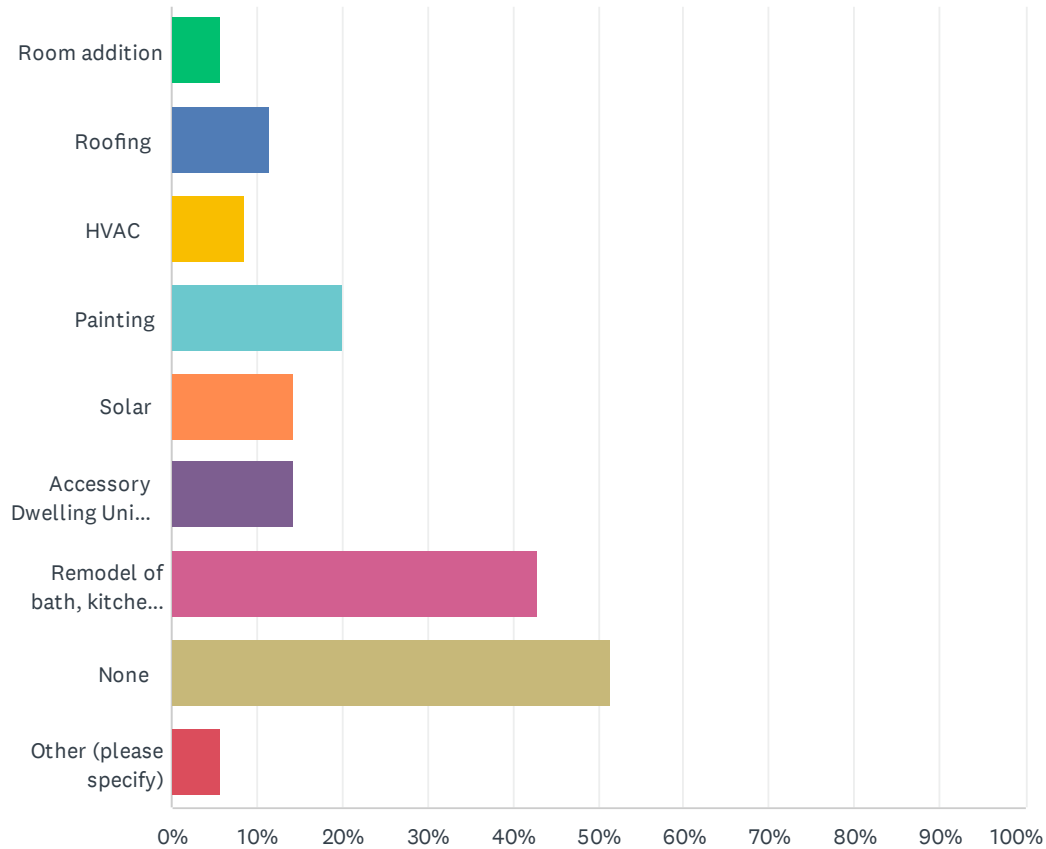


ANSWER CHOICES	RESPONSES	
Excellent condition	23.08%	9
Shows signs of minor deferred maintenance (e.g., peeling paint, chipped stucco, etc.)	41.03%	16
Needs extensive major repairs or renovation (teardown/rebuild)	12.82%	5
Needs one or more major systems upgrades (e.g., new roof, windows, electrical, plumbing, HVAC system, etc.)	17.95%	7
Other (please specify)	5.13%	2
TOTAL		39

#	OTHER (PLEASE SPECIFY)	DATE
1	Exterior has been renovated in the last year, remodeling interior as we can afford it.	11/13/2021 7:57 AM
2	Bit the neighborhood has too much trash permanently lying around; listens ranging from masks to abandoned cars	11/11/2021 5:06 AM

Q12 Which of the following housing upgrades or expansions have you considered making on your home?

Answered: 35 Skipped: 11



ANSWER CHOICES	RESPONSES	
Room addition	5.71%	2
Roofing	11.43%	4
HVAC	8.57%	3
Painting	20.00%	7
Solar	14.29%	5
Accessory Dwelling Unit, Granny Flat, Guest House	14.29%	5
Remodel of bath, kitchen or other facility	42.86%	15
None	51.43%	18
Other (please specify)	5.71%	2
Total Respondents: 35		

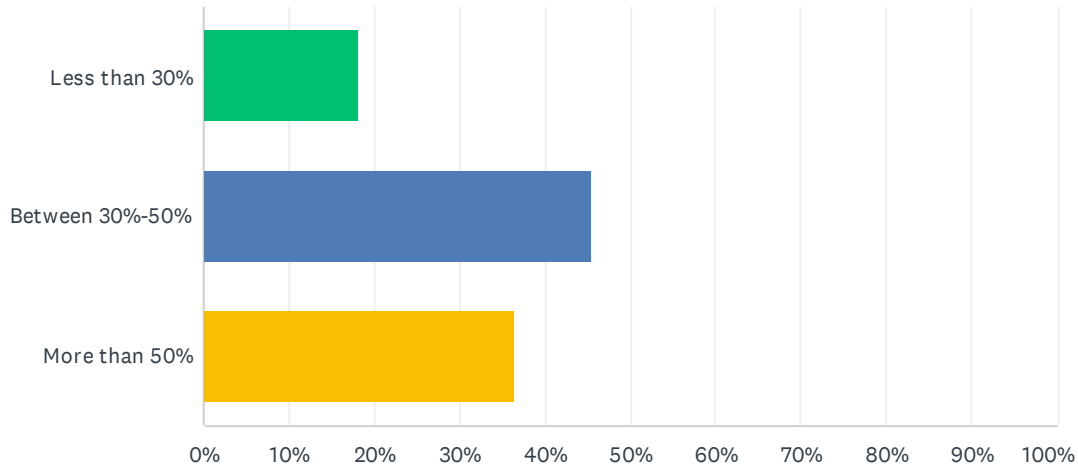
#	OTHER (PLEASE SPECIFY)	DATE

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1	Window dressing,	11/10/2021 6:19 PM
2	I'm renting, so housing upgrades or expansions don't apply	11/9/2021 5:31 PM

Q13 Based on your monthly income before taxes, how much of your monthly income do you spend on housing?

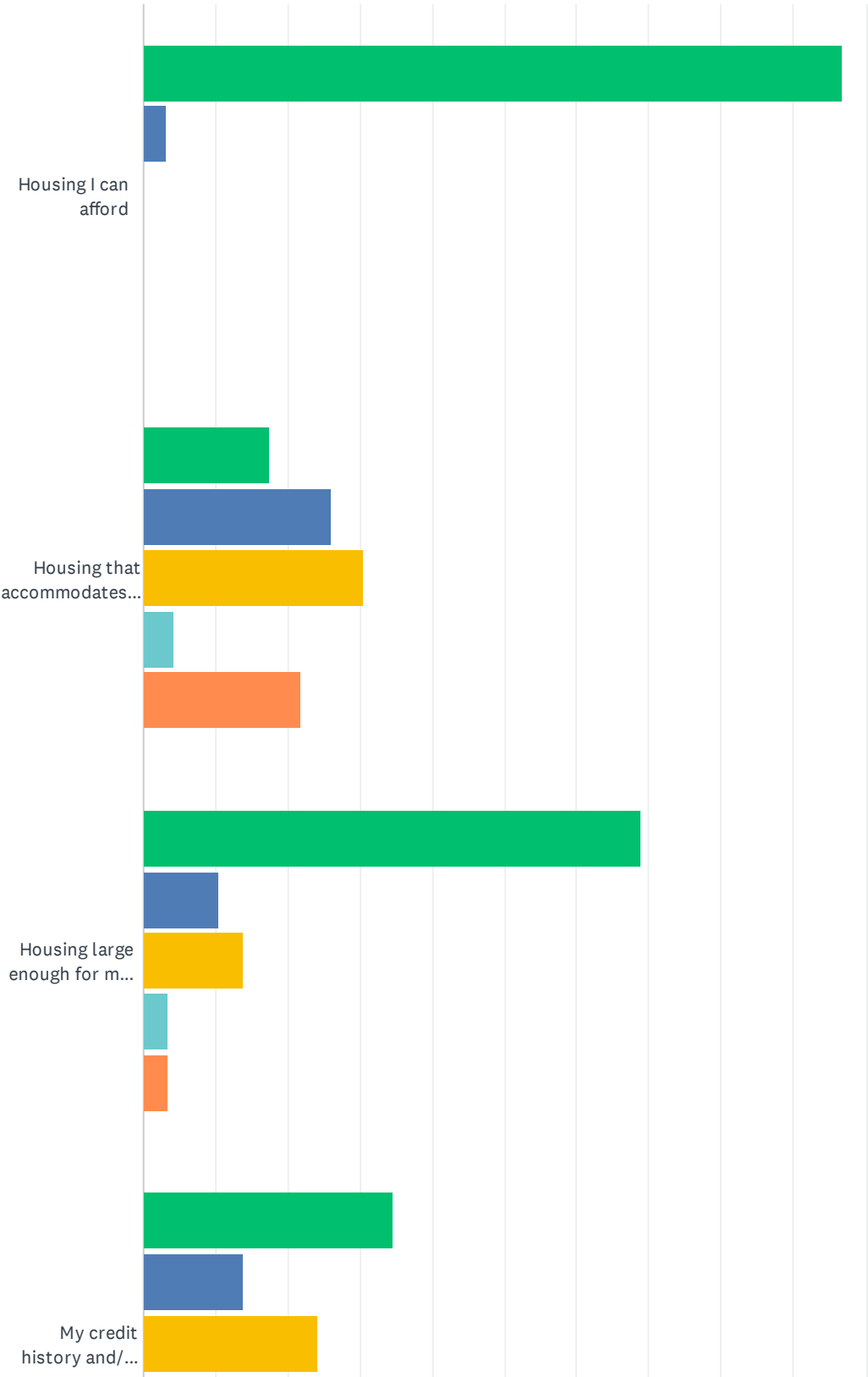
Answered: 33 Skipped: 13



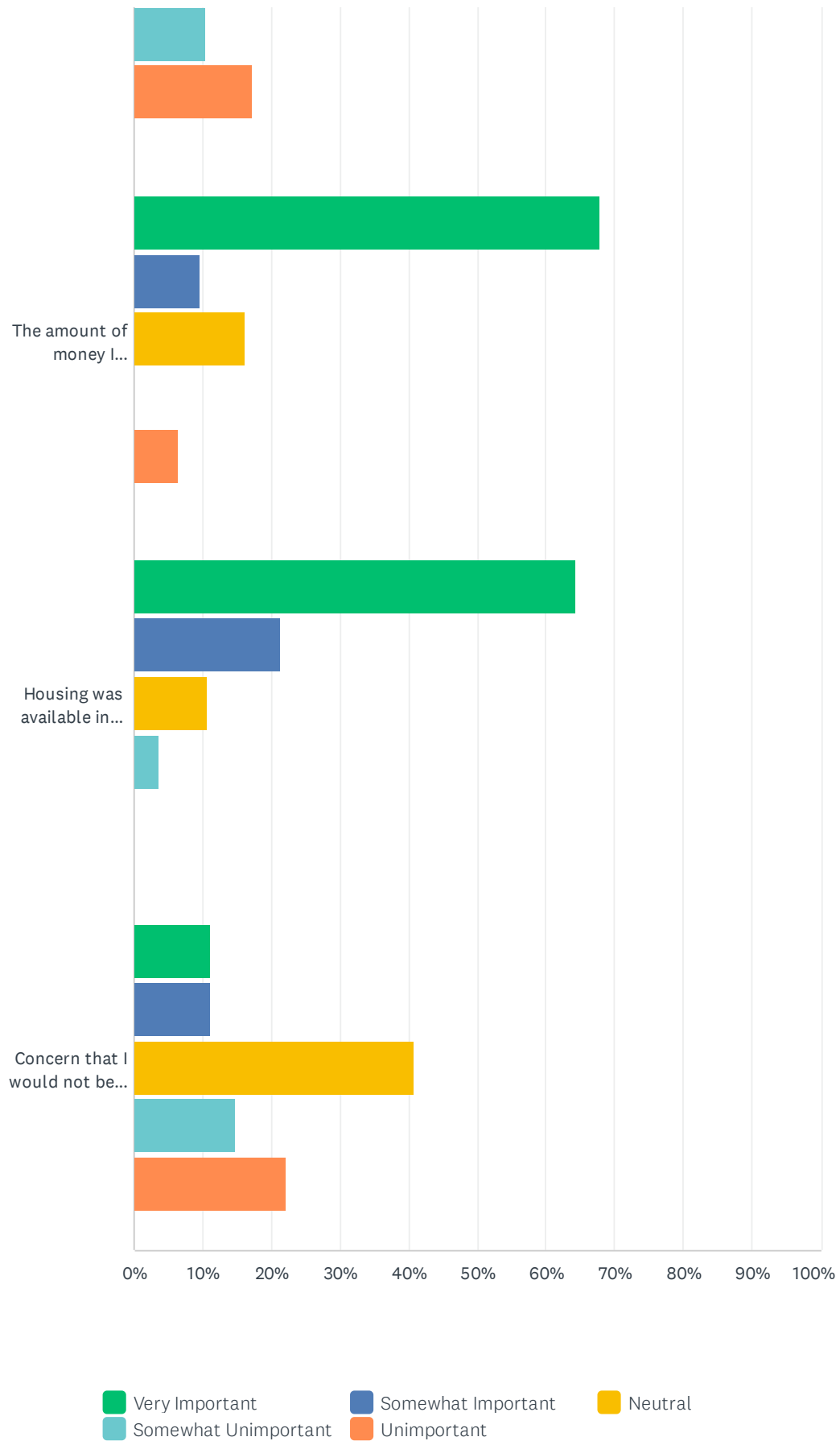
ANSWER CHOICES	RESPONSES	
Less than 30%	18.18%	6
Between 30%-50%	45.45%	15
More than 50%	36.36%	12
TOTAL		33

Q14 How important are the following factors in your housing choice? (If a statement does not pertain to you, please leave blank.) (1-5 scale)

Answered: 33 Skipped: 13



Avalon 2021-2029 Housing Element Update Survey



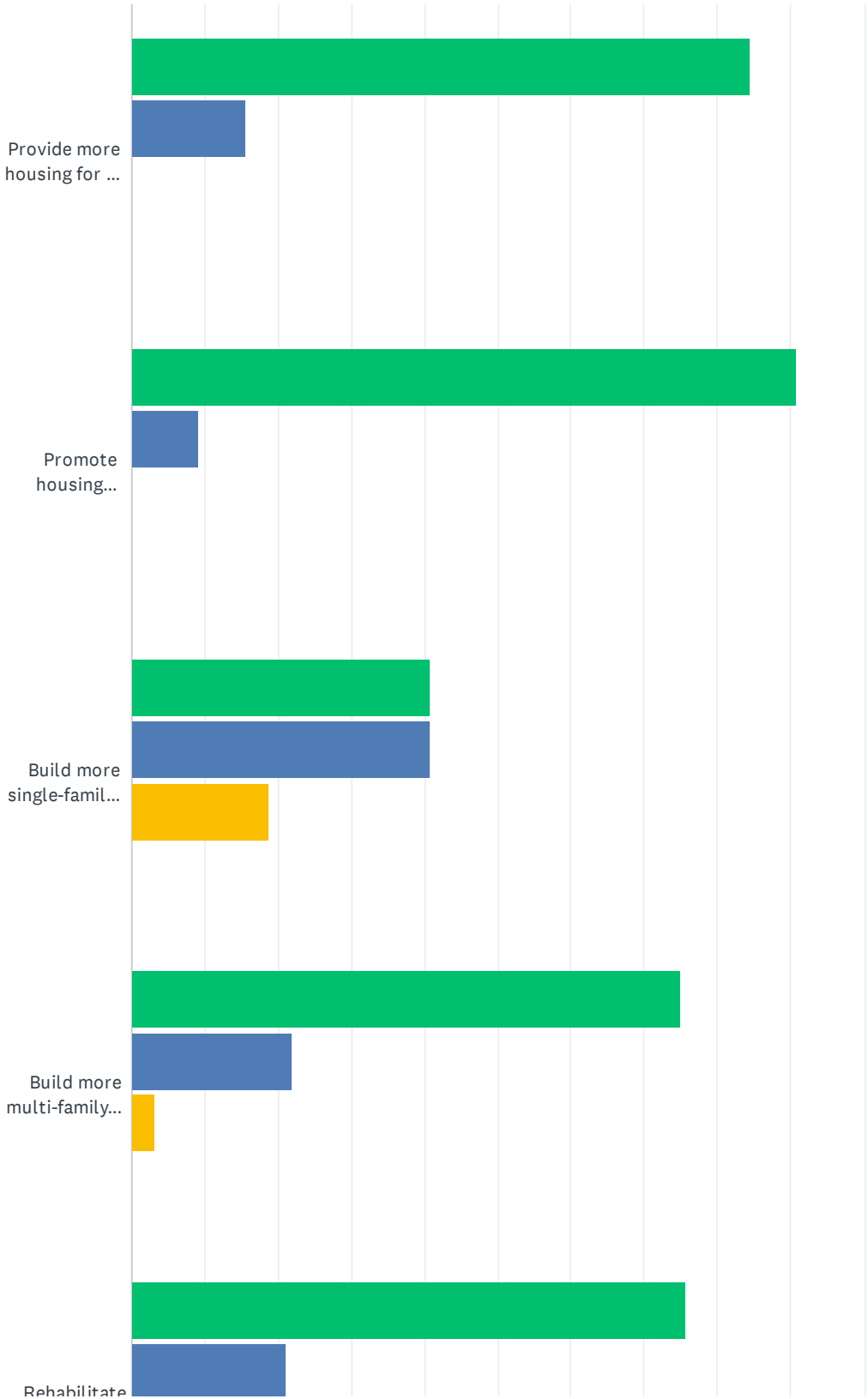
Avalon 2021-2029 Housing Element Update Survey

	VERY IMPORTANT	SOMEWHAT IMPORTANT	NEUTRAL	SOMEWHAT UNIMPORTANT	UNIMPORTANT	TOTAL	WEIGHTED AVERAGE
Housing I can afford	96.88% 31	3.13% 1	0.00% 0	0.00% 0	0.00% 0	32	1.03
Housing that accommodates disability of household member	17.39% 4	26.09% 6	30.43% 7	4.35% 1	21.74% 5	23	2.87
Housing large enough for my household	68.97% 20	10.34% 3	13.79% 4	3.45% 1	3.45% 1	29	1.62
My credit history and/or credit score	34.48% 10	13.79% 4	24.14% 7	10.34% 3	17.24% 5	29	2.62
The amount of money I have/had for deposit	67.74% 21	9.68% 3	16.13% 5	0.00% 0	6.45% 2	31	1.68
Housing was available in the neighborhood I chose at the time I needed it	64.29% 18	21.43% 6	10.71% 3	3.57% 1	0.00% 0	28	1.54
Concern that I would not be welcome in that neighborhood	11.11% 3	11.11% 3	40.74% 11	14.81% 4	22.22% 6	27	3.26

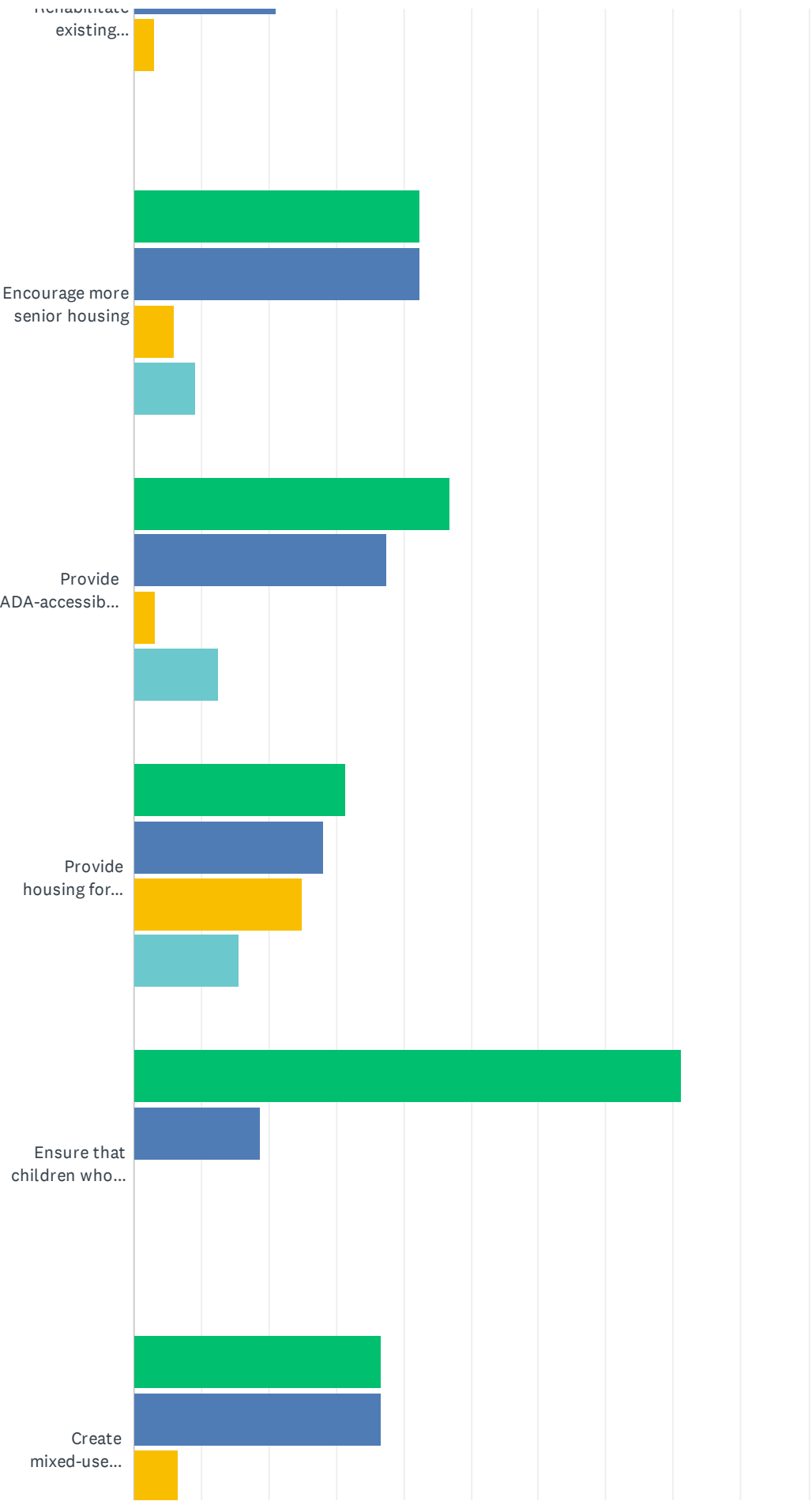
#	OTHER (PLEASE SPECIFY)	DATE
1	Wasn't completely dilapidated many properties are terribly ran down.	11/11/2021 7:46 AM
2	Quality of construction and features	11/10/2021 10:47 AM

Q15 How important are the following housing priorities to you and your household?

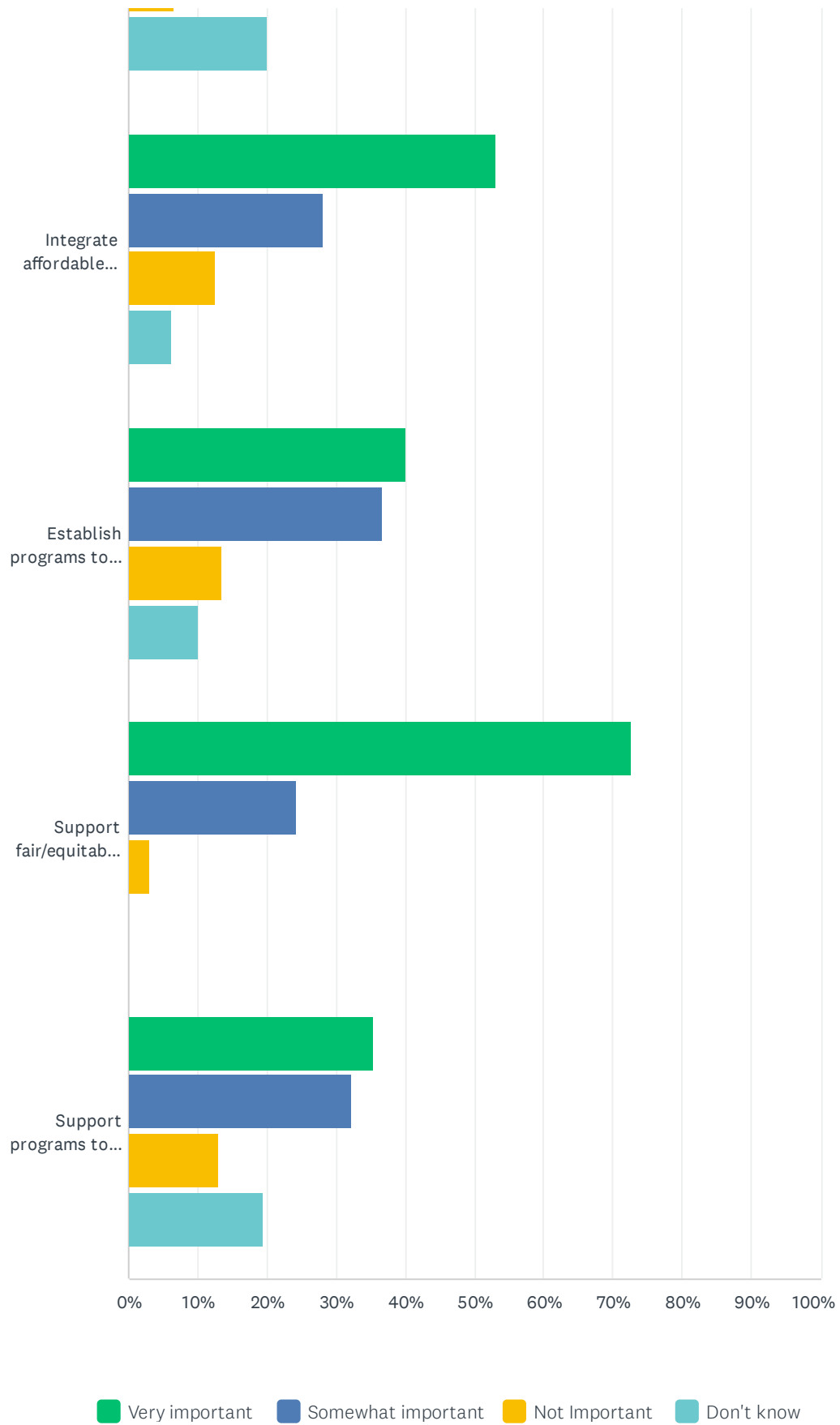
Answered: 33 Skipped: 13



Avalon 2021-2029 Housing Element Update Survey



Avalon 2021-2029 Housing Element Update Survey

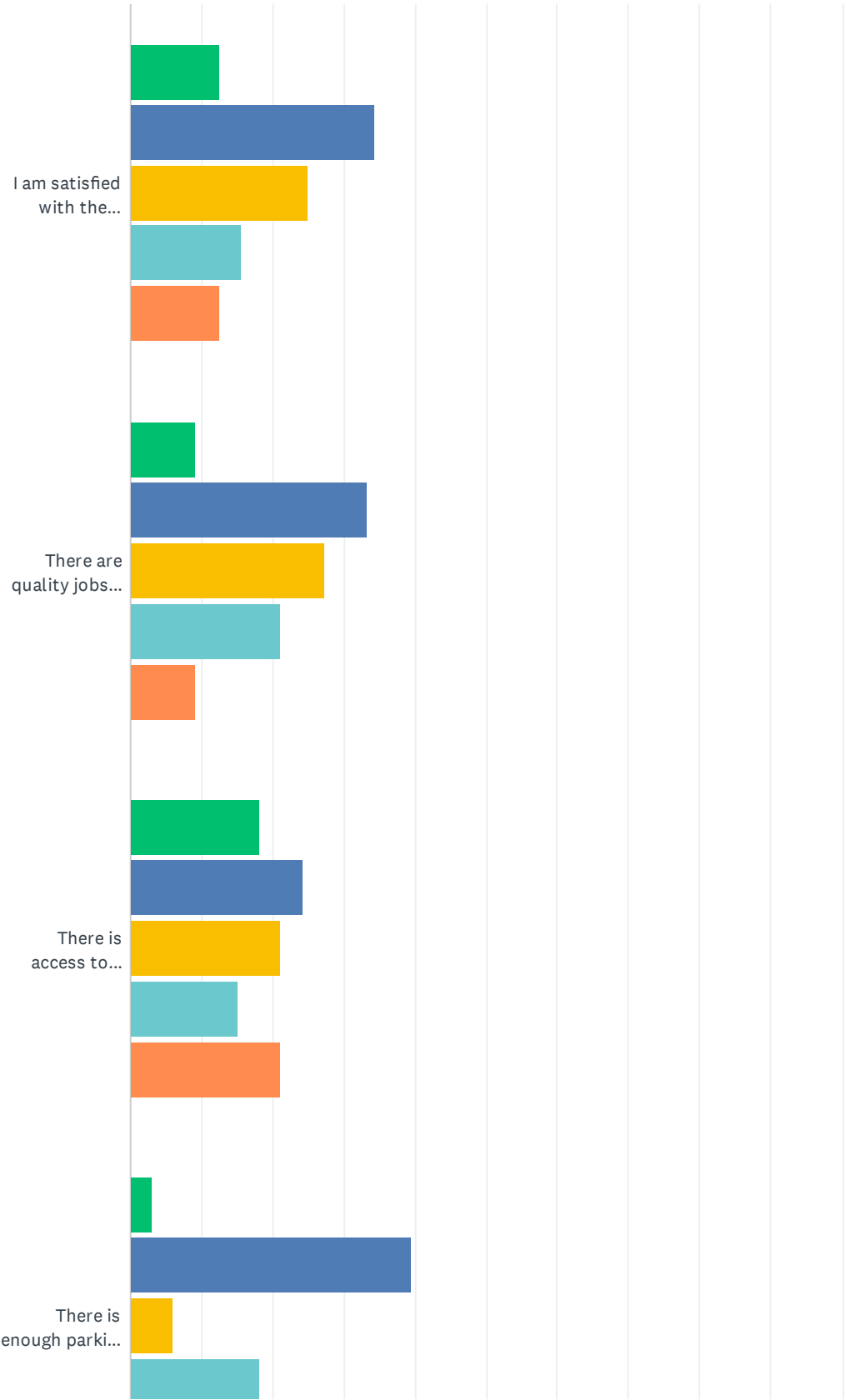


Avalon 2021-2029 Housing Element Update Survey

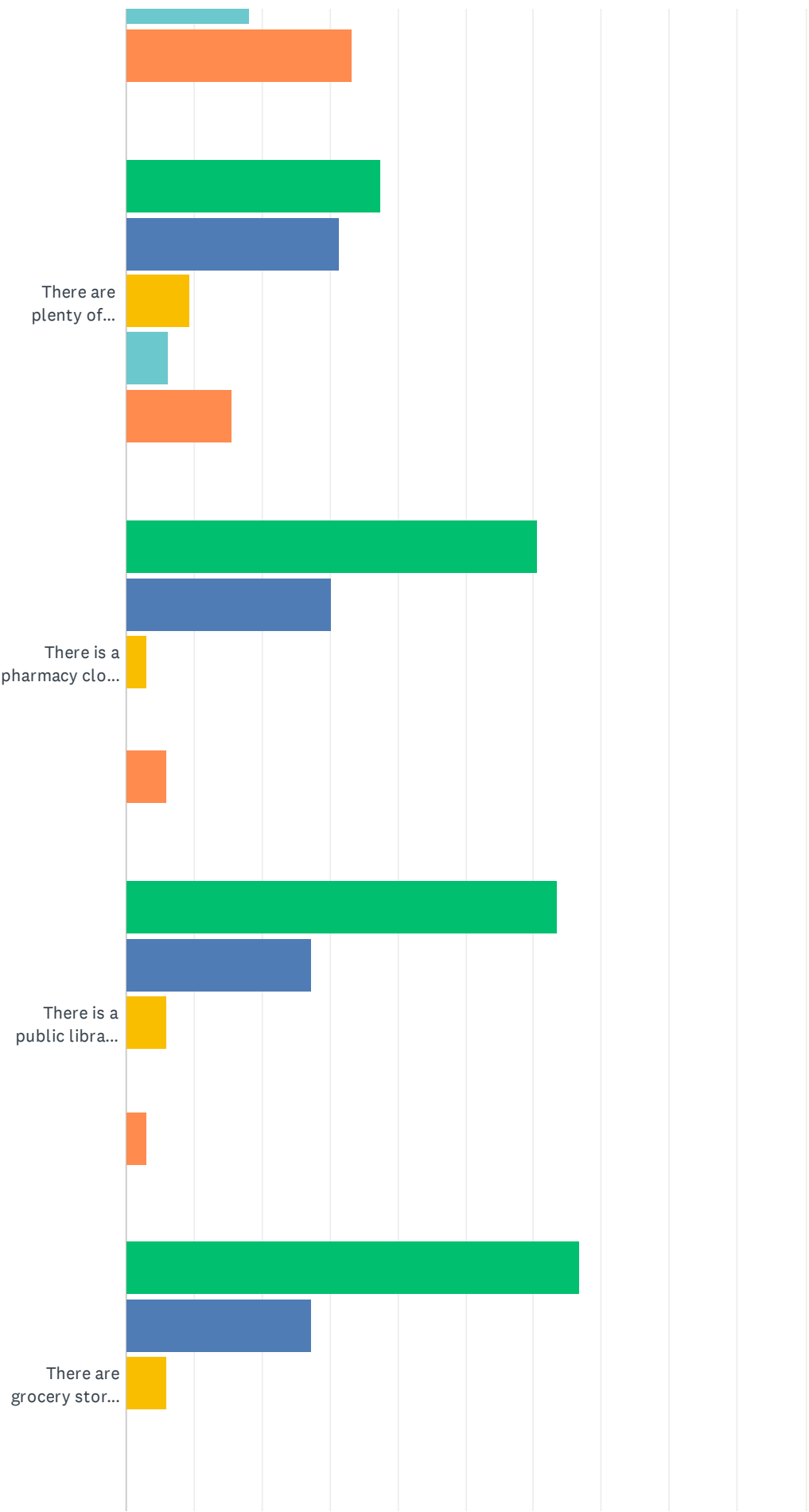
	VERY IMPORTANT	SOMEWHAT IMPORTANT	NOT IMPORTANT	DON'T KNOW	TOTAL	WEIGHTED AVERAGE
Provide more housing for all income levels	84.38% 27	15.63% 5	0.00% 0	0.00% 0	32	1.16
Promote housing affordable to working families	90.91% 30	9.09% 3	0.00% 0	0.00% 0	33	1.09
Build more single-family housing	40.63% 13	40.63% 13	18.75% 6	0.00% 0	32	1.78
Build more multi-family housing (apartments, condos, etc.)	75.00% 24	21.88% 7	3.13% 1	0.00% 0	32	1.28
Rehabilitate existing housing	75.76% 25	21.21% 7	3.03% 1	0.00% 0	33	1.27
Encourage more senior housing	42.42% 14	42.42% 14	6.06% 2	9.09% 3	33	1.82
Provide ADA-accessible housing	46.88% 15	37.50% 12	3.13% 1	12.50% 4	32	1.81
Provide housing for homeless	31.25% 10	28.13% 9	25.00% 8	15.63% 5	32	2.25
Ensure that children who grow up in Avalon can afford to live in Avalon as adults	81.25% 26	18.75% 6	0.00% 0	0.00% 0	32	1.19
Create mixed-use (commercial/office and residential) projects to bring different land uses closer together	36.67% 11	36.67% 11	6.67% 2	20.00% 6	30	2.10
Integrate affordable housing throughout the community to create mixed-income neighborhoods	53.13% 17	28.13% 9	12.50% 4	6.25% 2	32	1.72
Establish programs to help at-risk homeowners keep their homes, including mortgage loan programs	40.00% 12	36.67% 11	13.33% 4	10.00% 3	30	1.93
Support fair/equitable housing opportunities	72.73% 24	24.24% 8	3.03% 1	0.00% 0	33	1.30
Support programs to help maintain and secure neighborhoods that have suffered foreclosures	35.48% 11	32.26% 10	12.90% 4	19.35% 6	31	2.16

Q16 Please respond to each statement: (1-5 scale)

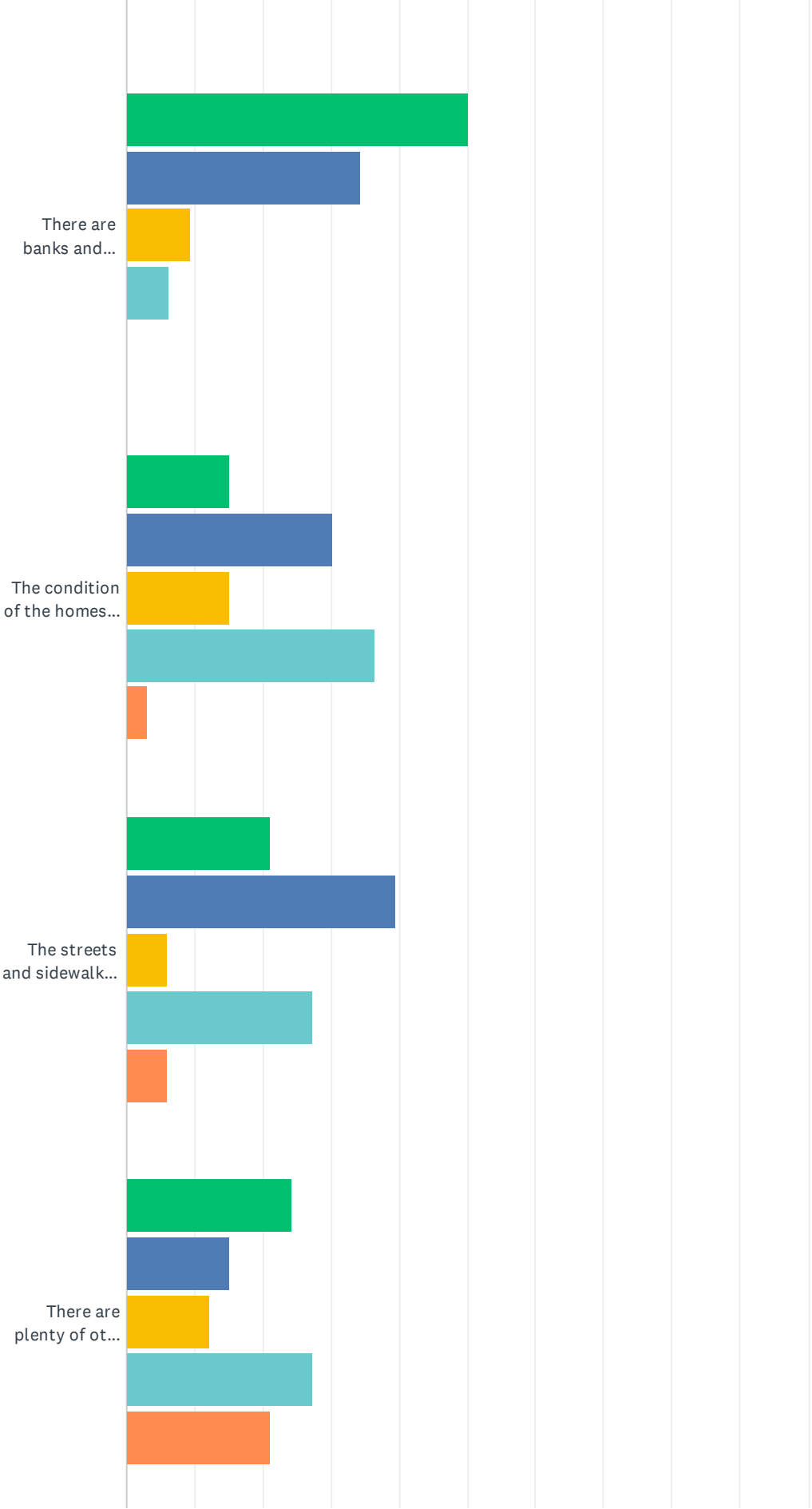
Answered: 33 Skipped: 13



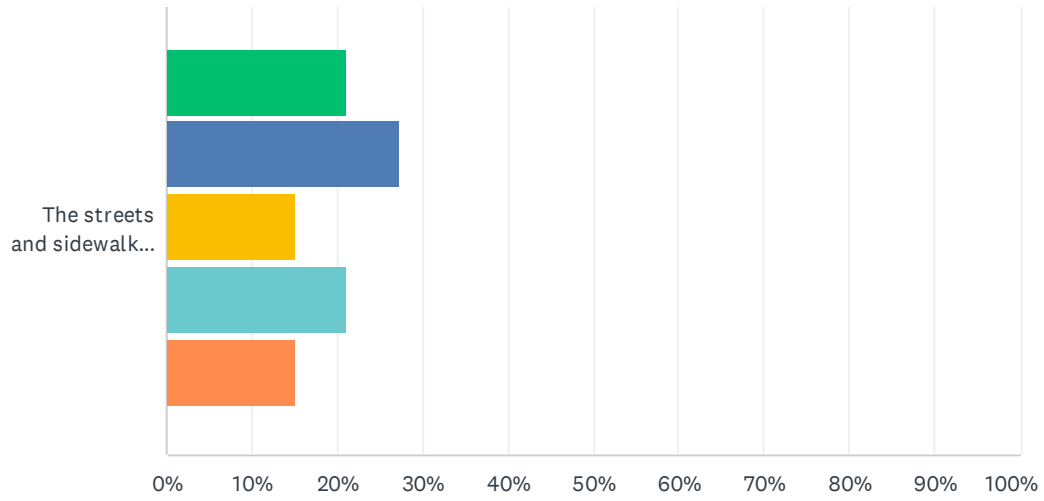
Avalon 2021-2029 Housing Element Update Survey



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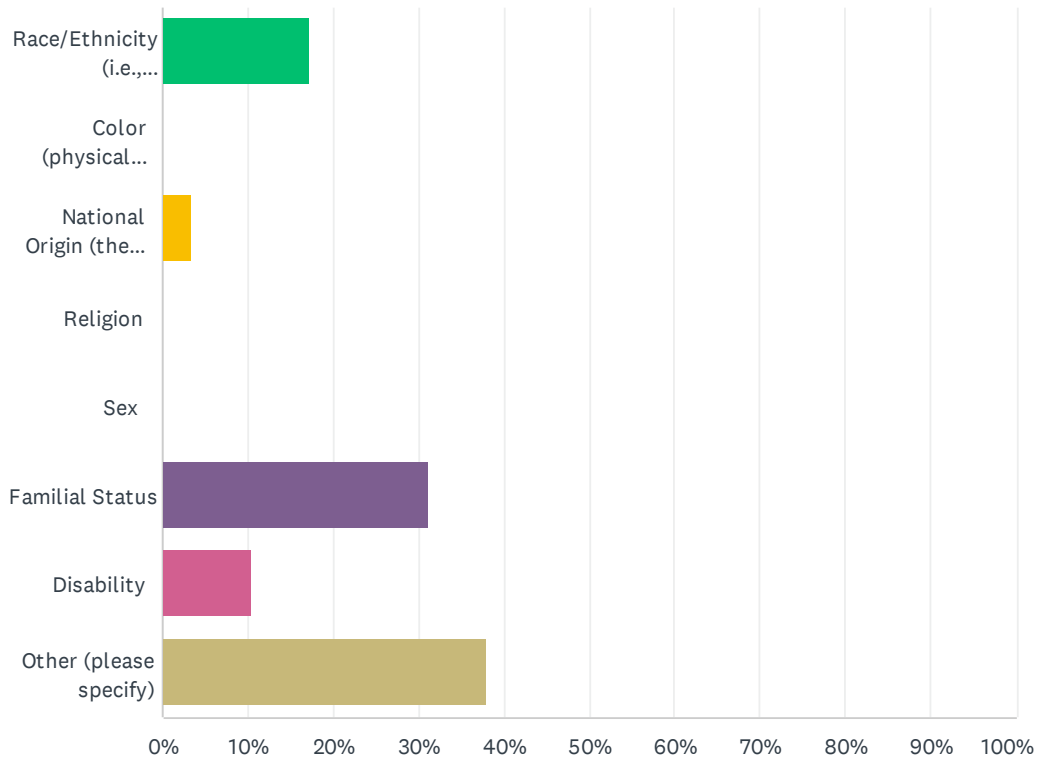
Strongly agree Somewhat agree Neutral
Somewhat disagree Strongly disagree

Avalon 2021-2029 Housing Element Update Survey

	STRONGLY AGREE	SOMEWHAT AGREE	NEUTRAL	SOMEWHAT DISAGREE	STRONGLY DISAGREE	TOTAL	WEIGHTED AVERAGE
I am satisfied with the schools in my area	12.50% 4	34.38% 11	25.00% 8	15.63% 5	12.50% 4	32	2.81
There are quality jobs in my neighborhood	9.09% 3	33.33% 11	27.27% 9	21.21% 7	9.09% 3	33	2.88
There is access to public transit close to my neighborhood	18.18% 6	24.24% 8	21.21% 7	15.15% 5	21.21% 7	33	2.97
There is enough parking in my area of town	3.03% 1	39.39% 13	6.06% 2	18.18% 6	33.33% 11	33	3.39
There are plenty of parks, playgrounds, or green space near me	37.50% 12	31.25% 10	9.38% 3	6.25% 2	15.63% 5	32	2.31
There is a pharmacy close to my house	60.61% 20	30.30% 10	3.03% 1	0.00% 0	6.06% 2	33	1.61
There is a public library close to my house	63.64% 21	27.27% 9	6.06% 2	0.00% 0	3.03% 1	33	1.52
There are grocery stores close to my neighborhood	66.67% 22	27.27% 9	6.06% 2	0.00% 0	0.00% 0	33	1.39
There are banks and credit unions near where I live	50.00% 16	34.38% 11	9.38% 3	6.25% 2	0.00% 0	32	1.72
The condition of the homes in my neighborhood are acceptable	15.15% 5	30.30% 10	15.15% 5	36.36% 12	3.03% 1	33	2.82
The streets and sidewalks near my home are well kept	21.21% 7	39.39% 13	6.06% 2	27.27% 9	6.06% 2	33	2.58
There are plenty of other public spaces near my home	24.24% 8	15.15% 5	12.12% 4	27.27% 9	21.21% 7	33	3.06
The streets and sidewalks in my neighborhood have adequate lighting	21.21% 7	27.27% 9	15.15% 5	21.21% 7	15.15% 5	33	2.82

Q17 The federal Fair Housing Act prohibits discrimination in the sale, rental, and financing of housing based on race, color, national origin, religion, sex, familial status, and disability. Of those, which do you think is the biggest problem in housing discrimination in Avalon?

Answered: 29 Skipped: 17



ANSWER CHOICES	RESPONSES	
Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)	17.24%	5
Color (physical appearance)	0.00%	0
National Origin (the country where a person was born)	3.45%	1
Religion	0.00%	0
Sex	0.00%	0
Familial Status	31.03%	9
Disability	10.34%	3
Other (please specify)	37.93%	11
TOTAL		29

#	OTHER (PLEASE SPECIFY)	DATE
1	None of these. Too many units have been bought by non-residents who turn them into vacation	11/13/2021 8:04 AM

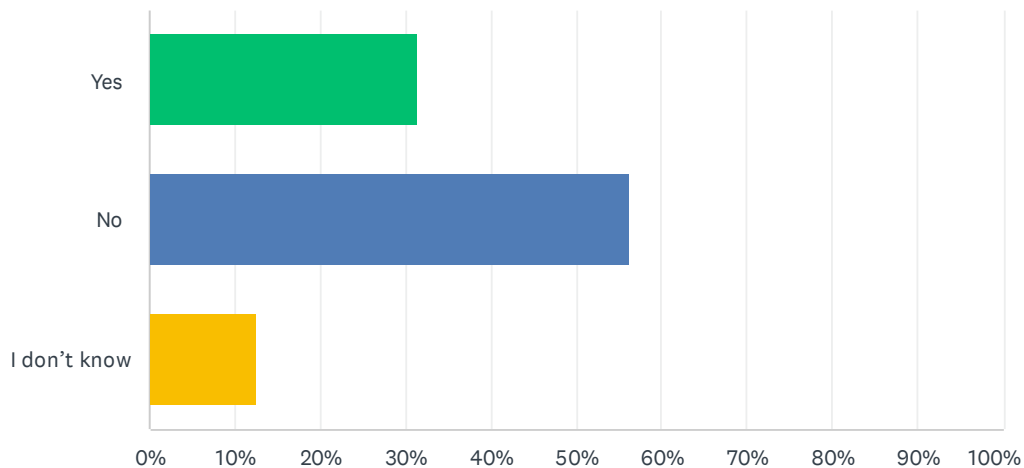
Avalon 2021-2029 Housing Element Update Survey

rentals, eliminating year-round options.

2	Price	11/12/2021 7:21 AM
3	Does not apply	11/11/2021 2:51 PM
4	Money	11/10/2021 6:24 PM
5	Economic	11/10/2021 10:47 AM
6	Affordability	11/10/2021 3:00 AM
7	Credit and a pet.	11/9/2021 8:14 PM
8	none apply	11/9/2021 5:16 PM
9	None, this is one of the most non discriminatory places I have ever lived	11/9/2021 5:00 PM
10	financial housing cost too much a single person needs 3-4 jobs	11/9/2021 4:49 PM
11	NA	11/9/2021 1:30 PM

Q18 Have you ever experienced or witnessed housing discrimination in the City of Avalon? (Reminder: Housing discrimination occurs when factors like a person's race, color, national origin, religion, sex, familial status, and disability are used in making decisions related to in the sale, rental, or financing of housing).

Answered: 32 Skipped: 14

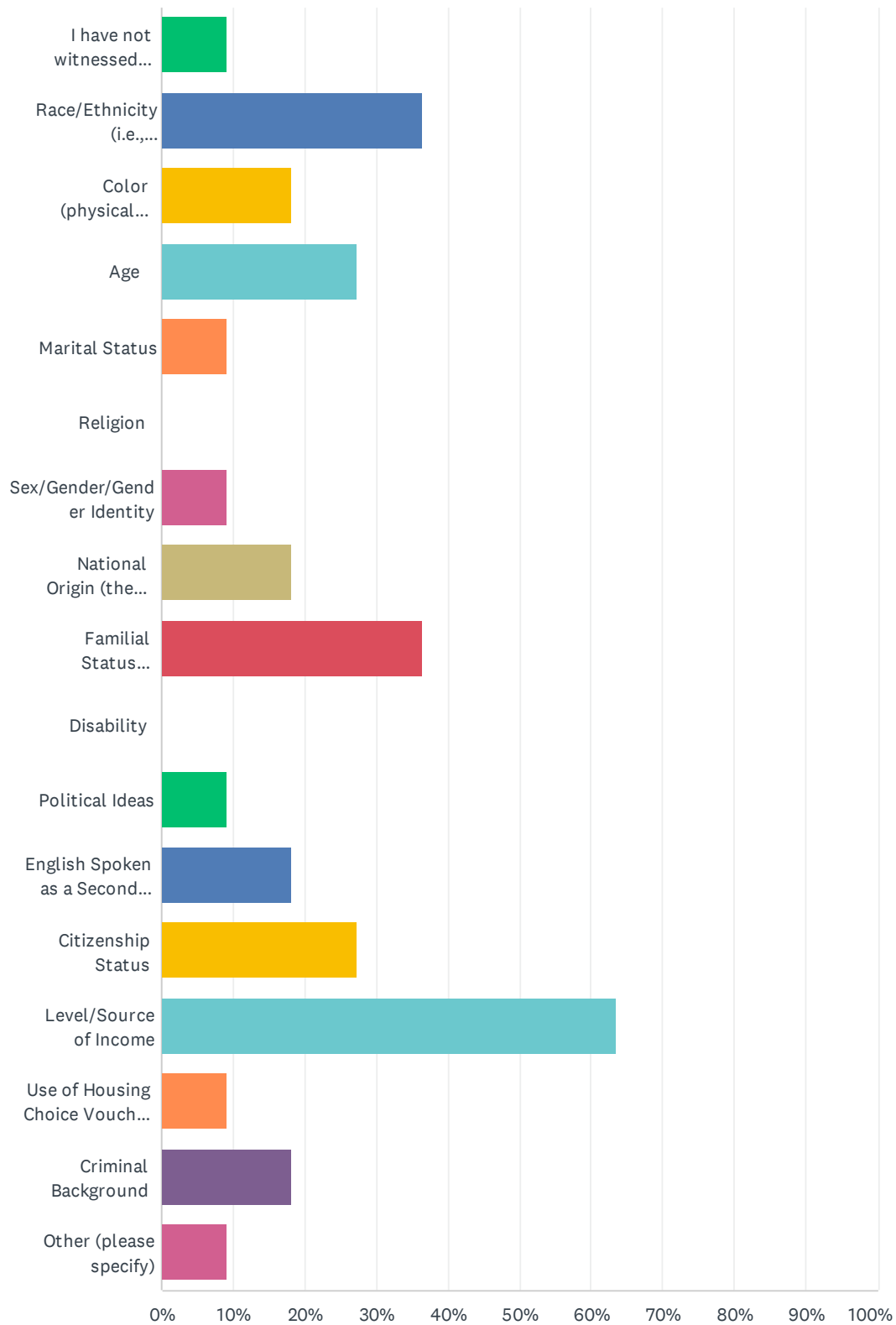


ANSWER CHOICES	RESPONSES	
Yes	31.25%	10
No	56.25%	18
I don't know	12.50%	4
TOTAL		32

Q19 On what grounds do you believe you witnessed housing discrimination in Avalon? (Select all that apply)

Answered: 11 Skipped: 35

Avalon 2021-2029 Housing Element Update Survey



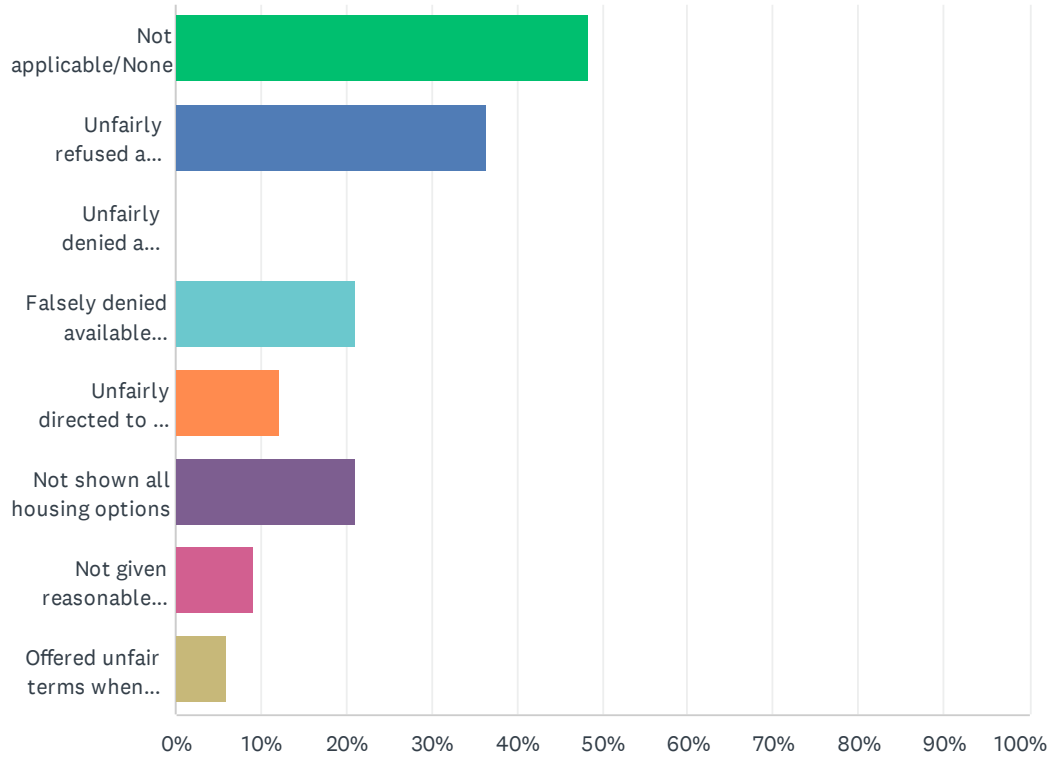
Avalon 2021-2029 Housing Element Update Survey

ANSWER CHOICES	RESPONSES	
I have not witnessed housing discrimination	9.09%	1
Race/Ethnicity (i.e., Caucasian, Asian, Latino, etc.)	36.36%	4
Color (physical appearance)	18.18%	2
Age	27.27%	3
Marital Status	9.09%	1
Religion	0.00%	0
Sex/Gender/Gender Identity	9.09%	1
National Origin (the country where a person was born)	18.18%	2
Familial Status (Families with Children)	36.36%	4
Disability	0.00%	0
Political Ideas	9.09%	1
English Spoken as a Second Language	18.18%	2
Citizenship Status	27.27%	3
Level/Source of Income	63.64%	7
Use of Housing Choice Voucher or other assistance	9.09%	1
Criminal Background	18.18%	2
Other (please specify)	9.09%	1
Total Respondents: 11		

#	OTHER (PLEASE SPECIFY)	DATE
1	Based on wanted more money for unit	11/10/2021 6:25 PM

Q20 Do you know of anyone in Avalon who has faced the following: (select all that apply)

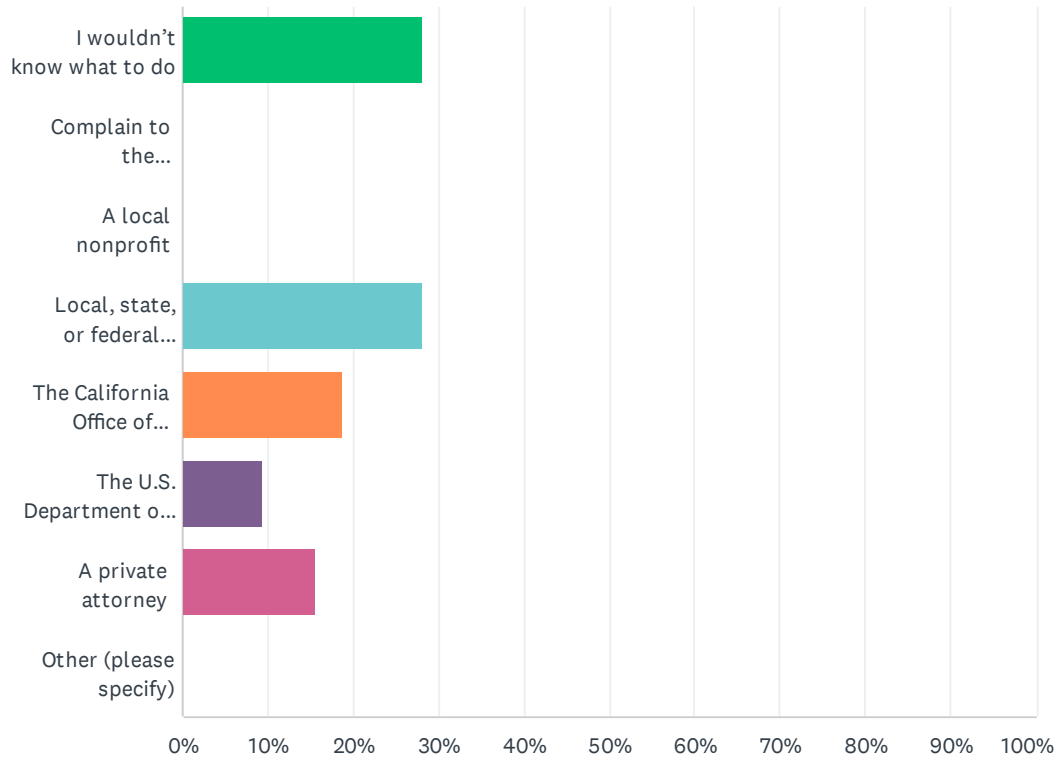
Answered: 33 Skipped: 13



ANSWER CHOICES	RESPONSES	
Not applicable/None	48.48%	16
Unfairly refused a rental or sale agreement	36.36%	12
Unfairly denied a mortgage	0.00%	0
Falsely denied available housing options	21.21%	7
Unfairly directed to a certain neighborhood and/or locations	12.12%	4
Not shown all housing options	21.21%	7
Not given reasonable accommodation for a disability	9.09%	3
Offered unfair terms when buying or selling	6.06%	2
Total Respondents: 33		

Q21 Where would you refer someone if they felt their fair housing rights had been violated?

Answered: 32 Skipped: 14

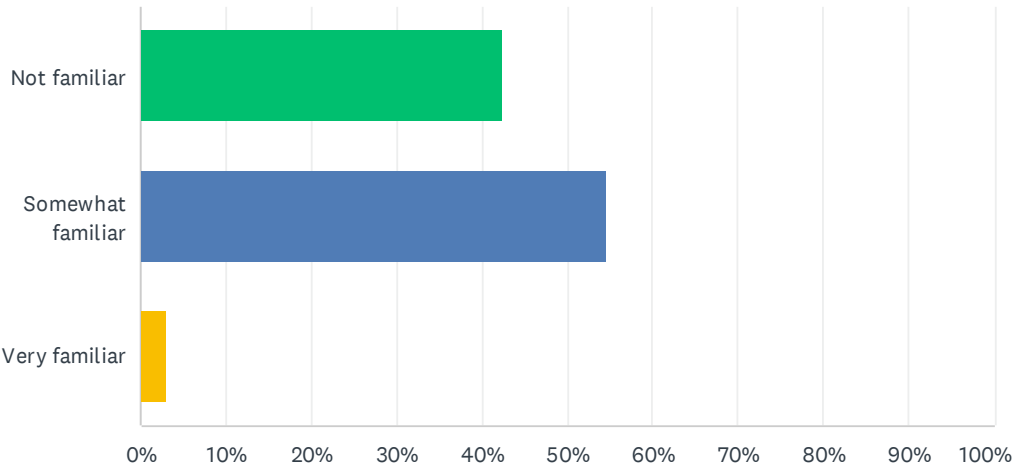


ANSWER CHOICES	RESPONSES	
I wouldn't know what to do	28.13%	9
Complain to the individual/organization discriminating	0.00%	0
A local nonprofit	0.00%	0
Local, state, or federal government	28.13%	9
The California Office of Housing and Community Development	18.75%	6
The U.S. Department of Housing and Urban Development	9.38%	3
A private attorney	15.63%	5
Other (please specify)	0.00%	0
TOTAL		32

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

Q22 How familiar are you with Fair Housing Laws?

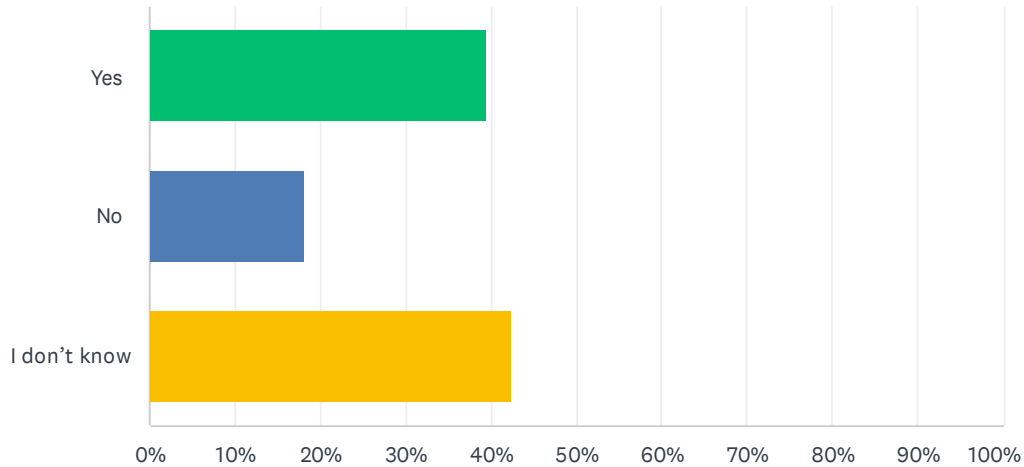
Answered: 33 Skipped: 13



ANSWER CHOICES		RESPONSES	
Not familiar		42.42%	14
Somewhat familiar		54.55%	18
Very familiar		3.03%	1
TOTAL			33

Q23 Do you think Federal and/or State Fair Housing Laws are difficult to understand or follow?

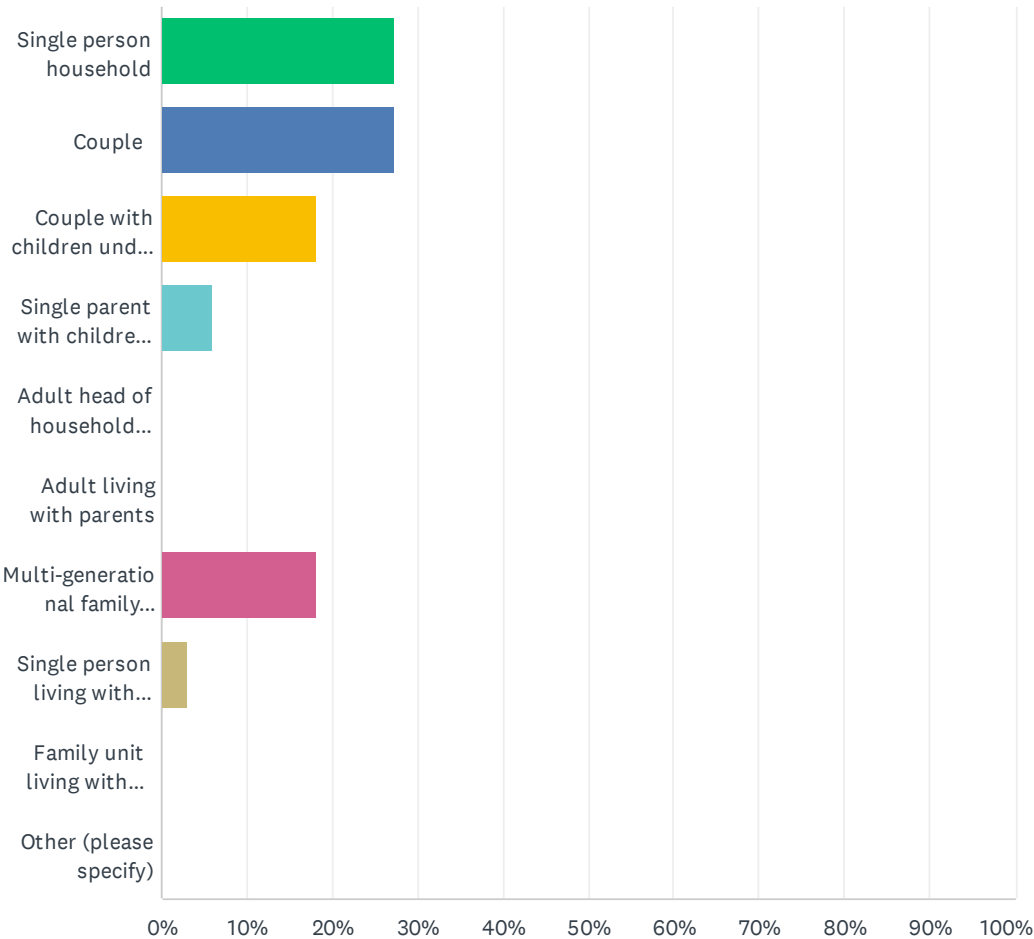
Answered: 33 Skipped: 13



ANSWER CHOICES	RESPONSES	
Yes	39.39%	13
No	18.18%	6
I don't know	42.42%	14
TOTAL		33

Q24 Which of the following best describes your household type?

Answered: 33 Skipped: 13



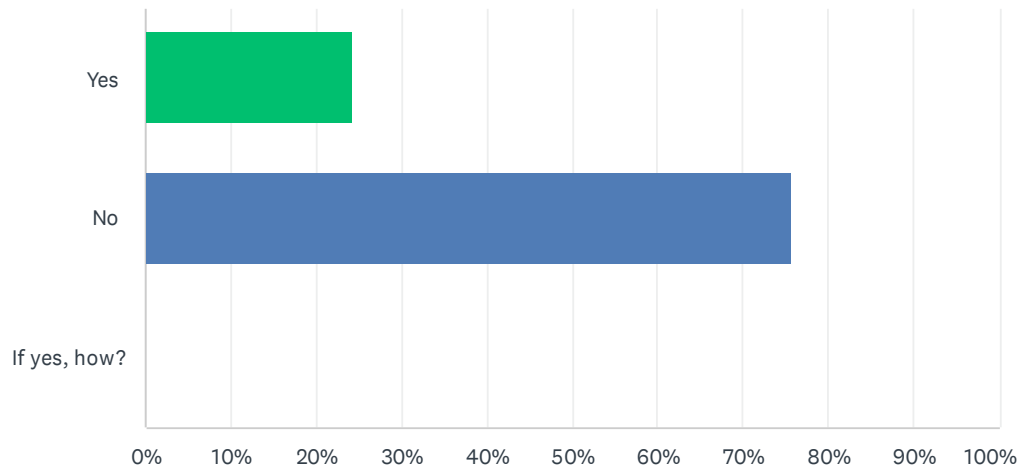
Avalon 2021-2029 Housing Element Update Survey

ANSWER CHOICES	RESPONSES	
Single person household	27.27%	9
Couple	27.27%	9
Couple with children under 18	18.18%	6
Single parent with children under 18	6.06%	2
Adult head of household (non-parent) with children under 18	0.00%	0
Adult living with parents	0.00%	0
Multi-generational family household (grandparents, children, and/or grandchildren all under the same roof)	18.18%	6
Single person living with roommates	3.03%	1
Family unit living with roommates	0.00%	0
Other (please specify)	0.00%	0
TOTAL		33

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

Q25 Has the Coronavirus impacted your housing situation?

Answered: 33 Skipped: 13

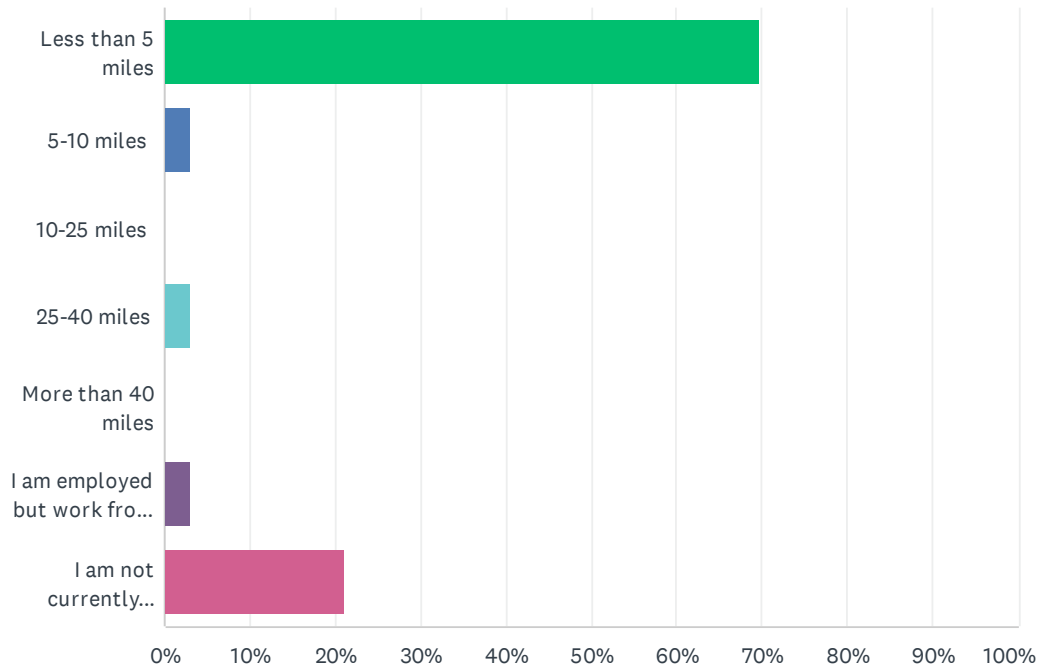


ANSWER CHOICES		RESPONSES	
Yes		24.24%	8
No		75.76%	25
If yes, how?		0.00%	0
TOTAL			33

#	IF YES, HOW?	DATE
	There are no responses.	

Q26 If you are currently employed, approximately how long is your one-way commute to work? (If your commute has changed due to the Coronavirus, please answer this question based on your commute before the pandemic's impact on your travel patterns).

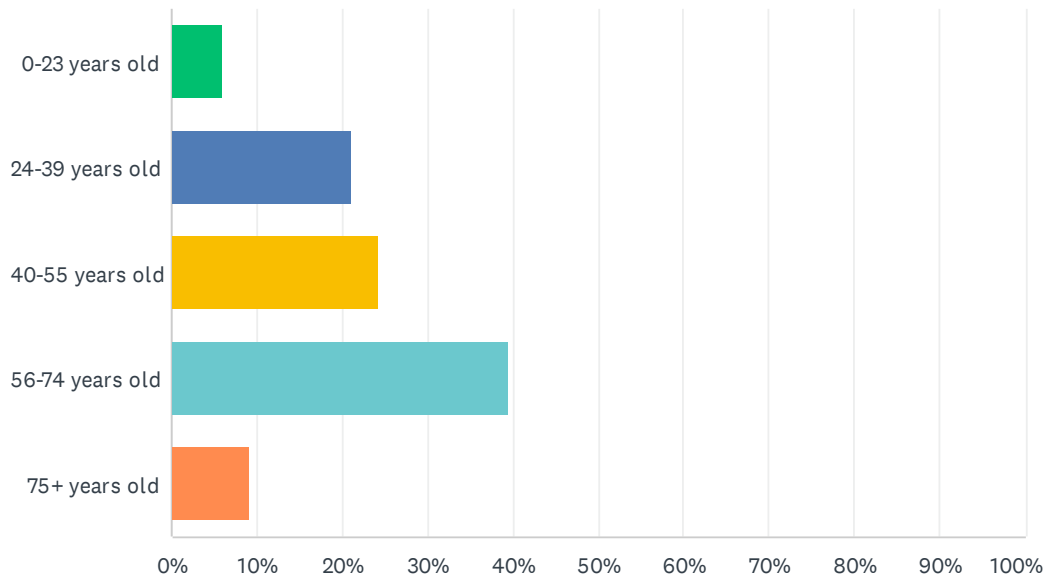
Answered: 33 Skipped: 13



ANSWER CHOICES	RESPONSES	
Less than 5 miles	69.70%	23
5-10 miles	3.03%	1
10-25 miles	0.00%	0
25-40 miles	3.03%	1
More than 40 miles	0.00%	0
I am employed but work from my home (pre-pandemic)	3.03%	1
I am not currently employed	21.21%	7
TOTAL		33

Q27 What age range most accurately describes you?

Answered: 33 Skipped: 13



ANSWER CHOICES	RESPONSES	
0-23 years old	6.06%	2
24-39 years old	21.21%	7
40-55 years old	24.24%	8
56-74 years old	39.39%	13
75+ years old	9.09%	3
TOTAL		33

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RESOLUTION NO. 22-04

AN RESOLUTION OF THE CITY COUNCIL OF THE CITY OF AVALON, ADOPTING GENERAL PLAN AMENDMENT GPA 21-01 (2021-2029 HOUSING ELEMENT UPDATE)

WHEREAS, the California Government Code requires that cities review and update their Housing Elements every eight (8) years, according to a schedule set forth by the State Department of Housing and Community Development ("HCD"); and

WHEREAS, the Housing Element sets forth the housing policies for the City, facilitates the preservation and development of housing, and establishes programs to accommodate the City's share of the regional housing needs in Southern California; and

WHEREAS, the City of Avalon has been assigned an allocation of 27 new housing units as its share of the regional housing needs assessment ("RHNA") in Southern California; and

WHEREAS, in accordance with State Law, the City of Avalon has prepared a Draft Housing Element for the 6th Cycle covering 2021-2029 period in accordance with California Government Code Sections 65580-65589.8 attached hereto as Exhibit A; and

WHEREAS, the Housing Element (2021-2029) complies with the requirements of State law and conforms to the purposes, intent and provisions of all the Elements of the City's General Plan; and

WHEREAS, Staff has reviewed and considered the Final Environmental Impact Report ("FEIR") for the General Plan certified by the City Council (State Clearinghouse No. 2011091042), including the impacts and mitigation measures identified therein. In compliance with CEQA Guidelines Section 15164 an Addendum to the General Plan FEIR has been prepared which concludes that the proposed updates to the General Plan Housing Element do not result in any new or greater environmental impacts than were previously analyzed, disclosed, and mitigated. None of the conditions in CEQA Guidelines Section 15162 are present to require the preparation of a subsequent EIR, and no additional environmental review is required; and

WHEREAS, on December 3, 2021, pursuant to Government Code section 65585(b)(1), the City submitted the draft 2021-2029 Housing Element to the State of California Department of Housing and Community Development ("HCD"); and

WHEREAS, the California Department of Housing and Community Development must review and provide comments on the Public Draft Housing Element and the City must update the Public Draft Housing Element in response to those comments in order to comply with State Housing Law; and

WHEREAS, on January 19, 2022, the Planning Commission held a duly-noticed public hearing on the subject Amendment, at which all those in attendance were given the opportunity to speak on the General Plan Amendment (Housing Element Update); and

WHEREAS, the Planning Commission considered all the written and oral testimony presented at the public hearing in making its decision to recommend adoption to the City Council via Resolution No. PC 22-03; and

WHEREAS, on February 10, 2022, the City Council held a duly-noticed public hearing on the subject Amendment, at which all those in attendance were given the opportunity to speak on the General Plan Amendment (Housing Element Update); and

WHEREAS, based on substantial evidence provided in the Housing Element Background Report, the City Council finds that the existing uses on the site identified to accommodate the City's RHNA do not impede additional residential development during the period covered by the housing element; and

WHEREAS, the City Council has considered the Planning Commission's recommendation, the staff report and supporting documents, public testimony, and all appropriate information that has been submitted with the Ordinance; and

WHEREAS, all legal prerequisites to the adoption of the Ordinance have occurred.

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF AVALON DOES ORDAIN AS FOLLOWS:

- Section 1.** The Planning Commission recommends that the City Council adopt General Plan Amendment GPA 21-01 (2021-2029 Housing Element Update), formalized and in substantially similar form as that attached hereto as Exhibit A, subject to any required, incorporated revisions requested by HCD.
- Section 2.** The Planning Commission finds that adoption of this Resolution is exempt from the California Environmental Quality Act ("CEQA") pursuant to Section 15164. An Addendum to the General Plan FEIR has been prepared which concludes that the proposed updates to the General Plan Housing Element do not result in any new or greater environmental impacts than were previously analyzed, disclosed, and mitigated. None of the conditions in CEQA Guidelines Section 15162 are present to require the preparation of a subsequent EIR, and no additional environmental review is required.

PASSED, APPROVED AND ADOPTED at a special meeting of the City Council of the City of Avalon on this 10th day of February, 2022 by the following vote:

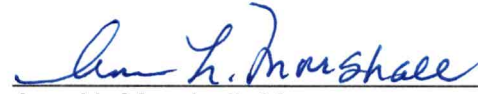
AYES: Mayor Marshall, Councilmembers DeLaRosa, Lavelle and Ponce

NOES: None

ABSENT: Mayor ProTem MacGugan-Cassidy

ABSTAIN: None

City of Avalon



Ann H. Marshall, Mayor

ATTEST:



Denise A. Radde, City Clerk

**Please Start Here, Instructions in Cell
A2, Table in A3:B15**

Form Fields

Site Inventory Forms must be submitted to HCD for a housing element or amendment adopted on or after January 1, 2021. The following form is to be used for satisfying this requirement. To submit the form, complete the Excel spreadsheet and submit to HCD at sitesinventory@hcd.ca.gov. Please send the Excel workbook, not a scanned or PDF copy of the tables.

General Information	
Jurisdiction Name	AVALON
Housing Element Cycle	6th
Contact Information	
First Name	Susanna
Last Name	Gutierrez (Savitt)
Title	Assistant City Planner
Email	sgutierrez@cityofavalon.com
Phone	(310) 510-0220
Mailing Address	
Street Address	<u>Canyon Road</u>
City	Avalon
Zip Code	90704

Table A: Housing Element Sites Inventory, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information1	Optional Information2	Optional Information3
AVALON AVALON	Tremont Street/Country Club Drive	90704	7480002072		High Density Residential C-1	HD-R-CH	0	40	1.52	Partially developed	YES - Planned	NO - Privately-Owned	Available	Used in Prior Housing Element - Non-Vacant	24	0	0	24	Site is owned by the Santa Catalina Island Company and developed as a residential community.		

Table B: Candidate Sites Identified to be Rezoned to Accommodate Shortfall Housing Need, Table Starts in Cell A2

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Optional Information1	Optional Information2	Optional Information3
AVALON																					

Table C: Land Use, Table Starts in A2

Zoning Designation (From Table A, Column G)	General Land Uses Allowed
HD-R-CH	Multifamily residential uses

City of Avalon Draft Housing Element
HCD Findings

A. Review and Revision

Finding	Narrative Response	Final Page
The element must provide an evaluation of the cumulative effectiveness of past goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness) and revise programs as appropriate.	Added evaluation of cumulative effectiveness of policies and actions in meeting the housing needs of special needs populations	BR-9

B1. Housing Needs, Resources, and Constraints: Fair Housing

Finding	Narrative Response	Final Page
Outreach: The element describes some general comments from the housing element survey. However, the survey contains several questions and responses related to affirmatively further fair housing (AFFH) and the element should better incorporate the results of the survey into the assessment of fair housing to prioritize contributing factors to fair housing issues and formulate appropriate programmatic response	Added additional language throughout the section to better incorporate responses from the survey, as well as additional discussion under Contributing Factors.	BR-91-96; BR-110
Enforcement and Outreach Capacity: The element indicates that the 2018 Analysis of Impediments to Fair Housing Choice identified no barriers to fair housing choice specific to Avalon (p. 83) and describe enforcement capacity. However, the element should identify and analyze any local enforcement trends. In addition, the element must address compliance with existing fair housing laws and regulations and include a summary of fair housing issues related to enforcement and outreach capacity and relationship to other fair housing issue areas (e.g., segregation and integration, racially and ethnically concentrated areas of poverty (R/ECAP), etc.).	Included Table 6-1 describing City’s compliance with fair housing laws and regulations.	BR-93-96; BR-109-110
Disproportionate Housing Needs including Displacement Risk: While the element provides some information on overcrowding at the local level (neighborhood to neighborhood), it must also analyze these conditions at a regional level (city to region) and by tenure (owner and renter). For substandard housing, the element reports 51.2 percent of the housing stock as being older than 50 years and potentially needing repairs (p. 88). However, this analysis should incorporate local data and knowledge, such as housing conditions surveys or code enforcement activities. In addition, the element must also provide an analysis for homelessness and displacement (i.e., disinvestment-driven, investment-driven, and disaster-driven).	Included additional discussion of overcrowding at a regional level compared to the local level as well as by tenure. Also included analysis of homelessness. Included a more in-depth analysis of displacement (see Figure 6-20), including disaster-driven displacement. Also see Program 26	BR-104-106; Housing Plan
Sites Inventory: While the element includes some general discussion and conclusions of sites and AFFH, a full analysis should address location, the number of sites and units by all income groups and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity) and any isolation of the regional housing needs allocation (RHNA) by income group. The analysis should discuss how the sites improve or exacerbate fair housing conditions and should be supported by local data and knowledge and other relevant factors	Included a more detailed analysis of how sites impact fair housing conditions, including segregation and integration factors.	BR-96-103; 107-108
Local Data and Knowledge: The element notes the City undertook a local survey due to challenges related to sampling, small population in the American Community Survey (ACS) and opines the ACS does not portray an accurate picture. As a result, the assessment of fair housing should emphasize this local survey and other local sources of data and knowledge and incorporate the information throughout the assessment of fair housing. For example, the element should analyze income patterns and trends and concentrated areas of affluence or areas of higher income and evaluate coincidence across the various of components of the assessment of fair housing (e.g., segregation and integration and disproportionate housing needs including displacement).	Included analysis of areas of affluence and more detailed analysis of segregation/integration and disproportionate housing needs, including displacement.	BR-91-110
Other Relevant Factors: The element must include relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning and investment practices, presence of	Included additional information about the need for workforce housing due to tourism.	BR-93; BR-108

City of Avalon Draft Housing Element
HCD Findings

Finding	Narrative Response	Final Page
redlining, restrictive covenants, neighborhood investment or disinvestment, federal investment such as transportation infrastructure, demographic trends or any other information that supplements the reported data and assists in a complete analysis		
Contributing Factors: Based on the outcomes of a complete analysis, the element should re-evaluate and prioritize contributing factors to fair housing issues as appropriate.	Included additional information regarding contributing factors.	BR-109-110
Goals and Actions: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions. Goals and actions must specifically respond to the analysis and prioritized contributing factors to fair housing issues. Actions must have metrics and milestones as appropriate and address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection	Revised goals, policies, and programs re: fair housing	Housing Plan

B2. Housing Needs, Resources, and Constraints: Household Characteristics

Finding	Narrative Response	Final Page
Housing Conditions: The element identifies the age of the housing stock and estimates replacement needs based on the age of the housing stock (p. 26). However, the age of the housing stock alone may misrepresent the units in need of rehabilitation and replacement. The element should include additional information to estimate the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from other organizations.	-Added housing conditions from survey results to provide local knowledge -Estimated number of units in need of rehabilitation and replacement	BR-29

B3. Housing Needs, Resources, and Constraints: Site Inventory

Finding	Narrative Response	Final Page
Parcel Listing: The element does not include a parcel listing. The element must list sites by parcel number or unique reference, parcel size, zoning, general plan designation, and describe existing uses for any nonvacant sites and include a calculation of the realistic capacity of each site. For additional information and sample sites inventory, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/inventory-of-land-suitable.shtml	Used HCD inventory form	Appendix A
Realistic Capacity: For Tremont Street (APNs 7480002072 and 7480002075), the element assumes 100 percent of maximum allowable density will be achieved but does not provide support for this assumption (p. 74). Additionally, for the Country Club Canyon (portion of APN 7480001026), the element assumes the site will develop with 140 units, of which 48 units are anticipated to develop during the planning period but does not provide support for these assumptions. The element should demonstrate what specific trends, factors, and other evidence led to the assumptions or adjust assumptions as appropriate. The estimate of the number of units for each site must be adjusted as necessary, based on the land use controls and site improvements, typical densities of existing or approved residential developments at a similar affordability level	Revised entire chapter – focused on Tremont Street, provided evidence for capacity assumptions (Master Plan and past development)	BR-81-87
Large Sites: Sites greater than 10 acres (large sites) cannot be utilized toward the RHNA for lower-income households unless the element demonstrates sites of equivalent size and affordability were successfully developed during the prior planning period or provides other evidence sufficient to demonstrate the appropriateness of large sites. The element identifies one large site greater than 10 acres. Specifically, for the Country Club Canyon site, the element assumes 24 units will be affordable to low-income households (p. 74 and 79). Additional analysis, as described above, is necessary to demonstrate the appropriateness of this site.	Removed large sites from the inventory (see Table 5-4, RHNA Site Inventory)	BR-84; BR-87

City of Avalon Draft Housing Element
HCD Findings

Finding	Narrative Response	Final Page
Zoning for Lower-Income Households: The element must demonstrate densities appropriate to accommodate housing for lower income households. For communities with densities that meet specific standards (at least 20 units per acre for Avalon), no analysis is required. (Gov. Code, § 65583.2, subd. (c)(3).) Otherwise, an analysis must demonstrate appropriate densities based on factors such as market demand, financial feasibility and development experience within identified zones. Specifically, the element should address this requirement for the Country Club Canyon site, intended to accommodate development of units affordable to lower-income households.	Added language confirming site meets default density for Tremont Street	BR-83
Environmental Constraints: The element describes some environmental conditions within the City, but it should also relate those conditions to identified sites and describe any other known environmental or other constraints that could impact housing development on identified sites in the planning period.	Added nexus between environmental conditions and identified sites	BR-75
Infrastructure: The element describes various challenges related to water availability and some discussion of sewer capacity, but it should clarify whether sufficient total sewer capacity is available or planned to accommodate the RHNA and add or modify programs if necessary. In addition, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) Given the City is the sewer provider, the element should discuss compliance with this requirement and if necessary, add or modify programs to establish a written procedure by a date early in the planning period	-Added to sewer capacity discussion and analysis -Added discussion of procedure to grant priority water and sewer service to developments with units affordable to lower-income households -Added Program 22	BR-78; BR-151; Housing Plan
Accessory Dwelling Units (ADU): The element notes three ADUs were approved in 2020. However, HCD records indicate the City has not reported any ADUs as part of the annual progress report, pursuant to Government Code section 65400. Further, an analysis of ADU trends should at least initially be based on permitted units, although the analysis can incorporate approvals. The City should reconcile these records and revise the analysis as appropriate based on permitted ADUs.	Updated to 4 units over the 8 year period	BR-81
Sites Identified in Prior Planning Period: Sites identified in prior planning periods (vacant sites identified in two planning periods or nonvacant sites identified in prior planning period) shall not be deemed adequate to accommodate the housing needs for lower-income households unless a program, meeting statutory requirements, requires rezoning within three years. The element should clarify if sites were identified in prior planning periods and if so, which sites and include a program if utilizing previously identified sites in the current planning period	Done and added Program 15 for rezoning	BR-83; Housing Plan
Zoning for a Variety of Housing Types: <i>Emergency Shelters:</i> The element indicates emergency shelters are permitted in the Commercial (C) and Special Commercial (SC) zones with an Emergency Shelter Permit. The element must demonstrate the zone has sufficient capacity to accommodate the identified housing need for emergency shelters. (Gov. Code, § 65583, subd. (a)(4).) For example, the element should describe typical parcels sizes, whether the sites are nonvacant, and the potential for reuse opportunities. Additionally, the element must also identify actual development standards and analyze those standards as potential constraints. <i>Employee Housing:</i> The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs. Specifically, while the element includes Program 17 (Zoning Code Updates) to address agricultural worker housing, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone.	<i>Emergency Shelters:</i> -Clarified development standards for emergency shelters -Demonstrated C and SC zones have sufficient capacity to accommodate identified housing need for emergency shelters <i>Employee Housing:</i> -Updated Program 17, Zoning Code Updates – Remove Constraints, to address employee housing for six or fewer employees <i>Permanent Supportive Housing:</i> -Updated Program 17, Zoning Code Updates – Remove Constraints <i>Accessory Dwelling Units (ADUs):</i> -Updated Program 14, Accessory Dwelling Units	BR-56; HP-16; HP-13

City of Avalon Draft Housing Element
HCD Findings

Finding	Narrative Response	Final Page
The element should demonstrate compliance with this requirement or add or modify programs if necessary. • <i>Permanent Supportive Housing</i>: Supportive housing shall be a use by-right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses pursuant to Government Code section 65651. The element must demonstrate compliance with this requirement and include programs as appropriate. • <i>Accessory Dwelling Units (ADUs)</i>: After a cursory review of the City’s ordinance, HCD discovered several areas which were not consistent with State ADU Law. HCD will provide a complete listing of ADU noncompliance issues under a separate cover. As a result, the City should promptly implement Program 14 (Accessory Dwelling Units) to update the City’s ADU and zoning ordinances to comply with state law.		
Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD’s housing element webpage at https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element for a copy of the form and instructions	Submitted	Appendix A

B4. Housing Needs, Resources, and Constraints: Government Constraints

Finding	Narrative Response	Final Page
Land-Use Controls: The element must identify and analyze all relevant land use controls impacts as potential constraints on a variety of housing types. The analysis should address impacts on housing supply (e.g., number of units), costs, timing and ability to achieve maximum densities. The analysis should address heights and the lack of fixed parking requirements in the L/M zone and for single room occupancy uses. Based on the outcomes of a complete analysis, the element should include programs to address or remove the identified constraints. In addition, the element describes the City’s Annual Growth Policy where the City annually identifies the types of projects. While the element states this process does not the number of units, it should analyze the impacts of this policy on housing cost, timing, types and affordability. For example, the element should list the typical results of this annual policy, any impacts on housing and opportunities to prioritize affordable housing. This is particularly important given the lack of past production affordable to lower and moderate-income households relative to housing for above moderate-income households	-Added to analysis of parking -Add analysis of height limits as potential constraint -Added new section call Consideration of Land Use Controls as Potential Constraints -Added discussion and analysis of impacts of Annual Growth Policy (p.51)	BR-61; BR-59; BR-62 BR-51;
Local Processing and Permit Procedures: While the element includes information about processing times and indicates the Planning Commission reviews most projects for conformance with zoning. The analysis of major site plan review should address the typical number of public hearing if any, approval findings and any other relevant information. The analysis should address impacts on housing cost, supply, timing and approval certainty.	-Added analysis of Planning Commission review -added analysis of impact of Processing and Permit Procedures on Housing Supply and Affordability	BR-64-65; BR-66
Fees and Exactions: The element lists some entitlement fees, but it should describe and evaluate all required fees for single family and multifamily housing development, including impact fees, and analyze their impact as potential constraints on housing supply and affordability. For example, the analysis should identify the total amount of fees, including impact fees and their proportion to the development costs for both a typical single family and multifamily housing development.	-Added Table 4-8 estimating fees for single and multifamily housing and analysis of potential constraint	BR-70
On/Off-Site Improvements: The element must identify subdivision level improvement requirements, such as minimum street widths (e.g., 40-foot minimum street width), and analyze their impact as potential constraints	-Added on/off-site improvement section	BR-62

City of Avalon Draft Housing Element
HCD Findings

Finding	Narrative Response	Final Page
on housing supply and affordability. For additional information and a sample analysis, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/constraints/codes-and-enforcement-on-offsite-improvement-standards.shtml .		
Constraints on Housing for Persons with Disabilities: • <i>Reasonable Accommodation:</i> The element describes the City’s reasonable accommodation procedure and lists findings of approval (p. 55). However, the element must still analyze findings of approval. For example, the analysis should address potentially subjective findings related to the “character of the neighborhood” and “any other factors that may have bearing on the request. • <i>Definition of Family:</i> The element should identify and evaluate any definition of family used in zoning and land use for impacts on housing for persons with disabilities and include programs if necessary • <i>Residential Care Facilities for Seven or More Persons:</i> The element indicates Program 7 will permit residential care facilities for six or fewer persons in all zones that allow single or multifamily uses, subject to the same permit processing requirements and development standards (p.54). However, the element should address the lack of zoning, particularly residential, and conditional use permit (p. 85) as potential constraints on housing for persons with disabilities.	-Added Program 17 to update standards for reasonable accommodation -Added definition of family and evaluation on impacts for persons with disabilities	BR-59

B5. Housing Needs, Resources, and Constraints: Nongovernmental Constraints

Finding	Narrative Response	Final Page
Timing of Approval: The element must analyze the length of time between receiving approval for housing development and submittal of application for building permits. The analysis should address any hinderances on the construction of the RHNA.	Added timeframe	BR-67

B6. Housing Needs, Resources, and Constraints: Special Housing Needs

Finding	Narrative Response	Final Page
Persons with Developmental Disabilities: While the element notes the lack of data available from the Department of Developmental Services, it must still estimate and analyze the needs of persons with developmental disabilities. For example, the element could estimate needs based on a generally acceptable proportion of the population.	-Added data from DDS and analysis of needs of persons with developmental disabilities	BR-40
Persons Experiencing Homelessness: The element identifies the number of persons experiencing homelessness but should evaluate characteristics (e.g., chronically homelessness, mentally ill, veterans). The element may utilize county level data to facilitate this evaluation	-Added county level data to evaluate characteristics of persons experiencing homelessness (Table 3-37)	BR-44

C1. Housing Programs: Development Scheduling

Finding	Narrative Response	Final Page
Programs must include specific commitment and definitive implementation timelines to demonstrate a “beneficial impact” in the planning period. The element includes several programs with “ongoing implementation and annual monitoring and reporting throughout the planning period” and should be revised with discrete timelines (e.g., annual (beyond monitoring) or by year) where appropriate. Examples include Programs 1 (Housing Rehabilitation), 5 (First Time Homebuyer Assistance), 6 (Housing Trust Fund), 8 (Affordable Housing Development), 12 (Density Bonus Program) and 15 (Monitoring Potential Constraints).	Updated programs in Housing Plan to include specific commitment and implementation timelines.	Housing Plan

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C2. Housing Programs: Site Availability

Finding	Narrative Response	Final Page
As noted in Finding B3, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition, the element should be revised as follows: <i>Program 19 (Water Availability)</i>: Given water is a primary factor related to accommodating the RHNA, this Program should include actions beyond coordinating planning documents and supporting an increase in allocations. <i>Sewer Capacity</i>: The element notes the City’s sewer pipelines are old and leaks have been identified (p. 70). As a result, the element should include a program to address these deficiencies.	-Modified Program (now Program 20), Water Availability -Added to discussion and analysis of sewer infrastructure and capacity	HP-17; BR-78

C3. Housing Programs: Adequate Housing

Finding	Narrative Response	Final Page
Programs must include specific commitment and discrete timelines to assist in the development of housing for lower and moderate-income households as noted above in Finding C1. In addition, the element should be revised as follows: <i>Program 7 (Temporary Summer Housing)</i>: The Program should include specific commitment with timelines beyond working with the Santa Catalina Island Company and implementing existing requirements on an ongoing basis. For example, the Program could coordinate with affordable developers, apply for funding, establish incentives beyond density bonus law or other actions to encourage the development, maintenance and improvement of housing. <i>Program 12 (Density Bonus Program)</i>: The City’s ordinance, last updated in 2010, appears inconsistent with State Density Bonus Law. As a result, the Program should include specific commitment to amend the ordinance early in the planning period. <i>Short Term Rentals</i>: The element describes a significant number of short-term rentals that potentially affect the availability of the housing stock. This is further supported by the lack of rentals to examine housing costs (p. 29). As a result, the element should include a program to address these circumstances	Updated Programs to include specific commitment and discrete timelines -Updated Program 7 and 12. Short-term rentals addressed in Program 7 -Added to discussion and analysis of short-term rentals	Housing Plan; BR-70

C4. Housing Programs: Constraint Removal

Finding	Narrative Response	Final Page
As noted in Findings B4 and B5, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints. In addition, the element includes Program 17 (Zoning Code Updates) to update the Development Code and define and regulate residential care facilities. However, this Program should include specific commitment to permit group homes (six or fewer and seven or more persons) in residential zones with objectivity to promote approval certainty without constraints on housing for persons with disabilities	Added to programs based on results of analysis of potential governmental and nongovernmental constraints Updated Program (now Program 18)	Housing Plan

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C5. Housing Programs: AFFH

Finding	Narrative Response	Final Page
As noted in Finding B1, the element must include a complete assessment of fair housing. Based on the outcomes of that analysis, the element must add or modify programs.	Modified Program 26 based on assessment of fair housing	Housing Plan

C6. Housing Programs: ADUs

Finding	Narrative Response	Final Page
Program 14 Accessory Dwelling Units: As noted on page 73, this Program should include specific commitment and timing to survey ADUs to determine their affordability. In addition, the Program should conduct a review of ADU production and affordability every two years (instead of a mid-cycle review) and commit to additional actions such as adjusting assumptions, rezoning or establishing additional incentives within a specified timeframe (e.g., six months).	Modified Program 14	Housing Plan

D. Quantified Objectives

Finding	Narrative Response	Final Page
While the element includes quantified objectives for new construction and rehabilitation, it should consider conservation objectives beyond at-risk preservation. For example, conservation objectives could consider Programs 2 (Code Enforcement), 3 (Non-transient Rental Inspection), and 21 (Housing Choice Vouchers).	Updated programs	Housing Plan

E. Public Participation

Finding	Narrative Response	Final Page
While the City made efforts to include the public through a Community Open House and survey, moving forward, the City could employ additional methods for public outreach, particularly to include lower-income and special needs households and neighborhoods with higher concentrations of lower-income households. For example, the City could conduct targeted stakeholder interviews or establish a committee representative of lower-income households in future public outreach efforts. In addition, while the element includes a summary of the public participation process and survey responses (Appendix B pp. 3-21), it should summarize comments and discuss how comments were incorporated into the element. In addition, HCD understands the City made the element available to the public on December 3, 2021, the same day as submittal to HCD. By not providing an opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element and it reduces HCD’s ability to consider public comments in the course of its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City’s consideration of public comments must not be limited by HCD’s findings in this review letter	Reviewed public outreach with the City and updated Appendix B	Appendix B

F. Consistency with General Plan

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Finding	Narrative Response	Final Page
The element must describe how the housing element is internally consistent with the rest of the general, including any information to demonstrate what was conducted to achieve and maintain internal consistency as part of this update. The element does not address this requirement and must include specific discussion on how consistency across the general plan was achieved and how it will be maintained during the planning period. For additional information and a sample program, see the Building Blocks at http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/analysis-consistency-general-plan.shtml .	Added discussion of General Plan consistency in Background Report	BR-151

G. Coastal Zone

Finding	Narrative Response	Final Page
The element does not meet the statutory requirements. The housing element must identify the number of low- and moderate-income dwelling units that have been replaced, demolished, and/or converted, within the coastal zone, since January 1, 1982. The element must also identify the number of residential dwelling units for low- and moderate-income households that have been constructed or required for replacement within the coastal zone.	-Added new section, Coastal Zone Housing Requirements, to identify number of low and moderate income units demolished and constructed within coastal zone	BR-152