



CITY OF CUDAHY

6TH CYCLE HOUSING ELEMENT

UPDATE

CITY OF CUDAHY PLANNING DEPARTMENT
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OCTOBER 2021

HOUSING ELEMENT

Amended March 20, 2018
6th Cycle Draft Amendment, October 2021

Cudahy City Council Resolution No. 18-07
Cudahy City Council Resolution No. 21-

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1. INTRODUCTION

This Housing Element is divided into eight (8) Sections:

- Introduction
- Housing Needs Analysis
- Regional Housing Needs Assessment and Special Needs
- Land Inventory
- Resources and Constraints
- Evaluation of Previous Housing Element
- Housing Goals, Policies, Programs, and Quantified Objectives
- Affirmatively Furthering Fair Housing

The 6th Cycle Housing Element

The 6th Cycle Housing Element for the City of Cudahy is a required element of the City's General Plan and is, therefore, required to be consistent with the General Plan. The 6th Cycle Housing Element covers the time period from October 15, 2021, to October 15, 2029, and includes extensive background information on community demographics, including population, employment and households, current housing, as well as updated policies, programs, and 'quantified objectives' to guide the City's development through 2029. State Law requires that the Element include the following components:

- An analysis of the City's population, household, and employment base, and the characteristics of the housing stock.
- A summary of the present and projected housing needs of the City's households.
- A review of potential constraints to meeting the City's identified housing needs.
- An evaluation of opportunities that will further the development of new housing.
- A Community Outreach Plan
- A Statement of the Housing Plan to address identified housing needs
- An analysis on Affirmatively Furthering Fair Housing

Also, this is the first Housing Element Cycle to implement the requirements of Assembly Bill 686 (AB 686), Affirmatively Furthering Fair Housing (AFFH). As of January 1, 2019, AB 686 extends the obligation to affirmatively further fair housing to all public agencies in the State of California. Affirmatively furthering fair housing means taking meaningful actions to combat discrimination that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics.

This Housing Element must address:

- (1) Significant discrepancies in housing needs and in access to opportunities,
- (2) Replacing segregated living patterns with truly integrated and balanced living patterns,
- (3) Transforming racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity,
- (4) Fostering and maintaining compliance with civil rights and fair housing laws.

2. HOUSING NEEDS ANALYSIS

This chapter gives an overview of the City's population and employment growth, household characteristics, and housing characteristics. It also provides an analysis of the housing affordability and a discussion of housing receiving federal, State, or local aid 'at-risk' of conversion due to the impending expiration of assistance. Key findings of this chapter include:

3. REGIONAL HOUSING NEEDS ASSESSMENT AND SPECIAL NEEDS

The first part of this chapter outlines the Regional Housing Needs Allocation (RHNA) process which is maintained by the State. Through this process, each jurisdiction is given a set of numbers presenting housing units for each income level that the jurisdiction must help construct, rehabilitate, or conserve during the housing period from 2021 to 2029. The chapter then describes Cudahy's share of the regional housing needs, and what has already been achieved in meeting those needs.

4. LAND INVENTORY

This chapter assesses the housing development potential in Cudahy. The purpose is to determine the quantity of land available on suitable sites to accommodate the City's RHNA. The analysis indicates there are approximately 16.18 acres of vacant or underutilized land that can support 314 -housing units at various income levels.

5. RESOURCES AND CONSTRAINTS

This chapter identifies the resources that are available to the city to meet its quantified objectives for housing, especially new construction for affordable housing; as well as government and market constraints that might hinder housing development and includes a detailed analysis of the current permitting and regulatory process. In those cases where potential governmental constraints are identified, the city has identified programs to remove and/or mitigate those constraints. Also included is an analysis for low- and moderate-income housing assistance from State and federal sources.

6. EVALUATION OF THE PREVIOUS HOUSING ELEMENT

This chapter reviews the City's accomplishments under the 2013 Housing Element, particularly the city's progress towards meeting its Regional Housing Needs Assessment goals, and the 2018 update. The analysis found that since 1992, 68 affordable units have been constructed. 142 are considered at-risk. A comprehensive General Plan update was adopted in 2018 as part of the comprehensive General Plan and housing element update.

7. HOUSING GOALS, POLICIES, PROGRAMS, AN QUALTIFIED OBJECTIVES

This chapter of the Housing Element lists updated housing goals, policies, and implementing programs for the City of Cudahy, responding to the assessment of the 2013 Housing Element, the 2018 update, as well as key issues, trends, opportunities, and constraints outlined in the Housing Needs Analysis and the assessment of Resources and Constraints.

The following nine goal areas have been defined in the Housing Element:

Goals

- **Housing Element Goal 1:** The City of Cudahy will improve the housing supply and the choice of housing opportunities through private investment and, where necessary, through public action and financing.
- **Housing Element Goal 2:** The City of Cudahy will promote affordable housing and shelter for all economic segments of the community.
- **Housing Element Goal 3:** The City of Cudahy will support and provide incentives for the maintenance and rehabilitation of the existing housing stock.
- **Housing Element Goal 4:** The City of Cudahy will encourage development of a viable urban community consistent with orderly growth and environmental conservation to provide suitable living environments, with access to employment, community facilities, and services.
- **Housing Element Goal 5:** The City of Cudahy will promote equal access and opportunity to housing regardless of race, religion, sex, marital status, ancestry, national origin, or color.
- **Housing Element Goal 6:** The City of Cudahy will identify and address significant discrepancies in housing needs and in access to housing opportunities.
- **Housing Element Goal 7:** The City of Cudahy will identify and replace segregated living patterns with truly integrated and balanced living patterns.
- **Housing Element Goal 8:** The City of Cudahy will identify and transform racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity.
- **Housing Element Goal 9:** The City of Cudahy will foster and maintain compliance with civil rights and fair housing laws.

For each goal, a series of policies are defined, with implementing programs for each policy, as appropriate.

8. AFFIRMATIVELY FURTHERING FAIR HOUSING

This section will address the following:

- Significant discrepancies in housing needs and in access to opportunities.
- Replacing segregated living patterns with truly integrated and balanced living patterns.
- Transforming racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity.
- Fostering and maintaining compliance with civil rights and fair housing laws.

1 Introduction

1.1 WHAT IS A HOUSING ELEMENT?

The Housing Element is one the seven required elements of the General Plan. State Housing Element law, enacted in 1969, mandates that local governments adequately plan to meet the existing and projected housing needs of all segments of the population. It requires that the Housing Element be consistent with all parts of the General Plan and be closely related to the Land Use Element, which specifies land within the jurisdiction that can be utilized for housing development. The law acknowledges that, for the private market to adequately address housing needs and demands, local governments must adopt plans and regulatory systems, which support housing developments. As a result, the successful growth of a community rests largely upon the implementation of local general plans, and in particular, the Housing Element.

The 6th Cycle Housing Element has a planning period of 8 years. It is programmatic in focus and is required to meet specific requirements set by the California Department of Housing and Community Development (HCD).

The Housing Element of the Cudahy General Plan addresses the housing needs of the city. The primary focus of the Housing Element is to encourage the provision of suitable housing for City residents and to protect the vitality of existing residential neighborhoods. The goals and policies of the Cudahy Housing Element address the following issues:

- (a) the promotion of new housing development,
- (b) the maintenance and improvement of existing housing unit,
- (c) and identifying and addressing housing discrimination.

Through its housing program, the city will improve the quality of existing housing and encourage the production of new housing types to meet residents' needs.

Cudahy is primarily a residential community, with most of the city zoned residential with varying maximum densities. These designations are:

- Low Density Residential Zone (LDR) - 15 du/acre
- Medium Density Residential (MDR) – 25 du/acre
- High Density Residential (HDR) – 40 du/acre

There is also a large number of mobile home parks in the city, which the city is committed to improve and maintain with continued partnership with the State. The city spans just over 1 square mile and with a population density of 19,729 people per square mile, Cudahy is 10th in the Nation, and 2nd in California as the most densely populated city. The Housing Element examines the housing problems of the City and seeks to provide solutions to improve future housing conditions.

The average household income in Cudahy is \$55,752 with a poverty rate 26.16%. The median rental cost is \$1,306 per month, and median house value \$420,700.

This Housing Element is designed to address key housing issues in the City. These issues include:

- (a) the need to maintain and rehabilitate the existing housing stock,
- (b) development of new housing to relieve overcrowding and housing cost, and
- (c) the maintenance of affordable housing for low-income households, special needs households and overpaying households.

The city is continuously seeking to meet the housing needs of its residents and to accommodate its share of regional housing. This will accomplish both state and local housing goals.

The Housing Element fulfills the requirements of the State Planning and Zoning Law and the regulations of Section 65580-65589.5 of the California Government Code. State law is very specific on the content of the Housing Element and makes it clear that the provision of affordable housing is the responsibility of all local governments. It expects the city to have its fair share in the development of regional housing needs and to contribute to the attainment of State housing goals.

1.2 FREQUENCY OF REVIEW AND UPDATE

The process of updating Housing Elements is triggered by HCD through the “regional housing needs” process. The Regional Housing Needs Allocation (RHNA) process is a State mandate on planning for housing, whereby each jurisdiction in the State is given “fair share” of local housing needs according to income distribution. Prior to the 2013 update, the last time the State initiated the regional housing needs process was in 1999.

The current Housing Element will serve the planning period beginning October 15, 2021, to October 15, 2029. This is an eight-year period to coincide with the RHNA process.

1.3 HOUSING ELEMENT CONTENTS

The Housing Element is required by State law to include:

- An assessment of existing housing needs—with an analysis of housing affordability, conditions, special needs, and affordable units at-risk of converting to market-rate—as well as projected needs as laid out in the RHNA.
- A detailed sites inventory and analysis that evaluates the jurisdiction’s ability to accommodate its RHNA.
- An analysis of constraints on housing in the jurisdiction
- Housing programs that identify adequate sites to accommodate the City’s share of the regional housing need; assisting in the development of housing for very low- and low- income households; removing or mitigating governmental constraints to affordable housing; conserving and improving the existing affordable housing stock; promoting equal housing opportunity; and preserving the at-risk units identified; and

- Quantified objectives that estimate the maximum number of units, by income level, to be constructed, rehabilitated, and conserved over the planning period of the element.

1.4 RELATIONSHIP TO GENERAL PLAN ELEMENTS

The current Cudahy 2040 General Plan was adopted in March 2018 and established a long-range plan. The plan includes eight elements required by State law, including:

Land Use,
Transportation,
Open Space/Recreation,
Conservation,
Public Safety,
Noise,
Housing,
Air Quality, and
Economic Development Elements.

This Housing Element is intended to serve as the seventh required element of the General Plan. It takes into consideration new land use designations and other policies in the Plan to ensure consistency between the other Plan elements. The Housing Element update will serve as the foundation for a comprehensive update of the goals/policies of the remaining 6 elements during the next General Plan update in the coming years.

Consistency with General Plan and Policies

2018 General Plan Amendment

Between 2016 - 2018, the City of Cudahy undertook a comprehensive General Plan update. New General Plan Land Use designations were developed, allowing higher densities in residential areas, and identifying new areas for mixed-use development with higher residential densities. The city completed a concurrent Development Code and Zoning Map update to provide zoning districts consistent with the new General Plan. This focused Housing Element amendment identifies sites to meet the existing RHNA, with consistently higher densities allowed, and replaces sites identified in the original 2013 and the updated 2018 Housing Element that were no longer available due to rezoning.

The Housing Element of the General Plan is one component of the City's overall long-range planning strategy. The California Government Code requires that the General Plan contain an integrated, consistent set of goals and policies. The Housing Element is, therefore, affected by policies contained in other elements of the General Plan.

As stated earlier, Cudahy is primarily a residential community where most of the zoning is higher density residential. Cudahy is one of the most densely populated cities in the region. The Housing Element examines the housing problems of the City and seeks to provide solutions to improve future housing conditions.

This Element has been developed in accordance with the current Land Use Plan. All goals and policies in the General Plan were also reviewed concurrently to ensure consistency between the Elements.

1.5 INFORMATION SOURCES

The information presented in this Housing Element is gathered from a variety of sources. The primary source of information used in the compilation of demographic, housing, and socio-economic information for Cudahy includes data collected by the U.S. Bureau of the Census. Several other sources were also consulted during the preparation of this analysis, with the key sources being the State Department Housing and Urban Development (HUD), the State Department of Finance (DOF), and the Southern California Association of Governments (SCAG), and the American Community Survey (ACS). SCAG is mandated under State law to prepare population, housing, and employment projections that are to be used in the development of the region's Growth Management Plan. These projections were used in the determination of the city's *regional housing needs assessment* (RHNA).

Various other sources (both private and public) were also used. Wherever possible, data from the City and County were used to facilitate an understanding of local needs and conditions.

1.6 PUBLIC OUTREACH

Covid-19

The 6th Cycle Housing Element is the first Housing Element to be prepared during the Covid-19 pandemic. From the beginning of 2020 through 2021, most offices, schools, places of worship, places of social gathering, retail stores, restaurants, government offices and religious and educational institutions were either closed or operated remotely and/or with limited staff.

As a result of government and health regulations regarding social distancing and closures of government establishments and other facilities, gathering information from city staff and members of the community as required by the California Housing Element Law has been a challenge. Interacting with city staff to obtain information has also been restricted. However, through it all, the City of Cudahy has been able to proceed with community outreach efforts through a series of community surveys in English and Spanish, Planning Commission Workshop, focused stakeholder interviews and other outreach efforts designed to measure the effectiveness of the existing 5th Cycle Housing Element while serving as potential foundation for the 6th Cycle policies, goals, and objectives.

Los Angeles County in general, and specifically cities within the gateway communities, experienced more disruption in services than any other county or counties in the State. For example, Los Angeles County reported 1.43 million cases of covid-19 and 25,530 deaths. In comparison, San Diego County reported 3,942 deaths, Riverside County reported 4,826 deaths, San Bernardino County reported 5,439 deaths, and Orange County reported 5,312 deaths. The number of deaths in these counties did not equal the deaths in Los Angeles County alone. By contrast, Santa Barbara County reported only 494 deaths, and Sonoma County reported 368 deaths.

Community Outreach

The Housing Element was prepared with public outreach and participation to the extent permissible under the restrictions of covid 19. To ensure the broadest community involvement, particularly among low-income and special needs groups, the city used several strategies, including:

- On August 1, 2021, the city conducted a Planning Commission workshop via zoom to inform members of the Commission and the general public of the housing element process, receive input, and to inform of the AB 686 requirements. .
- On August 26, 2021, a focused stakeholder interview consisting of 11 members of the Cudahy community who were either land developers, community activists, residents, and business owners, was conducted via zoom. The participants ranged from the owner of a bakery, a residential developer, a representative from the East Yard Communities for Economic Justice to a school principal and an executive from a utility company. The survey questions ranged from the functions of the Housing Element to whether the City's current land use policies adequately meet the City's housing goals.
- A Community Outreach survey prepared in English and Spanish, and made available over a period of 60 days, between July 14, 2021, and September 14, 2021, was distributed and broadcast over several social media outlets, including a dedicated website specifically for the Housing Element Update, was made available to everyone. There was a total of 52 respondents.
- Information on the Housing Element update was made available at all City facilities, including City Hall, Senior Center, Parks and Recreation, as well as on the city's website.

The city distributed survey fliers to all City facilities, including.

- Senior Center
- City Hall
- Parks & Recreation
- Nation Night Out
- Food Distribution
- Other city events

The City maintains a distribution list of stakeholder organizations, interested private citizens and public agencies (see list above), posts public information on the City's website and at the physical location of the meetings, and issues press release. The venues for the public meetings were ADA accessible and served by public transportation. The city also advertised meetings, public hearings, and availability of the Housing Element in the monthly community newsletter.

Community Input

Through the published survey using SurveyPlanet, the city was able to collect responses to the questions on the survey regarding the Draft Housing Element. Comments and suggestions included:

- Providing affordable housing
- Address the homelessness issue
- Most respondents were favorable toward gentrification if the City provides existing residents with first right of refusal for existing residents
- Utilizing existing properties in the City that are currently under-utilized or vacant for more housing unit opportunities
- Concerns over the City's residential height restrictions which prevent the development of more high

rises with higher densities

- Concern with parking in the city
- A reduction in the size of units required by the city would allow developers to build more affordable units.
- The use of density bonus to encourage development of more affordable housing
- Provision of permanent shelters for the homeless
- The city should investigate making more its resident homeowners rather than renters
- The City's current rents are too high
- Residential properties are not being kept up
- Provide diverse housing opportunities

Survey Results

1. ***Do you live and/or work in the City of Cudahy?***

69% of the participants in this survey live in Cudahy but their job is located somewhere else where only 20 percent live and work in in the city of Cudahy.

2. ***Do you own a business in the City of Cudahy?***

92% for both English and Spanish Survey) of participants do not own a business in the city of Cudahy.

3. ***Are you a member of a community civic organization?***

Most participants are members of a community civic organization (at 87%) but in the Spanish survey more participants are involved in the community at 41%.

4. ***Do you currently own or rent your residence?***

In the English survey that most of the participants (62%) rent their residence where in the Spanish survey about 50% of the participants who own their own residence and about 50% rent their residence within the city of Cudahy.

5. ***Do you think that the range of housing options currently available in Cudahy meets the needs of the community?***

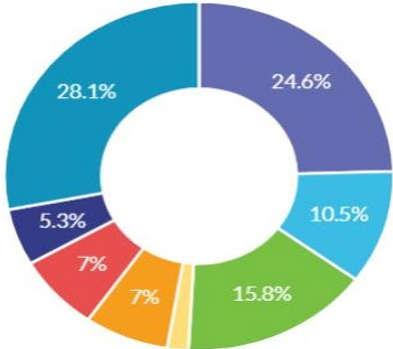
Most of the participants believe that the range of housing options available in Cudahy do not meet the needs of the community.

6. ***In your opinion, what type(s) of additional housing are most needed in the City of Cudahy? (Select all that apply)***

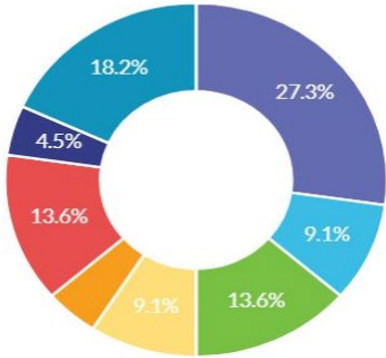
Participants are equally split between the different types of housing with the most focusing on Single family housing, Condominiums and Duplex/attached housing.

7. ***Describe the housing stock in the City of Cudahy (Select all that apply):***

28% of the English survey participants picked other and wrote their own word to describe the city's housing stock (for example: limited, expensive, overpopulated, low income, lack of stock, crowded, unsafe, etc.) with Diverse coming in second at 25% where the Spanish survey is the reverse. For the Spanish survey the word Diverse is selected by 27% of the participants where in second they selected other at 18% of the time.

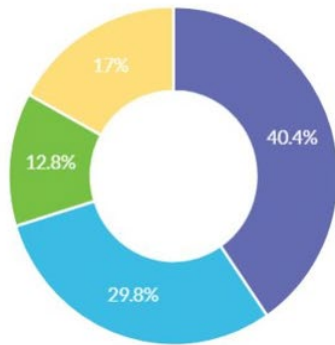


Choice	Total
Diverse	14
Inclusive	6
Affordable	9
Vibrant	1
Welcoming	4
Design-Friendly	4
Historic	3
Other	16



Choice	Total
Diversa	6
Inclusiva	2
Económicas	3
Dinámicas	2
Cálidos	1
Diseño agradable	3
Histórico	1
Other	4

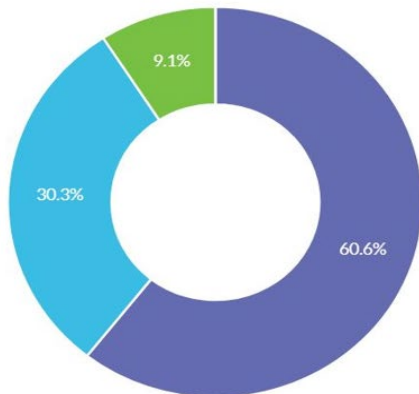
8. **How important are the following housing priorities to you and your household? Provide more housing for all income levels.**



Choice	Rating	Total
1 - Very Important	19	19
2 - Somewhat Important	14	7
3 - Not Important	6	2
4 - Don't Know	8	2

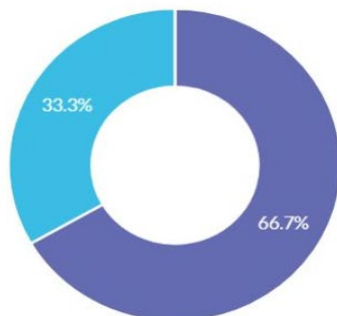
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9. **How important are the following housing priorities to you and your household? Promote housing affordable to working families.**



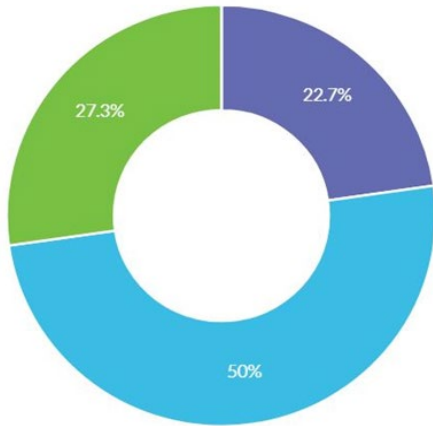
Choice	Rating	Total
1 - Very Important	20	20
2 - Somewhat Important	10	5
3 - Not Important	3	1
4 - Don't Know	0	0

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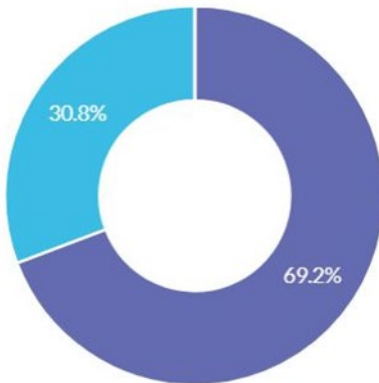


Choice	Rating	Total
1 - Muy Importante	8	8
2 - Algo Importante	4	2
3 - No Importante	0	0
4 - No lo sé	0	0

10. How important are the following housing priorities to you and your household? Build more Single-Family Housing.

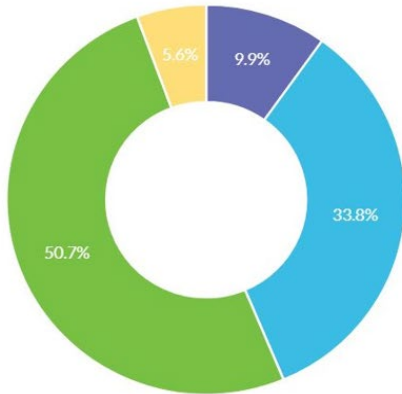


Choice	Rating	Total
1 - Very Important	10	10
2 - Somewhat Important	22	11
3 - Not Important	12	4
4 - Don't Know	0	0



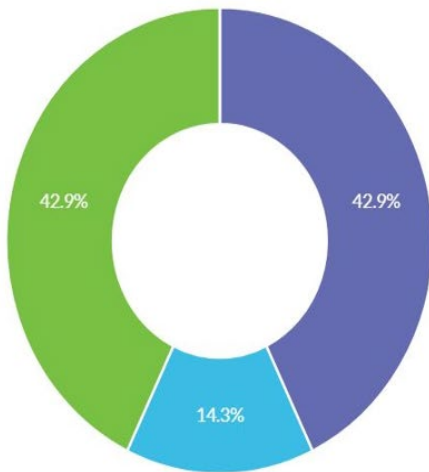
Choice	Rating	Total
1 - Muy Importante	9	9
2 - Algo Importante	4	2
3 - No Importante	0	0
4 - No lo sé	0	0

11. How important are the following housing priorities to you and your household? Build more Multi-family housing (apartments, condos, etc.)



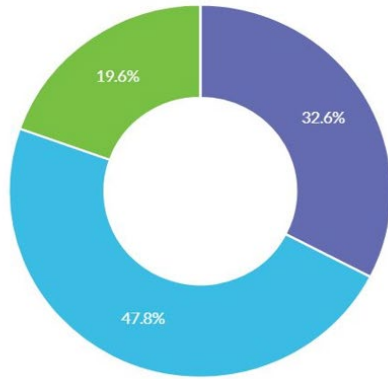
Choice	Rating	Total
1 - Very Important	7	7
2 - Somewhat Important	24	12
3 - Not Important	36	12
4 - Don't Know	4	1

a.



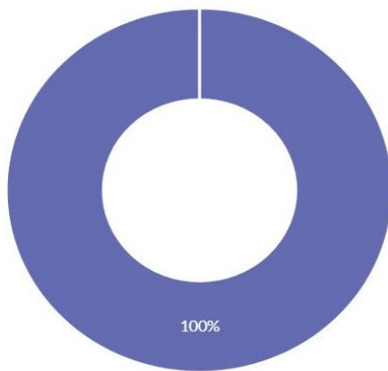
Choice	Rating	Total
1 - Muy Importante	6	6
2 - Algo Importante	2	1
3 - No Importante	6	2
4 - No lo sé	0	0

12. **How important are the following housing priorities to you and your household? Rehabilitate existing housing.**



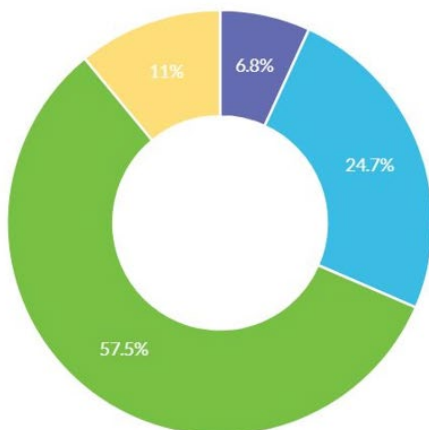
Choice	Rating	Total
1 - Very Important	15	15
2 - Somewhat Important	22	11
3 - Not Important	9	3
4 - Don't Know	0	0

a.



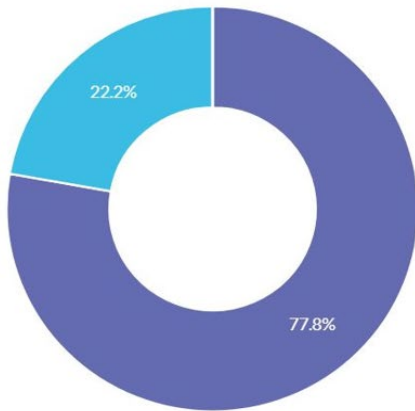
Choice	Rating	Total
1 - Muy Importante	8	8
2 - Algo Importante	0	0
3 - No Importante	0	0
4 - No lo sé	0	0

13. **How important are the following housing priorities to you and your household? Create mixed-use (commercial/retail/office and residential projects to bring different land uses closer together).**



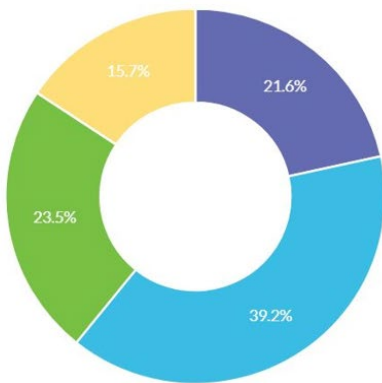
Choice	Rating	Total
1 - Very Important	5	5
2 - Somewhat Important	18	9
3 - Not Important	42	14
4 - Don't Know	8	2

a.



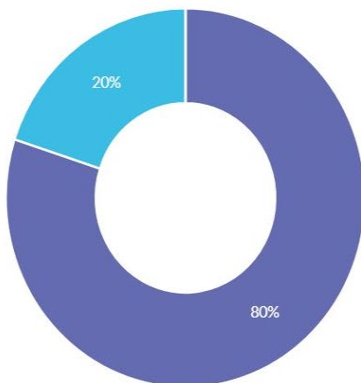
Choice	Rating	Total
1 - Muy Importante	7	7
2 - Algo Importante	2	1
3 - No Importante	0	0
4 - No lo sé	0	0

14. **How important are the following housing priorities to you and your household? Provide more housing for the disabled.**



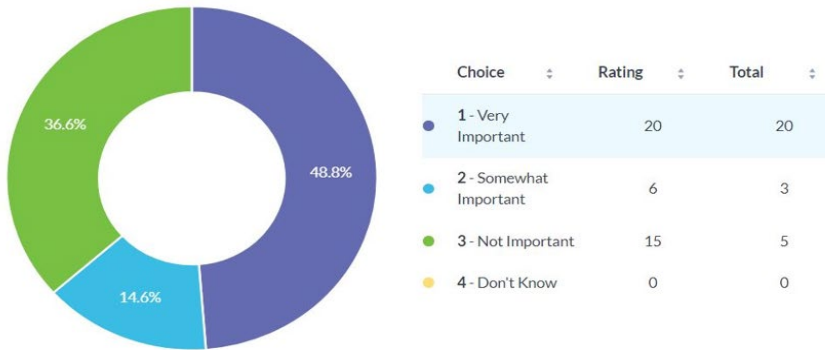
Choice	Rating	Total
1 - Very Important	11	11
2 - Somewhat Important	20	10
3 - Not Important	12	4
4 - Don't Know	8	2

a.

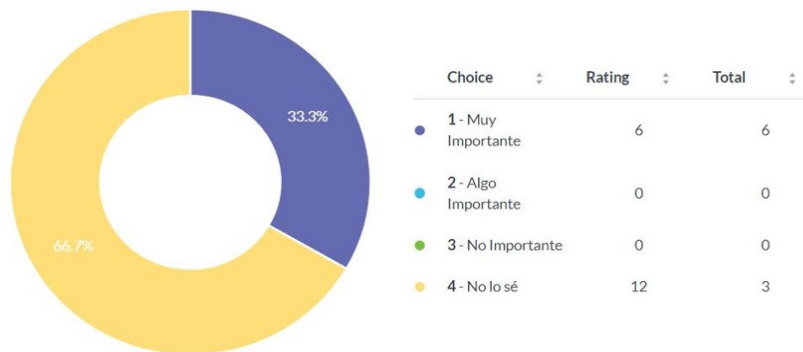


Choice	Rating	Total
1 - Muy Importante	8	8
2 - Algo Importante	2	1
3 - No Importante	0	0
4 - No lo sé	0	0

15. **How important are the following housing priorities to you and your household? How do you feel about Fair Housing?**



a.



16. **In a built-out community like Cudahy, what strategies should the city apply or pursue to ensure affordable fair housing for its residents?**

In both the English and Spanish surveys, the most frequent answer given was rent control regarding the number one strategy the city should apply or pursue to ensure affordable fair housing for its residents.

17. **In your opinion, what is the most pressing housing need(s) for the City of Cudahy right now?**

The most frequently suggested responses are affordable housing, parking, and overall availability of housing to the community.

In conclusion, the 6th Cycle Housing Element Update Survey completed for the city of Cudahy allowed us to infer from this sample size of participants that most of the residents rent their residence and do not own their own business. Even though most respondents in English are not involved in a community civic organization, about 50% of the respondents in Spanish are involved in a community organization. But the majority of both survey's participants agreed that the current range of housing options in the city of Cudahy do not meet the needs of the community and all types of housing are needed to provide even more diverse, affordable, and safer options for all residents. As seen in the graphs above for questions 10 -17 most of the

participants for both surveys thought the housing priorities mentioned were very important to their households but the strategies to pursue fair housing or even deciding on the most pressing needs for the city were mainly focused on rent control, affordable housing, housing availability, and parking. Overall, in total there were 52 participants who took part in both surveys over a two-month period.

1.7 REVIEWS BY STATE HCD

State law requires every updated Housing Element be submitted to California’s Housing and Community Development (HCD) to ensure compliance with the State’s minimum requirements. This ‘certification’ process is unique among the General Plan elements.

Housing Elements are submitted twice to HCD for review and comment: once during development of the Housing Element (in draft form), and again after adoption of the Housing Element by the local jurisdiction. The first period requires 60 days and must take place prior to adoption deadline. The second review requires 90 days and takes place after the adoption deadline. It is after the second review that written findings regarding compliance are submitted to the local government.

2 Housing Needs Analysis

2.1 POPULATION AND DEMOGRAPHICS

The type and amount of housing needed in a community is largely determined by population growth and various demographic variables. Factors such as population size, age, race, and occupation can be used to analyze the effectiveness of existing housing policies and provide a general direction and focus for future housing initiatives. Population characteristics include population growth trends in the city, age characteristics, and ethnicity.

POPULATION TRENDS

Cudahy is in Los Angeles County and is one the Gateway Communities of the county. According to the 2020 United States Census, Cudahy has a 2020 total population of 22,811 persons, which is a decrease from the 2010 census figure of 23,805 persons. The population growth estimate for the city by the State Department of Finance was 24,172. As stated earlier, the City of Cudahy spans over 1 mile and with a population density of 19,729 people per square mile, is 10th in the Nation, and 2nd in California as the most densely populated city. The average household income in Cudahy is \$55,752 with a poverty rate 26.16%. The median rental cost is \$1,306 per month, and median house value \$420,700.

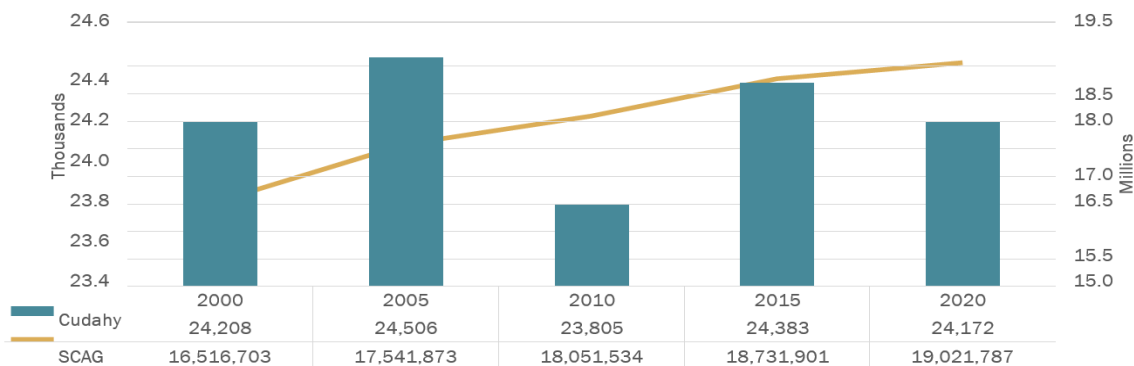
Chart 2.1 (Population, Housing, and Households) describes the population trend in Cudahy from 2000 to 2020. Over this period Cudahy had an annual population growth rate of 0% compared to 0.7% for the region.

Cudahy experienced its greatest population growth in the 1990s; however, from 2007 through 2010 there was a slight reduction in population that may be attributed to out-migration, cost of living, and the declining economy from 2000 to 2010. By contrast, in 1970, the city had a population of 16,998 persons. In 1980, the census estimated the City’s population at 17,984 persons; the 1990 census estimated the population at 22,817 persons and 24,208 persons in 2000.

Chart 2.1 – Population, Employment, and Households

I. POPULATION, EMPLOYMENT, AND HOUSEHOLDS

Population Trend, 2000-2020



Ethnicity

Cudahy is a predominately Hispanic/Latino community with Hispanic/Latinos comprising 95.2% of the city's residents. The City's White population is 3.1% and the Black/African American population is 0.7%. Cudahy also has a large immigrant population, and according to local sources, a large undocumented immigrant population. The number of undocumented immigrants residing in the city may sometimes skew socio-demographic information as most undocumented immigrants may be able to work and contribute to the economy of the area but may not be able to utilize Federal or State programs that require valid social security numbers or other means of identification.

Education

According to US Census numbers, the percentage of high school graduates or higher of persons residing in Cudahy age 25 years or older is 50.7%. The percentage of bachelor's degree holder or higher is 6.6%. 42.7 percent of Cudahy's residents have less than a high school education.

Household Size and Housing Stock

The average household size in the city has increased over the years largely due to several trends including increasing family size, shared living space to reduce cost, increasing cost of living, and overcrowding due to lack of available, affordable housing. In fact, the lack of affordable housing for the residents of Cudahy is cited at the top of their housing challenges.

According to data from the Southern California Association of Governments (SCAG), Cudahy's current household size of 5 persons per household, is 32% higher than the State average persons per household. In addition, the City's housing stock is getting older; well over half (57.4%) of the City's housing stock was built prior to 1960, therefore, housing supply, in conjunction with affordability, may contribute to the growing household size.

According to the latest California Department of Finance the housing makeup in Cudahy is as follows; 37 percent single detached units, 22.8 percent single attached units, 5.6 percent 2-4 units, 27.3 percent 5 or more units, and 7.3% mobile home units.

Population and Population Trend

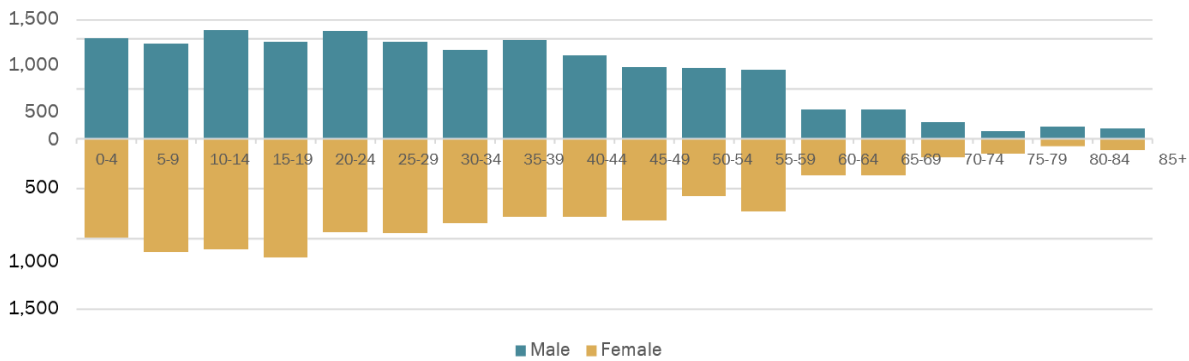
Year	Population	Change (#)	Change (%)
1970	16,998	n/a	n/a
1980	17,984	986	5.8%
1990	22,817	4,833	26.9%
2000	24,208	1,391	6.1%
2007	25,870	1,662	6.9%
2010	23,805	-2,065	-8%
2015	24,383	+578	+2.37%
2020	22,811	-1,572	-6.4

Sources: U.S. Census

From the table above, it is apparent that population growth in Cudahy was the greatest in the 1990's compared to the 1980 number. Although population increased from 1990 to 2007, the percentage of increase was smaller than the 26.9% growth from 1980 to 1990. 2020 saw a slight decrease in population but the 2015 population showed a slight rebound. The 2020 population, which was smaller than the projected population for same period, is 6.4% lower than the 2015 population. The population trend between 2015 and 2020 raises some concern for the city if the trend continues. The previous Housing Element adopted in 1992 assumed that growth in the coming decade would be like that observed from 1970 to 1980 (5.8%) and the resulting population projection included in the earlier housing element projected a population of 24,140 in the year-2000, which was quite close to the actual 2000 population figure of 24,208 persons identified in the U.S. Census for that year. A slight reduction in population in recent years may be due to the growing cost of housing in the city, the lack of “affordable” housing based on the City’s socio-economic data, new migration trends, and the inability to balance housing cost with lifestyle in the city.

Chart 2.2 – Current Population by Age and Sex

Current Population by Age and Sex



American Community Survey 2014-2018 5-year estimates

Looking at the City’s population breakdown by age and gender, Cudahy’s population is 49.7% male and 50.3% female. The 31.5% share of the population which is under 18 years of age is higher than the regional share of 23.4%. Cudahy's seniors (65 and above) make up 6.9% of the population, which is lower than the regional share of 13%. Table xx describes Cudahy’s current population by age and sex.

Chart 2.3 – Households by Household Size



American Community Survey 2014-2018 5-year estimates

The most commonly occurring household size in Cudahy is five people per household (24.4%) and the second-most commonly occurring household size is of four people per household (21.9%). There are also some household sizes of 7 persons and some with 1 person. Cudahy has a lower share of single-person households than the SCAG region overall (7.2% vs. 23.4%) and a higher share of 7+ person households than the SCAG region overall (5.7% vs. 3.1%)

Specialized Housing Needs

As part of the Housing Element process, State law requires analysis of specialized housing needs, including female-headed households to ensure adequate childcare or job training services. Of Cudahy's 5,601 total households, 24.5% are female-headed (compared to 14.3% in the SCAG region), 15.8% are female-headed and with children (compared to 6.6% in the SCAG region), and 1.4% are female-headed and with children under 6 (compared to 1.0% in the SCAG region).

According to the American Community Survey (ACS), 22.7 percent of Cudahy’s households are experiencing poverty, compared to 7.9 percent of households in the SCAG region. Poverty thresholds, as defined by the ACS, vary by household type. In 2018, a single individual under 65 years was considered in poverty with a money income below \$13,064/year while the threshold for a family consisting of 2 adults and 2 children was \$25,465/year.

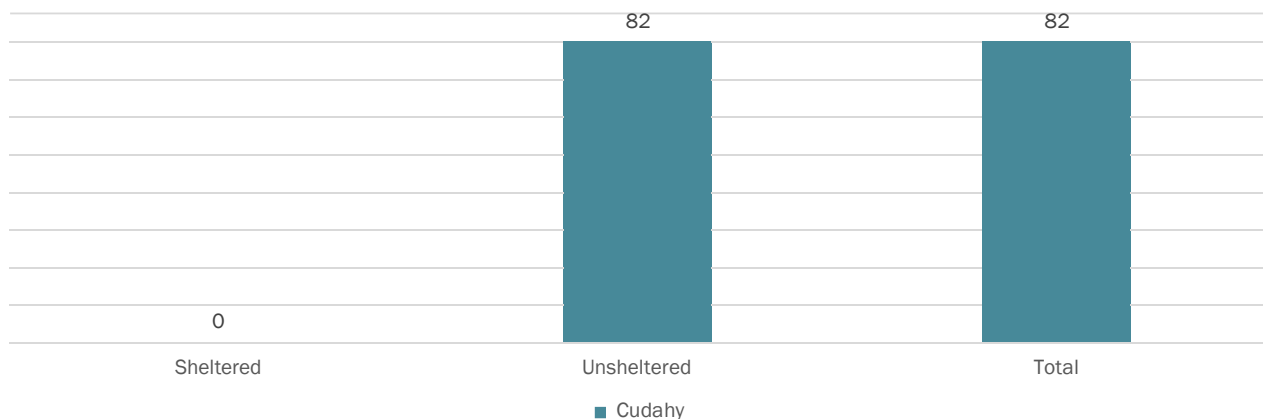
Table 2.2 - Elderly Households by Income and Tenure

		Owner	Renter	Total	Percent of Total Elderly Households
Income category, relative to surrounding area:	< 30% HAMFI	75	170	245	61.9%
	30-50% HAMFI	40	40	80	20.2%
	50-80% HAMFI	19	14	33	8.3%
	80-100% HAMFI	10	0	10	2.5%
	> 100% HAMFI	4	24	28	7.1%
TOT		148	248	396	

HUD CHAS, 2012-2016. HAMFI refers to Housing Urban Development Area Median Family Income.

Statute requires analysis of specialized housing needs, including housing needs for seniors. Federal housing data define a household type as 'elderly family' if it consists of two persons with either or both age 62 or over. Of Cudahy's 396 such households, 61.9% earn less than 30% of the surrounding area income, (compared to 24.2% in the SCAG region), 82.1% earn less than 50% of the surrounding area income (compared to 30.9% in the SCAG region).

Chart 2.6 - People Experiencing Homelessness



2019 city and county homelessness point-in-time counts processed by SCAG. Jurisdiction-level counts were not available in Imperial County and sheltered population (and thus total) counts were not available in Riverside County. As a result, SCAG region totals from this compilation of data sources likely undercount true totals.

RACE AND ETHNICITY CHARACTERISTICS

The United States 2020 Census summarizes the race and ethnicity for the city's population. Persons of Hispanic or Latino origin make up 95.2% of the community, with 3.1% White (non-Hispanic), 0.7% Black, and less than 1% Asian or Native Hawaiian or other Pacific Islander. Of 22,811 residents, 42.9% are foreign born, and 91.7% speak a language other than English at home.

AGE CHARACTERISTICS

According to the 2020 Census, the median age of City residents was 23.8 years of age compared to 33.7 years of age for the County. Currently the median age is 27, showing a shifting trend from a predominantly younger age group of 23.8 in 2000 to the current 2020 age group of 27.

The elderly population (persons 65 years of age or older) consisted of 7.6% of the total population in 1970. In 1980, the proportion of persons aged 65 and over declined to 4.8% of the total population. In 1990, the proportion of the same elderly group declined even further to 4.0% of the total population. The 2000 Census indicated that elderly residents accounted for 3.7% of the City's total population, and more recently at 5.1% in the 2010 Census. After many declining years, the population of those over 65 years old has begun to rise, likely due to longer expected life spans, improved health care and services, and current residents staying in the community. In 2020, persons 65 years or older make up 6.9% of the population.

According to the 2020 Census, 7.9% of the City's population were under 5 years of age. A total of 30.7% were between 5 years and 19 years of age. Working aged adults between the ages of 20 and 64 totaled 12,779 persons which represented 52.8%. Households with children, especially those with working parents or single heads of households, create a need for quality, affordable early care, and education services. The age grouping of the city's population according to the 2020 Census are indicated below in Table 2.3.

Age Group	Number of People	Percentage of Population
Under 5 years	2,182	9.2%
5 to 9 years	2,241	9.4%
10 to 14 years	2,408	10.1%
15 to 19 years	2,399	10.1%
20 to 24 years	1,953	8.2%
25 to 29 years	1,886	7.9%
30 to 34 years	1,832	7.7%
35 to 39 years	1,791	7.5%
40 to 44 years	1,770	7.4%
45 to 49 years	1,414	5.9%
50 to 54 years	1,178	4.9%
55 to 59 years	841	3.5%
60 to 64 years	688	2.9%
65 to 69 years	465	2.0%
70 to 74 years	296	1.2%
75 to 79 years	206	0.9%
80 to 84 years	155	0.7%
85 years and over	100	0.4%
Total Population	23,805	100.0%

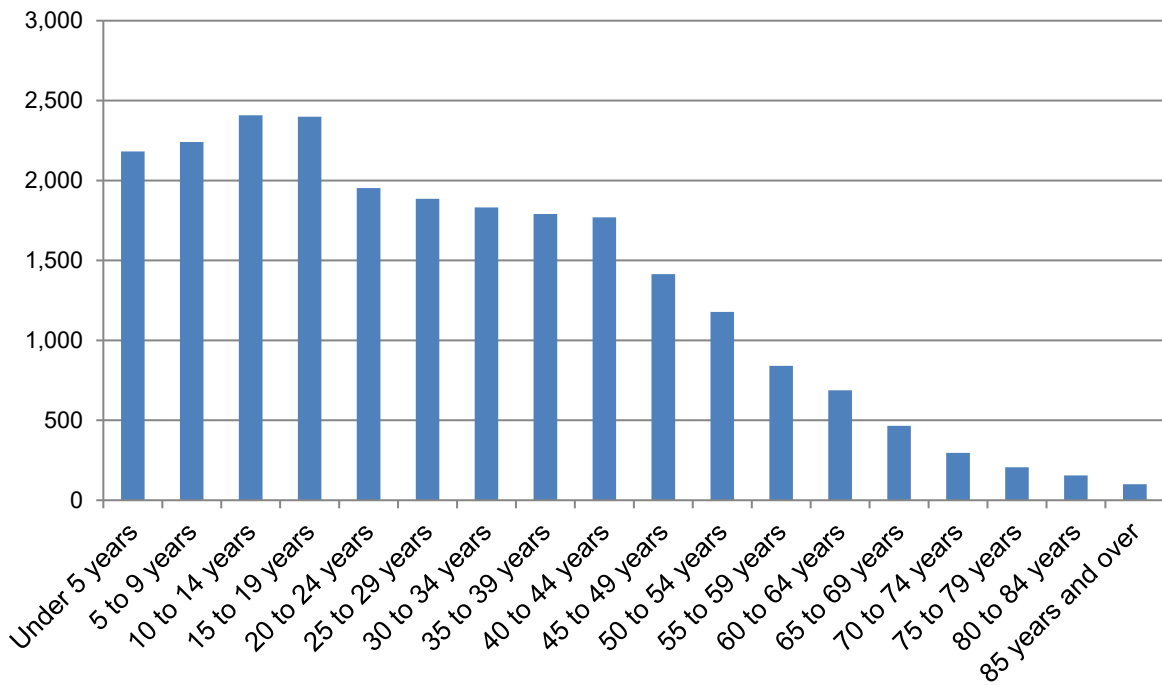
Source: U.S. Census Bureau (2020)

The median age for the City of Cudahy is 27 years of age which is significantly less than the national average of 37.2 years of age. Table 2-4 compared major age groupings tabulated from the 1980, 1990, 2000, and the 2010 census. As indicated in the table, the overall age distribution of the City’s population illustrated a decrease in the younger population and a slight increase of people 45 years old and higher. The trends in the City’s age characteristics are summarized in Table 2.4.

Table 2.4 Age Group Change 1980 - 2020					
Age Group	1980	1990	2000	2010	2020
<20 years	8,344 (46%)	9,626 (42%)	10,545 (44%)	9,230 (39%)	7,236 (30.7%)
20-44 years	6,830 (38%)	9,955 (44%)	9,947 (41%)	9,232 (39%)	9,563 (40.6%)
45-64 Years	1,952 (11%)	2,319 (10%)	2,832 (12%)	4,121 (17%)	5,121 (21.8%)
>65 years	868 (5%)	917 (4%)	884 (4%)	1,222 (5%)	1,649 (6.9%)
Total	17,984 (100%)	22,817 (100%)	24,208 (100%)	23,805 (100%)	23,569 (100%)

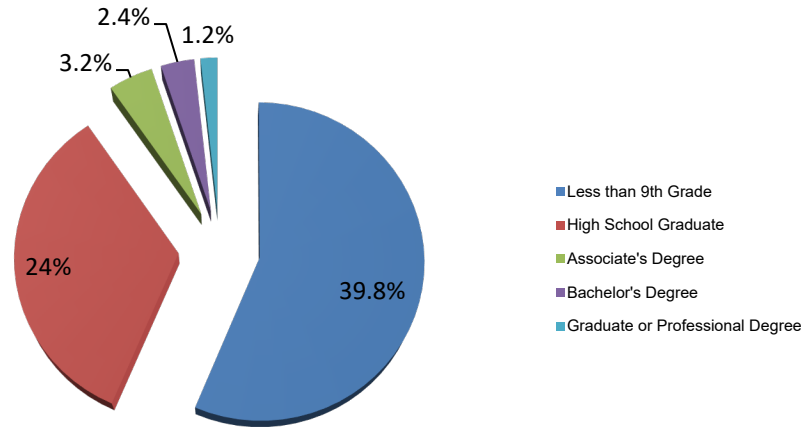
Chart 2.7 – Age Groups

Age Groups



EDUCATIONAL ATTAINMENT

Chart 2.8- Educational Attainment



Source: U.S. Census Bureau, 2007-2021 American Community Survey

To help increase the levels of educational attainment the City is looking to increase its support in policies that favor education; especially starting with education at early stages in life for those individuals in ages 0-5. Quality early care and education provides a foundation for success in grades K-12 for Cudahy's youngest residents. Early care and education translate to success in life because children who attend these programs are more likely to graduate from high school and attend college.

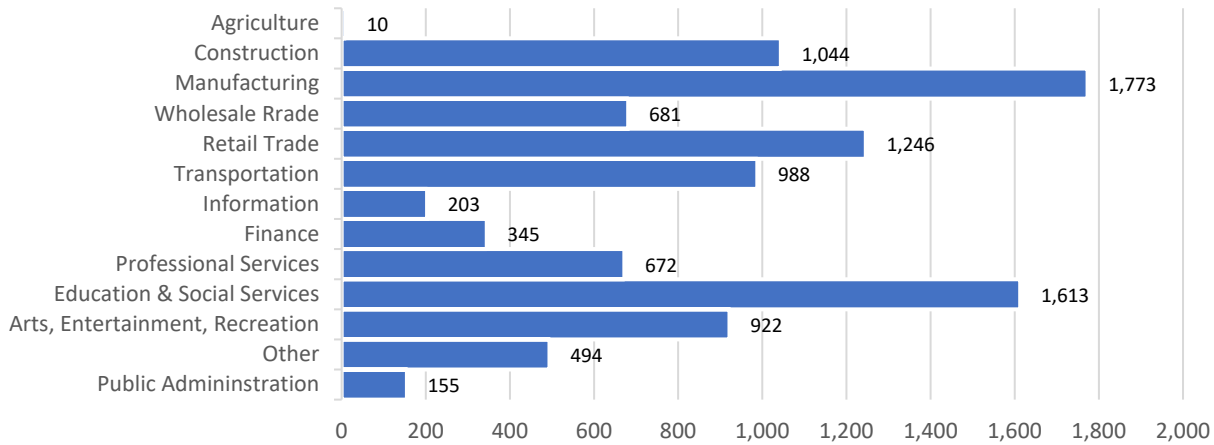
2.2 EMPLOYMENT CHARACTERISTICS

Employment types, income levels, and other factors determine the type of housing residents of the city can afford, while the unemployment rate is an indicator of the level of housing assistance needed. Employment and income levels are generally the function of regional growth or decline, which depends on factors beyond the city's control. Employment characteristics describe those economic and market factors relevant to the maintenance of existing housing and the need to produce new housing in the city.

EMPLOYMENT AND UNEMPLOYMENT

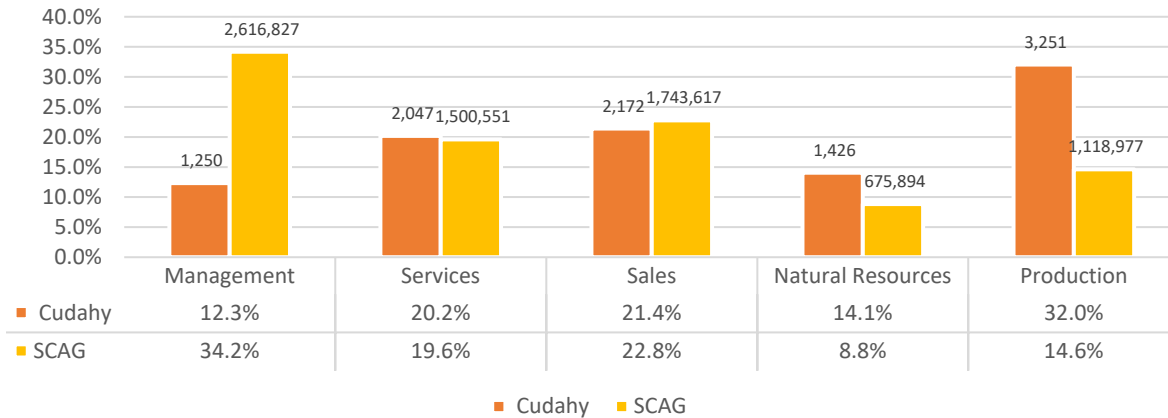
Cudahy has 10,146 workers living within its borders who work across 13 major industrial sectors. The chart below provides detailed employment information. The most prevalent industry is manufacturing with 1,773 employees (17.5% of total) and the second most prevalent industry is Education & Social Services with 1,613 employees (15.9% of total).

Chart 2.9 - Employment by Industry



American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes

Chart 2.10 - Employment by Occupation



American Community Survey 2014-2018 5-year estimates using groupings of SOC codes

In addition to understanding the industries in which the residents of Cudahy work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category is Production, in which 3,251 (32% of total employees) work. The second most prevalent category is sales (21.4% of the total employees), followed by Services (20.2%). Cudahy’s numbers for production workers doubles the SCAG region number (14.6%), while SCAG’s Management employment category (34.2%) almost triples Cudahy’s (12.3%). This trend is indicative and a symptom of the educational levels of Cudahy’s residents.

Farmworkers

Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions has farmworkers living in them, they are essential to the region’s economy and food supply.

Table 2.5 - Farmworkers by Occupation

Cudahy	Percent of total Cudahy workers:	SCAG Total	
54	0.53%	57,741	Total jobs: Farming, fishing, and forestry occupations
35	0.50%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations
Employment in the Agricultural Industry:			
Cudahy	Percent of total Cudahy workers:	SCAG Total	
4	0.04%	73,778	Total in agriculture, forestry, fishing, and hunting
10	0.14%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting

American Community Survey 2014-2018 5-year estimates using groupings of NAICS and SOC codes.

2.3 HOUSEHOLD CHARACTERISTICS

Household type and size, income levels, and other household characteristics determine the type of housing needed by residents. This section details the various household characteristics affecting housing needs. Household characteristics provide an overview of the key socioeconomic characteristics that affect housing needs.

Household Sizes

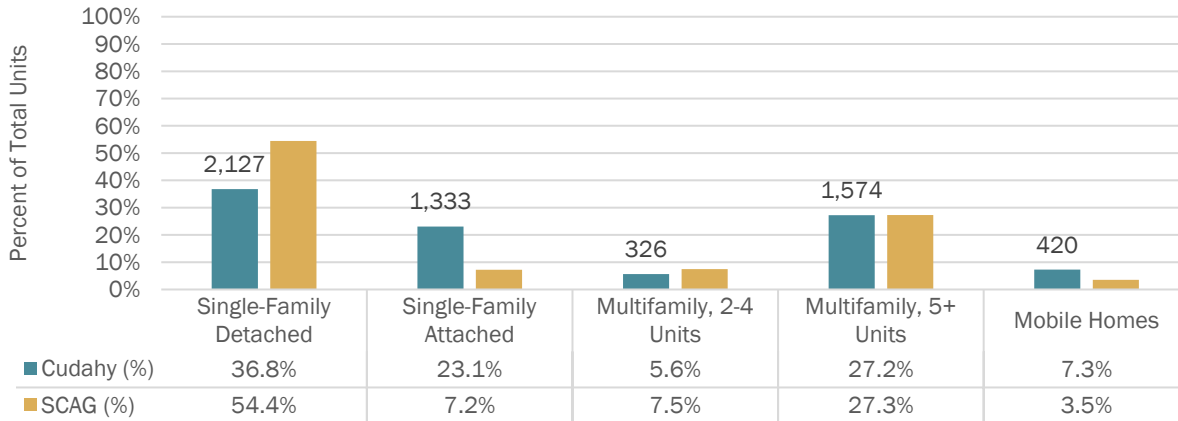
The U.S. Census defines a household as any group of people who occupy a housing unit, including families*, single people, or unrelated persons sharing living quarters. Persons living in licensed facilities, retirement homes, or dormitories are not considered households. Household characteristics are important indicators of the type of size of housing needed in a community.

*According to the most current U.S. Census definition, family is defined as “A group of two or more people who reside together and who are related by birth, marriage, or adoption.”

2.4 HOUSING STOCK

Housing types, age, vacancy rates, conditions and other factors affecting housing stock determine if the current supply of housing is in good conditions or in adequate supply for residents. This section examines various stock characteristics that affect the living environment of Cudahy residents. Housing characteristics focuses on trends related to residential development, housing type, and housing tenure.

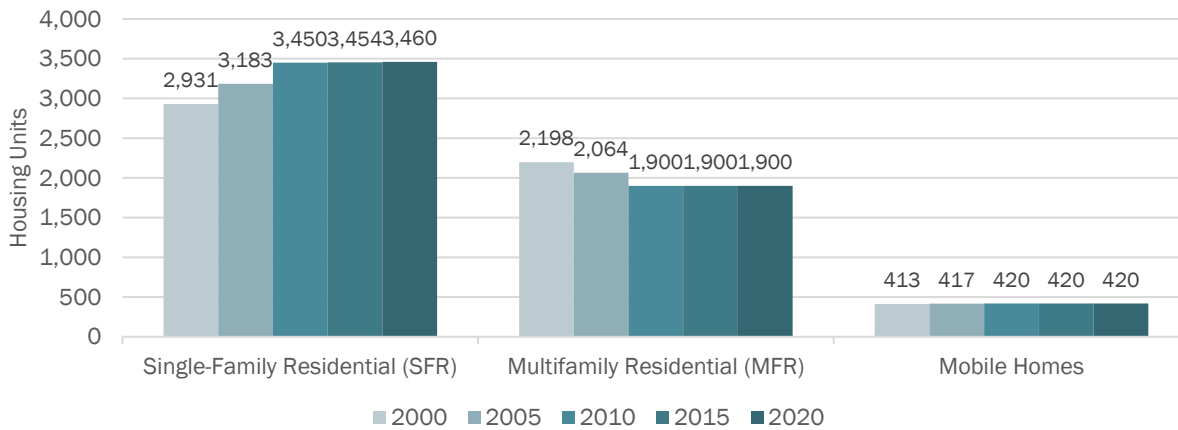
Chart 2.11 - Housing Types



CA DOF E-5 Population and Housing Unit Estimates

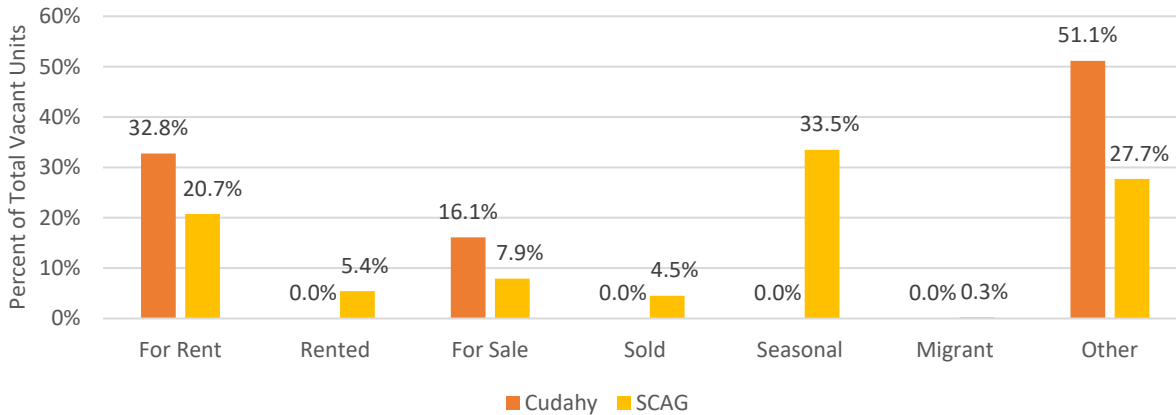
According to the 2020 California Department of Finance data, there were 5,780 housing units in Cudahy. This number is an increase of 10 units (5770) over the 2010 number. Of this total, 2,127 units (36.8%) were single detached units, 1,313 units (23.1%) were single attached units, 326 units (5.6%) were 2-4 units, and 1,574 units (27.3%) were 5 or more units. In addition, a significant number of households live in mobile home parks. A total of 420 units (7.3%) are mobile home units. The breakdown of housing unit types is illustrated in Table 2.

Chart 2.12 - Housing Trend



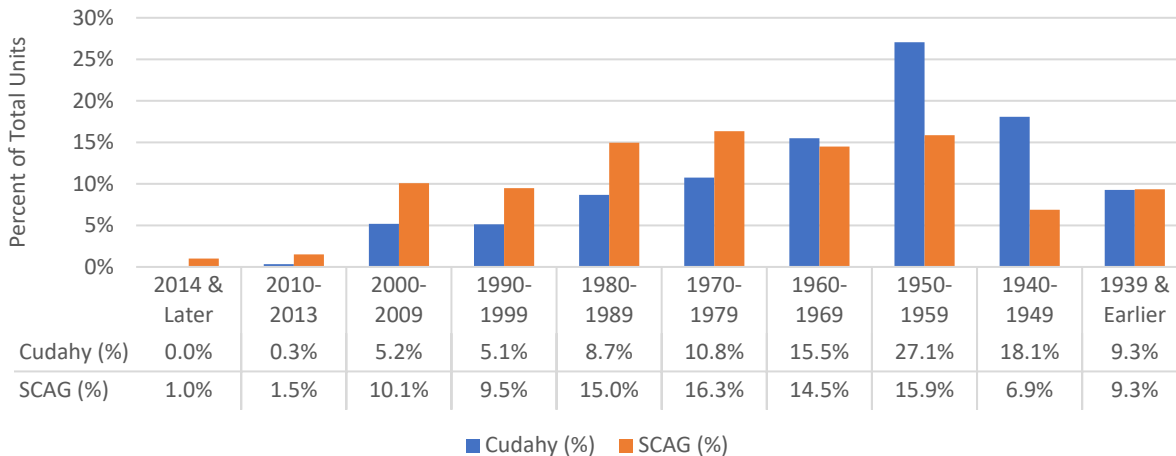
Over the last two decades, (2000 to 2020), there has been more construction of single-family residential units than multi-family residential units in Cudahy. When comparing 2000 to 2020, Single-Family Residential (SFR) units increased by 529, Multi-Family Residential (MFR) units increased by 298, and mobile units increased by 7.

Chart 2.13 - Vacant Units by Type



American Community Survey 2014-2018 5-year estimates.

Chart 2.14 - Housing Units by Year Structure Built



American Community Survey 2014-2018 5-year estimates.

Examining the age of the current housing stock is one way to determine how historical developments patterns have contributed to a city’s form. The time period where the highest share of the City of Cudahy’s housing units was built is 1950-1959, while in the SCAG region more were built during 1970-1979 than any other period.

HOUSING AGE, CONDITION & OVERCROWDING

Housing age is an important indicator of the conditions of Cudahy’s housing stock. Homes and structures weather with use and deteriorate with time. If they are not properly maintained, housing can deteriorate quickly and become eyesores or potential sources of danger. This directly affects property prices and the quality of life of city residents. A city with an older housing stock will have to budget more for preservation assistance, home repair costs, and energy requirements.

A parcel specific housing condition survey was undertaken in February 2013. During the survey, housing condition was evaluated according to the following criteria:

Category I: Good Condition. Housing units included in this category were considered to be in a good state of repair and no repairs were warranted.

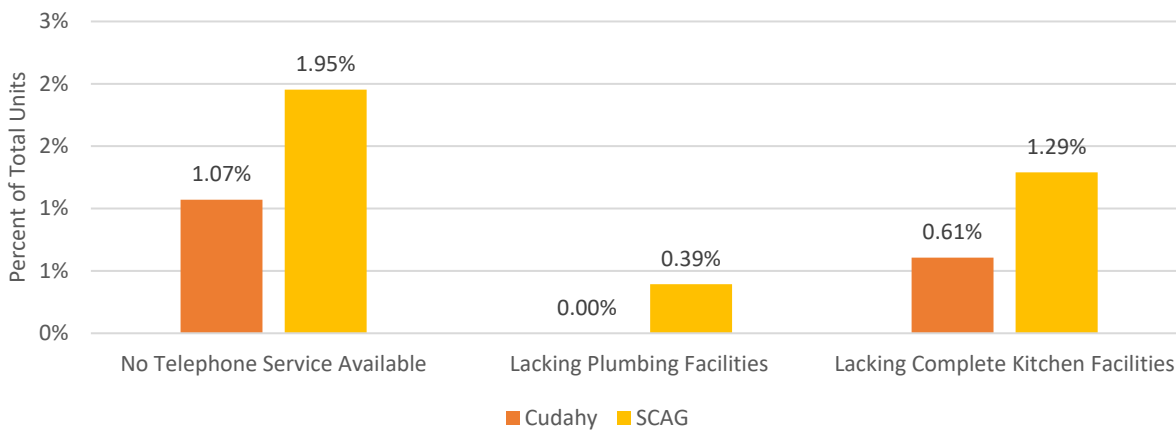
Category II: Minor Fix-Up; Paint-Up. General housing improvement needed including paint and minor repairs. Typically, improvements can be and are usually made by the property owner.

Category II: Major Repairs. This category includes major repairs such as replacement of the roof. Typically, such repairs would be performed by a contractor.

Category IV: Beyond Repair. This housing condition category applies to those structures where the cost of repair is estimated to exceed the value of the structure.

Although the City has not conducted a more recent housing conditions survey, it is safe to conclude that current conditions may not differ significantly from the results in 2013. The table identifying substandard housing identify few units lacking telephone, plumbing or kitchen facilities.

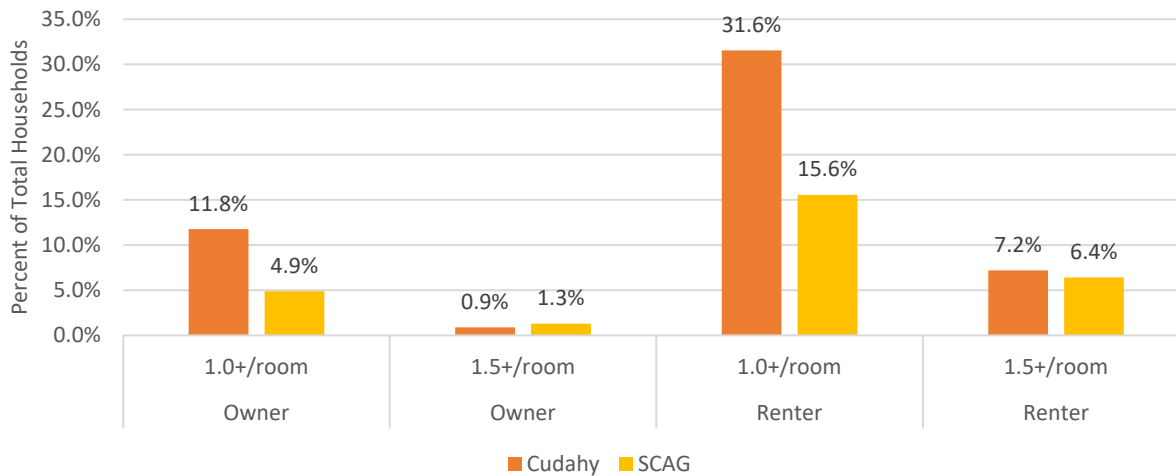
Chart 2.15 - Substandard Housing



American Community Survey 2014-2018 5-year estimates.

The American Community Survey (ACS) includes surveys about three factors of what may be considered substandard housing. In Cudahy, 60 units lack telephone service, 0 units lack plumbing, and 34 units lack complete kitchen facilities.

Chart 2.16 - Overcrowding by Extent and Tenure



HOUSING TENURE, OCCUPANCY AND VACANCY

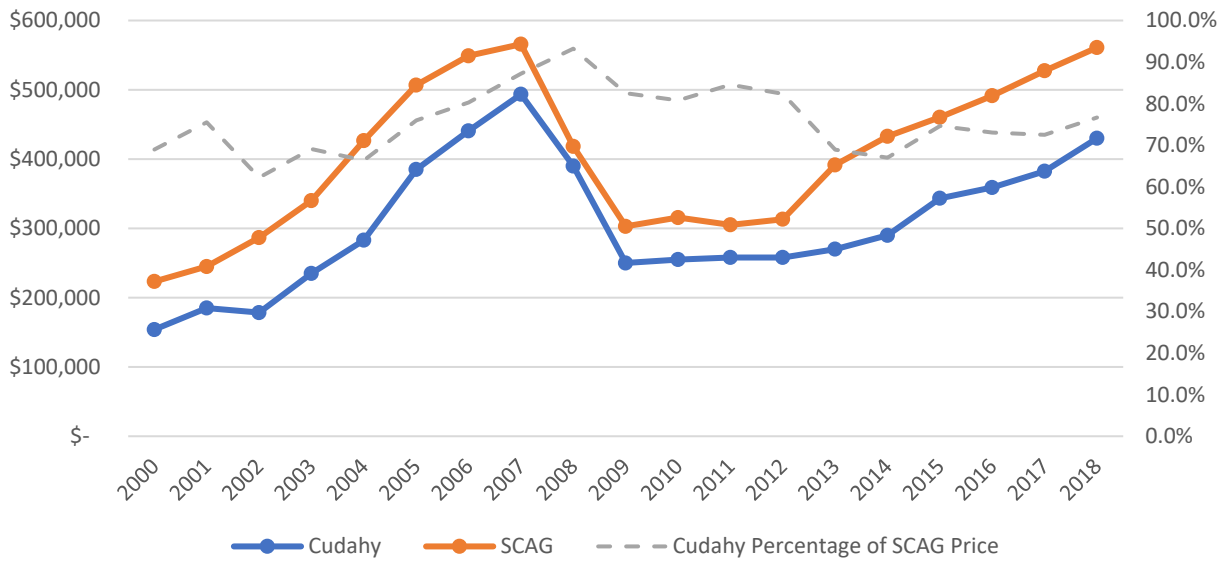
According to the most recent DOF estimates, a total of 5,607 units were occupied while the remaining 163 units were vacant. This translated into a vacancy rate of 2.82% compared to a vacancy rate of 5.9% for Los Angeles County. In 2020 the vacancy rate for owner-occupied units was 2.9% and the vacancy rate for rental units was 1.5%. Compared to other cities in the county, Cudahy’s housing vacancy rate is among the lowest. This results in an increased demand for a limited supply of housing units, which in turn, could affect the cost of both rental and owner-occupied units.

2.5 HOUSING COSTS AND AFFORDABILITY

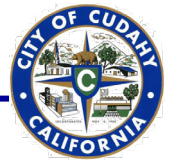
The department of Housing and Urban Development defines affordable housing as housing for which the owner or tenants pays less than 30 percent of the household income. The cost of housing vis-à-vis income directly impacts the degree of affordability. If housing costs are high relative to income, there will be a correspondingly higher prevalence of borrowing in the case of homeowners, and overpayment in the case of renters. Overcrowding also increases as people turn to sharing homes and apartments to reduce housing costs. This section summarizes the cost and affordability of Cudahy’s housing stock.

Between 2000 and 2020 median home sales prices in Cudahy increased 179% while prices in the SCAG region increased 151%. 2018 median home sales prices in Cudahy were \$430,000 and the highest experienced since 2000 was \$493,500 in 2007. Prices in Cudahy have ranged from a low of 62.2% of the SCAG region median in 2002 and a high of 93.2% in 2008.

Chart 2.17 - Median Sales Price of Existing Homes



SCAG Local Profiles, Core Logic/Data Quick. SCAG median home sales price calculated as household-weighted average of county medians.



HOUSING COSTS AND AFFORDABILITY

Census data indicated that for owner-occupied housing units, most of the monthly mortgage payments in the city in 2010 was \$2,000 or more with the median being \$1,812 per month. In 2020, the median mortgage payment was \$1,921.00. The 2020 median household income in Cudahy is \$46,642.00. A household is overpaying for housing if more than 30% of their net “take-home” income is used for paying rent or mortgages.

According to census figures for the year 2020, 255 households (45.2% of the total owner-occupied units) living in owner-occupied units paid more than 30% of their monthly income towards the mortgage. According to the same census figures, 2,624 renter households (56.3% of the total renter households) paid more than 30% of their monthly income towards the rent. For renters, the median gross rent per month significantly increased from \$1,103 in 2011 to \$1,306. On a percentage basis, this increase in cost represents an 18.4 percent increase. This dollar amount refers to the contract rent (i.e., monthly rent agreed to, or contracted for) plus the estimated average cost of utilities and fuels if paid for by the renter. This definition was used by the census to eliminate differentials due to varying practices in rent structuring.

The HUD-formulated Fair Market Rent (FMR) schedule is a guideline to maximum rents allowable for units receiving Section 8 assistance. HUD uses the *Consumer Price Index* and the census data to calculate the FMRs for each Standard Metropolitan Statistical Area (SMSA).

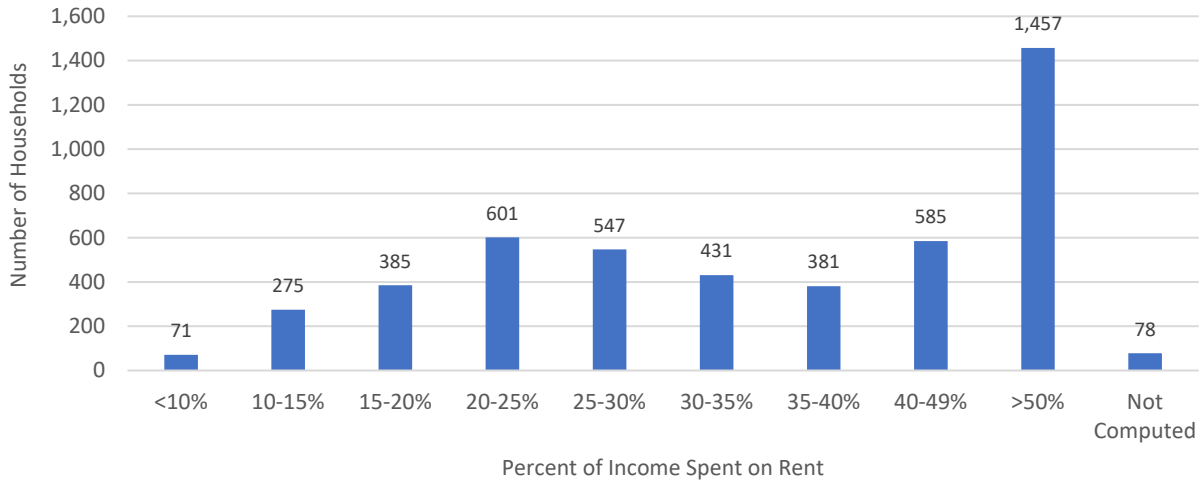
Because HUD includes different criteria in its definition of rent, census data and FMRs are not directly comparable. While some vacant property is available for new residential development, most of the new residential construction will occur on land that is presently occupied by existing development. The demolition, removal, and clean-up of these existing properties contribute to the higher cost of development. During the latter part of the 1990s, interest rates were generally low. In 2000, interest rates were raised by the Federal Reserve though they were once again lowered in the years following 2000 in response to fears of recession and have continually dropped in response to avoiding a further recession. With the currently low interest rates in 2020, the prices of residential and commercial properties have skyrocketed. In general, the cost (market-rate) for new land in the city ranges from \$100/square foot up to \$150/square foot. The actual construction cost for residential development ranges from \$300/square foot up to \$530/square foot. The current average rent in the city is \$1,624.00, and the average cost of a single-family residential property is approximately \$450.00 per square-foot. Homes are not as affordable in the city as they were 10 years ago, following a similar regional and state-wide trend.



2.6 RENT VS. OWN

RENTER

Chart 2.18 - Spending on Rent by Renter (ACS -2020)



Across Cudahy's 4,811 renter households, 2,854 (59.3%) spend thirty percent or more of gross income on housing cost, compared to 55.3% in the SCAG region. Additionally, 1,457 renter households in Cudahy (30.3%) spend fifty percent or more of gross income on housing cost, compared to 28.9% in the SCAG region.

While the previous table breaks down cost burden by area-relative income, the ACS also allows for the analysis of Cudahy's 4,733 renter households (for which income data are available) by spending on rent by income bracket (dollar amounts). As one might expect, the general trend is that low-income households spend a higher share of income on housing (e.g., over 50%) while high-income households are more likely to spend under 20% of income on housing.

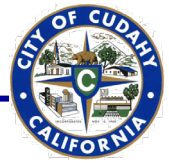
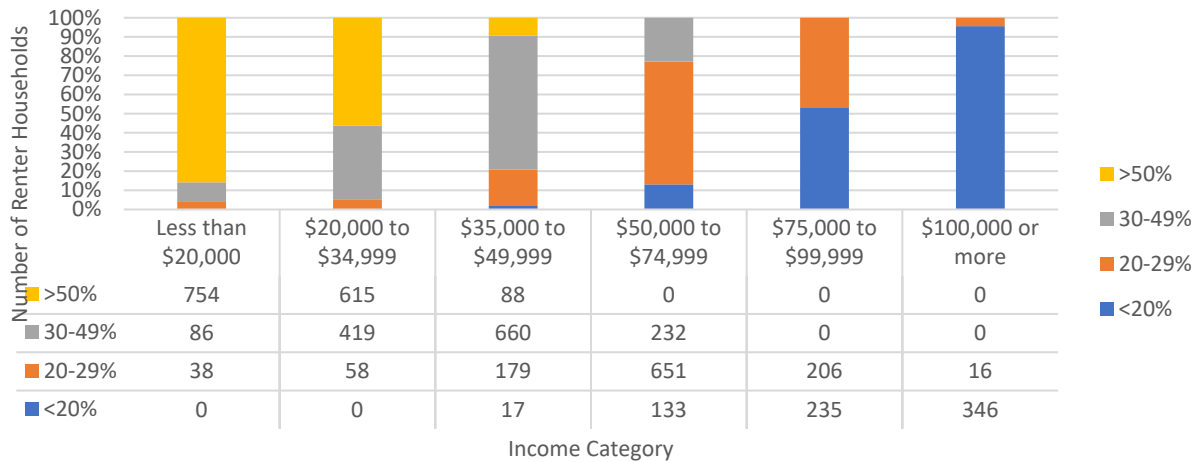
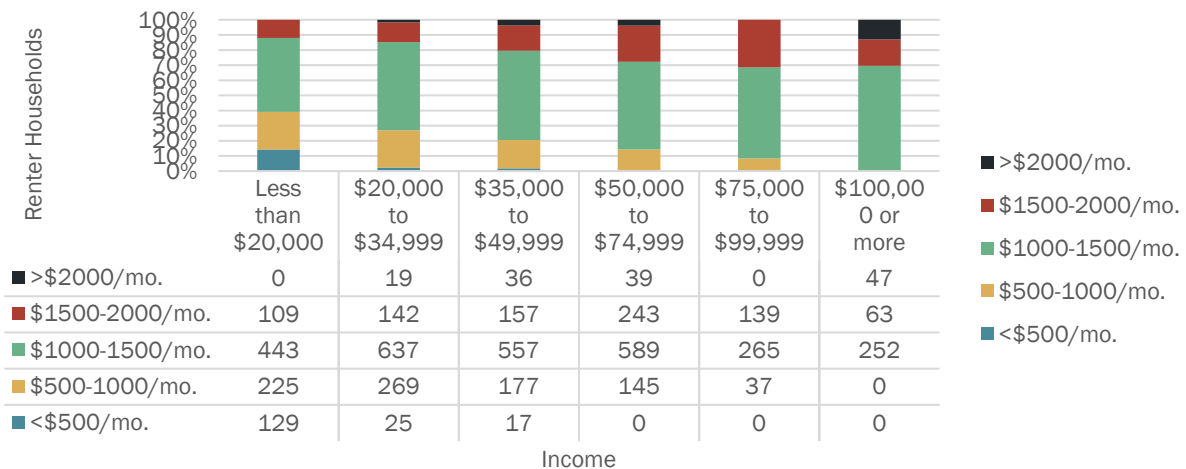


Chart 2.19 – Spending on rent By Income



American Community Survey 2014-2018 5-year estimates.

Chart 2.20 - Household Income by cash Rent



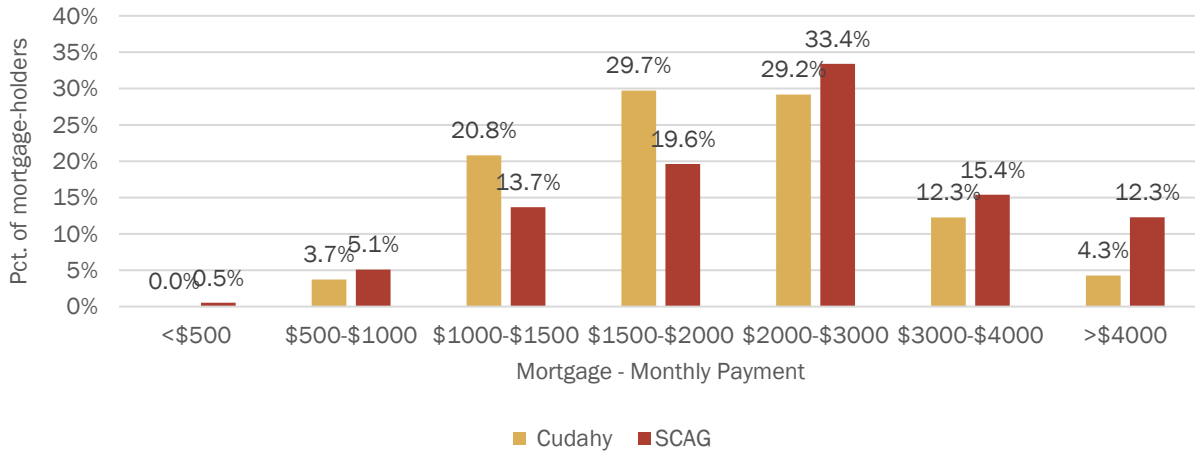
American Community Survey 2014-2018 5-year estimates.

Cudahy renter households' cash rent paid can be broken down by household incomes. As one might expect, the general trend is that lower-income households spend less on rent while higher-income households spend more on rent, though this may not be universally true. Rent categories range from <\$500/month (3.6% of Cudahy renters) to >\$2000/month (3% of Cudahy renters). The most common rent category in Cudahy is \$1000-1500/month with 57.6% of renters.



OWNER

Chart 2.21 - Monthly Owner Costs for Mortgage Holders



American Community Survey 2014-2018 5-year estimates

While renter households receive much of the focus when it comes to housing cost analysis, owner households make up 14.1% of Cudahy and 52.5% of the SCAG region. The most commonly occurring mortgage payment in Cudahy is \$1500-\$2000/month and the most commonly occurring mortgage payment in the SCAG region is \$2000-\$3000/mo.

Mortgage-holding households in Cudahy can be broken down by income and the percentage of income spent on mortgage costs. As one might expect, the general trend is that lower-income households spend a higher share of income on housing costs, while high-income households may spend a lower share of income on housing. The income category most prevalent amongst Cudahy mortgage-holding households is \$75,000 or more (305 households) and the most prevalent share of income spent on mortgage costs is over 30% (317 households).



Chart 2.22 - Cost for Mortgage Holders by Income

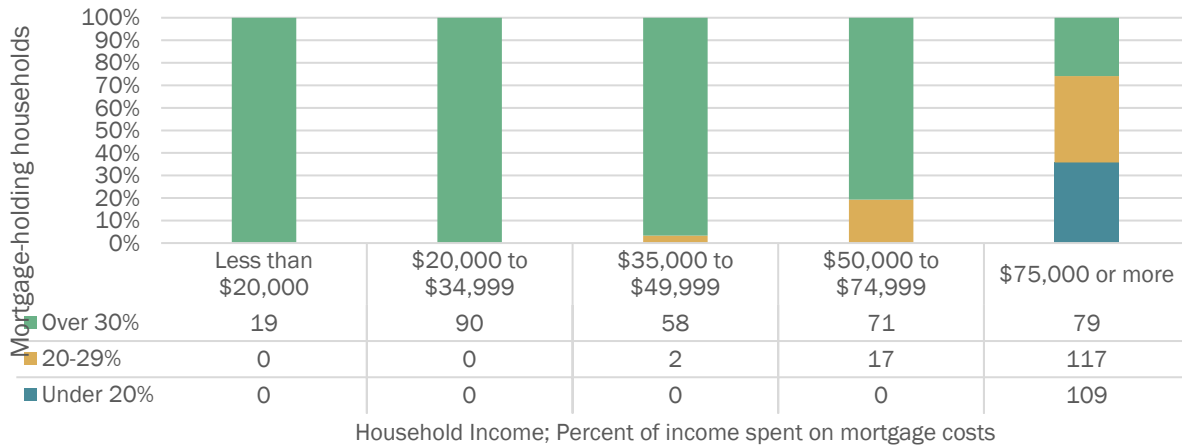
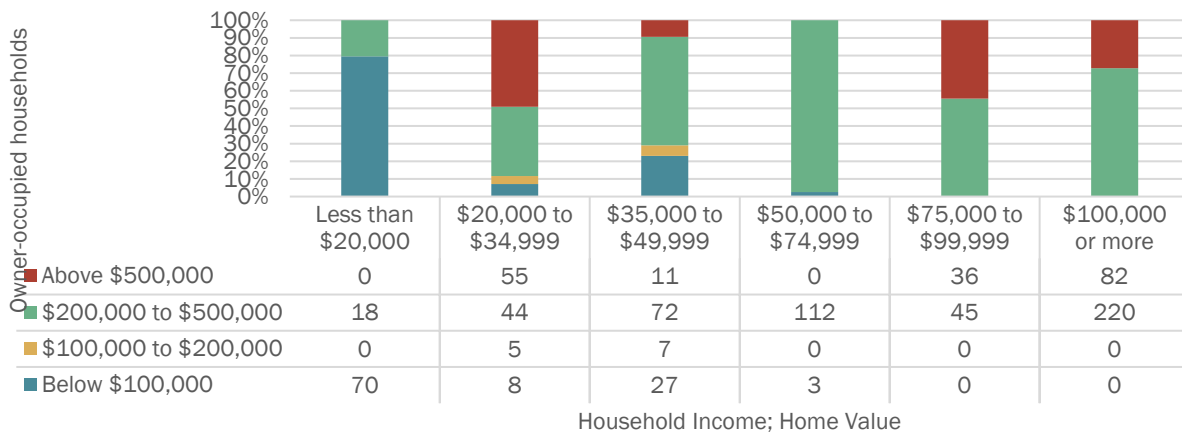


Chart 2.21 - Household Income by Home value



Another approach to evaluating the relationship between housing and income is to compare incomes and home values in Cudahy. The most commonly occurring income category amongst owner households in Cudahy is \$100,000 or more (302 households) and the most commonly occurring home value category is \$200,000 to \$500,000 (511 households).



2.7 HOUSING NEEDS ASSESSMENT

Table 2.6 – Final 6th Cycle Regional Housing Needs Allocation

Final 6th Cycle Regional Housing Needs Allocation for Cudahy:

	Units
Very-Low Income (<50% of AMI)	80
Low Income (50-80% of AMI)	36
Moderate Income (80-120% of AMI)	53
Above Moderate Income (>120% of AMI)	224
TOTAL	393

The Southern California Association of Governments (SCAG) has identified a total of 393 housing units for Cudahy’s Regional Housing Needs Assessment. The units are broken down as follows: 80 very low-income units, 36 low-income units, 53 moderate income units, and 224 above moderate-income units.

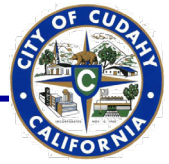
EXTREMELY LOW-INCOME HOUSEHOLDS

Extremely low-income is defined as households with income less than 30 percent of area median income. The area median household income in Cudahy is \$46,642. For extremely low-income households, this results in an income of \$13,992.6 or less. Households with extremely low incomes have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance is considered extremely low-income households. At the same time, a minimum wage worker could be considered an extremely low-income household with an annual income of approximately \$17,000 or less.

Housing the extremely low-income population (below 30% of area median income) can be especially challenging. The race/ethnicity with the highest share of extremely low-income households in Cudahy is Black, non-Hispanic (40% compared to 31% of total population). In the SCAG region, the highest share of extremely low-income households is Black, non-Hispanic (27.1% compared to 17.7% of total households).

EXISTING NEEDS

According to the 2020 Census data prepared by SCAG, of the City's 5,690 households in 2020, 2,879 households were considered low-income. Most extremely low-income households are renters and experience a high incidence of housing problems. For example, extremely low-income households faced housing problems (defined as cost burden greater than 30% of income



and/or overcrowding and/or without complete kitchen or plumbing facilities). Even further, extremely low-income households paid more than 50% of their income towards housing costs.

	Renters	Owners	Total
Total Number of ELI Households	2,624	255	2,879
Percentage with Any Housing Problems	12.6%	12.6%	25.3%
Percent with Cost Burden (30% of income)	56.3%	45.2%	50.3%
Percent with Severe Cost Burden (50% of income)	10.2%	71%	12%
Total Number of Households	4,702	1,011	5,713

Source: Census.gov; Southern California Association of Governments

PROJECTED NEEDS

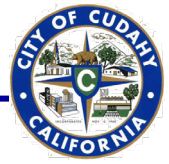
To calculate the projected housing needs, the city assumed 50% of its very low-income regional housing needs are extremely low-income households. As a result, from the very low-income need of 116 units, the city has a projected need of 80 units for extremely low-income households. Many extremely low-income households will be seeking rental housing and most likely facing an overpayment, overcrowding or substandard housing condition. Some extremely low-income households could be with mental or other disabilities and special needs. To address the range of needs, the city will employ a detailed housing strategy including promoting a variety of housing types, such as accessory dwelling units (ADU) and single-room occupancy (SRO) units without requiring a CUP.

With respect to single-room occupancy units, the city will seek to modify the zoning code to allow transitional housing in the future, as a permitted use to further accommodate these residents. In addition, the city is currently working on an Inclusionary Housing Ordinance that would require construction of more affordable housing in the city.

To address the housing needs of extremely low-income households, the city will identify and meet with nonprofit builders who specialize in building housing for extremely low-income households and supportive housing. This effort is design to:

- Build a long-term partnership in development,
- Gain access to specialized funding sources, including applying for funding sources that support deeper targeting,
- Identify the range of local resources and assistance needed to facilitate the development of housing for extremely low-income households, and
- Promote a variety of housing types, including higher density, multifamily supportive, single room occupancy, and shared housing.

As part of this effort, the city will develop an action plan with its nonprofit partners to develop housing for extremely low-income households. Activities include assisting with site identification



and acquisition, local financial resources, assisting and streamlining entitlements and providing concessions and incentives.

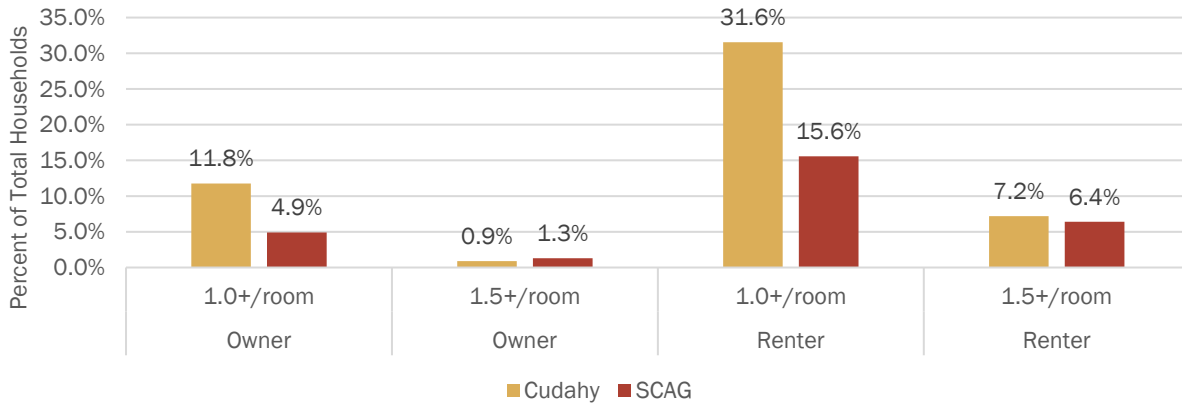
2.8 OVERCROWDING AND OVERPAYMENT

Overcrowding

Overcrowding is typically defined as more than one person per room, based on the Census Bureau’s definition of “room,” which excludes bathrooms, porches, balconies, foyers, halls, or half-rooms. Severe overcrowding occurs when there are more than 1.5 persons per room. Overcrowding can result when there are not enough adequately sized units within a community, or when high housing cost relative to income forces too many individuals or families to share housing. Overcrowding can also accelerate deterioration of the housing stock.

In Cudahy, 93 owner-occupied and 1,518 renter-occupied households had more than 1.0 occupants per room, which meets the ACS definition for overcrowding. 7 owner-occupied households and 346 renter-occupied households had more than 1.5 occupants per room, which meets the ACS definition for severe overcrowding.

Chart 2.22 - Crowding by Extent and Tenure

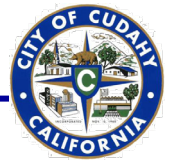


American Community Survey 2014-2018 5-year estimates.

To address overcrowding, this Housing Element will not include programs to increase density to increase the supply of residential units in Cudahy, because the city increased densities in 2018 as part of the comprehensive General Plan and Zoning Code update.

	Owner	Renter	Total
Occupied Units	916	4733	5649
Overcrowded Units	180	1248	1428
Severely Overcrowded	83	451	534

Source: Census.gov; American Fact Finder



Overpayment

A household is overpaying for housing (or cost burdened) if it spends more than 30% of its gross income on housing. Severe housing cost burden occurs when a household pays more than 50% of its income on housing. The prevalence of overpayment varies significantly by income, tenure, household type, and household size.

Table 2.9 Total Households Overpaying			
Households	Renter	Owners	TOTAL
All Households	4733	916	5649
Number of Households Overpaying	2,624	255	2,879
Percent of All Households Overpaying	56.3%	45.2%	50.9%

Source: Census.gov; American Fact Finder

Of the 2,879 households overpaying in Cudahy, 448 household were severely overpaying.

Table 2.10 Total Households Severely Overpaying			
Households	Renter	Owners	TOTAL
Number of Households Overpaying	2,624	255	2,879
Number of Households Severely Overpaying	267	181	448
Percent of Households Overpaying	10.2%	71%	15.5%

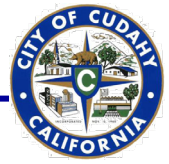
Source: Census.gov; American Fact Finder

In general, overpayment disproportionately affects lower income households; further, emphasizing the affordability gap between market rents and affordable housing costs for lower income households.

Table 2.11 Lower Income Households Overpaying			
Households	Renters	Owners	TOTAL
Total Households Overpaying	2,624	255	2,879
LOWER INCOME HOUSEHOLDS			
Lower Income Households Overpaying (30% of Income)	1,477	115	1,592
Lower Income Households Overpaying (50% of Income)	267	181	448

Source: Census.gov; American Fact Finder

To address overpayment, Cudahy will pursue a variety of programs to expand affordability. With a strong prevalence of overpayment/overcrowding with large family renter households, the city will focus its new construction on multi-family units.



2.9 “AT-RISK” HOUSING

“Assisted housing units” are defined as units with rents subsidized by federal, State, or local governmental programs. California Government Code Section 65583 requires that housing elements include an inventory of all assisted rental housing units within the local jurisdiction that are at-risk of losing subsidies, mortgage prepayment, or being converted to other uses if the expiration date of their financing program is between 2021 and 2031 (i.e., 10 years from the beginning of the housing element planning period—2021). In all, there are a total of 142 units at-risk of conversion in Cudahy.

CONVERSION RISK

State law requires Housing Elements provide an inventory of all assisted housing units if the expiration date of their financing program is within the next ten years of the housing element planning period. These housing units are deemed to be “at-risk” of being converted to market rate units. Additionally, HCD recommends jurisdiction assess the overall potential conversion risk of all assisted housing units. However, there is no “official” or prescribed methodology to conduct the analysis. Jurisdictions, therefore, are free to decide how to conduct the analysis by choosing a method most appropriate to their jurisdiction.

There are three general cases that can result in the conversion of public assisted units:

1. **Prepayment of HUD Mortgages:** Section 221(d’ (3), Section 202 and Section 236 — Section 221 (d)(3) is a privately-owned project where the U.S. Department of Housing and Urban Development (HUD) provides either below market interest rate loans or market-rate loans with a subsidy to the tenants. With Section 236 assistance, HUD provides financing to the owner to reduce the costs for tenants by paying most of the interest on a market rate mortgage. Additional rental subsidy may be provided to the tenant. Section 202 assistance provides a direct loan to non-profit organizations for project development and rent subsidy for low-income elderly tenants. Section 202 provides assistance for the development of units for physically handicapped, developmentally disabled, and chronically mentally ill residents.
2. **Opt-outs and Expirations of Project-Based Section 8 Contracts** — Section 8 is a federally funded program that provides for subsidies to the owner of a pre-qualified project for the difference between the tenant’s ability to pay and the contract rent. Opt-outs occur when the owner of the project decides to opt-out of the contract with HUD by pre-paying the remainder of the mortgage. Usually, the likelihood of opt-outs increases as the market rents exceed the contract rents.
 - Clara Park Commons Senior
3. **Other** — Expiration of the low-income use period of various financing sources, such as Low-income Housing Tax Credit (LIHTC), bond financing, density bonuses, California



Housing Finance Agency (CALHFA), Community Development Block Grant (CDBG) HOME and redevelopment funds. Generally, bond-financing properties expire according to a qualified project period or when the bonds mature.

- Clara Park Village
- Elizabeth Court
- Clara Court
- Live Oaks Garden

FEDERALLY ASSISTED “AT RISK” UNITS

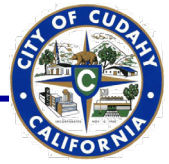
At-Risk Units includes a study of all low-income housing units, which may at some future time be lost to affordable inventory by the expiration of some type of affordability restrictions. The law requires that the analysis and study cover a ten-year period, and be divided into two periods, coinciding with updates of the housing elements.

Table 2.12 Summary of At-Risk Units

Project Name	Address	Target Group	Number of Units	Type of Assistance	Expiration Date	Current Owner	At-Risk
Clara Park Village	4805 Clara St Cudahy, CA 90201	Elderly	49	Section 8	2037	National Church Residents	Lower Risk
Elizabeth Court	5225 Elizabeth St Cudahy CA 90201	Low Income	25	Low-Income Housing Tax Credits	2013	Corp for Better Housing	Higher Risk
Clara Court	5159 Clara St Cudahy, CA 90201	Low-Income	36	Low-Income Housing Tax Credits	2013	Corp for Better Housing	Higher Risk
Live Oaks Garden	5203 Live Oak St Cudahy, CA 90201	Low-Income	32	Low-Income Housing Tax Credits	2015	Corp for Better Housing	Higher Risk
Clara Park Commons	4805 Clara St Cudahy, CA 90201	Low-Income	49	Low-Income Housing Tax Credits	2020	National Church Residents of Clara Commons	High Risk
Cudahy Gardens	4343 Elizabeth St Cudahy, CA 90201	Low-Income	99	Low-Income Housing Tax Credits	2029	Housing Corp of America	Lower Risk

Source: City of Cudahy Community Development Department

Based on our inventory of all assisted housing units within the city, three projects were identified with having a “Higher Risk” of being converted to market rate units. The projects identified as “higher risk” are Elizabeth Court, Clara Court, and Live Oaks Gardens; all owned by *Corp for Better Housing*. After identification of the at-risk units the city contacted the owner of the projects to inquire about the potential risk of losing these units to market rate units. The owner then indicated that they had no desire to sell their units and will be renewing their contracts to continue to provide them as affordable housing units; the City will contact the owner of the project to confirm their desire not to sell their units. Furthermore, the City will maintain contact with owners/management of at-risk projects and on an annual basis, confirm the status of contract renewals. As well as maintain and annually update a list of all assisted housing developments. The City will notify tenants of any possible modification to contract renewals affecting the status of their affordable housing units.



COST OF REPLACEMENT VS PRESERVATION

The best ways to ensure that no assisted units convert to market rate within the planning period are either to acquire and preserve all at-risk units or to construct new housing to replace those units. Either of these methods will ensure affordable controls and price restriction are extended to at-risk households under current federal, State, and local programs. In Cudahy, the cost of preserving assisted units is estimated to be less than that required to replace the units through new construction. Land prices, land availability and construction costs are generally the limiting factors to development of new affordable housing.

To provide a cost analysis of preserving at-risk units, costs must be determined for rehabilitation, new construction, or tenant-based rental assistance.

1. **Rehabilitation**– The primary factors used to analyze the cost of preserving low- income housing include: acquisition, rehabilitation, and financing. Actual acquisition costs depend on several variables such as condition, size, location, existing financing, and availability of financing (governmental and market). The following are estimated per unit preservation costs for the city

Fee/Cost Type	Cost Per Unit
Acquisition	\$266,359
Total Estimated Cost Per Unit	\$266,359

Source: City of Cudahy Community Development Department

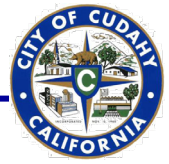
2. **New Construction/Replacement** – New construction implies construction of a new property with the same number of units and similar amenities as the one removed from the affordable housing stock. Cost estimates were prepared by using local information and data. The construction of new housing can vary greatly depend on factors such as location, density, unit sizes, construction materials and on-site and off-site improvements. The following table describes new construction costs in Cudahy.

Fee/Cost Type	Cost Per Unit
Acquisition	\$266,359
Construction	\$155,058.75
Financing/Other	\$55,000
Total Estimated Cost Per Unit	\$476,417.75

Source: City of Cudahy Community Development Department

**Construction cost = \$150/SF * 41,349SF (SF that can potentially be lost) = \$6,202,350/40 units = \$155,058.75 construction cost per unit.*

The rehabilitation of existing units instead of new construction is the most cost-effective approach towards the preservation of at-risk units.



QUALIFIED ENTITIES

The California Department of Housing and Community Development (HCD) keeps a current list of all the qualified entities across the State. A “qualified entity” is a nonprofit or for-profit organization or individual that agrees to maintain the long-term affordability of housing projects. Efforts by the City to retain low-income housing must be able to draw upon two basic types of preservation resources: organizational and financial. Qualified, non-profit entities need to be made aware of the future possibilities of units becoming at risk. Groups with whom the City has an ongoing association are the logical entities for future participation. The qualified entities that HCD list for (Los Angeles County) are listed below:

1. A Community of Friends	28. Jamboree Housing Corporation
2. Abbey Road Inc.	29. Keller & Company
3. Access Community Housing, Inc.	30. Korean Youth & Community Center, Inc. (KYCC)
4. Affordable Homes	31. Latin American Civic Assoc.
5. Affordable Housing People	32. Long Beach Affordable Housing Coalition, Inc
6. Century Housing Corporation	33. Los Angeles Center for Affordable Tenant Housing
7. Century Pacific Equity Corporation	34. Los Angeles Community Design Center
8. City Housing Real Estate Services	35. Los Angeles Housing Department/ Policy Planning Unit
9. City of Pomona Housing Authority	36. Los Angeles Housing Partnership, Inc.
10. Coalition for Economic Survival	37. Los Angeles Low Income Housing Corp. (LALIH)
11. Community Partnership Dev. Corp	38. LTSC Community Development Corporation
12. Community Rehabilitation Services, Inc	39. Many Mansions, Inc.
13. CSI Support & Development Services	40. Menorah Housing Foundation
14. DML & Associates Foundation	41. Nehemiah Progressive Housing Dev. Corp.
15. Doty-Burton Associates	42. Nexus for Affordable Housing
16. Eden Housing, Inc.	43. Orange Housing Development Corporation
17. FAME Housing Corporation	44. PICO UNION HOUSING CORPORATION
18. Foundation for Quality Housing	45. Poker Flats LLC
19. Opportunities, Inc.	46. ROEM Development Corporation
20. Francis R. Hardy, Jr.	47. Shelter For The Homeless
21. Hart Community Homes	48. Skid Row Housing Trust
22. Hollywood Community Housing Corp.	49. Southern California Housing Development Corp
23. Home and Community	50. Southern California Presbyterian Homes
24. Hope - Net	51. The East Los Angeles Community Union (TELACU)
25. Housing Authority of the City of Los Angeles	52. The Long Beach Housing Development Co.
26. Housing Corporation of America	53. West Hollywood Community Housing Corp.
27. Irvine Housing Opportunities	54. Winnetka King, LLC

Source: <http://hcd.ca.gov/hpd/hrc/tech/presrv/>

2.10 OPPORTUNITY FOR ENERGY CONSERVATION

Under State law, the Housing Element must include an analysis of the opportunities for energy conservation in residential development (Government Code Section 65583 (a)(7)). Planning for energy conservation is important for several reasons, but mainly because of the environmental costs and financial costs involved in energy use. This section of the report will discuss both factors briefly before moving on to discuss City programs and strategies to reduce energy use.



GREENHOUSE GAS EMISSIONS

Gases that trap heat in the atmosphere are known as Greenhouse Gases (GHG). GHG are emitted by both natural processes and human activities. GHG emissions that are produced both by natural and industrial processes include carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). The accumulation of GHG in the atmosphere regulates the earth's temperature. Without these natural GHG, the Earth's surface would be about 61°F cooler. However, emissions from fossil fuel combustion by humans have elevated the concentration of GHG in the atmosphere to above natural levels. Scientific evidence indicates a correlation between increasing global temperatures/climate change over the past century and human induced levels of GHG. These and other environmental changes have potentially negative environmental, economic, and social consequences around the globe.

The California Natural Resources Agency is presently developing the State's Climate Adaptation Strategy. Currently, there are no federal standards for GHG emissions and federal regulations have not been promulgated. Recently, the U.S. Supreme Court ruled that the harm associated with climate change are serious and well recognized, that the EPA must regulate GHG as pollutants, and unless the agency determines that GHG do not contribute to climate change, it must promulgate regulations for GHG emissions from new motor vehicles. To date, 12 states, including California, have set State GHG emission targets. The passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, promulgated the California target to achieve reductions in GHG to 1990 GHG emission levels by the year 2020. The environmental impact report (EIR) includes an evaluation of the existing greenhouse gas emissions within the planning area, those anticipated local greenhouse gas emissions anticipated at build-out under the implementation of the General Plan's land use policy, and those estimated greenhouse gas emissions for 1990.

UTILITY COSTS

In addition to reducing GHG emissions, planning for energy conservation can reduce utility and maintenance costs, which in turn, leads to housing affordability. This is particularly important to lower income households with less disposable income to pay for utilities. Depending on the age and condition of the home and the number and type of appliances, energy costs can represent more than 25 percent of overall monthly housing costs. As such, the incorporation of energy saving features, energy saving materials and efficient systems in new as well as remodeled homes is an important consideration.

In the past 20 years, rapidly increasing energy costs have contributed to the deterioration of housing affordability. Since 1970, energy costs to consumers have increased over 100 percent above the price of inflation. More recently, crude oil prices have increased to over 40 dollars a barrel. It is therefore prudent for city government like Cudahy to find ways and means to reduce energy consumption to reduce energy costs.

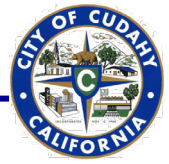


ENERGY CONSERVATION

The City shall consider the energy efficiency of new equipment when it purchases replacement equipment and shall purchase low energy replacements whenever feasible. Through the City's development review process, new construction shall be required to demonstrate that energy conservation measures beyond those required by Title 24 have been incorporated whenever feasible. To assist developers in knowing what options and special grants are available, the City shall work with the Southern California Edison Company and the Southern California Gas Company to identify new low-cost construction, heating and appliance techniques and equipment that can result in substantial energy and cost savings for future tenants and owners. The City shall make information and utility company contacts available to all applicants for building permits. The city will utilize its Development Review Process to encourage the use of low-polluting building materials in new construction. It will also utilize the Development Review Process to assure that the exposure of sensitive receptors to toxic and hazardous pollutants, as well as dust and odors is minimized or, where feasible, eliminated. The city will revise its California Environmental Quality Act (CEQA) Guidelines to ensure uniform assessment of air quality impacts of projects and will incorporate the SCAQMD significance thresholds in these Guidelines or into EIR's and negative declarations prepared pursuant to these Guidelines.

CITYWIDE STRATEGIES

The city works to promote energy conservation in a number of ways. The Cudahy General Plan provides policy direction under which city regulations, programs, and projects work in unison to ensure land use, transportation, and other aspects of City operations conform to energy conservation goals. Especially for housing development, the issue of energy conservation is addressed at two levels: for new construction and rehabilitation of existing structures.



3 Regional Housing Needs Assessment and Special Needs

3.1 REGIONAL HOUSING NEEDS ALLOCATION, 2014-2021

Every city and county in the State of California has a legal obligation to respond to its ‘fair share’ of the projected future housing need in the region in which it is located. For Cudahy and other Southern California jurisdictions, the regional housing need is determined by the Southern California Association of Governments (SCAG), based upon an overall regional housing need number established by the State. In accordance with State law, SCAG has determined the fair share of the regional housing need that must be planned for by each jurisdiction during the 2013 to 2021 planning period. That need is divided into four income categories of housing affordability (in accordance with State law).

METHODOLOGY

The RHNA methodology assigns each jurisdiction a share of the region’s total housing need. The methodology includes an allocation tool that is a mathematical equation that consists of weighted factors. For example, if one of the factors, e.g., household growth, is determined to be more important than another factor, e.g., transit. The methodology can give household growth a higher weight than transit in the formula. The methodology may also equally weight the factors, therefore ensuring that all the factors are of equal priority.

- The factors and weights (expressed in parenthesis) are:
- Household growth (45%)
- Existing employment (22.5%)
- Employment growth (22.5%)
- Household growth near existing transit (5%)

Employment growth near existing transit, Household growth, existing employment, and employment growth are estimated in SCAG’s regional household and employment forecasts. A jurisdiction’s share of the Regional Housing need is assigned accordingly to its percentage share of regional household growth, employment growth, existing employment, and household and employment growth near transit:

(Household Growth x 0.45) + (Employment Growth x 0.225) + (Existing Employment x 0.225) + (Household Growth near Transit x 0.05) + (Employment Growth near Transit x 0.05)

After determining the housing need, a number of “rules” are established by SCAG to determine the allocation of units by income. The broad concept is that local jurisdictions must plan for



income-based housing relative to the regional average. The income allocations scenarios give each jurisdiction 175 percent of the difference between their 2020 household income distribution and the 2020 regional household income distribution. An “adjustment factor” is then applied to determine housing unit allocation in each income category.

For a complete discussion of the methodology, see SCAGS website at: <http://www.scag.ca.gov/>

CUDAHY’S ‘FAIR SHARE’ OF THE REGIONAL HOUSING NEED

Regional Housing Needs Assessment provides a discussion of the Regional Housing Needs Assessment and how the city intends to accommodate its identified housing need.

The authority to determine housing needs for the various income groups for cities within the Southern California region has been delegated to the Southern California Association of Governments (SCAG), pursuant to Section 65584 of the Government Code. The housing needs are categorized according to the following income groups:

The **Extremely Low-Income** households are those whose income is 30% or less than that of the median household income for the greater Los Angeles area;

The **Very Low-Income** households are those whose income does not exceed 50% of the median household income for the greater Los Angeles area;

The **Low-Income** households earn from 51% to 80% of the median;

The **Moderate-Income** groups earn from 81% to 120% of the median; and,

The **Above Moderate** households earn over 120% of the median income.

The various housing categories and the income thresholds for each are discussed above. SCAG’s Regional Housing Needs Assessment (RHNA) estimated the eight-year future housing construction need for Cudahy at 393 units.

Table 3.1 RHNA 4 th Cycle January 2006 – June 2014			Table 3.2 RHNA 5 th Cycle January 2014 – October 2021		
Number of Units	Number	Percentages	Number of Units	Number	Percentages
Very Low-Income Households	94	23%	Very Low-Income Households	80	25%
Low-Income Households	60	15%	Low-Income Households	46	15%
Moderate Income Households	67	17%	Moderate Income Households	51	16%
Above Moderate-Income Households	180	45%	Above Moderate-Income Households	141	44%
Total Needed-Future Housing	401	100%	Total Needed-Future Housing	318	100%

Source: Southern California Association of Governments



Table 3.3
RHNA 6th Cycle
October 2021 – October 2029

Number of Units	Number	Percentages
Very Low-Income Households	80	20.35%
Low-Income Households	36	9.16%
Moderate Income Households	53	13.48%
Above Moderate-Income Households	224	56.9%
Total Needed-Future Housing	393	100%

Southern California Association of Governments

As indicated previously, those households that have incomes of 30% of the County median would fall into the extremely low-income category. Based on the 2020 income limits, an extremely low-income household would have the following household incomes: a one-person household with an annual income of \$17,400 or less; a two-person household with an annual income of \$19,900 or less; a three-person household with an annual income of \$22,400 or less; and a four-person household with an annual income of \$24,850 or less.

The planning period governed by the RHNA extends from 2021 to 2029. As a result, the city will only receive credit towards the RHNA for the new housing that is entitled, under construction, or built beginning in 2021.

As indicated in Table 3.2 the City's remaining unmet need for the planning period is 393 units. There is a remaining unmet need for above moderate-income units (141 units are still needed), moderate-income units (51 units are still needed), low-income units (46 units are still needed), and very low-income units (80 units are still needed).

WHAT THE NUMBERS MEAN

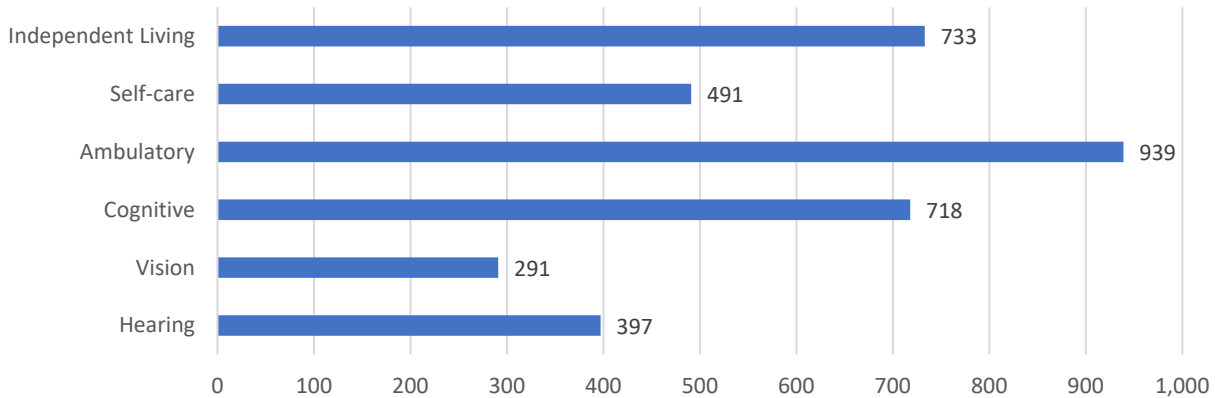
The primary goal of the RHNA numbers is to act as targets for jurisdictions to achieve during the planning period. Because local jurisdictions are rarely if ever involved in the actual construction of housing units, sometimes it is not possible for these targets to be met. HCD does not penalize jurisdictions for not meeting RHNA targets, if they have allocated enough land for the construction of units and have made a good effort through the implementation of housing policies and programs to help meet the RHNA targets.

3.2 SPECIAL HOUSING NEEDS

In addition to the general housing needs of the population, cities and counties must plan for the special housing needs of certain groups. For the Housing Element, Government Code (65583(a)(6)) requires that several populations with special needs be addressed: people who are homeless; persons with disabilities; female-headed households; large households; seniors; overcrowded households; farmworker households. To meet the needs of these groups; Cudahy must be creative and look to new ways of increasing the supply, diversity, and affordability of this specialized housing stock.

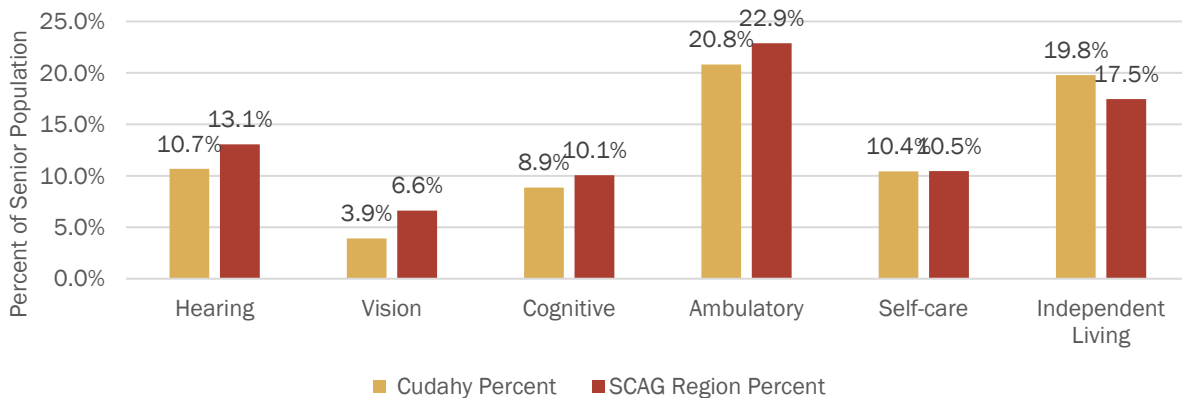


Chart 3.1 - Disability by Type



American Community Survey 2014-2018 5-year estimates.

Chart 3.2 - Disability by Type (Seniors 65 and Over)



American Community Survey 2014-2018 5-year estimates.

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In Cudahy, 27.8% of the population with a disability is employed, compared to 69.8% of the non-disabled population.

EMERGENCY SHELTER & TRANSITIONAL HOUSING

The primary agency that deals with the issue of homelessness in the city is the Los Angeles County Sheriff's Department, which serves Cudahy. Very few homeless persons have been observed in the city. Homeless persons (single males and females) have been found in the Cudahy area along the banks of the Los Angeles River in the City of Bell Gardens and the trash bins at local supermarkets. Homeless persons are encouraged to seek assistance from the Department of Public Social Services on Atlantic Avenue and local community services (Chicana Service Action Center, Human Services Association) in neighboring cities. The Salvation Army operates a shelter



located at 1370 Alamitos Avenue in the City of Long Beach. This Salvation Army shelter provides services to an average of 73 people per day. Of this number, approximately 10% are homeless. The Bell Shelter, located in the City of Bell adjacent to Cudahy, provides transitional housing for women with dependent children. The focus of the shelter's services is to provide women who are victims of domestic violence with housing while they are making a transition to independent living; the shelter has a 24-bed capacity. The Los Angeles Homeless Service Authority is also a good resource; their mission is "to support, create and sustain solutions to homelessness in Los Angeles County by providing leadership, advocacy, planning, and management of program funding" (<http://www.lahsa.org>).

Emergency Shelters

Emergency shelters are allowed without discretionary review in the Commercial Mixed Use (C/MU), Civic Mixed Use (Civic/MU), and Entertainment (E) zoning districts. Combined, these zone districts encompass 84.8 acres. The zoning districts identified are located along Atlantic Avenue, the City's main north/south corridor. The central location of these districts puts potential shelters near the core services and transportation corridor within the city. Services in the immediate area include a large dialysis facility, Kaiser Permanente (non-emergency) medical treatment facility, six clinics or medical facilities, and the County of Los Angeles Department of Public Social Services. Additionally, within the immediate area are seven main Metropolitan Transportation Authority bus lines including routes 111, 260, 315, 361, 611, 612, and 711, as well as the Cudahy Area Rapid Transit (City fixed route). Among the 84.8 acres of land in the three zoning districts, 11.5 acres are vacant. There are 6 large vacant sites (made up of various vacant lots) that range from 5 acres to 0.6 acres. North of Santa Ana Street, the predominant use in these districts is commercial (mostly in the form of large to small shopping centers, individual commercial uses, and motels) and residential (multi-family). South of Santa Ana Street, most buildings in the districts identified are vacant or have older, light industrial uses. As the southern area has transitioned slightly away from its industrial roots, several industrial uses have been repurposed, for example, for a church. The Los Angeles Department of Public Social Services maintains a large office location in this area from which they administer various social service programs for the public.

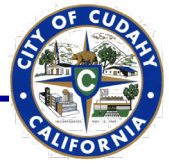
In addition to the same land use regulations and development standards that apply to all development within the identified districts (e.g., lot size, setbacks, building height, etc.), an emergency shelter proposed in these districts must comply with the following operational use regulations/standards:

- **Occupancy.** A maximum of 15 beds or persons may be served nightly, with associated support service not open to the public. Any emergency shelter for homeless with greater than 15 beds shall be subject to approval of a conditional use permit consistent with Chapter 20.84 PART 5.
- **Hours of Operation.** Emergency shelters for homeless providing less than 15 beds are not required to be open 24 hours a day but may be open 24 hours. Clients for emergency



shelters for homeless shall have a specified check out time as detailed in the management and operation plan but may remain on the premises to utilize on-site services offered.

- Length of Stay. The length of stay of an individual client shall not exceed six months within a 12-month period; days of stay need not be consecutive.
- Management and Operation Plan. The applicant or operator shall submit a management and operation plan for the emergency shelter for review during the over-the-counter approval process for review and feedback by the Community Development Director or designee in consultation with law enforcement at the time the project is proposed, prior to issuance of permits. If site plan review applies, then the management and operational plan should be submitted and reviewed concurrently with those applications. The plan shall remain active throughout the life of the facility, with any changes subject to review and approval by the Community Development Director or designee in consultation with the chief of police. The plan should be based on "best practices" and include, but not limited to, a security plan, procedures, lists of services, staff training, "good neighbor" communication plan, client transportation and active transportation plan, ratio of staff to clients, client eligibility and intake and check out process, detailed hours of operation, and an ongoing outreach plan to Cudahy homeless population. The city may inspect the facility at any time for compliance with the facility operational plan and other applicable laws and standards.
- Parking. One vehicle parking space shall be provided per five beds. A covered and secured area for bicycle parking shall be provided for use by staff and clients, commensurate with demonstrated need, but no less than a minimum of eight bike parking spaces.
- Waiting and Intake Area. A client waiting and intake area shall be provided and contain a minimum of 10 square feet per bed provided at the facility. The client waiting and intake area shall be screened from the public right-of-way by a solid wall of at least six feet in height and shall be sufficient in size to accommodate all persons waiting to enter the facility.
- Support Services. Emergency shelters may also provide the following support services:
 - Food preparation and dining areas;
 - Laundry facilities;
 - Restrooms and showers;
 - Areas to secure and store client belongings;
 - Indoor and/or outdoor recreational facilities and open space



- A private area providing referral services to assist shelter clients in entering programs aimed at obtaining permanent shelter and income. Referral services refers to the initial assessment of a homeless client to identify the areas in which assistance is needed and connecting clients with appropriate off-site programs and services depending on their need.
- Restrooms. The number of toilets and showers shall comply with applicable building codes and plumbing codes.
- Trash Enclosure and Loading Zone. Each facility shall have a trash enclosure and loading zone as provided in Chapters 20.20 and 20.28.

Transitional and Supportive Housing

State law (AB 2634 and SB 2) requires local jurisdictions to address the provisions for transitional and supportive housing. Transitional and supportive housing facilities meeting the Government Code Section 65582 definition are considered a residential use and allowed by right in all zones that allow residential uses of the same type, consistent with State law. These facilities are subject to the same development standards and permit processing criteria required for similar uses in the same zones.

HOMELESSNESS

The results of the 2020 Greater Los Angeles homeless count showed 66,436 people in Los Angeles County experiencing homelessness. This represents a 12.7% rise from last year's point-in-time count. Three years into the 10-year investment from Measure H, LA County's homeless services system has doubled the number of annual housing placements. Improvements in coordination across agencies through the LAHSA based Housing Central Command have increased the speed of placements. And efforts to protect the most vulnerable people from COVID-19 led to the rapid sheltering of 6,010 people since the March Safer at Home order (4,056 through Project Roomkey, 1,708 in Rec and Parks shelters, and 246 in trailers)—and a goal to move 15,000 of the most vulnerable people experiencing homelessness into housing.

Most of the people experiencing homelessness that the homeless system helps house stay housed. Eighty-eight percent of the people placed in permanent housing through the system in 2018 have not returned to homelessness. In 2019, the rehousing system helped 22,769 people move into permanent housing. And many more people occupy interim housing this year: 18,395 people experiencing homelessness in L.A. County were sheltered, up from 14,722 the previous year, a 25% increase.

Meanwhile, county-wide, 732 new permanent supportive housing units opened in 2019, and thousands more are expected soon, including 2,360 scheduled to open in the next 12 months of a total construction pipeline of 10,638 homes.



The LAHSA point-in-time homeless data count for the City of Cudahy, indicates that on January 23, 2019, 76 homeless persons were processed, representing only 1% of the total in the Service Planning Area (SPA). The City of Cudahy is located in SPA 7. On January 23, 2020, the number of homeless people processed in the city decreased to 23, which still represents 1% of the total in SPA 7.



HOMELESSNESS STATISTICS BY CITY
CUDAHY

Cudahy	SPA 7	City Share of SPA
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Point-in-Time Homeless Count Data			
On January 23rd, 2019:			
Total Persons	76	5,095	1%
On January 22nd, 2020:			
Total Persons	23	4,586	1%

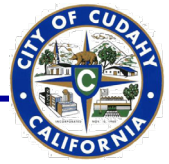
Cumulative CES Statistics from HMIS - 7/1/2020 to 12/31/2020			
CES Assessments			
Total Persons Assessed	34	2,827	1%
Individuals Assessed	10	1,759	1%
Youth Assessed	1	198	1%
Families Assessed	23	904	3%
Veterans Assessed	1	178	1%
Persons Aged 62+ Assessed	1	310	0%
Types of Services Provided to those Assessed			
Interim Housing	6	1,132	1%
Rapid Re-Housing	23	1,132	2%
Street Outreach (Contacts)	4	1,030	0%
Street Outreach (Engagements)	1	311	0%
Other (Non-Permanent)	5	495	1%

Permanent Housing Placements - 7/1/2020 to 12/31/2020			
Persons Placed into Permanent Housing	7	416	2%

Point-in-Time Homeless Count Data – Taken from the 2019 and 2020 Greater Los Angeles Homeless Count totals.

Cumulative CES Statistics from HMIS – This data includes all persons that were assessed through CES and received homeless services in the date range. For households with more than one person (including families), the assessment of the head of household is applied to all members.

Permanent Housing Placements – Includes persons that have moved into permanent housing during the report period (through either rapid re-housing, permanent supportive housing, or other permanent destinations).



PERSONS WITH DISABILITIES

Disabled persons have special needs when it comes to housing and many of the households in the category are occupied by elderly persons. Door frames must be wider to accommodate wheelchairs, ramps instead of stairs are needed, handrails in bathrooms need to be installed, cabinet doors must be accessible, and light switches and other devices also need to be within easy reach. The cost for retrofitting an existing structure may be thousands of dollars and be beyond the reach of those households with lower incomes. The lack of such housing is even more pronounced when it comes to market-rate rental units.

Unless such provisions are made for disabled persons during original construction, such facilities will not likely be provided in a typical rental unit. Senior housing (both owner and rental) generally has many of the features outlined above. The real constraints are associated with the housing for families and working-aged adults. The results of this analysis are summarized below according to three general categories of potential constraints: 1. zoning and land use, 2. permits and processing procedures, and 3. building codes.

Zoning and Land Use: The zoning ordinance does not preclude or restrict the construction of exterior ramps or other improvements (exterior or interior) for disabled persons. The city treats residential care facilities with six or fewer persons as a single-family use. These facilities are allowed in any zone where single-family homes are permitted under state law. The zoning ordinance does identify these facilities as a permitted use. The city's zoning ordinance also permits reduced off-street parking space requirements for seniors though no such allowance is specifically identified for persons with disabilities.

Permits and Processing Procedures: There are no permit requirements for residential care facilities serving six or fewer persons. Furthermore, there are no special designs or permitting standards that have been established for residential care facilities. The city has no occupancy standards that specifically apply to unrelated adults. Requests to retrofit homes for disabled accessibility or for reasonable accommodation are handled as any other building permit or variance application.

Building Code: Cudahy has adopted the most recent Los Angeles County Code which includes provisions of the Americans with Disabilities Act. One provision is that a number of the residential units in new multi-family construction of three or more apartments, or four or more condominiums, must be accessible or adaptable.

HOUSEHOLDS IN NEED OF REASONABLE ACCOMODATION

The most recent 2020 Census identified those residents that have one or more disabilities as well as the type of disability. Table 3-4 indicates the number of disabilities by three major age groupings (under 17 years of age, 18 to 64 years of age, and 65 years of age or older). In addition, the table summarizes the types of disabilities for each major age grouping. A single individual within each age grouping may be counted numerous times depending on the types of disability.

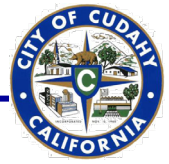


Table 3.5
Estimates Residents with Disabilities 2020

Category and Type of Disability	Number of People	Percentage of People
Persons Under the Age of 17	535	7.9%
Hearing Difficulty	79	1.2%
Vision Difficulty	101	1.5%
Cognitive Difficulty	496	7.3%
Ambulatory Difficulty	311	4.6%
Self-Care Difficulty	333	4.9%
Persons Between Ages 18-64	1,064	7.8%
Hearing Difficulty	179	1.3%
Vision Difficulty	274	2.0%
Cognitive Difficulty	309	2.3%
Ambulatory Difficulty	562	4.1%
Self-Care Difficulty	337	2.5%
Independent Living Difficulty	382	2.8%
Persons 65 years and older	618	58.7%
Hearing Difficulty	198	18.8%
Vision Difficulty	181	17.2%
Cognitive Difficulty	236	22.4%
Ambulatory Difficulty	413	39.3%
Self-Care Difficulty	257	24.4%
Independent Living Difficulty	315	29.9%

Sources: U.S. Census Bureau (2020)

DEVELOPMENTAL DISABILITIES

Persons with disabilities in Cudahy face unique problems in obtaining affordable and adequate housing. This segment of the population, which includes individuals with mental, physical, and developmental disabilities need affordable, conveniently located housing which, where necessary, has been specially adapted for wheelchair accessibility, along with other physical needs. The living arrangements for persons with disabilities depend on the severity of the disability. Many persons live at home in an independent environment with the help of other family members. To maintain independent living, disabled persons may require assistance. This can include special housing design features for the physically disabled, income support for those who are unable to work, and in-home supportive services for persons with medical conditions. Accessible housing can also be provided via senior housing developments. Most persons with disabilities live on an income that is significantly lower than the non-disabled population. Many disabled individuals live on a small, fixed income which severely limits their ability to pay for housing.

The Task Force on Family Diversity estimates that at least one-third of all persons with disabilities in the United States live in poverty. Persons with disabilities have the highest rate of unemployment relative to other groups. For most, their only source of income is a small, fixed pension afforded by Social Security Disability Insurance (SDI), Social Security Insurance (SSI), or Social Security Old Age and Survivor's Insurance (SSA), which will not adequately cover the cost of rent and living expenses even when shared with a roommate. In addition, persons with disabilities oftentimes experience discrimination in hiring and training. When they find work, it tends to be unstable and at low wages.



The term developmental disability refers to a severe and chronic disability attributable to a mental or physical impairment, such as *cerebral palsy* (a disability resulting from damage to the brain before, during, or shortly after birth and outwardly manifested by muscular in- coordination and speech disturbances); *epilepsy* (any of various disorders marked by abnormal electrical discharges in the brain and typically manifested by sudden brief episodes of altered or diminished consciousness, involuntary movements, or convulsions); or *autism* (a developmental disorder that appears by age three and that is variable in expression but is recognized and diagnosed by impairment of the ability to form normal social relationships, by impairment of the ability to communicate with others, and by stereotyped behavior patterns especially as exhibited by a preoccupation with repetitive activities of restricted focus rather than with flexible and imaginative ones that begins before individuals reach adulthood (<http://www.nlm.nih.gov/medlineplus/mplusdictionary.html>))

Zip Code	Age Group 00-17 yrs.	Age Group 18-21 yrs.	Age Group 22-64 yrs.	Age Group 65+	Grand Total
90201	449	75	226	3	753

Job 9001 - Active Consumers In LA, Ventura, San Diego, Orange, Riverside & San Bernardino Counties by Age Group. (based upon CMF created 9/4/13)

Mental Disabilities: Based on the most current Census information the city has a total of 964 residents with mental disabilities; 33% are male and 67% are females.

Gender	Male	Female	TOTAL
	317	647	964
Percentage	33%	67%	100%

Source: U.S. Census. Bureau; 2017 - 2021 American Community Survey

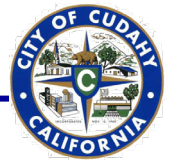
Physical Disabilities: Based on the most current Census information the city has a total of 1,118 residents with physical disabilities; 43% are male and 57% are females.

Gender	Male	Female	TOTAL
	478	640	1,118
Percentage	43%	57%	100%

Source: U.S. Census. Bureau ;2017 - 2021 American Community Survey

STRATEGIES AND PROGRAMMATIC RESPONSES TO MEET NEED

Appropriate housing for persons with mental or physical disabilities include very low-cost units in large group home settings (near retail services and public transit), supervised apartment settings with on- or off-site support services, outpatient/day treatment programs, and inpatient/day treatment programs, crisis shelters and transitional housing.



In 1984, Title 24 of the State Uniform Building Code mandated that all multiple-family residential construction projects containing more than five units under construction after September 15, 1985, would conform to specific disabled adaptability/accessibility regulations. In 1988, the Federal government enacted the U.S. Fair Housing Amendment Act; in part with the intent of increasing the number of rental units being built that would be accessible to handicapped individuals. In July 1993, the State of California issued "California Multifamily Access Requirements" based upon the Act. Unfortunately, the actual increase in the number of handicapped-accessible units available on the current rental market has been small.

The city does not require special building codes or onerous project review to construct, improve, or convert housing for persons with disabilities. Both the federal Fair Housing Act and the California Fair Employment and Housing Act impose an affirmative duty on local governments to make reasonable accommodations (i.e., modifications or exceptions) in their zoning and other land-use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling.

The City also makes rehabilitation funds available to income qualified households for accessibility improvements through its CDBG Program; CDBG funds can be used for a variety of housing efforts including activities aimed at reducing costs, housing acquisition and rehabilitation through short and long-term loans, grants, or loan guarantees; direct payment of rent or mortgage and housing counseling services and fair housing activities.

The housing needs of several other categories of disabled persons, including developmentally disabled persons and the mentally ill are typically not addressed by Title 24 Regulations. The housing needs of persons with these types of disabilities, in addition to basic affordability, range from needing slight modifications of existing units to the need for a variety of supportive housing arrangements. Some of this population can only live successfully in housing which provides a semi-sheltered, semi-independent living state, such as clustered group housing or other group-living quarters; others can live independently if affordable units are available.

Based on a review of the city's development procedures and policies, no specific constraints were identified other than consideration of reduce parking requirements for group care housing and streamlined review for applications that involve the retrofit of existing units to accommodate reasonable access. In summary, the city's zoning ordinance does not contain any provisions that would preclude the development of housing for handicapped persons. There are no zoning restrictions that would limit the use of ramps, wider doorways, or other features that would be desirable in such units. No additional review or development standards are required for handicapped units beyond that required for all units.

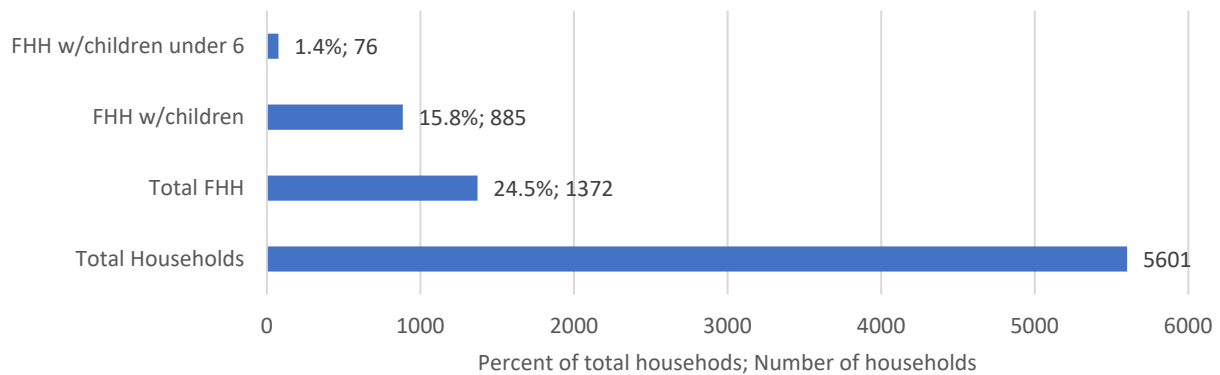
FEMALE-HEADED HOUSEHOLDS

Female headed households generally refers to those households with a female that is a single parent. Female-headed households tend to have low-incomes, thus limiting housing availability for this group. Female-headed households accounted for 24.5% (1,372 households) of the city's



total number of households in 2020. An estimated 15.8% of the households in the city (885 households) was female headed with dependent children less than 18 years of age. More significantly, the same census figures for 2020 indicated that 45.1% of the female headed households with dependent children had incomes that were below the poverty level. Thus, providing housing opportunities for this group relates both to affordability and services related to the care of children. This number bares importance in relation to social service needs, such as childcare, recreation programs, and health care, which are of special concern to these households.

Chart 3.3 - Female-Headed Households (ACS 2020)



LARGE FAMILY HOUSEHOLDS

According to the HCD’s definition, the term "large family" refers to a family containing five or more persons. Large family households, containing five or more persons, frequently experience a greater incidence of overcrowding, especially in older units and rental housing. Most rental units in the city contain one or two bedrooms. In addition, landlords may be reluctant to rent smaller units to larger families. Finally, many owner-occupied units are overcrowded (refer to the previous section) due to extended families sharing housing to reduce mortgage or rental costs.

Large families are identified as a group with special housing needs based on the limited availability of adequately sized, affordable housing units. With a median household income of \$41,805 (35% lower than the State average), a total of 24.3% of City of Cudahy residents live below the poverty line, almost twice the State average of 13.7%. Taking into consideration the previous statistics, large families often face these conditions, frequently resulting in the overcrowding of smaller dwelling units and in turn accelerating unit deterioration.

Most of the market rate owner-occupied housing constructed during the past ten years had three or more bedrooms. In recent years, few rental units have been constructed in the city with even fewer new rental units containing three or more bedrooms. According to the most recent census, 1,259 units (21.4% of the total housing units in the City) contained five rooms, 397 units (6.8%) contained six rooms, and 181 units (3.1%) have seven or more rooms.



Large Families (those containing five or more persons) are overwhelmingly residing in renter units at 83%.

Table 3.9 Tenure by Large Families

Tenure	Owner	Renter	TOTAL
Family with >5 persons	364	1,723	2,087
Percentage	17%	83%	100%

Source: U.S. Census Bureau; 2017 - 2021 American Community Survey

OVERCROWDING

Overcrowded housing is defined by the U.S. Census as units with more than one inhabitant per room, excluding kitchen and bathrooms. Overcrowding usually occurs because of high housing costs, such that families double-up or reside in smaller units to devote income to other basic necessities such as food and medical fees.

Of the occupied housing units in the city identified in the 2020 Census, 1,428 units were identified as being overcrowded (25.3% of the City’s total number of occupied units) and 534 units (9.5% of the total occupied units in the city) were identified as being severely overcrowded.

ELDERLY HOUSEHOLDS

Escalating housing costs, particularly in the rental market, severely impact housing affordability for the elderly who usually have fixed incomes. The housing needs of the elderly can be addressed through the provision of smaller units, congregate housing, and rental and rehabilitation assistance programs. The special needs of many elderly households often are a result of lower (and fixed) incomes, physical disabilities, and dependence needs. As indicated in a previous section, approximately 5.1% of the City’s population was 65 years of age or older. In 2010, there were 909 households (16.8%) with individuals 65 years of age or older.

Within those 909 elderly households, 217 of those households contained a single individual while 692 households contained two or more persons.

Elderly householders are predominately residing in renter units at 65%

Table 3.10 Tenure by Elderly Households

Tenure	Owner	Renter	TOTAL
	208	388	596
Percentage	35%	65%	100%

Source: U.S. Census Bureau ;2017-2021 American Community Survey



FARMWORKERS

The special housing needs of many farm workers stem from their low wages and the seasonal nature of their employment. Most of the Cudahy residents work in the Los Angeles-Long Beach Metropolitan area in non-agricultural occupations. The 2020 census identified 37 persons employed in the agricultural, forestry, and fishing sector. These persons are likely to be employed in nurseries, stables, and not in traditional agricultural production. The demand for housing generated by farm workers in the city is thus estimated to be extremely low.



4 Land Inventory

This section assesses the housing development potential in Cudahy during the 2021-2029 Housing Element planning period. The purpose is to determine the quantity of land available to accommodate the City's RHNA. The RHNA is broken down by income group into four categories: Very Low (less than 50% of the Area Median income (AMI)), Low (50-80% of AMI), Moderate (80-120% of AMI), and High (over 120% of AMI). While a jurisdiction must show that it has adequate sites in total to meet its RHNA, it must also show that it can meet the allocation at each of these income categories.

4.1 HOUSING INVENTORY

The State requires that a Housing Element identify how much housing can be constructed to accommodate the community's RHNA. Section 65583(a)(3) of the California Government Code states that this inventory must be site specific to help localities determine the appropriate zoning, development standards, and infrastructure capacity to accommodate the new construction needed. The Code also requires that all land identified must be available for residential use in the planning period. Sites that require rezoning may be included in the inventory if actions are taken to address the rezoning early in the planning period.

The types of sites that are appropriate for residential development include:

- Vacant residentially zoned sites.
- Vacant non-residentially zoned sites that allow residential development.
- Underutilized residentially zoned sites capable of being developed at a higher density or with greater intensity; and
- Non-residentially zoned sites that can be redeveloped for, and/or rezoned for, residential use (via program actions, such as rezoning).

REGIONAL HOUSING NEEDS ALLOCATION (RHNA)

This Housing Element addresses the RHNA for two planning periods:

- The current RHNA (6th Cycle) planning period which spans 2021-2029
- The lower-income RHNA (referred to as the unaccommodated RHNA or rollover RHNA) from the previous (5th Cycle) planning period (2014-2021)



The unaccommodated 5th cycle RHNA from 2014-2021 rolled over and is added to the current planning period because HCD found that the city did not make adequate sites available to accommodate the RHNA during the 5th cycle RHNA planning period.

Table 4.1 Regional Housing Needs Allocation

Affordability Level (AMI: Area Median Income)	RHNA (2014-2021)	Unaccommodated RHNA (2008-2013)	Total
Extremely and Very Low-Income (0-50% AMI)	80	154	234
Low-Income (51-80% AMI)	46	-	46
Moderate-Income (81- 120% AMI)	51	-	51
Above Moderate- Income (121%+ AMI)	141	-	141
Total	318	154	472

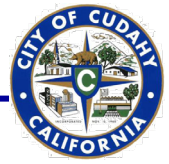
SITES INVENTORY ASSUMPTIONS

Realistic Capacity

Consistent with HCD Guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. The Cudahy General Plan and Development Code establish three residential and two mixed-use land use categories to provide housing opportunities for all household income ranges. A realistic density calculation of 60 percent of the maximum density has been applied to the residential and mixed-use sites. The 60 percent realistic capacity figure is consistent with the realistic development scenario in the General Plan Land Use Element. Overall, the use of expected densities provides a very realistic, and perhaps somewhat conservative approach, as developments in Cudahy can achieve much higher densities through development at maximum density.

ZONING APPROPRIATE TO ACCOMMODATE HOUSING FOR LOWER-INCOME HOUSEHOLDS

Higher density residential and mixed-use zones provide the potential for lower construction cost because of economies of scale created and are therefore most suitable for development of housing affordable to very low-income and low-income households. The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least 20 units/acre for the City of Cudahy), State HCD is obligated to accept sites with those density standards (20 units/acre or higher) as appropriate for accommodating the jurisdiction’s share of regional housing need for lower-income households. The capacity of sites that allow development densities of at least 20 units/acre are credited toward the lower-income RHNA, pursuant to State law. Per Government Code Section 65583.2(c)(3)(B), the Medium Density Residential (MDR), High Density Residential (HDR), and mixed-use designations are consistent with the default density standard for Cudahy. Therefore, capacity on sites with these designations is credited towards the lower-income RHNA



categories. Sites designated for single-family uses (15 units/acre) are credited towards the above moderate-income RHNA.

SITE SUITABILITY

Site identification criteria were used to ensure the inclusion of sites with a high potential for redevelopment based on size, location, current uses, and allowed densities.

- **Capacity:** The Sites Inventory includes both vacant and underutilized sites. Underutilized sites are parcels that are currently developed at less than the maximum permitted density. Many of these sites are in areas intended for high-density development, yet the sites are developed at significantly lower densities. Identified underutilized sites included in this inventory have a realistic capacity of at least two times the existing use.
- **Size and location:** Development of parcels of at least one-half acre in size is desirable in terms of construction economies and effective use of State or federal grants. However, in older cities, the subdivision pattern has resulted in many lots less than one-half acre in size. Vacant sites of all sizes are included in the inventory as they present opportunities for consolidation into larger developments. Underutilized sites in the inventory are limited to a minimum size of one-half acre and a location adjacent to other underutilized or vacant sites to accommodate lot consolidation.
- **Potential for redevelopment:** In 2018, new General Plan Land Use designations were developed, allowing for higher density development in residential areas and identifying new areas for mixed-use development with higher residential densities. The city completed a concurrent Development Code and Zoning Map update to provide zoning districts consistent with the new General Plan. These changes significantly increased allowable densities in residential and mixed-use areas and is expected to provide more incentive to recycle underutilized and deteriorating property. In single-family residential areas, allowable density has been increased from nine units per acre to 15 units per acre. In the Medium Density and High-Density Residential areas, allowable densities have more than doubled (from 12 units per acre to 25 units per acre and from 16 units per acre to 40 units per acre, respectively). The density increases reflect development trends in the residential areas and are expected to produce additional housing to address severe deficiency between the number of residents and number of available housing units in the city. Recent residential development in the city consists of the construction of additional dwelling units, ADU's, and recycling of single-family structures on large lots to higher-density residential developments. With allowable density increases across all residential land use categories and with most of the city zoned for high density residential uses, the recycling of land to higher uses is expected to continue.



SITES INVENTORY AND ANALYSIS

The sites inventory included in this section is divided into two parts. The first part presents sites to address the city's unaccommodated RHNA from the 5th cycle planning period (2014-2021) consistent with State law (Government Code Section 65584.09). The second part of the inventory presents sites to address the City's current 6th cycle (2021-2029) RHNA. The inventories are presented separately to facilitate tracking of sites throughout the planning period and due to the different criteria each inventory must address under housing element law. The requirement to identify sites for the unaccommodated RHNA is in addition to the requirement to identify sites for the current cycle RHNA. The City may not count capacity on the same sites for both planning periods (RHNA cycles) (Government Code 65584.09[b]). Together, the inventories show sufficient capacity to address the City's current and previous RHNA.

The City's land inventory was developed by a combination of methods, among them, utilizing data available from the city and the LA County Assessor's Parcel Maps, a review of aerial maps, and most importantly, through field work. The Sites Inventory and Analysis lists properties by parcel number or other unique reference, showing for each parcel: size, zone, General Plan and zoning designation, existing use, maximum allowable density, and number of units that can be accommodated in each site (realistic capacity). In addition, the lot consolidation potential and any constraints to development are also listed.

Sites for the current and unaccommodated previous cycle RHNA are shown on Table 4.3 and Figure 4.1.

UNACCOMMODATED RHNA (5th Cycle, 2013-2021)

Because HCD found that the city did not make adequate sites available to accommodate the RHNA in the previous planning period, Government Code Section 65584.09 requires the identification or, if necessary, rezoning of sites to address the unaccommodated lower-income RHNA from the previous planning period. The City of Cudahy must carry over 154 lower-income units from the 2013-2021 RHNA.

Unaccommodated RHNA Site Requirements

Housing Element Law (Government Code 65583.2[h]) requires that jurisdictions accommodate all the lower-income, unaccommodated RHNA on sites that are zoned to permit owner-occupied and rental multifamily residential use by right (as defined in Government Code 65583.2[i]) during the planning period. These sites must permit at least 16 units per site at a density of at least 20 units per acre. At least half of the very low- and low-income housing must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project. The unaccommodated RHNA (2013-2021) sites inventory is limited to sites that meet these criteria. All sites in the unaccommodated RHNA inventory are zoned for High Density Residential,



which allows residential uses by right, and allow a minimum density of 20 units per acre and a maximum density of 40 units per acre. The minimum site capacity is 16 units (based on realistic capacity, not maximum capacity, which is much higher).

Actual Units Constructed Since 2015

Table 4.2 – Housing Units by Construction Year							
	2015	2016	2017	2018	2019	2020	2021
Unit Type					2	2	11
ADUs							
Condominiums							
Townhomes				20		6	
Apartments				6	48		
Residential Conversions	5	8			2	3	
Single-Family Residential	4	1			1		
TOTAL	9	9	0	26	53	11	11
GRAND TOTAL	119						

Between 2015 and 2021, the City of Cudahy issues 119 building permits for residential construction /conversion. The 53 units constructed in 2019 was the largest over the seven-year period, and apartments (48) was the highest category. In contrast, there were zero building permits issued for residential construction in 2017, and the largest number of townhomes built (20) was in 2018.



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
Unaccommodated 2008-2013 RHNA Sites									
6224003016	0.94	High Density Residential	High Density Residential	4 Dwelling Units	40	23	Very Low/Low	Yes	No
6224004015	0.70	High Density Residential	High Density Residential	5 Dwelling Units	40	17	Very Low/Low	Yes	No
6224006028	0.68	High Density Residential	High Density Residential	4 Dwelling Units	40	16	Very Low/Low	Yes	No
6224017017	0.94	High Density Residential	High Density Residential	5 Dwelling Units	40	23	Very Low/Low	Yes	No
6225019010	0.78	High Density Residential	High Density Residential	5 Dwelling Units	40	19	Very Low/Low	Yes	No
6226009004	0.93	High Density Residential	High Density Residential	7 Dwelling Units	40	22	Very Low/Low	Yes	No
6226009009	0.73	High Density Residential	High Density Residential	5 Dwelling Units	40	18	Very Low/Low	Yes	No
6226010015	0.74	High Density Residential	High Density Residential	1 SFR	40	18	Very Low/Low	Yes	No
6226014015	0.81	High Density Residential	High Density Residential	5 Dwelling Units	40	20	Very Low/Low		No
6226014030	0.65	High Density Residential	High Density Residential	1 SFR	40	16	Very Low/Low		No
6226014031	0.91	High Density Residential	High Density Residential	1 SFR	40	22	Very Low/Low		No



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
6226020015	0.93	High Density Residential	High Density Residential	1 SFR	40	22	Very Low/Low	Yes	No
6226021006	0.75	High Density Residential	High Density Residential	6 Dwelling Units	40	18	Very Low/Low	Yes	No
<i>2014-2021 RHNA Sites</i>									
6224003012	0.58	High Density Residential	High Density Residential	2 Dwelling Units	40	14	Very Low/Low	Yes	No
6224004009	0.94	High Density Residential	High Density Residential	11 Dwelling Units	40	23	Very Low/Low	Yes	No
6224004025	0.23	High Density Residential	High Density Residential	Vacant	40	6	Very Low/Low	Yes	No
6224010001	0.94	High Density Residential	High Density Residential	11 Dwelling Units	40	23	Very Low/Low	Yes	No
6224017010	0.23	High Density Residential	High Density Residential	Vacant	40	6	Very Low/Low	Yes	No
6224018054	1.22	High Density Residential	High Density Residential	14 Dwelling Units	40	29	Very Low/Low	Yes	No
6225019021	0.90	High Density Residential	High Density Residential	10 Dwelling Units	40	22	Very Low/Low	Yes	No
6225028054	0.93	High Density Residential	High Density Residential	10 Dwelling Units	40	22	Very Low/Low	Yes	No
6226008023	0.22	High Density Residential	High Density Residential	Vacant	40	5	Very Low/Low	Yes	No
6226014900	0.47	High Density Residential	High Density Residential	Vacant	40	11	Very Low/Low		No



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
6226014901	0.46	High Density Residential	High Density Residential	Vacant	40	11	Very Low/Low		No
6226020039	0.92	High Density Residential	High Density Residential	10 Dwelling Units	40	22	Very Low/Low	Yes	No
6226021012	0.93	High Density Residential	High Density Residential	10 Dwelling Units	40	22	Very Low/Low	Yes	No
6226024020	0.93	High Density Residential	High Density Residential	10 Dwelling Units	40	22	Very Low/Low	Yes	No
6226025006	0.52	High Density Residential	High Density Residential	3 Dwelling Units	40	13	Very Low/Low	Yes	No
6226031030	0.83	High Density Residential	High Density Residential	Vacant	40	20	Very Low/Low	Yes	No
6224007002	0.94	Med Density Residential	Med Density Residential	7 Dwelling Units	25	14	Very Low/Low	Yes	No
6224007009	0.59	Med Density Residential	Med Density Residential	Commercial Industrial Use	25	9	Very Low/Low	Yes	No
6224007800	0.78	Med Density Residential	Med Density Residential	Commercial Industrial Use	25	12	Very Low/Low	Yes	No
6224007801	0.93	Med Density Residential	Med Density Residential	Commercial Industrial Use	25	14	Very Low/Low	Yes	No
6224013902	0.10	Med Density Residential	Med Density Residential	Vacant	25	2	Very Low/Low		No
6226006901	0.07	Med Density Residential	Med Density Residential	Vacant	25	1	Very Low/Low		No



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
6226007003	0.18	Med Density Residential	Med Density Residential	Vacant	25	3	Very Low/Low	Yes	No
6226017010	0.93	Med Density Residential	Med Density Residential	5 Dwelling Units	25	14	Very Low/Low	Yes	No
6226017029	0.14	Med Density Residential	Med Density Residential	Vacant	25	2	Very Low/Low	Yes	No
6226018025	0.18	Med Density Residential	Med Density Residential	Vacant	25	3	Very Low/Low	Yes	No
6226027008	0.90	Med Density Residential	Med Density Residential	5 Dwelling Units	25	13	Very Low/Low	Yes	No
6226027009	0.80	Med Density Residential	Med Density Residential	4 Dwelling Units	25	12	Very Low/Low	Yes	No
6226027010	0.79	Med Density Residential	Med Density Residential	2 Dwelling Units	25	12	Very Low/Low	Yes	No
6226027011	0.78	Med Density Residential	Med Density Residential	4 Dwelling Units	25	12	Very Low/Low	Yes	No
6226029006	0.94	Med Density Residential	Med Density Residential	5 Dwelling Units	25	14	Very Low/Low	Yes	No
6225018009	0.08	Mixed Use/ Commercial	Mixed Use/ Commercial	Vacant	40 du/ac (MU)/30 du/ac (Res)	1	Very Low/Low	Yes	No
6225018010	0.26	Mixed Use/ Commercial	Mixed Use/ Commercial	Vacant	40 du/ac (MU)/30 du/ac (Res)	4	Very Low/Low	Yes	No
6225018011	0.39	Mixed Use/ Commercial	Mixed Use/ Commercial	Vacant	40 du/ac (MU)/30	7	Very Low/Low	Yes	No



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
6226022900	0.03	Mixed Use/Commercial	Mixed Use/Commercial I	Vacant	40 du/ac (MU)/30 du/ac (Res)	1	Very Low/Low	Yes	No
6226022901	0.20	Mixed Use/Commercial	Mixed Use/Commercial I	Vacant	40 du/ac (MU)/30 du/ac (Res)	3	Very Low/Low	Yes	No
6226022902	0.17	Mixed Use/Commercial	Mixed Use/Commercial I	Vacant	40 du/ac (MU)/30 du/ac (Res)	3	Very Low/Low	Yes	No
6226022903	0.19	Mixed Use/Commercial	Mixed Use/Commercial I	Vacant	40 du/ac (MU)/30 du/ac (Res)	3	Very Low/Low	Yes	No
6224015002	0.47	Single Family Residential	Single Family Residential	Vacant	15	4	Above Moderate		No
6224032800	0.22	Single Family Residential	Single Family Residential	Vacant	15	2	Above Moderate	Yes	No
6225010025	0.22	Single Family Residential	Single Family Residential	Vacant	15	2	Above Moderate		No
6225011006	0.22	Single Family Residential	Single Family Residential	Vacant	15	2	Above Moderate		No
6225025014	0.13	Single Family Residential	Single Family Residential	Vacant	15	1	Above Moderate		No
6225026002	0.44	Single Family Residential	Single Family Residential	Vacant	15	4	Above Moderate	Yes	No



Table 4.2 Sites Inventory Table

Parcel Number	Size (acres)	General Plan Designation	Zoning	Existing Use	Max. Density (du/acre)	Realistic Capacity (units)	Affordability Level (based on density)	Lot Consolidation Potential	Environmental or Infrastructure Constraints
6225026003	0.44	Single Family Residential	Single Family Residential	Vacant	15	4	Above Moderate	Yes	No
6225026009	0.08	Single Family Residential	Single Family Residential	Vacant	15	1	Above Moderate	Yes	No
6225026010	0.10	Single Family Residential	Single Family Residential	Vacant	15	1	Above Moderate	Yes	No
6225026013	0.54	Single Family Residential	Single Family Residential	Commercial Industrial Use	15	5	Above Moderate	Yes	No

Notes:

Realistic Capacity: A realistic density calculation of 60 percent of the maximum density has been applied to the residential and mixed-use sites consistent with the realistic development scenario in the General Plan Land Use Element.

Mixed Use: Capacity calculations for Mixed Use – Commercial sites assumes 40% of site development with mixed uses (commercial and residential) and 40% of site development with exclusively residential uses all at 60 percent of the maximum density consistent with the realistic development scenario in the General Plan Land Use Element.

November 2020



Figure 4-1 Sites Inventory Map





Unaccommodated RHNA Sites Summary

The 2013-2021 rollover RHNA sites inventory included in this Housing Element identifies capacity for 254 units, thus exceeding the required rollover of 154 units, and all sites are suitable for development of lower-income housing and comply with the unaccommodated RHNA requirements set forth in Government Code 65583.2(h). The 2013-2021 sites inventory is made up of 13 sites zoned for high-density residential development up to 40 units per acre. The sites range from approximately two-thirds of an acre to just under one acre in size. Total realistic capacity on these sites is 254 units, with individual site capacity ranging from 16 to 23 units. All sites have a realistic capacity of at least three times the existing use. Several sites are developed with one residential unit and provide the opportunity for at least a 16-fold increase in capacity. If developed at the maximum density, these unaccommodated RHNA sites can provide significantly more housing units. There are no identified constraints on these sites that would prevent development or reuse during this Housing Element period.

RHNA (6th Cycle, 2021-2029)

The housing sites inventory for the current (2021-2029) RHNA consists of a mix of vacant and underutilized land, as detailed in Table 4.2 and Figure 4.1, and summarized in Table 4.3.

Table 4.3: 2014-2021 RHNA Sites Capacity (Units)

Site Type	Site Affordability Level				Total
	Extremely and Very Low-Income (0-50% AMI)	Low-Income (51-80% AMI)	Moderate-Income (81- 120% AMI)	Above Moderate-Income (121%+ AMI)	
Vacant	92	--	--	21	113
Underutilized	338	--	--	5	343
Total	430	--	--	26	456

The inventory of vacant residential and mixed-use land in Cudahy totals 6.8 acres. Most vacant sites identified in the inventory allow densities above 20 units per acre and are credited towards the lower-income RHNA. These vacant properties, identified in Table 4.2, have the potential to yield 113 units, 92 of which can facilitate lower-income housing, as defined by state law.

The inventory of underutilized residential land in Cudahy totals 17.7 acres. Most underutilized sites identified in the inventory allow densities above 20 units per acre and are credited towards the lower-income RHNA. These properties, identified in Table 4.3, have the potential to yield 343 units, 338 of which can facilitate lower-income housing, as defined by state law. As stated previously, all underutilized sites in the inventory have a minimum size of one-half acre and are located adjacent to other underutilized or vacant sites to accommodate lot consolidation. All the



identified underutilized sites included in this inventory also have a realistic capacity of more than double the currently developed uses.

ADEQUACY OF SITES TO MEET THE RHNA

The sites inventory for both RHNA planning periods indicates a capacity for 710 units, 684 (96 percent) of which occur on sites suitable for development of lower-income housing. Overall, Cudahy can adequately accommodate and exceed the previous (2008-2013) and current (2013-2023) RHNA. Table 4-4 summarizes the RHNA status.

	Affordability Level (Based on Density)				Total
	Extremely and Very Low-Income (0-50% AMI)	Low-Income (51-80% AMI)	Moderate-Income (81- 120% AMI)	Above Moderate-Income (121%+ AMI)	
Previous (2008-2013) RHNA Sites (units)					
Vacant Sites	-	-			-
Underutilized Sites	254	-			254
Total Sites	254	-			254
RHNA	154	-			154
Redistributed Surplus/Shortfall of Units (+/-)	+100	-			+100
Previous (2014-2021) RHNA Sites (units)					
Vacant Sites	92	-	-	21	113
Underutilized Sites	338	-	-	5	343
Total Sites	430	-	-	26	456
RHNA	80	46	51	141	318
Redistributed Surplus/Shortfall of Units (+/-)	+138				+138
Current (2021-2019) RHNA Sites (units)					
Vacant Sites	92				
Underutilized Sites	338				
Total Sites	430				
RHNA	80	36	53	224	393
Redistributed Surplus/Shortfall of Units (+/-)	+119				+119

Inclusionary Housing Ordinance

The City of Cudahy, to foster the development of additional housing units to satisfy the mandated RHNA units, has begun an amendment to Cudahy Municipal Code Chapter 20.88, definitions, and Chapter 20.30 – Inclusionary Housing Program. Section 20.88.100 I.

Section 20.88.100 I defines an inclusionary unit as a dwelling unit that will be offered for sale or rent to very low, low, or moderate-income households, at an affordable housing cost in compliance with Chapter 20.30.



The Inclusionary Housing Ordinance is designed to encourage the development and availability of affordable housing by ensuring that the addition of the affordable housing units to the City's housing stock is proportional with the overall increase in new housing units.

All residential and mixed-use projects are required to incorporate the standards as part of an on-site Inclusionary Housing project.

- A. **Minimum number of units required.** A minimum of 20 percent of the total number of dwelling units in a residential or mixed-use project shall be developed, offered to, and sold or rented to households of very low, low, and moderate-income, at an affordable housing cost.
- B. **Fractional Units.** In calculating the required number of inclusionary units, any fractional unit shall be rounded-up to a whole unit.
- C. **Project Completeness.** A residential or mixed-use project application will not be determined complete until the developer has submitted a Housing Plan and Housing Agreement, which demonstrates the manner in which the requirements of this Chapter will be met.
- D. **Units for Sale.** If a project consists of units for sale, a minimum of 20 percent of the total number of units in the project shall be sold to very low, low, or moderate-income households.
- E. **Rental Units.** If the residential or mixed-use project consists of rental units, a minimum percent of the units shall be provided as follows:
 - 1. A minimum of five percent of the units shall be rented to very low-income households; and
 - 2. A minimum of five percent of the units shall be rented to very low-income or low-income households; and
 - 3. A minimum of 10 percent of the units shall be rented to very low-income, or low-income, or moderate-income households.
- F. **Displaced Households.** On-site inclusionary units shall be required when very low, low, and/or moderate-income households are displaced. Any other provisions of this Chapter, notwithstanding, any project subject to this Chapter which results in the displacement of very low, low, and/or moderate-income household(s) shall be required to provide on-site inclusionary units as required by this Chapter.
- G. **Priority Processing.** All residential and mixed-use projects providing inclusionary housing on-site, pursuant to the provisions of this Chapter, shall receive priority building department plan check streamlining, to the extent authorized by law.



- H. **Final Permit.** The Final Construction Permit sign off, or Certificate of Occupancy, for the inclusionary units shall be issued prior to, or concurrently with, the proposed project.

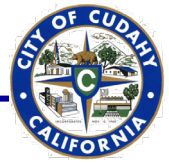
Alternatives to Providing On-Site Units.

As an alternative to developing required inclusionary units within an affected residential or mixed-use project in compliance with Section 20.30.040 (Inclusionary Unit Requirements), the requirements of this Chapter may be satisfied through one or more of the following alternatives, in compliance with this Chapter and Title 20 (Zoning Code).

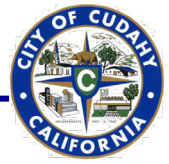
- A. **Off-Site Units.** Inclusionary units required by Section 20.30.040 (Inclusionary Unit Requirements), may be provided offsite, pursuant to Section 20.30.040 (Inclusionary Unit Requirements), if the inclusionary units are owned in whole or part, and operated, by a non-profit housing provider for the life of the project. The following requirements must be met to satisfy the off-site option of this Chapter:
1. Units for Sale or Rent. The developer shall agree to construct 25 percent more inclusionary units than the number of inclusionary units required by Section 20.30.040 A (Inclusionary Unit Requirements, Minimum Number of Units Required).
 2. The developer shall identify an alternate site suitable for residential housing, which the developer either owns or has site control over (i.e., purchase agreement, option to purchase, lease) subject to City review to ensure that the proposed development is consistent with the City's housing objectives and projects.
 3. The off-site units shall be located within a one-quarter mile radius of the market-rate units.
 4. The off-site units shall satisfy the requirements of Section 20.30.040 C, D, and E (Inclusionary Unit Requirements, Project Completeness, Units for Sale, and Rental Units).
 5. The off-site units shall not count towards satisfaction of any affordable, or inclusionary housing obligation, that development of the alternative site with market-rate units would otherwise be subject to, pursuant to this Chapter.

Exceptions to the location of the off-site units specified in this Section may be granted by the City Council on a case-by-case basis.

- B. **Land Donation.** A developer of a residential or mixed-use project may satisfy the Inclusionary Housing Requirement by dedicating land in-lieu of constructing restricted affordable units within the residential or mixed-use project if the City Council determines that all the following criteria have been met:
1. The dedicated site is transferred to the city prior to commencement of construction of the residential or mixed-use project or is subject to an agreement



- between the developer and the city that sets forth a date certain for transfer of the dedicated site and such agreement is in the best interests of the city; and
2. The value of the dedicated site at the date of dedication or the date such agreement to dedicate is executed, as applicable, is greater than the in-lieu fee in effect at the date of dedication or the date such agreement to dedicate is executed, as applicable, multiplied by the number of otherwise required affordable units within the residential or mixed-use project; and
 3. The dedicated site could accommodate at least the number of otherwise required affordable units within the residential or mixed-use project. Notwithstanding the above, the City shall not be required to construct restricted affordable units on the dedicated site, but may sell, transfer, lease or otherwise dispose of the dedicated site as necessary in furtherance of its inclusionary affordable housing goals.
- C. **Purchasing Affordable Housing Covenants.** A developer may purchase affordable housing covenants for units in an existing residential or mixed-use project within the city. All such units shall be:
1. Reasonably dispersed throughout the residential or mixed-use project; and
 2. Located in an area or areas of the City, as approved by the City Manager, or designee; and
 3. Proportional in the number of bedrooms and location to the market rate units included in the developer's residential or mixed-use project; and
 4. Comparable to the market rate units included in the residential or mixed-use project in terms of design, materials, finished quality, and appearance.
- D. **Substantially Rehabilitating Existing Housing.** A developer may purchase and substantially rehabilitate existing market rate units, for conversion to affordable units. Substantially rehabilitating means:
1. Rehabilitating a dwelling unit that has substantial building and/or other code violations; and
 2. Has been vacant for at least ninety days; and
 3. The unit is returned to the City's housing supply as decent, safe, and sanitary housing; and
 4. The cost of the rehabilitation work exceeds twenty-five percent of the market value of the unit after rehabilitation.
- E. **In-Lieu Fee.** The developer may choose to pay a fee in lieu of providing all or some of the inclusionary units as follows:
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1. Amount of Fee. The amount of the fee shall be as required by the Council's Fee Resolution.
2. Timing of Payment. One-half of the in-lieu fee shall be paid (or a letter of credit posted) before issuance of a building permit for any part of the residential or mixed-use project. The remainder of the fee shall be paid before a Certificate of Occupancy is issued for any unit in the project.
3. Housing Trust Fund. Fees collected in compliance with this Section shall be deposited in the Affordable Housing Trust Fund.

With these policies in place, the City of Cudahy anticipated using its Land Use plan to meet the RHNA numbers, with the understanding that there may be other obstacles to satisfying the RHNA requirements.

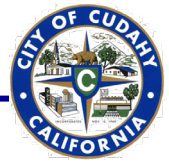
4.2 ENVIRONMENTAL AND INFRASTRUCTURE CONSTRAINTS

Environmental factors, such as topography, soils, landslides and seismic hazards, and noise, as well as the lack of infrastructure, such as roads, water, and sewer lines, are constraints to housing development in the city. However, most of the potential housing sites identified by the city are not constrained by environmental factors or by lack of adequate infrastructure, with the exceptions of earthquake, ground shaking which affects the entire region and poor water infrastructure provided by Tract 180 Water Company. The General Plan has taken these environmental factors into account. Where development is planned, any site that remains can be mitigated through appropriate design and environmental planning.

ENVIRONMENTAL SETTING

The City of Cudahy is a relatively new city having only incorporated in the 1960s. At the time of incorporation, more than 80% of the city's total land area was developed. In terms of land area, Cudahy is one of the smallest cities in Los Angeles County with only 1.07 square miles. Despite its relatively small land area, Cudahy is home to 23,805 residents according to the most recent DOF estimates. The City's relatively large population given its small geographic area makes it one of the most densely populated communities in California.

A great majority of the city consists of residential land uses with residential neighborhoods accounting for approximately 394-acres of land or 51.5% of the total land area of Cudahy. An industrial area is in the southernmost portion of the city on both the west and east sides of Atlantic Avenue. Industrial land uses account for approximately 79-acres of land or 12.3% of the City's total land area. Commercial land uses are located along the major roadways such as Atlantic Avenue and at key intersections and account for approximately 43-acres of land or 6.7% of the total City's total land area.



NOISE

Cudahy is in an area where the ambient noise levels are relatively high. A citywide noise inventory performed in May 2013, found that virtually all the neighborhoods in Cudahy are in areas where noise levels exceed 65 dBA. The city's noise environment is not expected to significantly change over time since the primary factors contributing to noise, namely the arterial roadway and freeway traffic and nearby industrial uses, will have a continued presence in the city. State noise guidelines recommend locating residential development in areas exposed to ambient outdoor noise levels no greater than 65 A-weighted decibels (dBA).

GEOLOGIC AND SEISMIC HAZARDS

No known earthquake faults traverse Cudahy and the City is not exposed to natural environmental hazards such as flooding, slope erosion and landslides. However, the city is located within an area that is subject to liquefaction hazards. The city is located within the dam inundation area of the Garvey Reservoir in Monterey Park.

The nearest major river is the Los Angeles River. This River does have a potential impact on the City of Cudahy. Normally this river channel is dry and only carries a significant water flow during a major rainstorm. The river channel is part of the County Flood Control District and the City is protected by a levee wall.

City of Cudahy, like most of the Los Angeles Basin, lie over the area of one or more known earthquake faults, and potentially many more unknown faults, particularly so-called lateral or blind thrust faults.

The major faults that have the potential to affect the greater Los Angeles Basin, and therefore the City of Cudahy are the:

- Norwalk
- Raymond Hill
- Malibu Coast-Santa Monica-Hollywood
- San Andreas
- Newport-Inglewood
- San Fernando
- Sierra Madre
- Whittier

The Los Angeles Basin has a history of powerful and relatively frequent earthquakes, dating back to the powerful 8.0+ 1857 San Andreas Earthquake which did substantial damage to the relatively few buildings that existed at the time. Paleoseismological research indicates that large (8.0+) earthquakes occur on the San Andreas fault at intervals between 45 and 332 years with an average interval of 140 years. Other lesser faults have also caused very damaging earthquakes since 1857. Notable earthquakes include the 1933 Long Beach Earthquake, the 1971 San



Fernando Earthquake, the 1987 Whittier Earthquake, and the 1994 Northridge Earthquake. In addition, many areas in the Los Angeles Basin have sandy soils that are subject to liquefaction, including in the City of Cudahy.

ROADS

The transportation system in Cudahy consists of a roadway network dominated by Atlantic Avenue, collector streets, and local streets. The Long Beach Freeway (State Route-710) is located just east of Cudahy. Also, the City's central location in Los Angeles County provides Cudahy with easy access to most parts of the Southern California region. Local circulation within the city generally follows a grid pattern; except for Atlantic Avenue which extends in a north-south orientation at a slight angle and Salt Lake Avenue which follows the curve of the railroad tracks. Atlantic Avenue is a regional highway that extends north to Alhambra and south to Long Beach. Traffic volumes on most City streets are currently approaching or are at capacity.

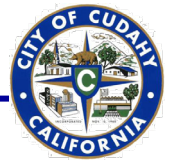
Regional access to the city is provided by the Long Beach Freeway (I-710) that extends along the City's eastern border. Access to this freeway is provided by Florence Avenue (north of Cudahy) and Firestone Boulevard (south of Cudahy), both being major arterials located just outside the city. Florence Avenue is a major roadway that provides a connection to the Long Beach Freeway for the neighboring communities of Downey, Bell, and Bell Gardens. With local freeway access largely dependent on Florence Avenue, the traffic on this roadway during peak hours is congested. Local access to Florence Avenue is provided by Wilcox Avenue and Atlantic Avenue and access to Firestone Boulevard is provided by Atlantic Avenue. The transportation system framework within Cudahy is largely defined by Atlantic Avenue which is a major north/south arterial that extends through the city. Other north/south roadways include Salt Lake Avenue, Wilcox Avenue, and Otis Avenue which also provide access to neighboring cities. Clara Street and Santa Ana Street are two primary east/west roadways. Aside from Atlantic Avenue and Santa Ana Street (west of Atlantic Avenue), all the streets in the city consist of two travel lanes.

All the potential housing sites identified are infill sites located in existing built-out areas of the city, and all have adequate road accesses (ingress and egress).

ASSESSMENT OF SEWER AND WATER

The City of Cudahy is served by three water agencies, including Tract 349 Mutual Water Company, Tract 180 Mutual Water Company, and Golden State Water Company. Tract 349 Mutual Water Company serves the west side of Atlantic; Tract 180 Mutual Water Company serves the east side of Atlantic, and Golden State Water Company serves the southeast portion of the city. Water for all three water companies comes from a series of groundwater wells throughout the Central Basin.

Tract 349 Mutual Water Company currently has plans to replace one of the existing groundwater wells. Although the location of the new well has not yet been determined, it will be located at one of the two existing well locations



Tract 180 Mutual Water Company has identified deficiencies within the water system along Clara Street, Elizabeth Street, Cecelia Street Park Avenue, and Atlantic Avenue, and along the east side of Live Oak Avenue. Proposed improvements include upsizing water lines throughout the service area. The water lines on Atlantic Avenue that range in size from 10" to 14" will be replaced with lines ranging in size from 10" to 12". Tract 180 is currently addressing the deficiencies in the water system along Clara Street. Phase Two of the Clara Street Pipe Replacement Project is under construction. In addition, the Elizabeth Street Pipe Replacement Project is currently in the process of securing funds for the project.

Golden State Water Company (Golden State Water) provides water services to the east portion of the city east of Wilcox Avenue. Currently, no deficiencies exist within Golden State Water's jurisdiction. Increases in land use density from new developments/redevelopments will require fire flow tests as mandated by the LA Fire Department. Golden State Water has since implemented the Unidirectional Flushing (UDF) program to mitigate iron and manganese levels within the water supply.

Water use would be expected to rise with the anticipated increase in population under the General Plan Update. However, the expansion in conservation practices such as low water use gardening and use of recycled water would likely dampen demand somewhat. Also, the increase in mixed-use and multi-family housing units typically results in lower household water use as lawn and garden irrigation practices are less necessary than in single family homes. Low water use practices are common in the Southern California region and are consistent with the General Plan Update policies.

The sewer system is managed by the City's Public Works Department. The local sewage is discharged into a larger system (County of Los Angeles Consolidated Sewer District) managed by the Los Angeles County Sanitation District (LACSD) which provides both primary and secondary treatment of all City of Cudahy sewage flows while Los Angeles County Department of Public Works (County DPW) maintains all city-owned collection systems. The field operation and maintenance services are fulfilled by utilizing the services provided by the Consolidated Sewer Maintenance District (CSMD) managed by the County DPW. Approximately 14.2 miles of sanitary sewer collection facilities serve customers in the city. The city is responsible for ensuring that the public sewer infrastructure is correctly designed, adequately sized, and easily maintainable. The CSMD also provides a supporting role in reviewing all proposed sewer plans for new developments in the city to ensure that they conform to County design standards and particularly to ensure that district's requirements for acceptability for maintenance. Results from the inspection of 74,557 feet of the City's sewer system determined that 88 percent of the system is free from structural defects. The remaining 12 percent of the pipe segments were placed on a priority list based on the severity and the need for action. Since the 2013 SCAR, all segments on the priority list have been repaired as of April 2016.

The anticipated population increase in Cudahy (because of General Plan land use policies) would likely increase the amount of wastewater delivered to the treatment facility. Given a projected



Year 2040 population of 30,607, this would result in a generation of 2.26 million gallons per day (mgd) of wastewater (an increase of about 0.5 million gallons per day (gpd). This increase represents less than one percent of the remaining capacity at the Joint Water Pollution Control Plant in Carson.

Water Sewer Priority

In accordance with Government Code Section 65589.7, immediately following City Council adoption, the City must deliver to all public agencies or private entities that provide water or sewer services to properties within the City of Cudahy a copy of the 2021-2029 Housing Element.



5 Resources and Constraints

The availability of financing resources from federal, State, and local sources, as well as private lenders and non-profit organizations, is essential to the construction and rehabilitation of housing. The success of housing projects is also affected by governmental constraints (such as land use controls and development fees) and non-governmental constraints (such as housing market situation and environmental constraints). These factors will be discussed in this chapter.

Housing Constraints indicates those environmental factors, governmental factors, and market factors that could impede the development of new housing.

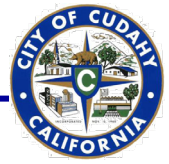
5.1 FINANCING AND SUBSIDY SOURCES

Federal, State, and local agencies provide a wide range of resources to help support the construction, acquisition, and rehabilitation of housing units for lower-income households in Cudahy. Many of these resources are made available to local tenants, owners, and developers of affordable housing through City and County programs and services. Although there is a wide range of programs, the availability of funding through these programs is typically inadequate to satisfy all needs. As a result, there is a fair amount of competition for program funds that are available, and any one development may need to draw upon multiple resources to be financially feasible.

FEDERAL RESOURCES

The federal government offers a wide variety of resource related housing assistance. The mortgage interest deduction and the real estate tax deduction are just two of the most common choices for homeowners provided through the income tax code. The deductions promote homeownership and reduce tax liabilities for home-owning taxpayers. Moreover, the deductions are used widely and expansively across the nation. Among the states, California has the highest amount of mortgage interest and real estate tax deducted every year.

Aside from tax of mortgage deductions, the federal government provided housing assistance to California jurisdictions through several programs. Like State programs, federal programs often change in terms of program details, application procedures, and amount of subsidy dollars available. For detailed descriptions, current subsidy levels, and up-to-date application procedures, refer to program literature available online from HUD at <http://www.hud.gov>.



Some of the largest programs, based on current funding levels include:

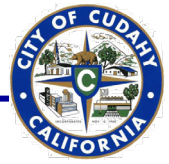
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)

The Community Development Block Grant (CDBG), a longstanding program of HUD funds local community development activities such as affordable housing, anti-poverty programs, and infrastructure development. Cities with populations over 50,000 receive CDBG funds directly from HUD while smaller cities apply directly to the County or State for a portion of the funding that is allocated and administered by those entities. HUD makes allocations based on a formula that takes population, poverty, and housing distress into account. CDBG funds can be used for a variety of housing efforts including activities aimed at reducing costs for private development (helping fund site acquisition, improvements, and other soft cost); housing acquisition and rehabilitation through short and long-term loans, grants, or loan guarantees; direct payment of rent or mortgage and housing counseling services; activities relating to energy conservation and renewable energy resources; and fair housing activities. CDBG funds are best used in combination with other subsidy sources or to provide predevelopment funding to initiate housing development.

The City shall continue housing programs on housing development, infrastructure, rehabilitation, and job development, as allowed by the CDBG program. The city currently uses its CDBG moneys for the Home Improvement program, Business assistance program, fair housing foundation services, code enforcement, senior nutrition program, food distribution programs and the development of public facilities. It shall coordinate with the County Housing Authority in implementing programs outlined in the Comprehensive Housing Affordability Strategy (CHAS) for Los Angeles County. The City shall prepare a brochure outlining available housing assistance and rehabilitation programs in the City. The city is not applying for other federal programs, although it has evaluated potential participation in the HOME, HOPE, and other housing loan programs of HUD. It shall distribute these to property owners and make them available at City Hall. The brochure shall encourage residents to participate in the Section 8 housing assistance payments program and the housing voucher program through the Los Angeles County Housing Authority. The program is ongoing under the Community Development Department and is financed by the General Fund.

5.2 GOVERNMENT CONSTRAINTS ON HOUSING PRODUCTION

It is in the public interest for the government to regulate land use and building standards to protect the general welfare of the community. On the other hand, stringent regulations, processing fees and lengthy procedures can potentially deter private enterprises from developing housing. The City of Cudahy regulates the use of land within the city limits through General Plan, the Zoning Ordinance, and building codes and standards.



GOVERNMENTAL CONSTRAINTS

Public constraints, such as land use and development controls, site improvement fees, and development permits, affect the supply, distribution, and cost of housing. Although often unpopular, these controls are necessary to protect the community's health, safety, and welfare. Building codes and other development requirements can influence the cost of housing. Key development standards that could add to the cost of housing development and the City's response include the following:

The City has adopted the 2013 California Building Code as amended by the 2014 Los Angeles County Building Code by reference that establishes minimum construction standards. The City's existing development requirements included in the Zoning Ordinance and Building Code do not include any architectural standards that would add to the cost of new housing development. In addition, there are no unique open space, parking, or Mello-Roos fee requirements that are applicable to new developments outside of what is standard throughout the region. The only local amendment to the building code adopted by the City is in reference to identifying the Planning Commission as the building Board of Appeals.

Code Enforcement site visits are typically complaint driven. The City of Cudahy also maintains several programs that property owners may take advantage of if their units are found to be substandard. Code Enforcement officers have been very proactive in referring residential property owners to these programs.

All the residential areas where the residential zoning is applicable are well served by streets and other infrastructure. No street dedications or new infrastructure is required for the typical infill development. However, as properties are intensified, the existing water lines are becoming overtaxed, which will eventually require updating and improving water supply throughout the City which will add to the cost of future construction.

The California Energy Resources Conservation and Development Conservation have developed guidelines used by building code enforcement officials to implement energy conservation regulations established by the California Energy Commission. While serving as a mitigation tool to help reduce electricity and natural gas consumption, they do add to the cost of housing. State law also authorizes school districts to collect impact fees for all new residential, commercial, and industrial construction.

The school fees that are charged towards new residential development are State mandated and are beyond the City's ability to control. The Los Angeles Unified School District (LAUSD) levies a school development fee for residential construction. Building inspection services such as plan checks, and permit issuance are contracted, and the fees charged to the developer for these services are typically less than the actual cost for review time though any increased administrative costs beyond the base fees for discretionary review are waived. The planning fees that are charged in the city do not make any distinction between rental housing and owner-occupied housing or the types of housing (single-family or multiple-family).



The City of Cudahy has fully implemented the provisions of AB 884. The plan check review for new construction averages two to four weeks, which is considerably less than most surrounding cities. During a development's design and planning, the City staff is available to conduct pertinent reviews and issue permits related to engineering, drainage, grading, public works, electrical, and other aspects of new developments. Even with those infill projects that require some form of discretionary review, the City has taken advantage of recent legislation that calls for smaller infill projects to be categorically exempt through the referral of a Class 32 California Environmental Quality Act (CEQA) Categorical Exemption.

Residential infill projects are handled through the City's streamlined review and entitlement process. The entire development process from land clearance through construction typically takes between six months to one year to complete, depending on the number of units. This includes the time required for plan check and construction.

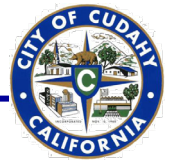
CUDAHY GENERAL PLAN LAND USE POLICY

The Land Use Plan of the Cudahy General Plan has been developed to promote new residential development in the city. The Plan has several features which were developed to increase the availability of housing and maintain the existing housing stock. The Land Use Plan, illustrated in Exhibit LU-2 of the Land Use Element, preserves existing neighborhoods developed largely as single-family neighborhoods. The new General Plan increases the allowed density in the multi-family residential areas and intensity of nonresidential districts to encourage revitalization and lot consolidation, create new open spaces to enhance residents' quality of life, and provide flexibility in land use policy to accommodate emerging land use trends. The General Plan land use categories allow residential development as follows:

- Low-Density Residential: 15 du/ac
- Medium-Density Residential: 25 du/ac
- High-Density Residential: 40 du/ac
- Mixed Use-Commercial: 40 du/ac if mixed use; 30 du/ac residential only
- Mixed Use-Civic: 40 du/ac if mixed use; 30 du/ac residential only
- Innovation Industrial: 1.5 FAR (allows live/work)

The updated Land Use Element significantly increased development maximums and encourages new housing types. The Land Use Element identifies a realistic buildout and a maximum theoretical buildout. Realistic buildout would assume a total of 7,222 gross dwelling units in the city and a population of 30,607 persons by 2040. The theoretical maximum buildout would allow 12,037 gross dwelling units and a total population of 51,012 persons by 2040.

Past residential development projects in the city have consisted primarily of land recycling, as lots with older single-family detached units are replaced with multi-family housing. This was the reason for the building moratorium in 1990. It is primarily due to the limited amount of vacant



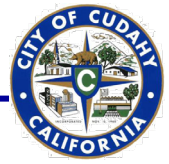
land in the city at that time (13.2 acres or 1.9 percent) and the economic advantages of multi-family projects on High Density Residential lots. Thus, it is expected that future development will continue this trend.

Most of the City of Cudahy consists of very low-income neighborhoods. According to the 2020 Census data prepared by SCAG, of the City's 5,770 households in 2010, 2,921 households or 52.9% were considered low-income. Of these, 1,029 households were overpaying for housing. Thus, the other 1,892 low-income households (52.9% of low-income households) were not overpaying for housing. The units occupied by these households may be considered affordable because low-income households occupy them, and their rents are less than 30 percent of the occupying household's income. Census data indicated that for owner-occupied housing units, most of the monthly mortgage payments in the city ranged in 2020 was \$2,000 or more with the median being \$1,812 per month. A household was overpaying for housing if more than 30% of their net "take-home" income was used for paying rent or mortgages. According to census figures for the year 2020, 255 households (45.2% of the total owner-occupied units) living in owner-occupied units paid more than 30% of their monthly income towards the mortgage. According to the same census figures, 2,624 renter households (56.3% of the total renter households) paid more than 30% of their monthly income towards the rent.

While it cannot be identified where these affordable housing units are located, the city may conclude that they include developments with 10 units per acre, as well as those with 14 units per acre (as allowed under the current zoning code). The current housing market and availability will continue to drive housing prices up within the city. However, new housing development is expected to meet some of the demand for affordable housing created by low-income households in the area, as a function of economic and market forces. These projects can be developed with densities of 10 to 14 dwelling units per acre, as found in the city; however, increasing the existing allowable density in the MDR Zone to 25 and HDR Zone to 40 dwelling units per acre will further facilitate meeting the demand for affordable housing. These increases will provide an additional 860 new housing units: going from the current 5,770 to a potential 6,630 housing units. Additionally, increasing allowable density with a maximum of 35% density bonus; will encourage the redevelopment of existing properties at a higher density, resulting in additional housing stock.

Also, the application of a density bonus for low-income and senior residents housing projects and projects that provide or include early care and education or services for the needy or elderly, will increase the maximum allowable density to 20 dwelling units per acre in the HDR Zone, this can be done without taxing existing infrastructure.

Further increases in density beyond those allowed by the General Plan's realistic buildout assumption will lead to demands on infrastructure and services which cannot be met by existing facilities (sewer, roads, water, storm drain, police, fire, etc.). This will be especially significant on traffic and local circulation, schools of the LAUSD, and police services. Future policies and goals should consider updating facilities including sewer, roads, water, storm drains, etc.



DEVELOPMENT CODE REQUIREMENTS

The City of Cudahy Development Code includes development standards and requirements for existing and potential development within the Low Density Residential, Medium Density Residential and High-Density Residential zone districts, as well as three mixed-use districts (Civic Mixed Use, Commercial Mixed Use and Entertainment) and the Innovation Industrial district, which allows live/work units. The development standards do not appear to represent a constraint to development given the amount of rehabilitation that has occurred in recent years. The minimum lot size and setback requirements are very liberal. For example, most communities in the area require between 5 to 10 feet for the side and rear yard setbacks.

Table 5.1 Development Standards

Zone Dev. Standard	Commercial/ Mixed Use	Civic/ Mixed Use	Innovation Industrial	High Density Residential	Medium Density Residential	Low Density Residential
Density	30-40 du/ac	30-40 du/ac	30 du/ac	20-40 du/ac	25 du/ac	15 du/ac
Yards	Front: variable Side and Rear: 10' when adjoining Res.	Front: variable Side and Rear: 10' when adjoining Res.	Front: 10' Side: none. 10' on corner lots Rear: 10-30' when adjoining Res.	Front: variable Side: 5' (+2' for each additional story) Rear: 10'	Front: variable Side: 5' Rear: 5' (+2' for each additional story)	Front: variable Side: 5' Rear: 10'
Lot Coverage/ Open Space	50%	50%	60%	Private: 150 sq. ft. /unit Common: 280 sq. ft. /unit	Private: 150 sq. ft. /unit Common: 280 sq. ft. /unit	250 sq. ft./unit or 25% of the lot area/unit (exclusive of the front yard setback)
Building Height	4 stories	4 stories	2-3 stories	4 stories	3 stories	2 stories or 35' (whichever is less)
Distance Between Buildings	N/A	N/A	N/A	10 ft	10 ft	10 ft; 5 ft between acc structure
Parking	Single-family Detached, Duplex, Condominium and Townhouse: 2 garage spaces/dwelling unit, plus 1 additional garage or surface space where dwelling unit contains 5 or more bedrooms Apartments: 2 spaces/dwelling unit, at least one space in a garage Efficiency Apartments and Senior Housing: 1 space/dwelling unit For all but single-family dwellings, Guest Parking shall be provided at .75 space/dwelling unit.					
Fences, Hedges, & Walls	Front: 42" solid materials; 48" wrought iron Side/Rear: 96"					
Minimum Living Area	1 bedroom: 700 sq. ft. 2 bedrooms: 900 sq. ft. 3 bedrooms: 1,100 sq. ft. 4+ bedroom: 1,100 sq. ft. plus 150sq. ft. for each additional	1 bedroom: 700 sq. ft. 2 bedrooms: 900 sq. ft. 3 bedrooms: 1,100 sq. ft. 4+ bedroom: 1,100 sq. ft. plus 150 sq. ft. for each additional	1 bedroom: 700 sq. ft. 2 bedrooms: 900 sq. ft. 3 bedrooms: 1,100 sq. ft. 4+ bedroom: 1,100 sq. ft. plus 150 sq. ft. for each additional	1 bedroom: 700 sq. ft. 2 bedrooms: 900 sq. ft. 3 bedrooms: 1,100 sq. ft. 4+ bedroom: 1,100 sq. ft. plus 150 sq. ft. for each additional	1 bedroom: 700 sq. ft. 2 bedrooms: 900 sq. ft. 3 bedrooms: 1,100 sq. ft. 4+ bedroom: 1,100 sq. ft. plus 150 sq. ft. for each additional	1,100 sq. ft.

Source: Cudahy's Development Standards per Municipal Code

Table 5.1 above indicates basic residential development standards for Cudahy; the table shows density, yard requirements (front, side, and rear), lot coverage, open space, building heights, distances between buildings (main and accessory buildings), parking, fences, hedges, walls, and



minimum living area. Cudahy has three residentially based zone districts; Low-Density Residential, Medium-Density Residential; and High-Density Residential. The Development Code also allows stand-alone residential and mixed-use in the Commercial/Mixed Use, Civic/Mixed Use , and the Entertainment zone districts , as well as live/work units in the Innovation Industrial zone district.

PROCESSING AND PERMIT PROCEDURES

The Development Code stipulates the residential types permitted, conditionally permitted, development review permit, or prohibited in each zone allowing residential uses. Permitted Uses are those uses allowed without discretionary review, in designated areas, if the project complies with all development standards. Conditional Use Permits (CUP) are approved by the Planning Commission unless appealed to the City Council. Findings to approve a CUP include:

- A. Consistency. The use shall be consistent with the general plan and consistent with the integrity and character of the zone in which it is to be located.
- B. Site suitability. The site for a proposed conditional use is adequate in size and shape to accommodate the yards, walls and fences, parking and loading, landscaping, and other development standards prescribed in this zoning code, or required by the Planning Commission, City Council, or other authorized agent in order to integrate the conditional use with the land and uses in the neighborhood.
- C. Neighborhood compatibility. The Planning Commission shall consider the nature, condition, and development of adjacent uses, buildings, and structures and the effect the proposed conditional use may have on such adjacent uses, buildings, and structures.
- D. Access and circulation. The site for a proposed conditional use should relate to streets and highways adequate in width and pavement to carry the kind and quantity of traffic such use would generate. Adequate provisions for public access are available to serve the use.
- E. Utilities and services. Adequate provisions for water, sewer, and public utilities and services are available to ensure that the use will not be detrimental to public health and safety.
- F. Safety and welfare. The use will not be detrimental to the public interest, health, safety, convenience, or welfare.

Roughly 50% of the city is zoned for the highest density residential designation, with under 10% low density residential. The remaining commercial is focused on Atlantic Avenue (roughly 6%), with approximately 12% industrial, and the remaining is public/institutions/parks/streets. Because of such high concentration of higher density zoning, new development under the permitted zoning densities is not found to be inconsistent with the nature, condition and development of adjacent uses, buildings, or structures.

Table 5.2 describes the housing types by permitted uses (*indicates a proposed Program).



- In the Development Code, any employee housing providing accommodations for six or fewer employees shall be deemed a single-family structure pursuant to California Health & Safety Code Section 17021.5.
- State law also requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of the California Government Code). In Cudahy, a manufactured/factory-built house is a single-family detached dwelling unit and is treated as such.
- Transitional housing and supportive housing shall be considered a residential use of property and shall be subject only to those restrictions that apply to other residential dwellings of the same type in the same zone.
- The definition of “family” may limit access to housing for persons with disabilities when municipalities narrowly define the word, illegally limiting the development of group homes for persons with disabilities, but not for housing similar sized and situated families. The City’s Development Code includes the following definition of family: *“A group of persons, whether related or unrelated, who live together in a non-transient and interactive manner, including the joint use of common areas of the premises which they occupy and sharing household activities and responsibilities such as meals, chores, and expenses. Notwithstanding the foregoing, any group of persons required to be considered as a “family” for zoning purposes pursuant to California Health & Safety Code Sections 1267.8, 1566.3, 1568.0831, 1569.85, 11834.23, or any other state law shall be deemed to be a family for purposes of this code.”* This definition does not discriminate nor limit access to housing for persons with disabilities.

Table 5.2 Housing Types Permitted by Zoning District

Residential Use	ZONE					
	LDR	MDR	HDR	Civ MU	Com MU	I-I
1 DU	P	P	P	NP	NP	NP
2-4 DU	P	P	P	NP	NP	NP
5+ DU	P	P	P	P	P	CUP
Residential Care < 6P	P	P	P	NP	NP	NP
Residential Care > 6P	NP	CUP	CUP	NP	CUP	NP
Emergency Shelter	NP	NP	NP	P	P	NP
Single-Room Occupancy			P			
Manufactured Homes	P	P	P	NP	NP	NP
Mobile-Home Parks	NP	NP	CUP	NP	NP	NP
Transitional Housing	P	P	P	P	P	CUP
Supportive Housing	P	P	P	P	P	CUP
2 nd Unit	P	P	P	NP	NP	NP

P= Permitted; CUP= Conditional Use Permit; NP=Not Permitted

Source: City of Cudahy Building & Planning Departments



Permit Processing

The time required to process a project varies greatly from one project to another and is directly related to the size and complexity of the proposal and the number of actions or approvals needed to complete the process. Table 5.3 identifies the typical processing time most common in the entitlement process. It should be noted that each project does not necessarily have to complete each step in the process (i.e., small scale projects consistent with General Plan and Zoning designations do not generally require Environmental Impact Reports (EIR), General Plan Amendments, Rezones, or Variances). Also, certain review and approval procedures may run concurrently. For example, a ministerial review for a single-family home would be processed concurrently with the design review, typically taking 3-6 months. Similarly, entitlements for multiple family residential projects can be run concurrently, and typically takes 3-6 months to process. The city also encourages the joint processing of related applications for a single project. As an example, a rezone petition may be reviewed in conjunction with the required site plan, tentative tract map, and any necessary variances. Such procedures save time, money, and effort for both the public and private sector.

Table 5.3 Timeliness for Permit Procedures

Type of Approval or Permit	Typical Processing Time
Ministerial Review	2 weeks
Conditional Use Permit	3 months
Zone Change	3 – 6 months
General Plan Amendment	3-6 months
Site Plan Review	2 weeks
Architectural/Design Review	3 months
Tract Maps	3 months
Parcel Maps	3 months
Initial Environmental Study	1 month
Environmental Impact Report	3-6 months
Other	

Source: City of Cudahy Building & Planning Departments

Table 5.4 lists the typical approval requirements by project type. After a project has been approved, the Building & Safety department then issues building permits through a plan check submittal/process. Throughout construction, the Building & Safety department will perform building inspections to monitor the progress of the project and ensure compliance with the plans and code.

Table 5.4 Processing Procedures by Project Type

List Typical Approval Requirements	Single Family Unit	Subdivision	Multi-Family
		DRP	DRP
		CUP	CUP
		PARCEL	TRACT

Source: City of Cudahy Building & Planning Departments



ENTITLEMENT FEES

The City charges fees to process plans submitted for residential projects and to finance the provision of important services 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. The fees have not been found to act as a constraint to the development of housing in Cudahy.

Two types of fees are charged and discussed below: planning and development fees and development impact fees. Planning and permitting fees are charged on an at-cost basis to cover staff services and administrative expenses for processing development applications.

Minor Variance	\$630.00
CUP/Variance	\$2,660.00
Zone Change	\$4,225.00
*Sign Review Permanent/Temporary	\$135.00
Environmental Review Negative Declaration & Exemption County Registrar Document Handling Charge	\$10,000 deposit \$75.00
Minor Project Review Major Project Review	\$630.00 \$5,000.00 deposit
Subdivision Map Review (S-9)	\$4,225.00
Tentative Map Consideration (S-10)	\$4,225.00
Development & Appeal Processing Administrative Appeal Planning Commission Appeal City Council Appeal	 \$630.00 \$1,295.00 \$1,295.00

Source: City of Cudahy Building & Planning Departments

Development impact fees are required to provide essential services and infrastructure to serve new residents. Development projects in Cudahy are subject to Development Impact Fees. These include the following:



Table E.1: Maximum Justified Impact Fee Summary

Land Use	Traffic Facilities	Parks and Recreation Facilities ¹	General Government Facilities	Total (Onsite Parking) ²
<i>Residential - Fee per Dwelling Unit</i>				
Single Family	\$ 2,037	\$ 11,624	\$ 1,395	\$ 15,056
Multifamily	1,365	10,303	1,237	12,905
<i>Nonresidential - Fee per 1,000 Sq. Ft.</i>				
Commercial	\$ 3,174	\$ -	\$ 196	\$ 3,370
Office	3,174	-	233	3,407
Industrial	1,945	-	110	2,055

¹ Mitigation Fee Act fee shown. Quimby fees in lieu of parkland dedication only apply to development occurring in subdivisions. Quimby in-lieu fees are \$37,884 per single family unit and \$33,579 per multifamily unit.

² Assumes that development project provides parking onsite. Maximum justified fee of \$29,170 in-lieu of providing one space onsite. Refer to City's municipal code parking standards for detailed parking requirements.

ON-/OFF-SITE IMPROVEMENTS

If subdivision level improvements modify right of way street conditions, then the project must follow City standard guidelines such as: standard plans for public works construction, Cudahy's Green Street Manual, Low Impact Guidelines, etc. All cost varies depending on the scope of work. However, following the above-mentioned City standard guidelines is more cost effective than traditional Best Management Practices (BMP).

CONSTRAINTS ON HOUSING FOR PERSONS WITH DISABILITIES

As noted in the Special Needs section of the Housing Needs Assessment Report, persons with disabilities have several housing needs related to accessibility of dwelling units; access to transportation; employment, and commercial services, and alternative living arrangements that include on-site or nearby supportive services.

The City ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility.

PROCEDURE FOR ENSURING REASONABLE ACCOMODATIONS

In 2018, as part of the comprehensive update to the Development Code, the City established a formal procedure for individuals with disabilities seeking equal access to housing to request a reasonable accommodation to zoning regulations, as provided by the Federal Fair Housing Amendments Act of 1988 and California's Fair Employment and Housing Act, and to establish criteria to be used when considering these requests. The purpose of the reasonable



accommodation process is to provide flexibility in the application of land use, zoning or building regulations, policies, or procedures for individuals with disabilities or developers of housing for persons with disabilities when it is necessary to eliminate barriers to equal housing opportunities.

DEVELOPMENT REVIEW PROCESS

Development Fee Review

The city is scheduled to regularly review its permit processing fees annually to ensure that they reflect the costs associated with the review process. The fee review will provide a basis for reducing fees which may be posing a constraint to housing production, and at the same time allow the city to recoup costs associated with individual developments.

Permitted Uses and Discretionary Approvals

Permitted uses are allowed by right in most Zoning Districts, with no action or approval required from the Planning Division. In some districts, a discretionary approval is required for certain permitted uses or occupancies. Discretionary actions are an approval letter with standard conditions, issued by the Planning Department. Conditions typically include applicable provisions of City codes or standards, such as Zoning requirements, building permit or code requirements, business license requirements, or permit requirements of other agencies, such as the Fire district or Water district.

Conditional Use Permits

Conditional Use Permits (CUP) are discretionary approvals subject to a public hearing. The planning department then reviews the application to deem it complete or incomplete; in either case the application will receive a letter with the status of their application stating whether more information is needed (incomplete application) or with a date to appear before Planning Commission (complete application). The CUP process (when complete) usually takes anywhere between 2-3 months. All CUPs are subject to specific findings contained within the City's Municipal Code which make it easy to understand what the applicant must be able to comply with; this part of the process is not discretionary (findings).

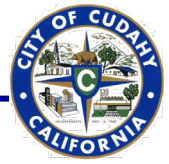
Environmental Review

The city conducts environmental reviews for all development projects, consistent with the requirements of the California Environmental Quality Act (CEQA). CEQA requires an environmental analysis for all projects that are not exempt. Projects with potentially significant impacts typically require preparation of either a Mitigated Negative Declaration with special studies, or an Environmental Impact Report (EIR). Preparation of these reports adds time and costs to the development review process and may require additional expenses if additional measures are required to mitigate potential environmental impacts.



Some projects are “categorically exempt” from CEQA because they comply with certain thresholds such as limited size or scope or because there is no reasonable possibility that they have the potential to significantly affect the environment. Article 19 of the CEQA Guidelines lists the types of projects that are normally exempt, including replacement or rehabilitation of existing facilities, construction, or conversion of small structures, and minor alterations to existing land. Certain residential projects providing affordable urban, agriculture, or urban infill housing that meets specified acreage, affordability, and unit criteria are also exempt from CEQA by statutory law. The requirements for environmental review apply statewide and are not particular to Cudahy alone, so they represent little or no constraints to housing development in the city.

Applicable projects funded with CDBG or other sources of federal funding (depending on the administration of the funding source), are also subject to the requirements of the National Environmental Policy Act (NEPA).



5.3 MARKET CONSTRAINTS ON HOUSING DEVELOPMENT

Market Constraints

Production cost factors such as land acquisition and improvement, construction material and labor, financing, overhead costs, and fees, are market constraints which impact the affordability of housing.

LAND COST / CONSTRUCTION COST

The cost of housing in Cudahy has increased in the last few years as land values, construction costs, and finance charges continue to increase. The diminishing supply of land available for residential construction has driven land and housing costs upward. The city typically has little control over the market fluctuations that affect housing costs. *“Land values across the U.S. rose on average 8% in 2021, which is an increase over 2020 rates. This trend will affect the overall cost of developing new housing units in the city and the State in general.”*

Land, construction, and financing costs represent the most significant nongovernmental constraints in the production of housing for most income groups in Cudahy. Land costs in this City are generally high due to high demand and the limited supply found in a built-out City. Land cost are seldom less than \$27,000 per unit (multifamily), and construction cost in the general Los Angeles area may range from \$150 to \$300 per square foot. A typical multi-family residential building lot in Cudahy sells for over \$375,000.

Construction costs include both “hard” and “soft” costs such as labor and materials (hard), and soft costs such as architectural and engineering services, development fees, construction financing, and insurance.

Over the past 16 years, the City of Cudahy has not experienced any vacant land sales.

AVAILABILITY OF FINANCING

An inventory of local lending institutions revealed that loans are available in the area to qualified clients.

HOUSING CRISIS

Residential vacancy rates and the location of the city within the Los Angeles basin are two market constraints that affect the affordability of housing. As Los Angeles development areas continue to expand, Cudahy and the surrounding cities are becoming an increasingly convenient area in which to live. Housing prices will continue to rise due to this demand. As previously mentioned, just over 1.9% of the housing stock within the Cudahy is vacant. This translates into a demand for housing in the region exceeding the available supply, which inflates both the rental and



ownership housing prices. If land values, construction costs, and interest rates continue to increase in the long-term, the cost of all new housing will rise accordingly.

As indicated above, the city has no control over the market fluctuations that may affect housing costs because market conditions result from a complex interplay of national economic policies and general economic conditions. Inflation in the cost of goods and especially housing means that many families find themselves unable to afford suitable housing. The lack of sufficient income causes more working people to share the cost of a home. As a result, overcrowding is common, and the housing choice of many households is severely restricted. This situation is further aggravated in periods of high unemployment as experienced in the last two years due to the covid-19 pandemic and the threats of eviction of tenants and foreclosure on mortgaged properties.

Redlining practices have not been observed in Cudahy, as the City's housing market is not characterized by wide disparities in prices. The Long Beach Fair Housing Foundation monitors redlining practices in the Southern California region, including the city and has found that redlining practices do not appear to be a problem.



6 Evaluation of the Previous Housing Element

The City of Cudahy’s prior Housing Element was adopted and certified by HCD in 2018. In keeping with State law requirements, the Housing Element must include an evaluation of previous program achievements, so there is an understanding of what worked well as well as what was not accomplished and the reasons why.

ASSESSMENT OF GOALS, POLICIES, PROGRAMS AND QUANTIFIED OBJECTIVES

Table 6.1: Review and Revise (2021 Housing Element)	
2021 Housing Element Program	Program Performance and Continued Appropriateness
<p><u>Housing Information Program</u></p> <p>The City shall establish a promotional campaign to area developers. The campaign shall promote the City of Cudahy and existing investment opportunities. The City shall work with local business groups (such as the Chamber of Commerce and Building Industry Association) on promoting available incentives to new development. The city will work with local early care and education advocates to create an information handout to inform developers, business groups, and households about the available early care and education services. The program will be managed by the Community Development Director and begin in 2013, promotional materials were developed by December 2014 for distribution, and is being updated on an ongoing basis.</p>	<p>The Housing information campaign was initiated through the development of an economic development informational flyer and presentations by City staff to the Early Childhood Education Coalition for SPA 7. The city is continuing to work with local early care and education advocates to distribute campaign material.</p> <p>This program is included in the updated Housing Element.</p>
<p><u>Second Unit Ordinance</u></p> <p>The City of Cudahy allows second units on single-family lots, as required by State law. This has led to second units on most lots in the Low Density Residential (LDR) Zone and has added to the current housing stock. This is an ongoing program by the Planning Department. Its implementation is funded by the General Fund. The Planning Department will monitor the construction of second units annually (coinciding with the fiscal year).</p>	<p>Single family neighborhoods represent a small portion of the City’s residential land (23%) and many of these existing neighborhoods have second units on their lots. As such, additional second unit development has been minimal. The City will update accessory unit requirements and regulations within the Development Code to comply with State law (Assembly Bill 2299 and Senate Bill 1069) in 2018.</p> <p>An updated version of the program is included in the updated Housing Element.</p>
<p><u>Development Monitoring Program</u></p> <p>The City shall develop a system for assessing the potential impacts from new development. The city will require all new development to undergo an assessment to ensure that adequate infrastructure is available to serve the development. The feasibility of a Mello Roos fee for the upgrade of existing infrastructure (including roads, water lines, etc.) will be explored for future implementation. The program is ongoing and will be monitored annually (coinciding with the fiscal year) by the Public Works Department and is financed through the General Fund. The study was completed by June 2014 and is included in the housing information program materials.</p>	<p>Infrastructure impacts from new developments are addressed through the environmental review process as required by the California Environmental Quality Act and will be fully assessed citywide through the General Plan Environmental Impact Report (EIR). Infrastructure availability is an integral part of maintaining a high quality of life for residents. This program and the provisions of ensuring adequate infrastructure are included in Program 13: Infrastructure Availability program.</p>
<p><u>Manufactured Housing</u></p> <p>The city allows manufactured homes and modular units on single-family lots. This permits the use of manufactured homes as affordable housing alternatives. This is an ongoing program, managed and</p>	<p>State law requires local governments to permit manufactured or mobile homes meeting federal safety and construction standards on a permanent foundation in all single-family residential zoning districts (Section 65852.3 of</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>monitored annually (coinciding with the fiscal year) by the Planning Department.</p>	<p>the California Government Code). In Cudahy, a manufactured/ factory-built house is a single-family detached dwelling unit and is treated as such.</p> <p>This program is implemented and is removed from the updated Housing Element.</p>
<p><u>Affordable Housing Incentives</u></p> <p>To encourage the development of affordable housing units, the City shall provide developers with incentives and shorten the permit process for low-income and senior citizen housing projects.</p> <p>The City shall compile information on available financing mechanisms and federal, state, and local programs and agencies that provide funding assistance for housing projects. This information shall be made available to developers. Cooperative ventures with developers on housing projects may also be initiated by the city.</p> <p>The program began in 2013 under the Community Development Department and was financed through the General Fund. An affordable housing ordinance to encourage development of affordable units and remove constraints was completed in December 2015, along with materials available for developers.</p>	<p>The provision of affordable housing for the Cudahy community is important to the City.</p> <p>An updated and expanded version of the program is included in the updated Housing Element. The new program includes an action item to develop development incentives and a community benefit permitting procedure that incentivizes benefits and desired public amenities provided by private development, which include, but are not limited to, low income and/or affordable housing.</p>
<p><u>CDBG Information Programs</u></p> <p>The City shall continue housing programs on housing development, infrastructure, rehabilitation, and job development, as allowed by the CDBG program. The city currently uses its CDBG moneys for the Home Improvement program, fair housing foundation services, code enforcement, senior nutrition program, food distribution program and the development of public facilities. It shall coordinate with the County Housing Authority in implementing programs outlined in the Comprehensive Housing Affordability Strategy (CHAS) for Los Angeles County. The city has prepared a brochure outlining available housing assistance and rehabilitation programs in the city. It has distributed these to property owners and has made them available at City Hall. The brochure shall encourage residents to participate in the Section 8 housing assistance payments program and the housing voucher program through the Los Angeles County Housing Authority. (The city is not applying for other federal programs, although it has evaluated potential participation in the HOME, HOPE, and other housing loan programs of HUD). The program is ongoing and monitored annually (coinciding with the fiscal year) under the Community Development Department and is financed by the General Fund.</p>	<p>Since 2014, the City has used CDBG funds for Code Enforcement, Single-unit Housing Rehabilitation Program, Business Assistance Program, Senior Activities Program, Food Distribution Program, and two construction projects at Clara Park and Cudahy Park.</p> <p>CDBG funding is an important resource for the city and the programs identified will continue. This program is included in the updated Housing Element.</p>
<p><u>Housing Conversion Program</u></p> <p>The City shall take the lead in coordinating efforts for the preservation of subsidized housing projects in Cudahy. To help conserve the low-income units at risk of conversion, the city may provide technical assistance to non-profit groups interested in buying the projects. It may aggressively look for an agency to buy the property or help the residents establish an association to buy the project.</p>	<p>Subsidized housing units in Cudahy are owned by non-profit affordable housing developers that have expressed a desire to continue renewing their subsidies that allow for the provision of affordable housing.</p> <p>A program addressing affordable housing at risk of conversion to market rate will be included in</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>The Community Development Director shall monitor the status of all subsidized housing projects and shall work with the City Manager in developing strategies to preserve these projects. Specific projects shall be reviewed for consistency with the goals of the General Plan and other City policies prior to implementation. Public participation shall be encouraged throughout the process to reflect the needs and interests of Cudahy residents. Financing will come from CDBG funds, and the General Fund, to the extent funds are available. Other funding sources that may be available shall also be explored.</p>	<p>the updated Housing Element and will be combined with a second existing program related to at-risk housing.</p>
<p><u>Inclusionary Housing Program</u></p> <p>The city is in the process of adopting an Inclusionary Housing Ordinance to encourage affordable housing units within new housing developments. The ordinance requires developers to provide a minimum percentage of affordable housing or pay fees, dedicate land, or establish agreements with other agencies for the construction of affordable units off site. To address Cudahy's overcrowding problems, the city included in the ordinance, the available options to requiring or encouraging large dwelling units (2 bedrooms or more) within new development. This may likewise be promoted by incentives to the allowable density and less stringent development standards. The inclusionary housing study was initiated by the Department of Community Development, with funding from the General Fund to the extent of available resources.</p>	<p>In addition to adopting an inclusionary housing program, the City will establish development incentives and community benefits permitting procedure that incentivizes benefits and desired public amenities provided by private development, which include, but are not limited to, low income and/or affordable housing, consistent with General Plan policy.</p> <p>This program is included in the updated Housing Element and directives pertaining to the community benefits program are added to several programs.</p>
<p><u>Housing Maintenance and Conservation</u></p> <p>The City of Cudahy has an ongoing program for the maintenance and conservation of the existing housing stock. There are programs aimed at the conservation of older housing units which are in good condition to maintain the units as affordable housing options. Rehabilitation and property maintenance programs ensure that living conditions are safe and decent for all households. By maintaining the existing housing stock and preventing the creation of substandard housing, the city improves the living environment for present residents. Implementation measures for housing maintenance and conservation are discussed below.</p> <p>Approximately 25 housing units are anticipated to benefit from the City's rehabilitation programs by 2021. Also, approximately 400 mobile homes will be conserved. This program is managed by the Community Development Director.</p>	<p>Since 2014, 20 units have been assisted through this program.</p> <p>An updated version of the program is included in the updated Housing Element.</p>
<p><u>Tenant Minor Home Repair Program</u></p> <p>The City shall continue to apply for Community Development Block Grants for housing rehabilitation programs in the City. These funds shall be used to offer technical assistance and loans under the Tenant Minor Home Repair program, as well as to implement housing rehabilitation programs which provide low interest loans, grants, and technical assistance to property owners. The program is ongoing and will continue to be managed and monitored annually (coinciding with the fiscal year) by the Community Development Department and financed through CDBG funds. The Tenant Minor Home Repair Program is complaint driven; complaints are filed with the City's Code Enforcement department which then schedules follow up inspections and provides tenants with information to resources. Furthermore, the tenants may be referenced to the City's Housing Department to seek</p>	<p>Due to lack of funding, this program is no longer available. Residents continue to have access to improvement programs through the Housing Maintenance and Conservation program.</p> <p>This program is removed from the Housing Element.</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
possible financial assistance.	
<p><u>SRO Hotels</u></p> <p>The City shall preserve single-room occupancy (SRO) hotels and strictly enforce ordinances regarding property maintenance and fire and safety standards to safeguard the public health, safety, and welfare of tenants.</p> <p>To encourage the use of hotels by "homeless" individuals, the city continuously works with hotel managers on making rooms available for emergency/transitional housing and makes community service agencies in the area aware of the facilities. The city also refers persons in need to these facilities. Vouchers shall be solicited from the hotel, local businesses, charitable agencies, and other organizations/individuals to provide short-term stays at the hotels. The 160 rooms available in local hotels are adequate to serve the temporary housing needs of homeless individuals in the area. This program is ongoing, implemented, and monitored annually (coinciding with the fiscal year) by the Community Development Department. It is funded by the General Fund, to the extent of available resources. Vouchers and/or an allocated budget were developed in December 2015.</p>	<p>Two motels in the City provide short term housing to homeless or at-risk individuals. City strictly enforces ordinances regarding property maintenance and fire and safety standards to safeguard the public health, safety, and welfare of tenants.</p> <p>The program will be included in the updated Housing Element.</p>
<p><u>Development Standards to Allow Uses</u></p> <p>The City shall modify its Municipal Code to allow the development, maintenance, and improvement of Emergency Shelters, SRO's, Transitional Housing, and Supportive Housing to address constraints and facilitate the development of low-income housing throughout the City. The City shall refer person in need to these facilities. This program is managed by the Planning Department, funded by the General Fund, and was completed in December 2015.</p>	<p>The city adopted a comprehensive update of the Development Code in 2018 which addresses Emergency Shelters, SROs, Transitional Housing, and Supportive Housing consistent with state law.</p> <p>The city will monitor development of these housing types and re-evaluate the effectiveness of established development standards. The program will be included in the updated Housing Element.</p>
<p><u>Emergency Shelters</u></p> <p>The city will amend the Zoning Ordinance so emergency shelters shall be a permitted use without a conditional use permit or other discretionary action in the High-Density Residential zone.</p>	<p>The city adopted a comprehensive update of the Development Code in 2018 that addresses Emergency Shelters consistent with state law.</p> <p>Emergency shelters are allowed without discretionary review in the Commercial Mixed Use (C/MU), Civic Mixed Use (Civic/MU), and Entertainment (E) zoning districts.</p> <p>Development standard review and monitoring of this development type is included in two other programs. As the zoning ordinance amendment is completed, this program is removed from the updated Housing Element. The monitoring of emergency shelter development is addressed in the Emergency, Transitional and Supportive Housing program.</p>
<p><u>Transitional and Supportive Housing</u></p> <p>The city will continue to monitor the inventory of sites appropriate to accommodate transitional housing and supportive housing and will</p>	<p>The city adopted a comprehensive update of the Development Code in 2018 which addresses Transitional and Supportive Housing consistent with state law.</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. In compliance with Senate Bill 2, the City will amend the Zoning Code to allow transitional and supportive housing in all residential zones, subject only to those regulations that apply to other residential uses of the same type in the same zone. This program is funded by the General Fund and managed by the Community Development Department.</p>	<p>The city will continue to monitor the inventory of sites appropriate to accommodate transitional housing and supportive housing and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. This program is renamed and updated to also address emergency shelters.</p>
<p><u>Code Enforcement</u></p> <p>The City shall continue code enforcement of nuisances such as inoperable vehicles, property maintenance, substandard units, and illegal garage conversions.</p>	<p>Code enforcement activities are an important part of the City's neighborhood preservation programs. The program will be included in the updated Housing Element.</p>
<p><u>Housing Cooperating Program</u></p> <p>The City shall work with Los Angeles County to identify and coordinate water and sewer infrastructure on the provision of adequate infrastructure and public services in Cudahy, including monitoring for grant funding sources, to meet the City's RHNA. The program will be financed through the General Fund. The CIP program was completed in December 2015 by the Public Works Department.</p>	<p>Infrastructure impacts from new developments are addresses through the environmental review process as required by the California Environmental Quality Act and will be fully assessed citywide through the General Plan Environmental Impact Report (EIR). Infrastructure availability is an integral part of maintaining a high quality of life for residents. In addition, consistent with the General Plan Implementation program, the City will establish permit tracking program by June 2019 that monitors new development and the redevelopment of existing uses that increase the number of residential unit and/or nonresidential square footage. This program is renamed and updated to address continued coordination with the County and ongoing development tracking.</p>
<p><u>Equal Access</u></p> <p>The city intends to minimize difficulties of special needs households in finding adequate housing by providing programs to prevent discrimination or to encourage the production of housing specifically designed for these households. The city amended its definition of family in 2014.</p> <p>The City shall refer discrimination complaints to the Fair Housing Network and ensure complaints are resolved. The city will participate and distribute fair housing materials at a variety of community activities such as food distribution, Easter egg hunt, national night out, and local carnivals/fairs to reach out to all segments of the community. The city will annually conduct fair housing press releases, directly contact interested groups for distributing fair housing materials, mail fair housing materials through utility billing and post fair housing information in a variety of community locations such as the library, bus stops, public counters, and post office. The program, managed by the Community Development Director, began in 2013, and promotional materials were developed in December 2014 for distribution, and will be updated on an ongoing basis. The program will be funded through the General Fund and staff time.</p>	<p>The city adopted a comprehensive update of the Development Code in 2018 which includes a definition of family consistent with state law.</p> <p>This program is combined with the Fair Housing Program in the updated Housing Element</p>
<p><u>Reasonable Accommodation Program</u></p>	<p>The City adopted a comprehensive update of the Development Code in 2018 that includes a formal procedure for individuals with disabilities</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>The City has developed a policy pursuant to the Fair Housing Amendments Act of 1988, to provide people with disabilities reasonable accommodation in rules, policies, practices, and procedures that may be necessary to ensure equal access to housing. This policy was developed by City Administration and completed in October 2014.</p>	<p>seeking equal access to housing to request a reasonable accommodation to zoning regulations, as provided by the Federal Fair Housing Amendments Act of 1988 and California's Fair Employment and Housing Act, and to establish criteria to be used when considering these requests. The purpose of the reasonable accommodation process is to provide flexibility in the application of land use, zoning or building regulations, policies, or procedures for individuals with disabilities or developers of housing for persons with disabilities when it is necessary to eliminate barriers to equal housing opportunities.</p> <p>This program is completed and removed.</p>
<p>Public Participation Program</p> <p>The city encourages community participation in all city programs. Noticing practices in the city include posting information on scheduled public hearings at City Hall, the Cudahy Library, and the Council Chambers at least two weeks prior to the hearing dates. The city also advertises these hearings, as well as other city programs, in the local newspaper (The Wave) and in the city newsletter. Both papers use English and Spanish in their articles to reach the primarily Hispanic Community of the area. An interpreter is also available during public hearings to facilitate communication between individuals who only speak Spanish. Brochures at City Hall are available in both English and Spanish versions. Spanish-speaking employees also facilitate the dissemination of information regarding city programs. It shall encourage residents to attend City Council and Planning Commission meetings by increased publicity practices. This will allow the city to get more input into its programs and tailor them to meet the needs expressed by residents. Public workshops have been conducted in the General Plan's revised goals and policies and Draft Land Use Plan to solicit resident concerns. Public hearings will continue to be held prior to adoption of the General Plan, including this Element. This will allow the city to better respond to the concerns and interests of Cudahy residents. This program is ongoing, to be monitored annually (coinciding with the fiscal year) and funded by the General Fund as services are contracted and staff time.</p>	<p>Public participation is a priority for the city. This program is combined with the Bilingual program in the updated Housing Element, as access for Spanish speakers in Cudahy is crucial to obtaining full participation.</p>
<p>Fair Housing Program</p> <p>The city promotes the use of the Fair Housing Council of Long Beach through the City newsletter and local papers and informs all city employees of the available services for referral. The City shall prepare a list of referral agencies to serve low-income households, handicapped, elderly, homeless, and other special needs groups. Information is given through Code Enforcement and City Housing Department. It shall make the list available at City Hall, the library and City parks for interested persons. Financing will be provided through the General Fund and CDBG funds. Referral information was completed in December 2015.</p>	<p>The city refers fair housing complaints to the Housing Rights Center and advertises fair housing services and information through the city newsletter and local papers and informs all city employees of the available services for referral.</p> <p>The program will be included in the updated Housing Element and combined with the Equal Access Program.</p>
<p>Food Distribution Program</p>	<p>The city conducts hot meals and food distribution on the 4th Thursday of every month. The program is important to the city and is a valuable resource</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>The City shall continue the hot meals and food distribution programs. Also, it shall assist public and non-profit agencies which provide support services to special needs populations (the homeless, the elderly, single-parent households, etc.). The food distribution program is ongoing, to be monitored annually (coinciding with the fiscal year) and financed through the CDBG.</p>	<p>for residents. The program will be included in the updated Housing Element.</p>
<p><u>Homeless Assistance Program</u></p> <p>The City shall continue to provide funds for the Human Services Association to serve the homeless and other special needs groups in the community. It shall also maintain a list of local social services to use as referral sources for residents in need. These services are discussed in the Housing Element Profile Report. This program is ongoing, to be monitored annually (coinciding with the fiscal year) and will continue to be financed through the CDBG.</p>	<p>Due to lack of funding, the City has not been able to provide funds to the Human Services Association. It does maintain a list of local social services to use as referral sources for residents in need and refers homeless individuals to local and regional homeless resources. The program will be included in the updated Housing Element.</p>
<p><u>Bilingual Programs</u></p> <p>The City's will actively produce documents and publications that are in both English and Spanish. This is an ongoing program monitored annually (coinciding with the fiscal year) by the Community Services Department. It is funded by the General Fund, to the extent available, and staff time.</p>	<p>Public participation is a priority for the city. This program is combined with the Public Participation program.</p>
<p><u>Handicapped Access</u></p> <p>The city currently requires new development to comply with State standards for handicapped access. It shall also enforce the recently adopted American with Disabilities Act. This program is implemented by the Department of Building and Public Services with funding from the General Fund. The city adopted the Los Angeles County Building Code in March 2013, which includes standards for ADA compliance.</p>	<p>The program is ongoing and will be included in the updated Housing Element</p>
<p><u>Senior Shared Housing Program</u></p> <p>The senior's Center on Clara Park serves as an information center for senior programs and resources. This is an ongoing program monitored annually (coinciding with the fiscal year) by the Community Services Department with funding from the General Fund.</p>	<p>The program is ongoing and will be included in the updated Housing Element</p>
<p><u>Housing for Extremely-Low-Income Households Program</u></p> <p>The city will encourage the development of housing units for households earning 30 percent or less of the median Family income for Los Angeles County. Specific emphasis shall be placed on the provision of family housing and non-traditional housing types such as single-room occupancy units and transitional housing. The City will encourage development of housing for extremely low-income households through a variety of activities such as outreach to housing developers on at least an annual basis, providing financial or in-kind technical assistance or land-write downs, providing expedited processing, identifying grant and funding opportunities, applying for or supporting applications for funding on an ongoing basis, reviewing and prioritizing local funding at least twice during the planning period and/or offering additional incentives beyond the density bonus provision. This program, administered by the Planning Department, is ongoing.</p>	<p>Through its Inclusionary Housing Ordinance, the City has established development incentives and community benefits permitting procedure that incentivizes benefits and desired public amenities provided by private development, which include, but are not limited to, extremely/low Income and/or affordable housing. This program is merged with the Affordable Housing Incentives program.</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p><u>Persons with Disabilities, including Developmental Disabilities Program</u></p> <p>The city shall seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities. The City shall provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, to projects targeted for persons with disabilities, including persons with developmental disabilities. The City shall reach out annually to developers of supportive housing to encourage development of projects targeted for persons with disabilities, including persons with developmental disabilities. The City shall work with the local Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. Information will be made available on the City's website and at City Hall counter.</p>	<p>The program is ongoing and will be included in the updated Housing Element</p>
<p><u>Preservation of At-Risk Units Program</u></p> <p>The City will monitor every three months, the status of any HUD receipt/approval Notices of Intent and Plans of Action filled by property owners to convert to market-rate units. The city will annually identify and meet and pursue funding with non-profit organizations as potential purchasers/managers of at-risk housing units. As part of coordination with non-profit partners, the city will annually explore funding sources available to purchase affordability covenants on at-risk projects, transfer ownership of at-risk projects to public agencies, purchase existing buildings to replace at-risk units, or construct replacement units. Where feasible the city will provide technical assistance and support to these organizations with respect to financing. The city will update this list annually. The City will provide tenant education within 30 days of notice and assist tenants to obtain special Section 8 vouchers reserved for tenants of converted properties. HUD has set aside special Section 8 vouchers for existing tenants in Section 8 projects that are opting out of low-income use. Upon conversion, the units will stay affordable to the existing tenants if they stay. Once a unit is vacated and new tenants move in, the units will convert to market-rate housing. This is an ongoing program monitored (coinciding with the fiscal year) and managed by the Community Development Department with funding from CDBG funds.</p>	<p>Subsidized housing units in Cudahy are owned by non-profit affordable housing developers that have expressed a desire to continue renewing their subsidies that allow for the provision of affordable housing.</p> <p>A program addressing affordable housing at risk of conversion to market rate will be included in the updated Housing Element. The details of this program are merged with the At-Risk Housing Preservation Program.</p>
<p><u>Consistency with General Plan</u></p> <p>The City shall conduct an integral review as part of its General Plan implementation to achieve consistency with other general plan elements, policies, programs, and community goals to reflect the policy direction contained in other parts of the General Plan. As portions of the General plan are amended in the future, this Housing Element will be reviewed to ensure that internal consistency is maintained. This is an ongoing program monitored annually (coinciding with the fiscal year) and managed by the Community Development Director and Planning Departments.</p>	<p>The program is ongoing and will be included in the updated Housing Element.</p>
<p><u>Zoning Update Program</u></p> <p>To address a shortfall and un-accommodated need of 280 units at appropriate densities, the city will increase allowable zoning densities of the HDR and CC Zone's city wide from 14.52 to allowing a minimum of 20 dwelling units per acre. Increasing the density to 20 dwelling units</p>	<p>In 2016-2018, new General Plan Land Use designations were developed, allowing for higher density development in residential areas and identifying new areas for mixed-use development with higher residential densities. The city completed a concurrent Development</p>



Table 6.1: Review and Revise (2021 Housing Element)

2021 Housing Element Program	Program Performance and Continued Appropriateness
<p>per acre will further facilitate meeting the demand for affordable housing. Pursuant to Government Code Section 65583(c)(1) and 65583.2(h) and (i), sites to accommodate the shortfall and un-accommodated need of 280 units will permit a minimum of 16 dwelling units per site and 50% will be zoned residential only. Candidate sites for rezoning include Site numbers 1, 2, 3, 4, and 11. In addition, the HDR and CC zones will be amended to permit owner-occupied or multifamily residential uses by right (without a conditional use permit, planned unit development permit, or other discretionary). This program was completed by October 2014 by the Community Development Department.</p>	<p>Code and Zoning Map update to provide zoning districts consistent with the new General Plan. These changes significantly increased allowable densities in residential and mixed-use areas and are expected to provide more incentive to recycle underutilized and deteriorating property.</p> <p>The updated sites inventory shows sufficient capacity to address the City's current and previous (rollover) RHNA.</p> <p>This program is completed and removed.</p>
<p>Affirmatively Furthering Fair Housing – AFFH – AB 686.</p> <p>As of January 1, 2019, AB 686 extends the obligation to affirmatively further fair housing to all public agencies in the State of California. Affirmatively furthering fair housing means taking meaningful actions to combat discrimination that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The 6th Cycle Housing Element analysis has addressed the following: (1) Significant discrepancies in housing needs and in access to opportunities; (2) Replacing segregated living patterns with truly integrated and balanced living patterns; (3) Transforming racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity; (4) Fostering and maintaining compliance with civil rights and fair housing laws. The city's Community Development Department, in conjunction with the State Department of Housing and Community Development (HUD) will administer and monitor this program.</p>	<p>Section 8 of this Housing Element includes an analysis of AB 686, Affirmatively Furthering Fair Housing. The City bears the responsibility of monitoring and enforcing any rules and regulations regarding Furthering Fair Housing by understanding the root causes of housing discrimination, who is being discriminated against and why, and implement programs, policies, and objectives in an affirmative fashion, to address discrimination of the protected classes in the City.</p> <p>This is an ongoing program that must be monitored and reported to the Department of Housing and Community Development.</p>



7 Housing Goals, Policies, Programs and Quantified Objectives

This section of the City of Cudahy Housing Element addresses the State's housing element requirements for a "statement of the community goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing"

The goals, policies, and programs delineated in this Housing Element serve to support the State of California's overarching goal of providing, "decent housing and a suitable living environment for every California" (Government Code Section 65580). This Housing Element proposes to add two programs that were not included in the previous Housing Element, and three programs will be deleted because they are no longer needed or may not be the best use of City resources.

The housing goals, policies, and programs that follow were created for the purpose of meeting the housing needs of the City throughout the 2021-2029 planning period given the limitations imposed by current political, economic, and social conditions, budget constraints and available local, State, and federal funding.

7.1 HOUSING GOALS, POLICIES, AND PROGRAMS

The City's housing goals have been developed to respond to the key housing related issues facing the City. As summarized in the Profile Report, Cudahy is experiencing a very high demand for housing. This is manifested by the low vacancy rate, the creation of unpermitted housing units, and the doubling-up of households in individual units resulting in overcrowding. The lack of housing has led to increases in rents and prices, which go beyond the affordability of its low-income residents.

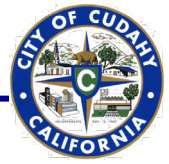
Housing Element Policies indicates those policies that will be applicable over the course of the planning period governed by this Element;

Housing Element Programs indicates those specific programs that will be effective in assisting in the conservation of affordable housing, the development of new affordable housing, the identification and provision of new sites for residential development, and the removal of governmental constraints.

Goals

Housing Element Goal 1: The City of Cudahy will improve the housing supply and the choice of housing opportunities through private investment and, where necessary, through public action and financing.

Housing Element Goal 2: The City of Cudahy will promote affordable housing and shelter for all economic segments of the community.



Housing Element Goal 3: The City of Cudahy will support and provide incentives for the maintenance and rehabilitation of the existing housing stock.

Housing Element Goal 4: The City of Cudahy will encourage development of a viable urban community consistent with orderly growth and environmental conservation to provide suitable living environments, with access to employment, community facilities, and services.

Housing Element Goal 5: The City of Cudahy will promote equal access and opportunity to housing regardless of race, religion, sex, marital status, ancestry, national origin, or color.

Housing Element Goal 6: The City of Cudahy will identify and address significant discrepancies in housing needs and in access to housing opportunities.

Housing Element Goal 7: The City of Cudahy will identify and replace segregated living patterns with truly integrated and balanced living patterns.

Housing Element Goal 8: The City of Cudahy will identify and transform racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity.


Housing Element Goal 9: The City of Cudahy will foster and maintain compliance with civil rights and fair housing laws.


Issue: Housing Availability


Although there has been an overall population decline in Cudahy, due to over-crowding and housing cost, there is an increasing need for housing in the city. Low vacancy rates and second units on single-family lots reflect this high demand. New housing development coupled with the City's new Inclusionary Housing Ordinance will help meet this need and provide residents with greater opportunities to find appropriate and adequate housing.

HOUSING ELEMENT GOAL 1:

The City of Cudahy will improve the housing supply and the choice of housing opportunities through private investment and, where necessary, through public action and financing.

 **Housing Element Policy 1.1:** The City of Cudahy will encourage future investment in the City's housing stock.¹


 **Housing Element Policy 1.2:** The City of Cudahy will evaluate the factors affecting housing costs and examine ways to reduce housing costs where governmental action is appropriate.

 **Housing Element Policy 1.3:** The City of Cudahy will support the development and use of new techniques in housing design, construction, and development.




¹ This symbol indicates a goal, policy, or program that addresses environmental justice issues.




 **Housing Element Policy 1.4:** The City of Cudahy will promote the development of attractive and safe housing to meet the community's needs.

Housing Element Policy 1.5: The City of Cudahy will provide prompt processing of housing construction applications through standardized development requirements and centralized processing.

Housing Element Policy 1.6: The City of Cudahy will encourage the assemblage and consolidation of existing small parcels in areas which permit higher density development. Larger parcels can better accommodate increased density housing, through a more efficient use of space resulting in more on-site amenities and greater use of open space.

 **Housing Element Policy 1.7:** The City of Cudahy will recognize the changing trends and patterns in the community and encourage a broad range of housing types to meet these needs.


 **Housing Element Policy 1.8:** The City of Cudahy will work with the appropriate service providers to develop and coordinate programs to assist in the conservation of affordable housing and to serve the homeless population.


Issue: Housing Affordability


Low-income households comprise a major segment of the City's population. Coupled with high demand and market rate housing, it has led to overpaying, overcrowding, and unpermitted housing units. Affordability is a major concern in Cudahy.

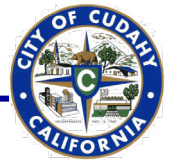
HOUSING ELEMENT GOAL 2:






The City of Cudahy will promote affordable housing and shelter for all economic segments of the community.

 **Housing Element Policy 2.1:** The City of Cudahy will promote all State, regional and local practices and plans that support housing availability for all economic segments of the population.

 **Housing Element Policy 2.2:** The City of Cudahy will promote local housing services to ensure federal, state, and local housing programs are available to assist the private sector in obtaining funds for housing development.

 **Housing Element Policy 2.3:** The City of Cudahy will utilize Community Development Block Grant funds to develop housing, expand economic opportunities through commercial development, improve community facilities and services, prevent deterioration of the housing stock, and redevelop residential areas.








-  **Housing Element Policy 2.4:** The City of Cudahy will inform residents of the availability of housing assistance programs and community services available in the area (such as Section 8 certificates and vouchers).
-  **Housing Element Policy 2.5:** The City of Cudahy will encourage variety in the supply of housing at costs affordable to the various income levels of the population.
-  **Housing Element Policy 2.6:** The City of Cudahy will solicit State and Federal funds for new housing development.
-  **Housing Element Policy 2.7:** The City of Cudahy will work towards the conservation of existing subsidized housing for low and moderate-income families.
-  **Housing Element Policy 2.8:** The City of Cudahy will seek funding opportunities and promote rental assistance for low and moderate-income families.

Issue: Housing Maintenance and Conservation





The City of Cudahy is primarily a residential community and has provided housing to the County's very low, low, and moderate-income households. Without maintenance and conservation, the City's housing stock can go into disrepair or be replaced with more expensive housing. To prevent displacement and the deterioration of housing and neighborhood quality, the city needs to promote the rehabilitation of existing housing units.

HOUSING ELEMENT GOAL 3:

The City of Cudahy will support and provide incentives for the maintenance and rehabilitation of the existing housing stock.

-  **Housing Element Policy 3.1:** The City of Cudahy will encourage, support, and provide incentives for the maintenance, conservation, and revitalization of existing residential units.
-  **Housing Element Policy 3.2:** The City of Cudahy will explore strategies and programs that will be effective in reducing the costs incurred by the homeowner for rehabilitation.
-  **Housing Element Policy 3.3:** The City of Cudahy will encourage relocation assistance for displaced persons living in rentals undergoing rehabilitation and/or reconstruction.
-  **Housing Element Policy 3.4:** The City of Cudahy will continue residential rehabilitation programs and provide technical assistance to property owners as needed.
-  **Housing Element Policy 3.5:** The City of Cudahy will encourage prompt rehabilitation or demolition and replacement of vacant and abandoned properties.



-  **Housing Element Policy 3.6:** The City of Cudahy will actively engage in identifying substandard and deteriorating housing in Cudahy and take appropriate actions to correct these deficiencies, such as initiating rehabilitation, maintenance, or replacement programs.
-  **Housing Element Policy 3.7:** The City of Cudahy will promote housing rehabilitation and conservation through public education and awareness programs.
-  **Housing Element Policy 3.8:** The City of Cudahy will encourage property maintenance to promote quality design, public safety, and to promote energy conservation.
-  **Housing Element Policy 3.9:** The City of Cudahy will work with the County or non-profit agencies in conserving existing low-income housing units and subsidized housing projects.

Housing Element Policy 3.10: The City of Cudahy will preserve existing single-family, lower density residential neighborhoods.

Issue: Neighborhood Preservation


Neighborhood quality is dependent on street and property maintenance, the availability of services and infrastructure and the residents' sense of community. By improving neighborhood quality, the City of Cudahy can create stability in the resident population and pride in its people.


HOUSING ELEMENT GOAL 4:

The City of Cudahy will encourage development of a viable urban community consistent with orderly growth and environmental conservation to provide suitable living environments, with access to employment, community facilities, and services.


Housing Element Policy 4.1: The City of Cudahy will reserve the existing residential neighborhoods and provide areas to accommodate new residential development.

Housing Element Policy 4.2: The City of Cudahy will coordinate regional and local public works and capital improvement programs in declining neighborhoods and in neighborhoods experiencing increased population due to redevelopment or land conversion activities.

-  **Housing Element Policy 4.3:** The City of Cudahy will provide the necessary public services and infrastructure, including encouraging early care and education facilities, to residential areas and locate new housing developments where availability of public facilities and services is assured.

-  **Housing Element Policy 4.4:** The City of Cudahy will encourage the application of high-quality urban design standards to create safe, attractive, functional housing units and neighborhoods.



 **Housing Element Policy 4.5:** The City of Cudahy will conserve existing residential areas and prevent the intrusion of incompatible uses into the neighborhoods.

Housing Element Policy 4.6: The City of Cudahy will encourage continued and new investment in the established residential neighborhoods in Cudahy.

Housing Element Policy 4.7: The City of Cudahy will increase property maintenance efforts by code enforcement to improve the overall appearance of the residential neighborhoods, thus maintaining property values in the City.


Housing Element Policy 4.8: The City of Cudahy will identify the best possible locations and development standards for residential development and encourage a high-quality environment for family life.


Issue: Equal Access to Housing


Discrimination can prevent households with special needs or certain characteristics from obtaining appropriate housing. The City of Cudahy seeks to eliminate all forms of housing discrimination to allow residents to find adequate housing.


HOUSING ELEMENT GOAL 5:

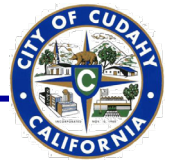
The City of Cudahy will promote equal access and opportunity to housing regardless of race, religion, sex, marital status, ancestry, national origin, or color.


 **Housing Element Policy 5.1:** The City of Cudahy will promote equal access and opportunities to housing through the provision of consumer information, assistance, and protection and through citizen involvement in the design and implementation of housing programs.


 **Housing Element Policy 5.2:** The City of Cudahy will explore procedures for fair and equitable treatment of the parties in housing contracts, such as buyer-seller and landlord-tenant agreements.

 **Housing Element Policy 5.3:** The City of Cudahy will encourage citizen participation and community involvement in the development and implementation of housing assistance and housing programs in the City. Actively pursue participation on housing issues by the City's elderly and minority populations.


 **Housing Element Policy 5.4:** The City of Cudahy will establish referral agencies to serve low-income households, the homeless, handicapped, elderly households and residents with special housing needs.




 **Housing Element Policy 5.5:** The City of Cudahy will enforce fair housing laws and encourage the use of fair housing council services.


 **Housing Element Policy 5.6:** The City of Cudahy will encourage and promote accessible housing for the handicapped. This includes the retrofitting of existing units and the enforcement of the State accessibility standards for new residential construction.

Housing Element Policy 5.7: The City of Cudahy will provide continued cooperation between the City and adjacent cities in the development of regional housing programs and homeless services.


 **Housing Element Policy 5.8:** The City of Cudahy will provide density bonuses for low-income housing projects and senior citizen housing projects.


HOUSING ELEMENT GOAL 6:

 **Housing Element Policy 6.1:** The City of Cudahy will identify areas of the city where significant discrepancies in housing needs and in access to opportunities exist and address them.

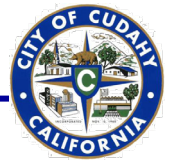
 **Housing Element Policy 6.2:** The City of Cudahy shall convene a task force consisting of city staff from the Community Development Department to implement this policy and make periodic reports to the City Manager and the City Council.

HOUSING ELEMENT GOAL 7:

 **Housing Element Policy 7.1:** Through its zoning and land use policies, the City of Cudahy shall systematically replace segregated living patterns with truly integrated and balanced living patterns.

 **Housing Element Policy 7.2:** The Community Development Director shall study and advise the City Manager, the Planning Commission, and the City Council on the best practices available to replace segregated living patterns in the City with truly integrated and balanced living patterns. The Community Development Director shall define “segregated living patterns” based on guidance and policies of the State Department of Housing and Community Development Department.

HOUSING ELEMENT GOAL 8:



Housing Element Policy 8.1: The City of Cudahy, in compliance with State Assembly Bill 686 (AB 686), shall identify and systematically transform racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity.



Housing Element Policy 8.2: The City of Cudahy shall establish a critical racially and ethnically concentrated areas of poverty within its boundaries and implement policies to transform those areas into areas of opportunity. This policy may require coordination with the HCD as most of the City of Cudahy is predominantly Hispanic/Latino and the predominantly low income.

HOUSING ELEMENT GOAL 9:



Housing Element Policy 9.1: The City of Cudahy shall establish and maintain policies that foster and maintain compliance with all civil rights and fair housing laws by training its Community Development staff in the details of the civil rights and fair housing laws.



Housing Element Policy 9.2: The City of Cudahy, in addition to establishing and maintain compliance with all civil rights and fair housing laws shall employ, where vacancies exist, those who are familiar with, or have worked specifically with fair housing and civil rights laws.

HOUSING PROGRAMS

The quality of housing in the City of Cudahy is a major concern. The Housing Program has been designed to address these needs and to help provide adequate housing to all residents. The housing program revolves around the key issues and housing goals of the City which have been discussed previously.

Housing Availability - the policies address the existing and future housing needs.

Housing Affordability - the policies provide housing for the City's lower income households and reduce overpayment.

Housing Maintenance and Conservation - the policies preserve the existing housing stock and conserve affordable housing units.

Neighborhood Preservation - the policies are designed to bring stability to the residential neighborhoods and promote community pride.

Equal Access - the policies are designed to assist special group's find appropriate housing.



Early care and Education Program Availability – the policies support the availability of quality, affordable early care, and education services for families.

Through the policies and programs in this Element, the City of Cudahy will be able to improve the quality of the environment for all residents. By addressing these interdependent issues at the same time, the City hopes to eliminate or slowly reduce its housing problems. The identification of funding sources for individual programs does not exclude the use of other funding sources which may be available.

SUMMARY OF PROGRAMS

Table 7.1 Summary of Programs

Program #	Name	Responsible Department	Completion Date
1	Adequate Sites Program	Community Development	Re-zoning completed in 2018; Ongoing (monitored annually)
2	Housing Information Program	Community Development	December 2018
3	Second Unit Ordinance	Planning	2018, Ongoing (monitored annually)
4	Promote Lot Consolidation	Planning	Ongoing, Community Benefits program by June 2019
5	Affordable Housing Incentives	Community Development	Ongoing, Community Benefits program by June 2019
6	CDBG Information Program	Community Development	Distribute brochure in December 2018. Ongoing (monitored annually)
7	At-Risk Housing Preservation	Community Development	Ongoing (monitored annually)
8	Housing Maintenance and Conservation	Community Development	Ongoing
9	Hotel and Motel Resources	Community Development	Ongoing (monitored annually)
10	Development Standards to Allow Uses	Planning	January 2020
11	Emergency, Transitional and Supportive Housing	Community Development	Ongoing (monitored annually)
12	Code Enforcement	Code Enforcement	Ongoing (monitored annually as part of the CDBG program)
13	Infrastructure Availability	Community Development	June/December 2019
14	Public Participation Program	City Clerk	Ongoing (monitored annually)
15	Fair Housing Program	Code Enforcement / Housing	December 2018; Ongoing
16	Food Distribution Program	Community Development	Ongoing (monitored annually)
17	Homeless Assistance Program	Community Development	Ongoing (monitored annually)
18	Handicapped Access	Building & Safety	Ongoing (monitored annually)
19	Senior Shared Housing Program	Community Services	Ongoing (monitored annually)
20	Persons with Disabilities, including Developmental Disabilities Program	Community Development	December 2018/2019
21	Consistency with General Plan Program	Community Development / Planning	Ongoing (monitored annually)

Source: City of Cudahy; Community Development Department



Housing Availability

Housing availability refers to the development and provision of housing units to meet existing and future needs of area residents. Housing development can be initiated by the city, private developers, or other agencies. Most new residential development will be initiated by the private sector because of limited financial resources on the part of the City, State, and Federal governments. Developers will generally provide market rate housing because they see housing development as a financially profitable activity. Housing projects funded by local state and federal agencies are likely to be reserved for low and moderate-income households. Specific programs designed to promote new residential development in the city are described in the following section.

Program 1: Adequate Sites

The residential sites inventory consists of vacant and underutilized residential land with the capacity to yield at least 710 units. The sites and RHNA comparison indicate that there are adequate sites to accommodate and exceed the total RHNA (including both the 2021 RHNA and 2014 unaccommodated RHNA) under the City's 2018 General Plan and Development Code standards.

The City of Cudahy has an unaccommodated RHNA from 2014 of 154 units in addition to the current RHNA (2021-2029). Within the current (2021) RHNA, there is a shortfall identified from the 2014 adopted Housing Element of 126 units. To satisfy the total unaccommodated (rollover) RHNA of 280 units, the city will re-zone at least 14 acres at a minimum density of 20 units per acre as part of the new General Plan and Development Code update. Per housing element law (Government Code 65583.2[h]), the sites re-zoned to address the lower-income, unaccommodated (rollover) RHNA units will be on sites that are zoned to permit owner-occupied and rental multifamily residential use by right (as defined in Government Code 65583.2[i]) during the planning period. These sites will permit at least 16 units per site at a density of at least 20 units per acre. The sites inventory presented in Table 4.2 includes sufficient sites to address these requirements.

The City will maintain an inventory of available sites for residential development and provide it to prospective residential developers upon request. The city will also conduct ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process.

Government Code §65863 states that no jurisdiction shall "reduce, or require, or permit the reduction of, the residential density for any parcel to, or allow development of any parcel at, a lower residential density, than projected" for sites identified in the Housing Element sites inventory unless the jurisdiction makes written findings that the reduction is consistent with the General Plan, and that the remaining sites identified in the Housing Element are adequate to accommodate the jurisdiction's need. The City will evaluate residential development proposals



for consistency with goals and policies of the General Plan specifically as they relate to the housing needs of the community.

Program 2: Housing Information Program

To encourage the development of high-quality housing on vacant and underutilized lots, the City shall establish a promotional campaign to area developers. The campaign shall promote the City of Cudahy and existing investment opportunities. The City shall work with local business groups (such as the Chamber of Commerce and Building Industry Association) on promoting available incentives to new development. This may be accomplished through networking, formal presentations, brochures, ads, and other promotional materials and activities. Staff will also keep informed of state and federal housing programs and provide information to interested residents and groups. The city will work with local early care and education advocates to create an information handout to inform developers, business groups, and households about the available early care and education services. The program will be managed by the Community Development Director and will be updated on an ongoing basis. The program will be funded through the General Fund.

Program 3: Second Unit Ordinance

As part of the comprehensive update to the Development Code, the City will update accessory dwelling unit requirements and regulations within the Development Code to comply with State law – Assembly Bill 2299 and Senate Bill 1069 – in 2018. The Planning Department will monitor the construction of second units annually (coinciding with the fiscal year).

Program 4: Promote Lot Consolidation

Although long-time policy encourages residential lot consolidation to achieve higher quality development, lot consolidation rarely occurs. As part of the comprehensive update to the General plan, the city increased the allowed density in the multi-family residential areas and intensity of nonresidential districts to encourage revitalization and lot consolidation. Within 3 years, the City will establish development incentives and a community benefit permitting procedure that incentivizes benefits and desired public amenities provided by private development, which include, but are not limited to, lot consolidation. In the interim, City staff will provide technical assistance and information to interested developers and post (at the Planning Department and on the city website) the Housing Element Sites Inventory table that identifies lot consolidation potential for residential sites.

Program 5: Affordable Housing Incentives

To encourage the development of affordable housing units, the City shall provide developers with incentives and shorten the permit process for low-income and senior citizen housing projects. These incentives may be like those awarded for high quality housing projects or developments on larger lots. Or they may involve a different set of parking, open space and density standards



which lower the cost of development. By expediting the review process, developers also save money and housing costs can be reduced. Within 3 years, the City will establish development incentives and a community benefit permitting procedure that incentivizes benefits and desired public amenities provided by private development, which include, but are not limited to, extremely low-income and/or affordable housing. In addition, the city provides information on available financing mechanisms and federal, state, and local programs and agencies that provide funding assistance for housing projects. This information shall be made available to developers. The City will also provide technical assistance and information to interested affordable housing developers and post (at the Planning Department and on the City website) the Housing Element Sites Inventory table that identifies residential development sites and a technical assistance memo on the use of the State's Density Bonus provisions.

Program 6: CDBG Information Programs

The City shall continue housing programs on housing development, infrastructure, rehabilitation, and job development, as allowed by the CDBG program. The city currently uses its CDBG moneys for the Single Unit Home Improvement program, fair housing foundation services, code enforcement, business assistance program, senior activities/nutrition program, food distribution program and the development of public facilities. It shall coordinate with the County Housing Authority in implementing programs outlined in the Comprehensive Housing Affordability Strategy (CHAS) for Los Angeles County. The city also provides informational brochures outlining available housing assistance and rehabilitation programs in the city. The brochure encourages residents to participate in the housing assistance payments program and the housing voucher program through the Los Angeles County Housing Authority. The program is ongoing, contingent on federal funding availability, and monitored annually (coinciding with the fiscal year) under the Community Development Department and is financed by the General Fund. The city will distribute the information brochure to every City facility.

Program 7: At-Risk Housing Preservation

Subsidized housing units in Cudahy are owned by non-profit affordable housing developers that have expressed a desire to continue renewing their subsidies that allow for the provision of affordable housing. The City shall take the lead in coordinating efforts for the preservation of subsidized housing projects in Cudahy. Every three months, the City will monitor the status of any HUD receipt/approval Notices of Intent and Plans of Action filled by property owners to convert to market-rate units. To help conserve the low-income units at risk of conversion, the city will provide technical assistance to non-profit groups interested in buying the projects. If any of the non-profit affordable housing providers decide to let their subsidized housing contracts lapse, the City will aggressively look for an agency to buy the property or help the residents establish an association to buy the project. the City will also notify all organizations listed on Table 2-15 (page 41) of the availability of property to ensure continued low-income housing. HUD has stated that they generally evaluate projects that apply for conversion and offer incentives to property owners to preserve these units. The California Housing Partnership Corporation (CHPC) has indicated that it will assist Cudahy in looking for a suitable organization who would take over



the subsidized projects in the city. The City will also provide tenant education within 30 days of notice and assist tenants to obtain special Section 8 vouchers reserved for tenants of converted properties. Public participation shall be encouraged throughout the process to reflect the needs and interests of Cudahy residents. Financing will come from CDBG funds, and the General Fund, to the extent funds are available. Other funding sources that may be available shall be explored, as well. This is an ongoing program monitored (coinciding with the fiscal year) and managed by the Community Development.

Program 8: Housing Maintenance and Conservation

The City of Cudahy has an ongoing program for the maintenance and conservation of the existing housing stock. There are programs aimed at the conservation of older housing units which are in good condition to maintain the units as affordable housing options. Rehabilitation and property maintenance programs ensure that living conditions are safe and decent for all households. By maintaining the existing housing stock and preventing the creation of substandard housing, the city improves the living environment for present residents. Implementation measures for housing maintenance and conservation are discussed below.

Approximately 5 housing units are anticipated to benefit from the City's rehabilitation programs annually. This program is managed by the Community Development Director.

Program 9: Hotel and Motel Resources

The City shall preserve hotels and motels as an emergency housing resource and strictly enforce ordinances regarding property maintenance and fire and safety standards to safeguard the public health, safety, and welfare of tenants. Code enforcement efforts on hotels and motels in the city have led to the upgrading and renovation of two local motels. The city does not allow SRO hotels to be used as permanent housing but will encourage their use as emergency and transitional shelter for the homeless. To encourage the use of hotels by "homeless" individuals, the city continuously works with hotel managers on making rooms available for emergency/transitional housing and makes community service agencies in the area aware of the facilities. The city also refers persons in need to these facilities. Vouchers shall be solicited from the hotel, local businesses, charitable agencies, and other organizations/individuals to provide short-term stays at the hotels. The 160 rooms available in local hotels are adequate to serve the temporary housing needs of homeless individuals in the area. This program is ongoing, implemented, and monitored annually (coinciding with the fiscal year) by the Community Development Department. It is funded by the General Fund, to the extent of available resources. Vouchers and/or allocated funds are searched for on an ongoing basis.

Program 10: Development Standards to Allow Uses

The city has modified its Municipal Code to allow the development, maintenance, and improvement of Emergency Shelters, Transitional Housing, and Supportive Housing to address constraints and facilitate the development of low-income housing throughout the city. The City



will monitor development of these housing types and re-evaluate the effectiveness or constraints posed by established development standards every two years starting in January 2020.

Program 11: Emergency, Transitional and Supportive Housing

The city will continue to monitor the inventory of sites appropriate to accommodate transitional housing and supportive housing and will work with the appropriate organizations to ensure the needs of homeless and extremely low-income residents are met. The city is committed to prioritizing funding and other available incentives for projects that provide housing for homeless and extremely low-income residents whenever possible. This program is funded by the General Fund and managed by the Community Development Department.

Neighborhood Preservation

Neighborhood preservation is seen as a mechanism to increase homeownership in the City, to promote property maintenance, and to maintain a more stable resident population. By improving public services and infrastructure in existing neighborhoods, including available early care and education, the city hopes to provide a more attractive residential environment. Implementation measures that will help achieve this goal are provided below.

Program 12: Code Enforcement

The City shall continue code enforcement of nuisances such as inoperable vehicles, property maintenance, substandard units, and illegal garage conversions. It shall identify substandard dwelling units and encourage rehabilitation through the provision of technical support and incentives such as streamlined permit processing, variances to development standards on a case-by-case basis, waiver of fees or fines if rehabilitation is undertaken within the next three months, etc. Also, it shall actively work towards the rehabilitation of structures which do not meet seismic safety standards and current electrical code requirements. The City shall coordinate with homeowner's associations in the enforcement of CC&R's regarding property maintenance. This program is ongoing, to be monitored annually (coinciding with the fiscal year) and will continue to be financed through CDBG funds. The Code Enforcement Program is complaint driven; complains are filed with the City's Code Enforcement department which then schedules follow up inspections and provides tenants with information to resources.

Program 13: Infrastructure Availability

The City shall work with Los Angeles County to identify and coordinate water and sewer infrastructure on the provision of adequate infrastructure and public services in Cudahy, Consistent with the General Plan Implementation program, the City will establish a permit tracking program by June 2019 that monitors new development and the redevelopment of existing uses that increase the number of residential unit and/or nonresidential square footage. The City will annually review the permit tracking data to determine levels of infrastructure need to ensure appropriate levels of circulation, water, sewer, storm drainage, and other utilities'



availability and capacity. In addition, the City will establish specific procedures and require that priority is given to developments with units affordable to lower-income households.

The city will pursue a study to evaluate current and potential impact fees from new development for infrastructure improvements and other public facilities to offset the impact of new development.

Program 14: Public Participation Program

The city encourages community participation in all city programs. Noticing practices in the city include posting information on scheduled public hearings at City Hall, the Cudahy Library, and the Council Chambers at least two weeks prior to the hearing dates. The city also advertises these hearings, as well as other city programs, in the local newspaper (The Wave) and in the city newsletter. Both papers use English and Spanish in their articles to reach the primarily Hispanic Community of the area. An interpreter is also available during public hearings to facilitate communication between individuals who only speak Spanish. Brochures at City Hall are available in both English and Spanish versions. Spanish-speaking employees also facilitate the dissemination of information regarding city programs. It shall encourage residents to attend City Council and Planning Commission meetings by increased publicity practices. This will allow the city to get more input into its programs and tailor them to meet the needs expressed by residents. Public workshops have been conducted in the General Plan's revised goals and policies and Draft Land Use Plan to solicit resident concerns. Public hearings will continue to be held prior to adoption of the General Plan, including this Element. This will allow the city to better respond to the concerns and interests of Cudahy residents. This program is ongoing, to be monitored annually (coinciding with the fiscal year) and funded by the General Fund as services are contracted and staff time.

The City will also actively produce documents and publications that are in both English and Spanish. This is an ongoing program monitored annually (coinciding with the fiscal year) by the Community Services Department. It is funded by the General Fund, to the extent available, and staff time.

*The Housing Element Update *Draft* was made available online October 10, 2021.

Program 15: Fair Housing Program

There are many special needs households in Cudahy that will benefit from programs designed to promote equal access and opportunity to housing. The city intends to minimize difficulties of special needs households in finding adequate housing by providing programs to prevent discrimination or to encourage the production of housing specifically designed for these households.

The city promotes the use of the Housing Rights Center through the City newsletter and local papers and informs all city employees of the available services for referral. The city will participate and distribute fair housing materials at a variety of community activities such as food



distribution, Easter egg hunt, national night out, and local carnivals/fairs to reach out to all segments of the community. The city will annually conduct fair housing press releases, directly contact interested groups for distributing fair housing materials, mail fair housing materials through utility billing and post fair housing information in a variety of community locations such as the library, bus stops, public counters, and post office. The City shall prepare a list of referral agencies to serve low-income households, handicapped, elderly, homeless, and other special needs groups. Information is given through Code Enforcement and City Housing Department. It shall make the list available at City Hall, the library and City parks for interested persons. Financing will be provided through the General Fund and CDBG funds.

Program 16: Food Distribution Program 

The City shall continue the hot meals and food distribution programs the 4th Thursday of every month. Also, it shall assist public and non-profit agencies which provide support services to special needs populations (the homeless, the elderly, single-parent households, etc.). The food distribution program is ongoing, to be monitored annually (coinciding with the fiscal year) and financed through the CDBG program.

Program 17: Homeless Assistance Program 

The City shall maintain a list of local social services to use as referral sources for residents in need. The information will be distributed to City departments that interface with homeless persons or persons at risk of being homeless.

Program 18: Handicapped Access

The city currently requires new development to comply with State standards for handicapped access. It shall also enforce the recently adopted American with Disabilities Act. This program is implemented by the Department of Building and Public Services with funding from the General Fund. The city adopted the Los Angeles County Building Code in March 2013, which includes standards for ADA compliance.

Program 19: Senior Shared Housing Program 

The senior's Center on Clara Park serves as an information center for senior programs and resources. This is an ongoing program monitored annually (coinciding with the fiscal year) by the Community Services Department with funding from the General Fund.

Program 20: Persons with Disabilities, including Developmental Disabilities Program

The city shall seek State and Federal monies, as funding becomes available, in support of housing construction and rehabilitation targeted for persons with disabilities. The City shall provide regulatory incentives, such as expedited permit processing and fee waivers and deferrals, to projects targeted for persons with disabilities, including persons with developmental disabilities.



The City shall reach out annually to developers of supportive housing to encourage development of projects targeted for persons with disabilities, including persons with developmental disabilities. The City shall work with the local Regional Center to implement an outreach program informing families within the City of housing and services available for persons with developmental disabilities. Information will be made available on the City’s website and at City Hall counter. Specific regulatory incentives shall be established by 2019 and initiation of cooperative outreach program with the local Regional Center by December 2018, with funding from the General Fund and other sources available.

Program 21: Consistency with General Plan

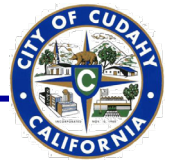
The City shall conduct an integral review as part of its General Plan implementation to achieve consistency with other general plan elements, policies, programs, and community goals to reflect the policy direction contained in other parts of the General Plan. As portions of the General plan are amended in the future, this Housing Element will be reviewed to ensure that internal consistency is maintained. This is an ongoing program monitored annually (coinciding with the fiscal year) and managed by the Community Development Director and Planning Departments.

7.2 PROPOSED QUANTIFIED OBJECTIVES FOR 2021-2029

Local jurisdictions are required under section 65583 of the California Government Code to propose quantified housing objectives and seek to meet them through Housing Element goals, policies, and programs. The quantified objectives do not represent a ceiling on development, but rather set a target goal for the jurisdiction to achieve based on needs, resources, or constraints. The quantified objectives of the city by income category are provided in table below. The City’s objective is to allow the construction of at least 339 new units; from very low to above moderate-income levels. And to rehabilitate 8 very low and 8 low-income level properties, totaling in 56 rehab units over the seven-year implementation phase.

7.2 Proposed Qualified Objectives for 2021-2029			
Income Category	New Construction	Rehabilitation	Conservation/Preservation
Extremely Low	117	10	10
Very low	117	9	9
Low	46	9	9
Moderate	51	0	0
Above Moderate	141	0	0
TOTALS	472	28	28

Source: City of Cudahy Community Development Department



8 Affirmatively Furthering Fair Housing (AFFH) AB 686

As stated earlier, as of January 1, 2019, AB 686 extends the obligation to affirmatively further fair housing to all public agencies in the State of California. Affirmatively furthering fair housing means taking meaningful actions to combat discrimination that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. The Bill added an assessment of fair housing to the Housing Element which includes the following components:

- (1) a summary of fair housing issues and assessment of the City's fair housing enforcement and outreach capacity,
- (2) an analysis of segregation patterns and disparities in access to opportunities,
- (3) an assessment of contributing factors, and
- (4) an identification of fair housing goals and actions.

This Housing Element analysis, therefore, must address the following:

- (1) Significant discrepancies in housing needs and in access to opportunities,
- (2) Replacing segregated living patterns with truly integrated and balanced living patterns,
- (3) Transforming racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity,
- (4) Fostering and maintaining compliance with civil rights and fair housing laws.

Public Housing Program

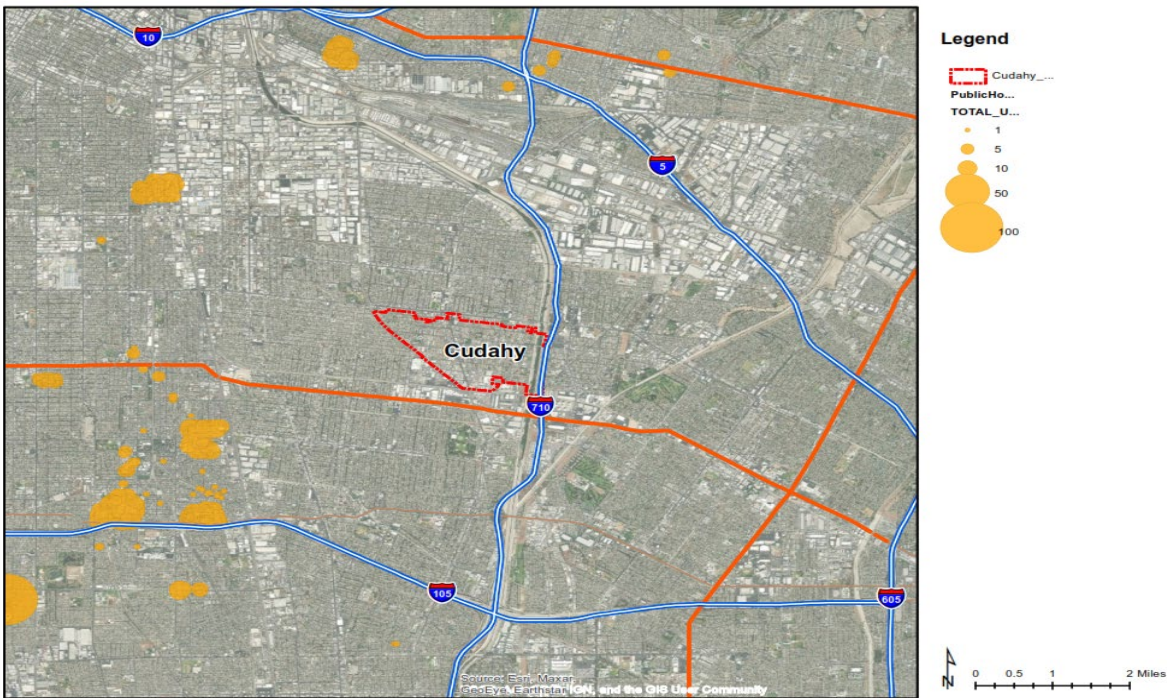
According to HUD's Public Housing Program, public housing was established to provide decent and safe rental housing for eligible low-income families, the elderly, and persons with disability. Public housing comes in all sizes and types from scattered single-family houses to high-rise apartments for elderly families. In the State of California, there are approximately 1.2 million households living in public housing units, managed by about 3,300 housing agencies (HAs) In the County of Los Angeles, the Los Angeles County Development Authority manages public housing programs for the City of Cudahy and some of the Gateway Cities. As indicated on Map 8.2, there are no recognized public housing buildings in the City of Cudahy.



Map 8.1 – Public Housing Buildings - Regional



Map 8.2- Public Housing Buildings - Cudahy





Housing Choice Vouchers

The U.S. Department of Housing and Urban Development’s (HUD) Housing Choice Voucher (HCV) Program assists very low-income families, the elderly, and the disabled in obtaining decent, safe, and sanitary housing in the private market. Public Housing Authorities (PHAs) receive federal funds from HUD to administer the voucher program, and housing subsidies are paid to the landlord directly by the PHA on behalf of the participating family. The voucher recipient remains responsible for paying any difference that exists between the actual rent charged by the landlord and the amount subsidized by the program. Voucher recipients are responsible for finding a suitable housing unit where the owner agrees to rent under the program. Because housing assistance is provided on behalf of the family or individual, participants are free to choose their own housing, including single-family homes, townhouses, and apartments provided that the chosen housing meets the requirements of the program, and is not limited to units located in subsidized housing projects. Qualified housing may also include the family's present residence. Furthermore, under certain circumstances, and if authorized by the PHA, a family may use its voucher to purchase a modest home. To protect the confidentiality of those receiving Housing Choice Voucher Program assistance, tracts containing 10 or fewer voucher holders have been omitted from this service. This dataset includes both tenant-based vouchers and project-based vouchers.

There are six Census Tracts in the City of Cudahy, namely: 6037534401, 6037534302, 60375344403, 6037534404, 6037534405, and 6037534406. In all the census tracts, there were 168 Housing Choice vouchers reported. Table 8.1, provides a breakdown by Census Tract and percentage of population by Census Tract:

Table 8.1 – Housing Choice Vouchers by Census Tract

Census Tract	# Of Housing Choice Vouchers	Percentage % of Population
6037534301	24	2.65
6037534302	29	4.30
6037534403	59	8.44
6037534404	12	1.38
6037544405	44	4.78
6037534406	0	0

Table 8.1 indicates that the highest utilization rate for Housing Choice Vouchers occurs in Census Tract 603754403 with 59, representing 8.44% of the Census Tract population.

Fair Housing and Equal Opportunity (FHEO) Inquiries 2013-2021

Between 2013 and 2021, there was one (1) Fair Housing and Equal Opportunity inquiry in the City of Cudahy. In 2010, the number of Fair Housing and Equal Opportunity inquiries in Los Angeles County was 291. 80 of those cases, or 25% were with a racial bias, 106 of the cases or 36.4% had a disability bias. 58 of the cases, or 20% had a familial status bias. In 2020, there were 130 total

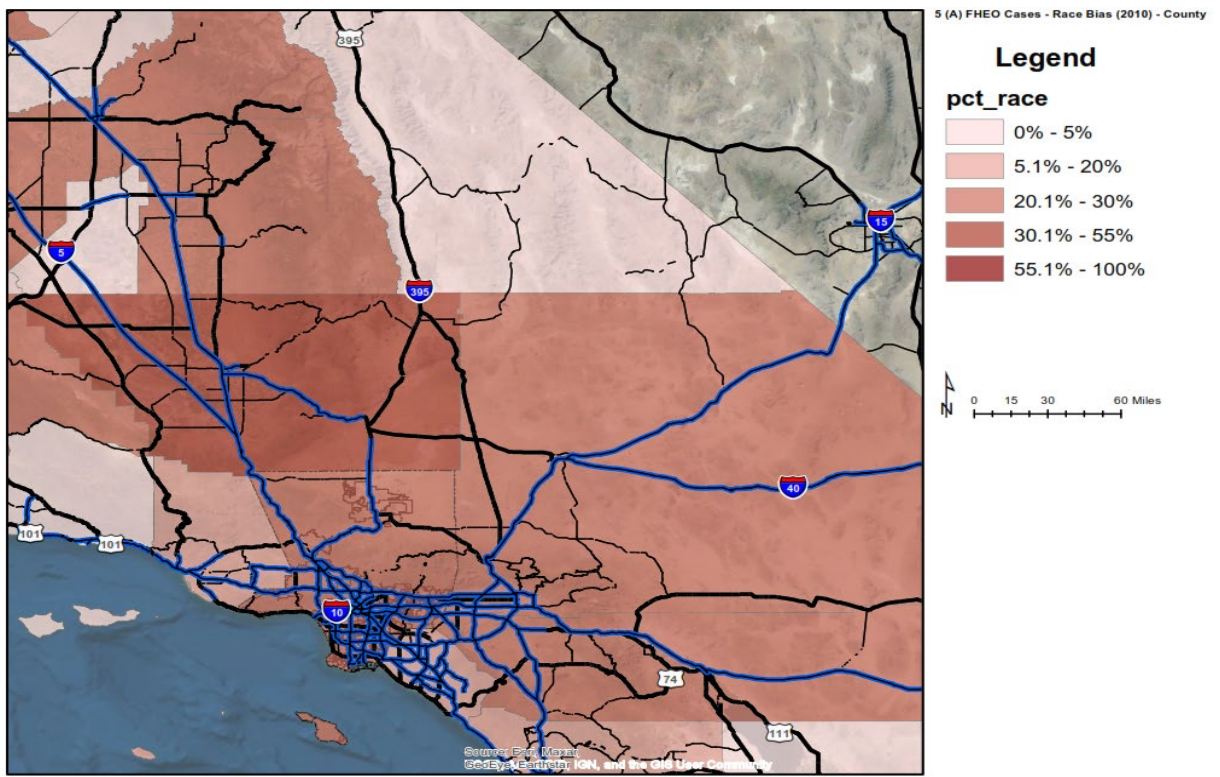


cases reported. 27, or 20.7% of the cases had a racial bias, 86, or 66% had a disability bias, and 9, or 7% had a familial status bias. Table 8.2 depicts the comparison between 2010 and 2020.

Table 8.2 Fair Housing and Equal Opportunity Inquiry

County Data Year	Total Cases	Cases with Racial Bias and %	Cases with Disability Bias and %	Cases with Familial Bias and %
Los Angeles County 2020	130	27 or 20.7%	86 or 66%	9 or 7%
Los Angeles County 2010	291	80 or 25%	106 or 36.4%	58 or 20%

Map 8.3 – Percentage of FHEO case reported in county 2010 based on race

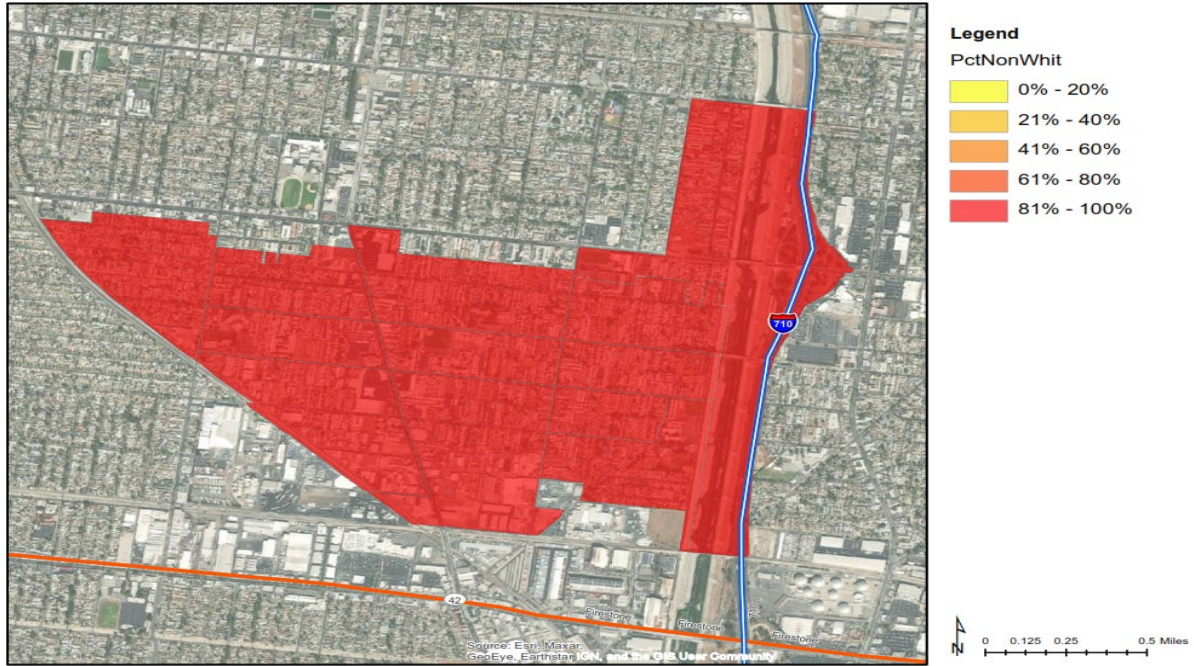


Segregation and Integration

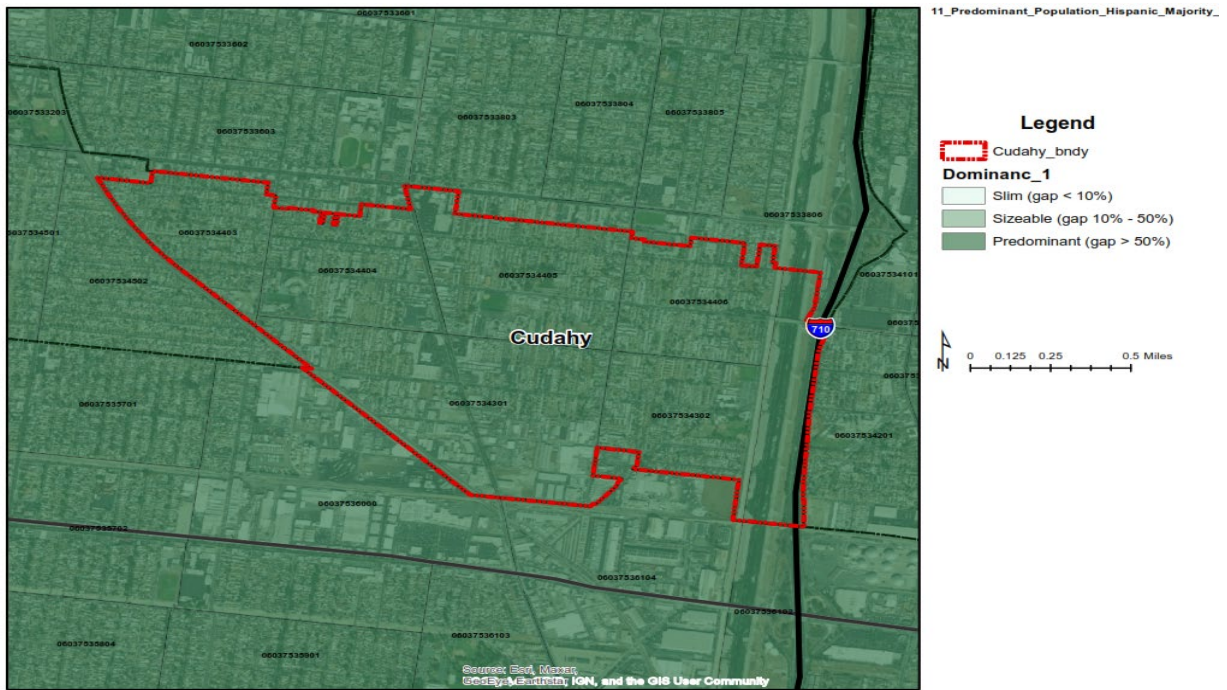
The population of some areas in the United States is dominated heavily by one racial or ethnic group. In the City of Cudahy, the predominant racial or ethnic group is Hispanic or Latino, comprising of over 96% of the population. The white population % was 1.47% and the black population % was 1.28%.



Map 8.4 – Percent White Population

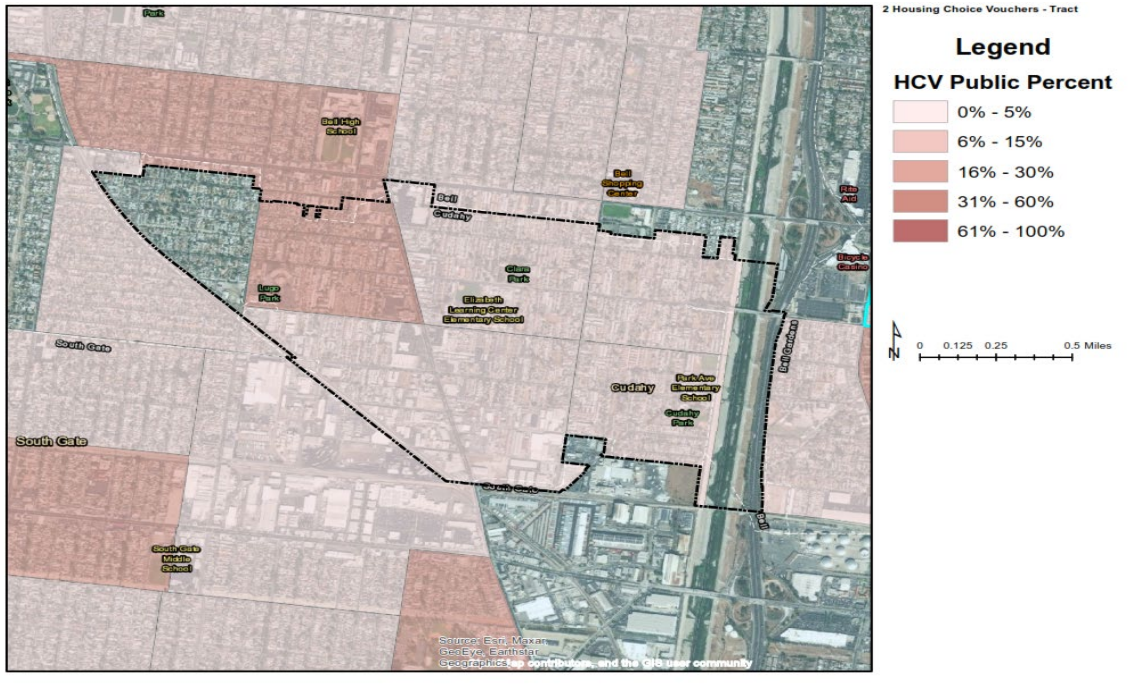


Map 8.5 – Predominant Population Hispanic Majority



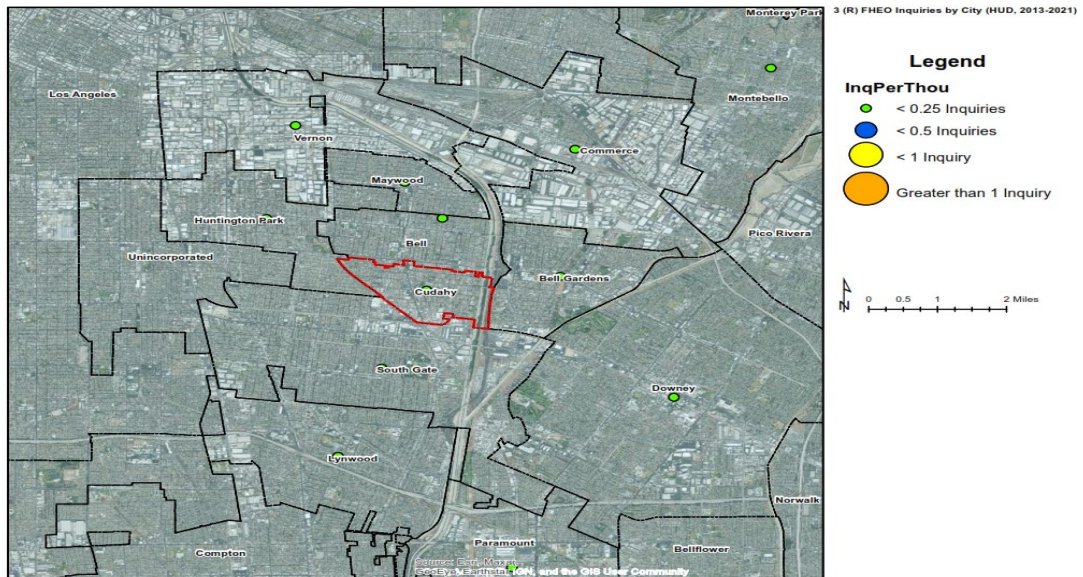


Map 8.6– Fair Housing Vouchers by Tract - Cudahy



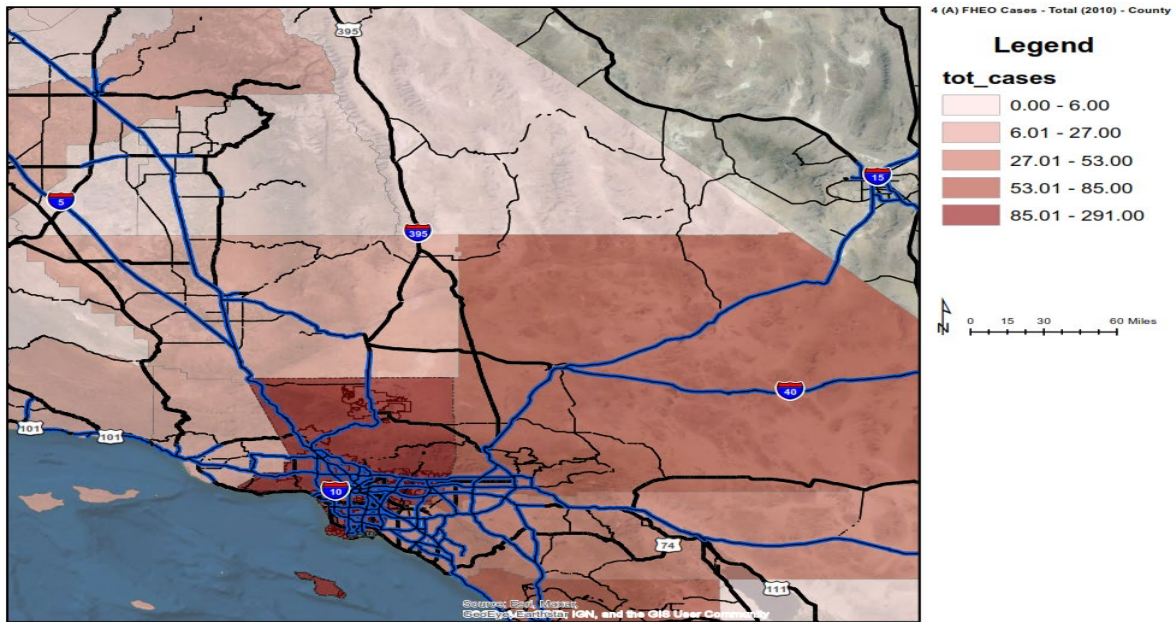
Based on Map 8.t, below, there were no Fair Housing and Equal Opportunity Inquiries in the City of Cudahy. However, there were Fair Housing and Equal Opportunity Inquiries in the county, but they were in the zero to 25 inquiries category.

Map 8.7 – Fair Housing and Equal Opportunity Inquiries by City



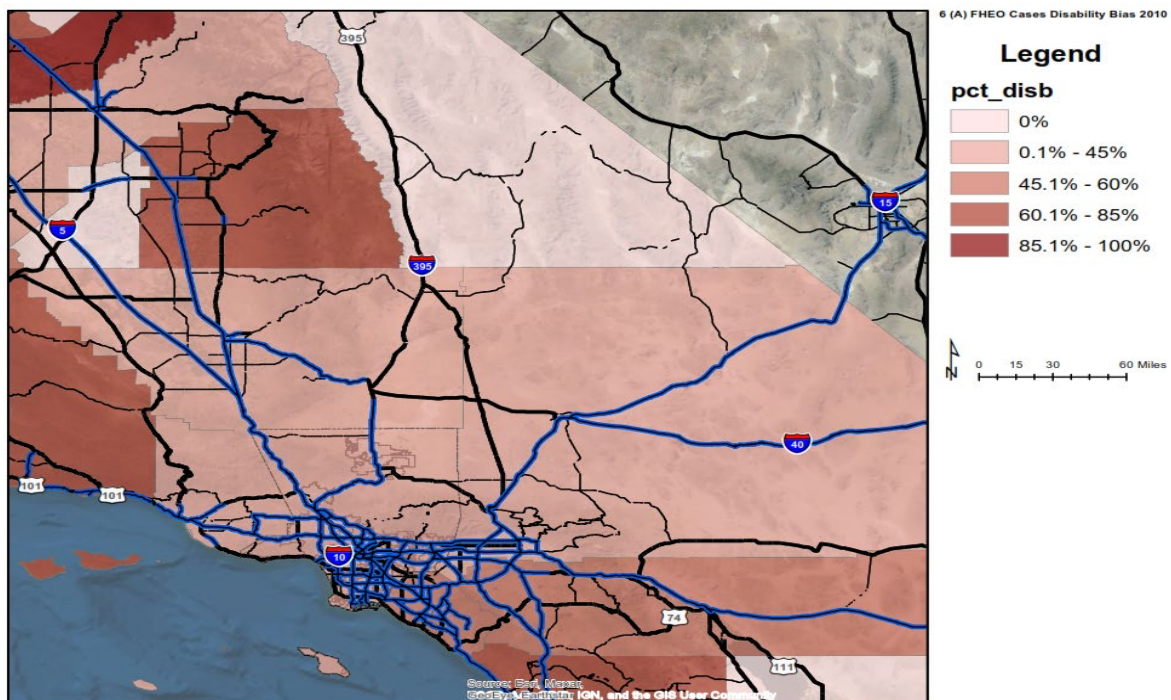


Map 8.8 – Fair Housing and Equal Opportunity Cases – Total (2010) County



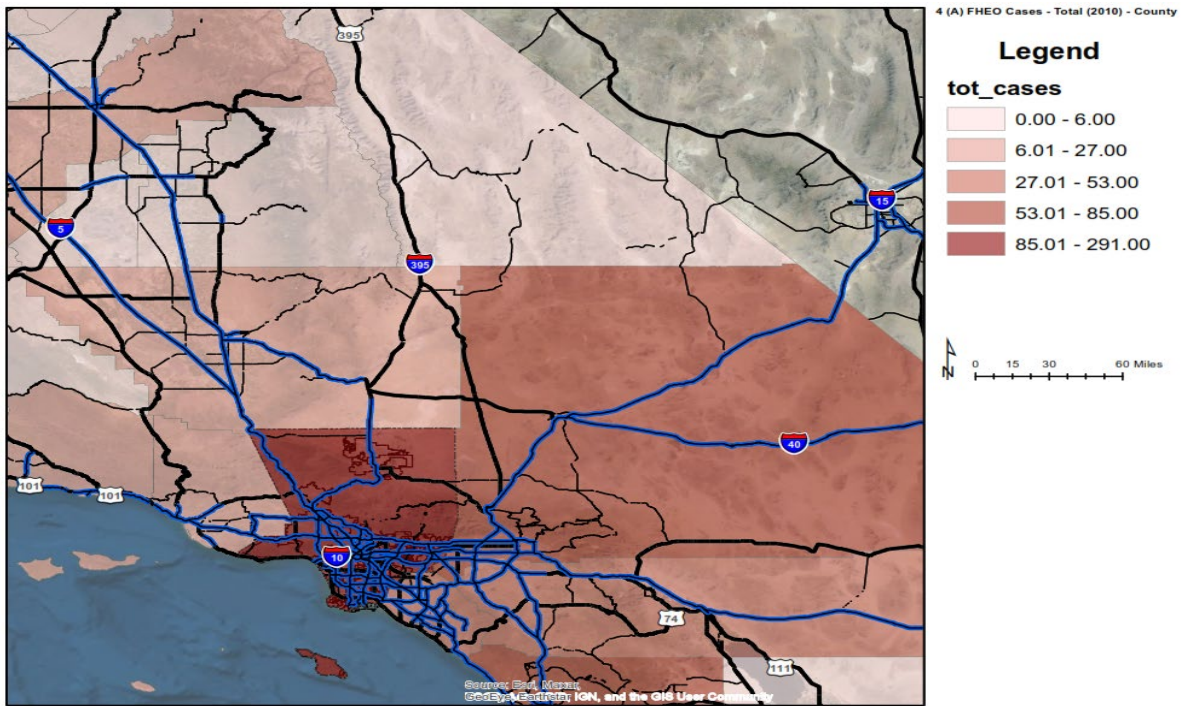
Population with Disability 2015 – 2019

Map 8.9 – FHEO Cases with Disability Bias 2010

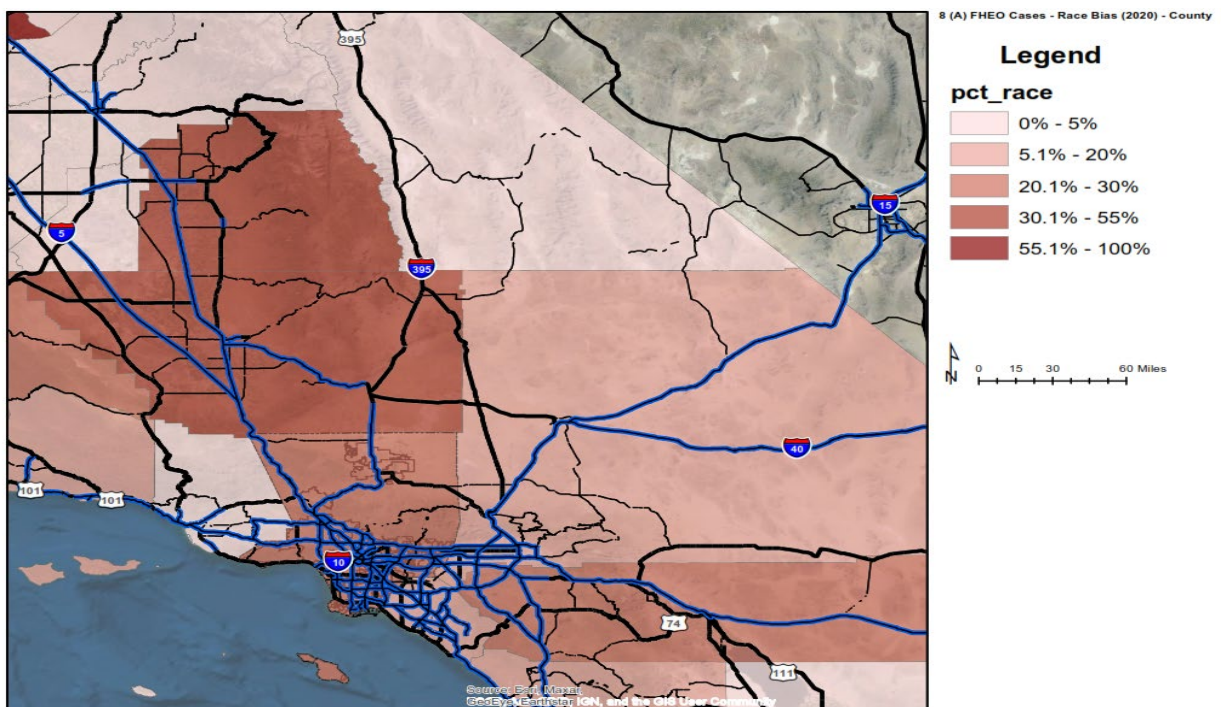




Map 8.10 – FHEO Total cases 2010 by County

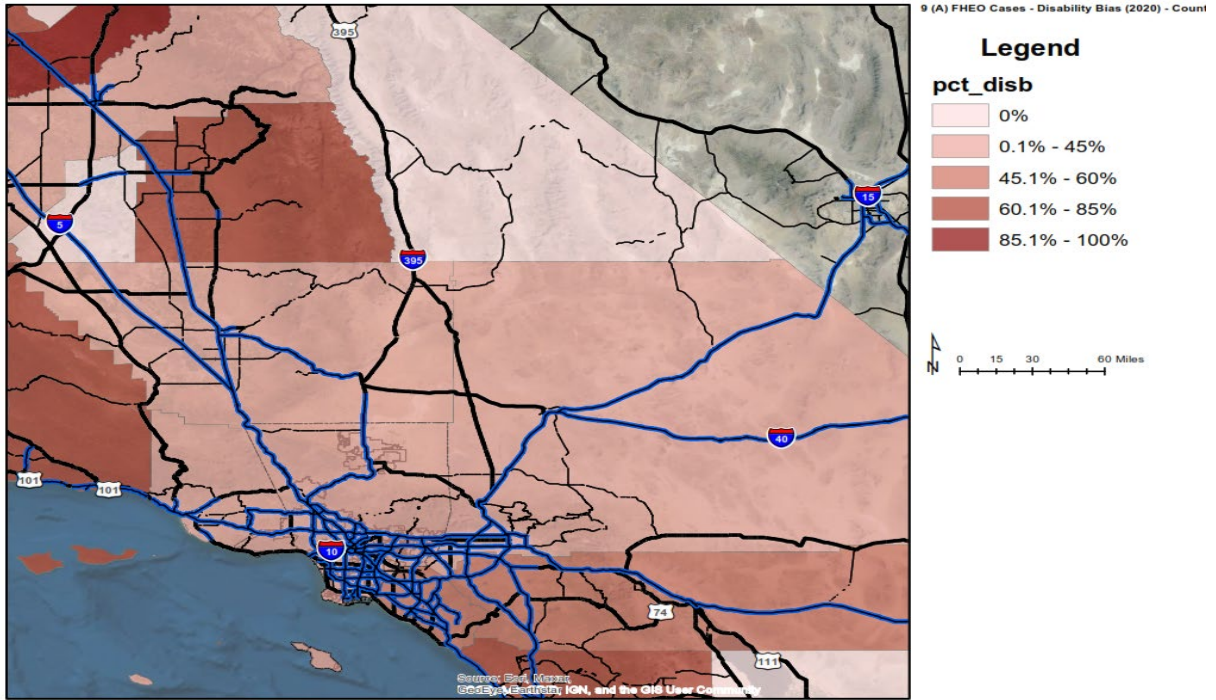


Map 8.11 – FHEO Cases with racial bias by County 2020

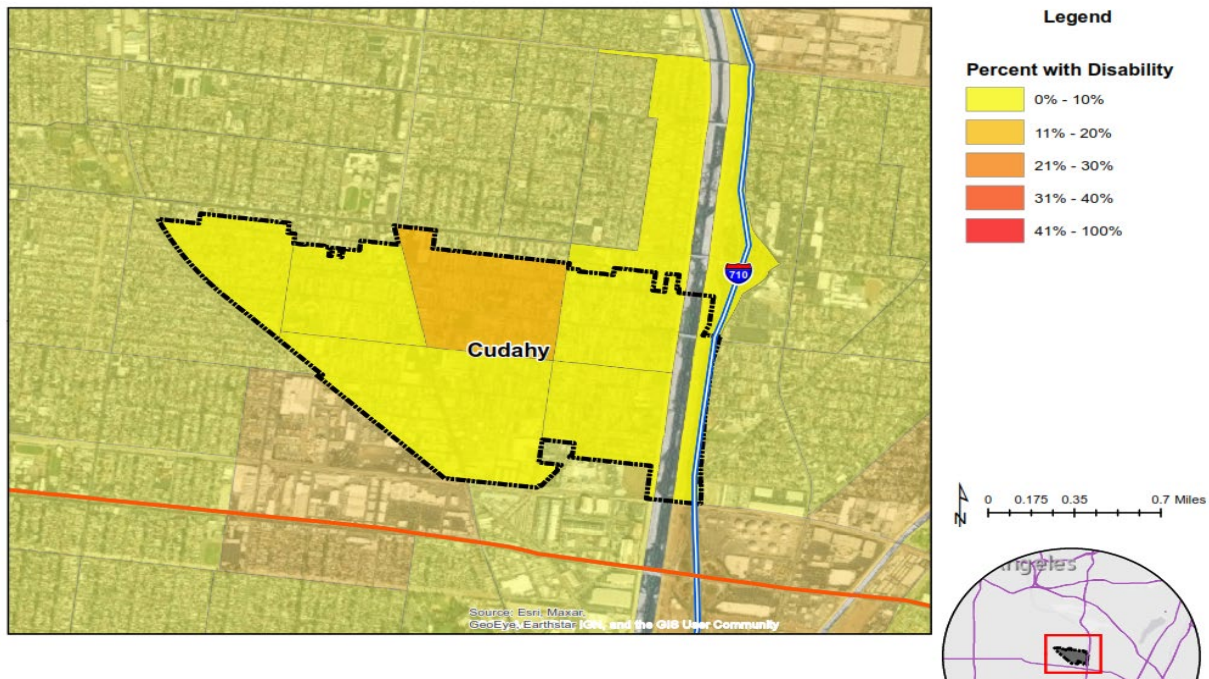




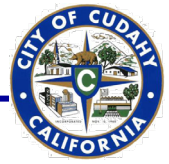
Map 8.12 – FHEO Cases with Disability Bias – 2020 – County



Map 8.13 – Population with a Disability – 2015 - 2019 By Tract

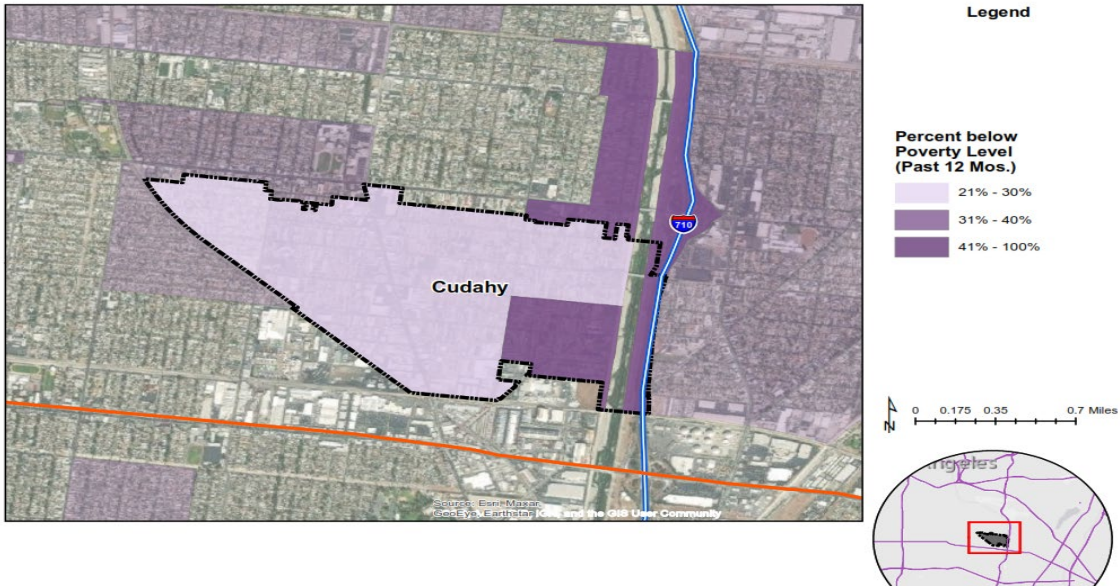


Based on Map 8.13, 11% to 20% of the Cudahy population reports a form of disability.
Poverty Status by Census Tracts

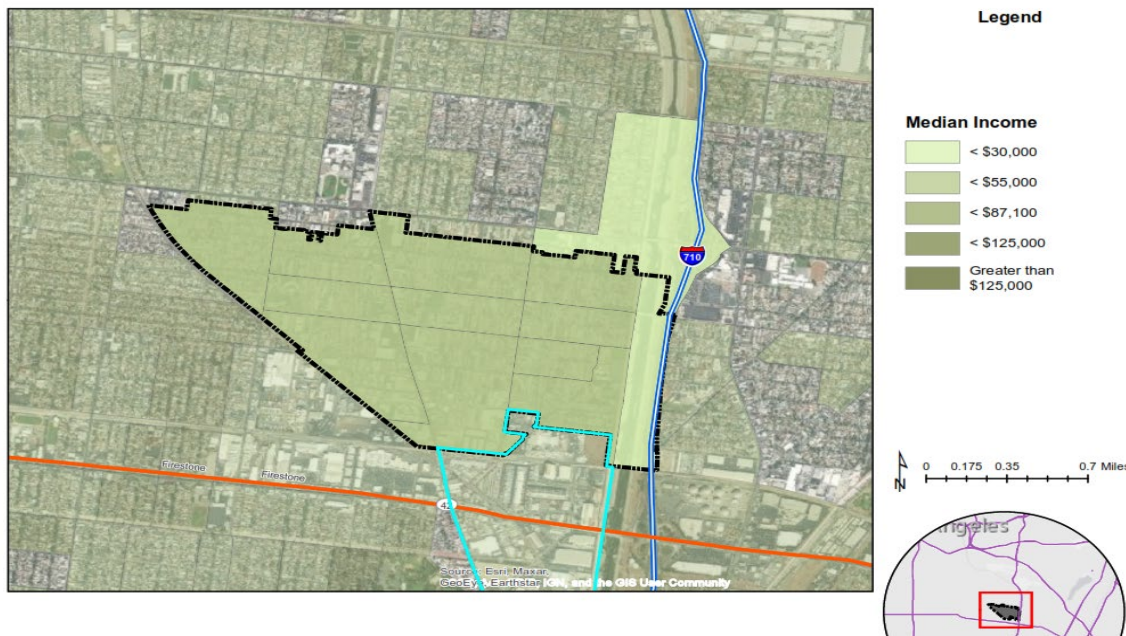


There are areas of the City of Cudahy where there are 41% to 100% of its residents live below the poverty level. For most of the city, 21% to 30% of residents live below the poverty level.

Map 8.14 – Percent of Population Below the Poverty Level- 2015 – 2019 By Census Tract



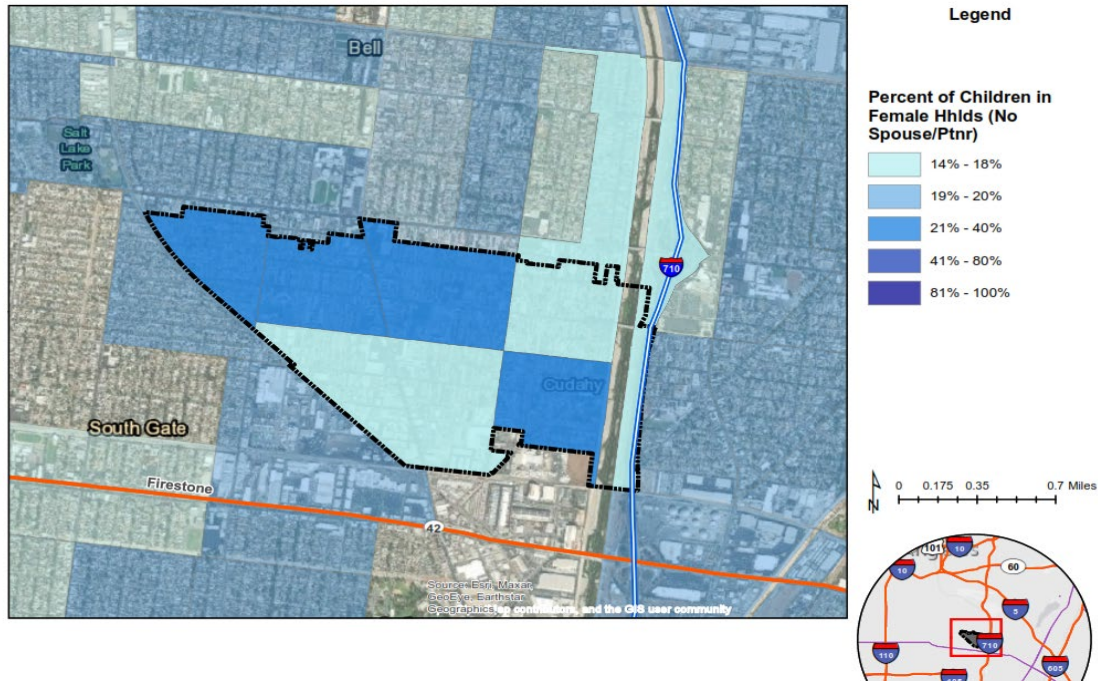
Map 8.15 - Median Income 2015 2019 By Block Group



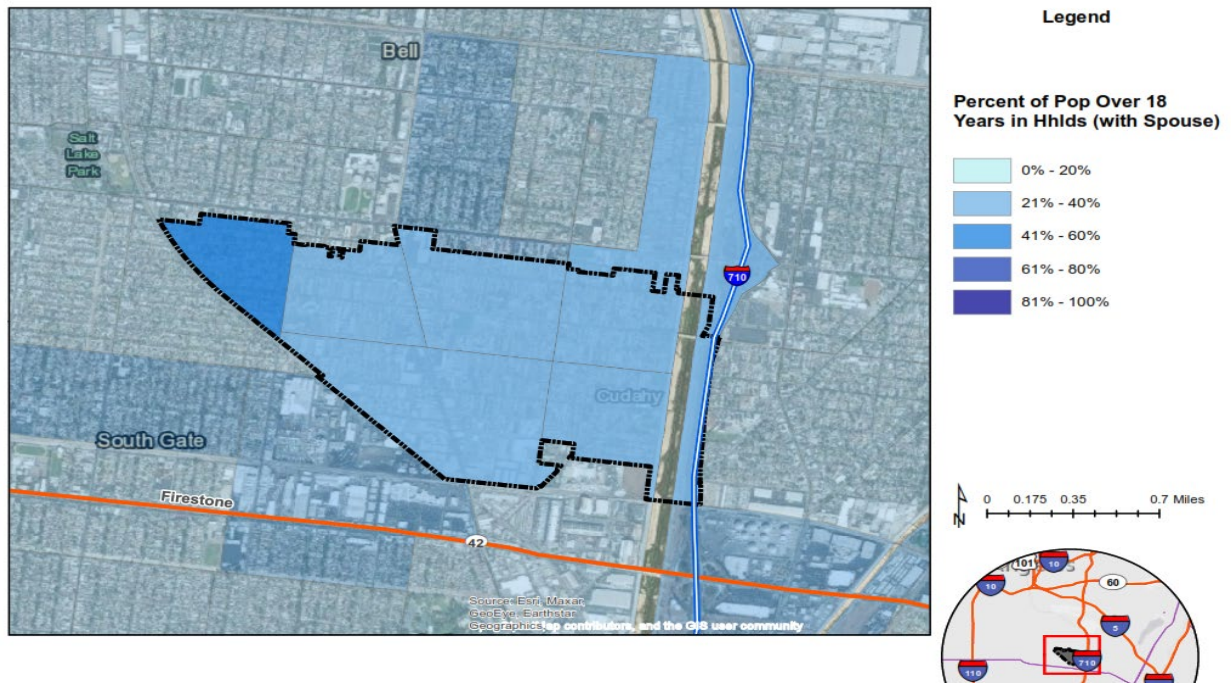
Map



Map 8.16 – Percent of Children in Female Householder, No Spouse/Partner Present Households (ACS, 2015-2019) – Tract

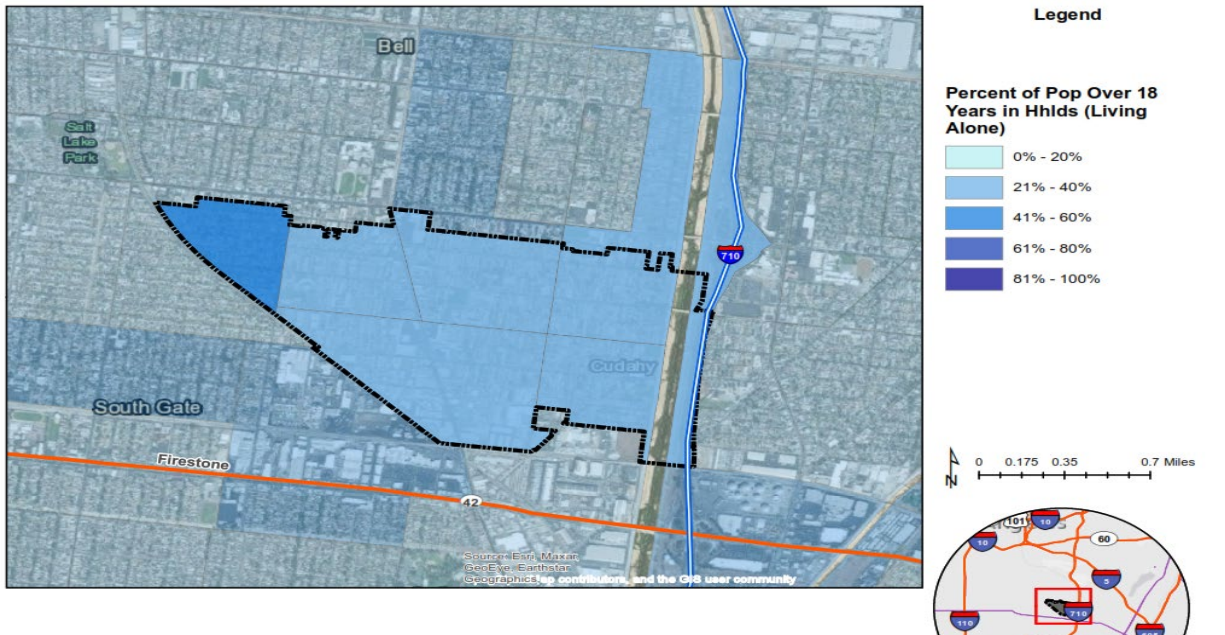


Map 8.17 – Percent of Population 18 years and Over in Households Living with Spouse (ACS, 2015-2019) Tract

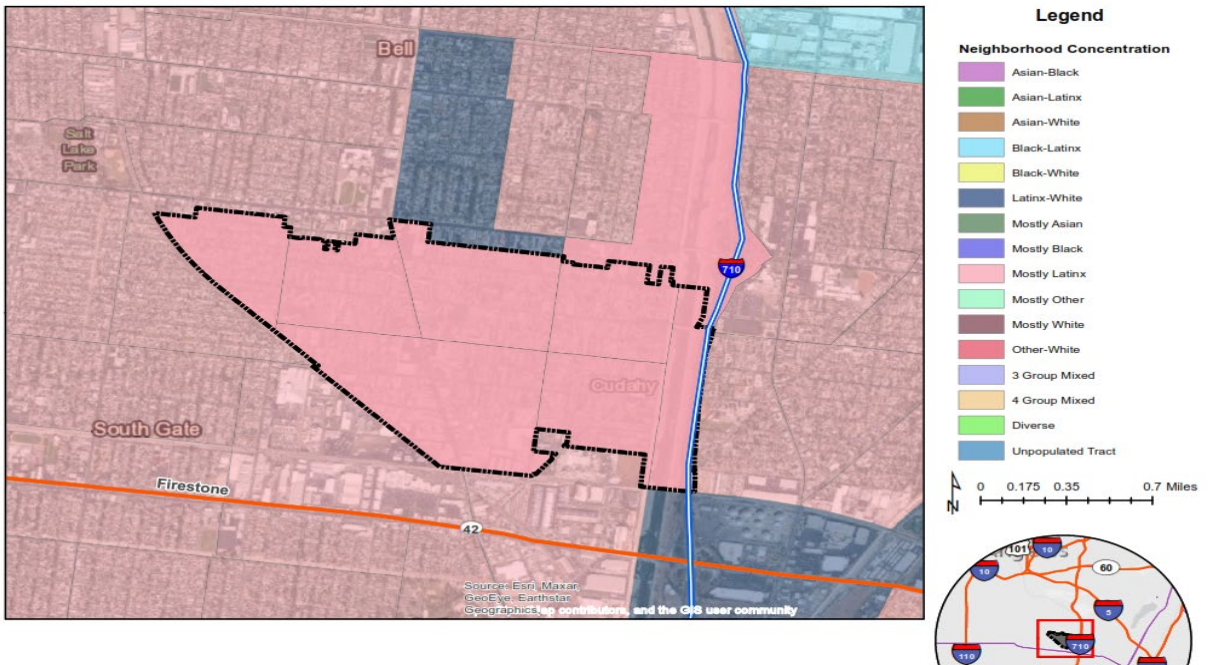




Map 8.18 – Percent of Population 18 years and over in Households Living Alone 2015 – 2019

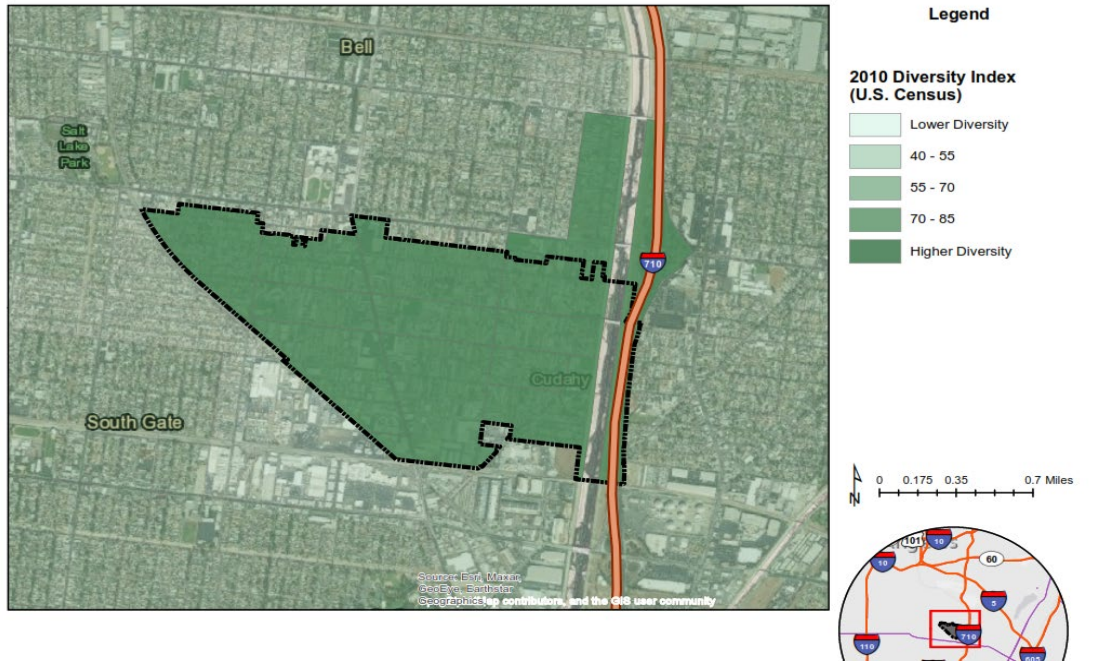


Map 8.19 – Neighborhood Segregation (UC Berkeley, 2019) – Tract



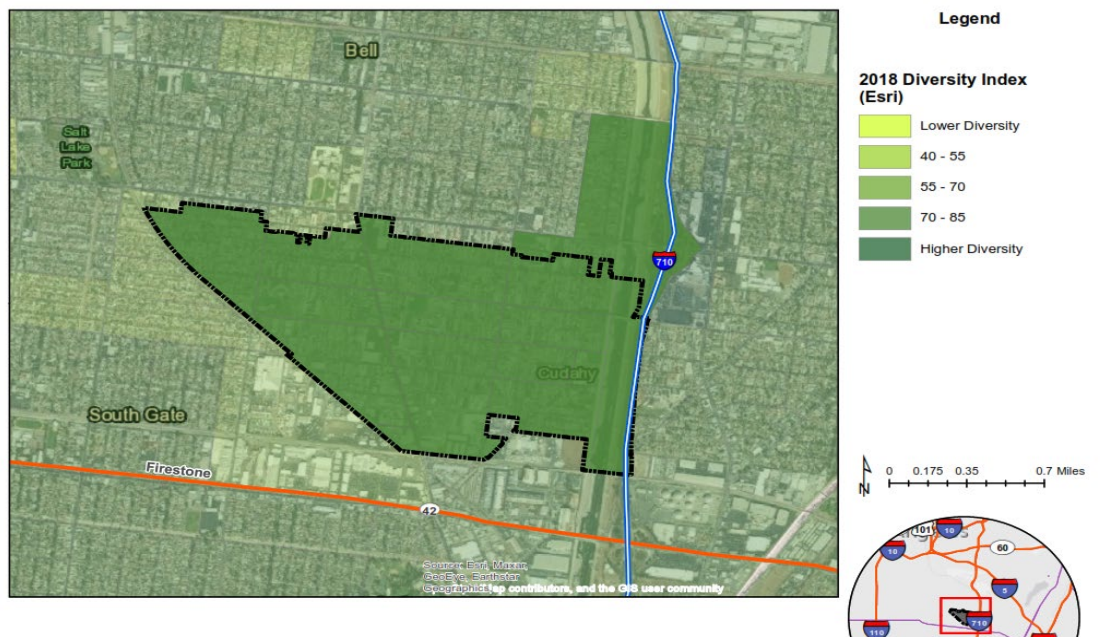


Map 8.20 – Diversity Index (2010) Block Group



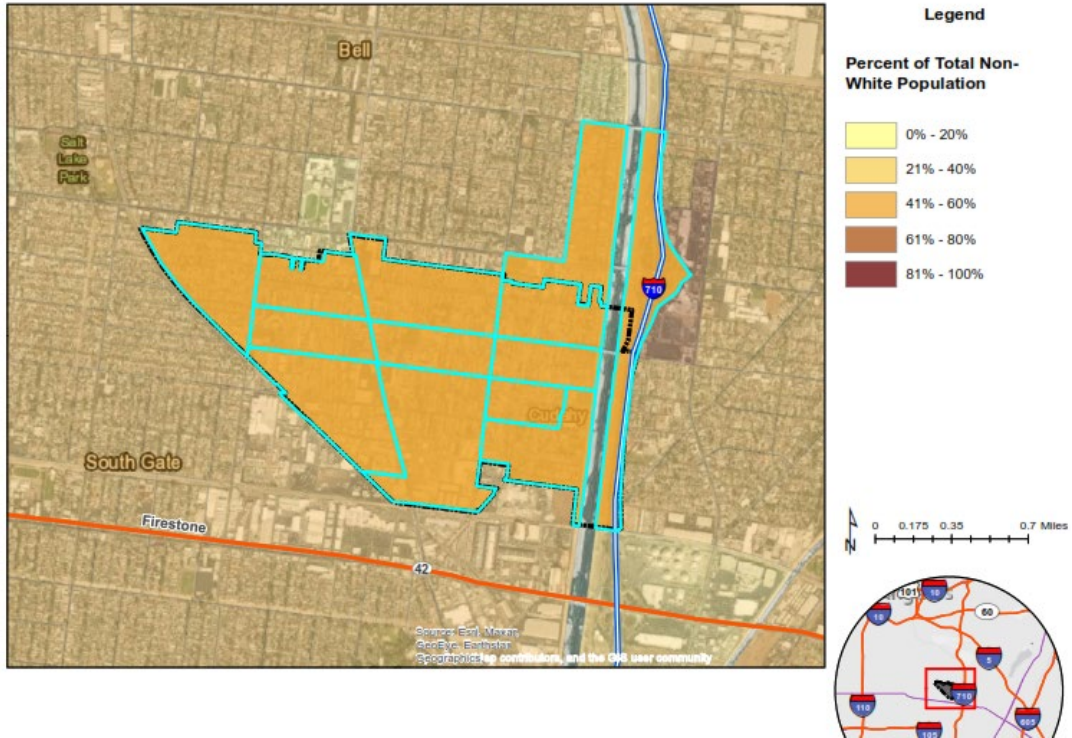
The diversity index for the City of Cudahy by tract in 2010. In 2018 indicates that the city is in the Higher Diversity category. In 2018, as indicated in Map 8.21, the diversity index prepared by ESRI indicates no change in that category.

Map 8.21- Diversity Index 2018 (ESRI)

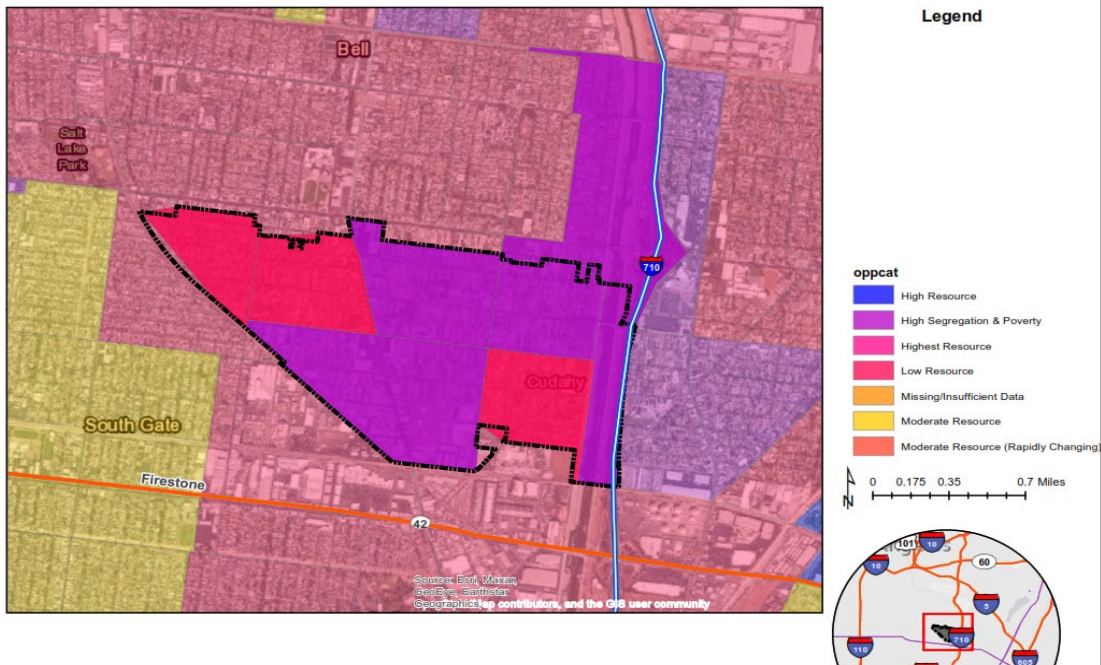




Map 8.22 – Racial Demographic 2010 Block Group



Map 8.23 – TCAC Opportunity Areas 2021 – Composite Score – Tract





In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened a group of independent organizations and research centers that would become the California Fair Housing Task Force (“Task Force”).

HCD provided a problem statement related to affirmatively furthering fair housing:

Housing policy, program guidelines, and regulations have untapped potential to both prevent further segregation and poverty concentration as well as encourage access to opportunity. HCD also shared its policy goals:

- Avoid further segregation and concentration of poverty; and
- Encourage access to opportunity through land use policy and affordable housing program design and implementation.

The Task Force was established with the following purpose:

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).

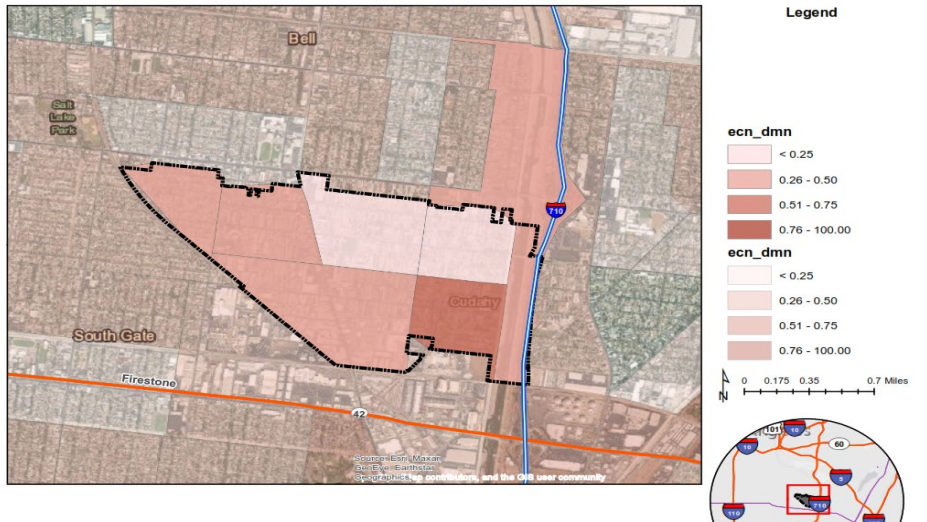
Opportunity mapping is a way to measure and visualize place-based characteristics linked to critical life outcomes, such as educational attainment, earnings from employment, and economic mobility. Opportunity maps can be used to inform how to target investments and policies in a way that is conscious of the independent and inter-related effects that research has shown places have on economic, educational, and health outcomes. Opportunity mapping also has limitations. For example, maps’ accuracy is dependent on the accuracy of the data behind them. Data may be derived from self-reported surveys of subsets of an area’s population, and sometimes may not be recorded or reliable in some areas. Further, even the most recent publicly available datasets typically lag by two years, meaning they may not adequately capture conditions in areas undergoing rapid change.

TCAC and HCD charged the Task Force with creating an opportunity map to identify areas in every region of the state whose characteristics have been shown by research to support positive economic, educational, and health outcomes for low-income families—particularly long-term outcomes for children. TCAC intended to adopt this map into its regulations, which it eventually did in December 2017, to accompany new policies aimed at increasing access to high opportunity areas for families with children in housing financed with 9% Low Income Housing Tax Credits (LIHTCs). For this reason, the Task Force designed this map and the methodology behind it with the funding infrastructure for the 9% LIHTC program (e.g., geographic competition, a separate funding pool for rural applicants), as well as that of key HCD funding programs such as the Multifamily Housing Program, in mind.



As it relates to Cudahy, the city is divided into two distinct groups: High Segregation & Poverty (more than 59%), and the remainder, moderate resources – rapidly changing category.

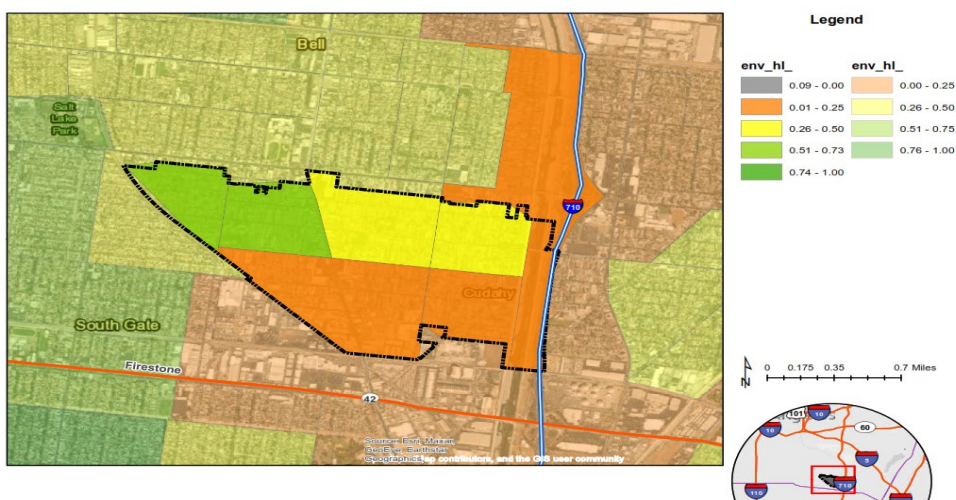
Map 8.24 – TCAC Opportunity Score Areas 2021 – Economic Score – Tract



Map 8.24 identifies the economic score for the City of Cudahy based on tract. One tract, located south of the city, has a 0.51 – 0.75 economic demand score, two tracts to the north and northeast of the city have a less than 0.25 score, while two tracts located west, and northwest of the city have a 0.25 – 0.50 score. In this category, not all the City of Cudahy is the same.

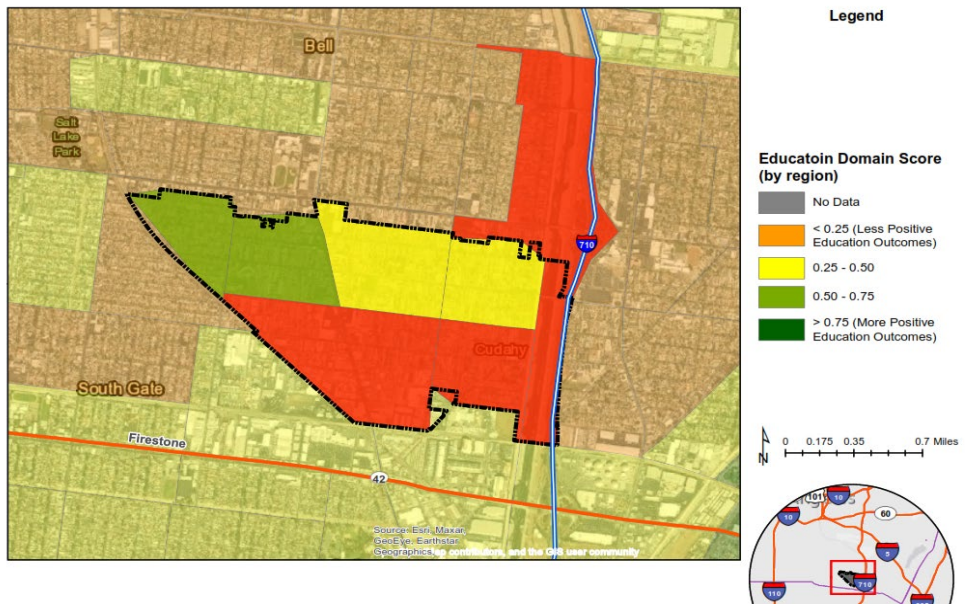
On the issue of environmental health, Map 8.23 identifies three distinct categories for the City of Cudahy: 0.74 – 1.00, 0.25 – 0.50, and 0.01 – 0.25.

Map 8.25 – TCAC Opportunity Areas 2021 Environmental Score by Tract





Map 8.26 – TCAC Opportunity Areas (2021) Education Score – Tract

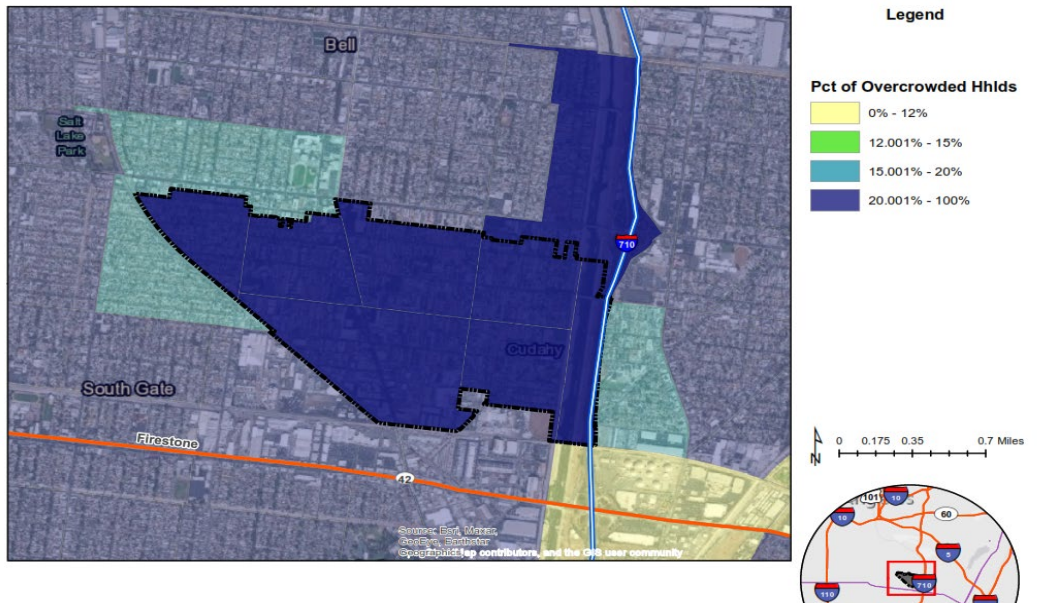


Overcrowded Households Data

Residential crowding has been linked to an increased risk of infection from communicable diseases, a higher prevalence of respiratory ailments, and greater vulnerability to homelessness among the poor. Residential crowding reflects demographic and socioeconomic conditions. Older-adult immigrant and recent immigrant communities, families with low income and renter-occupied households are more likely to experience household crowding. A form of residential overcrowding known as "doubling up"—co-residence with family members or friends for economic reasons—is the most reported prior living situation for families and individuals before the onset of homelessness. The household crowding table is part of a series of indicators in the Healthy Communities Data and Indicators Project (HCI) of the Office of Health Equity. The goal of HCI is to enhance public health by providing data, a standardized set of statistical measures, and tools that a broad array of sectors can use for planning healthy communities and evaluating the impact of plans, projects, policy, and environmental changes on community health. The creation of healthy social, economic, and physical environments that promote healthy behaviors and healthy outcomes requires coordination and collaboration across multiple sectors, including transportation, housing, education, agriculture, and others. Statistical metrics, or indicators, are needed to help local, regional, and state public health and partner agencies assess community environments and plan for healthy communities that optimize public health.



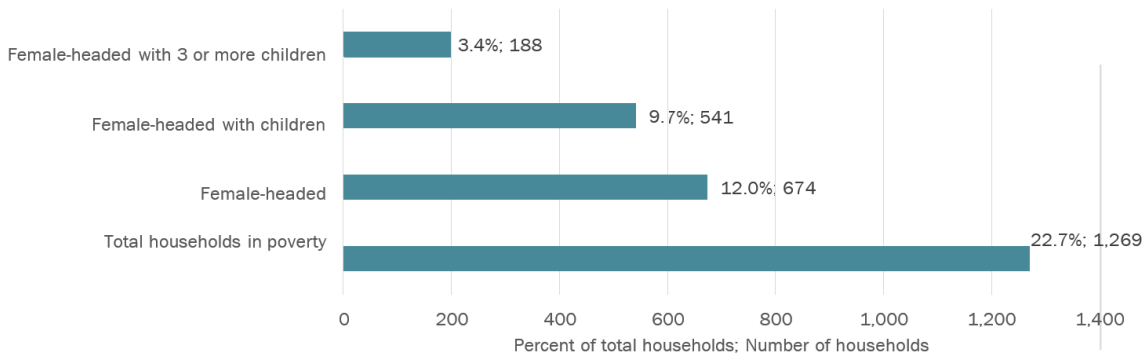
Map 8.27 – Overcrowded Households (CHHS) – Tract



Map 8.27 indicates that all the City of Cudahy is in highest category of overcrowded households. This narrative is consistent with the analysis in prior sections of this document that identify the city as densely population, and with a high number of household members. Based on Map 8.27, the percentage of overcrowded households in the city is in the 20.0001% – 100% range.

Chart 8.1– Percent of Households in Renter- Occupied Housing Units (HUD) Tract

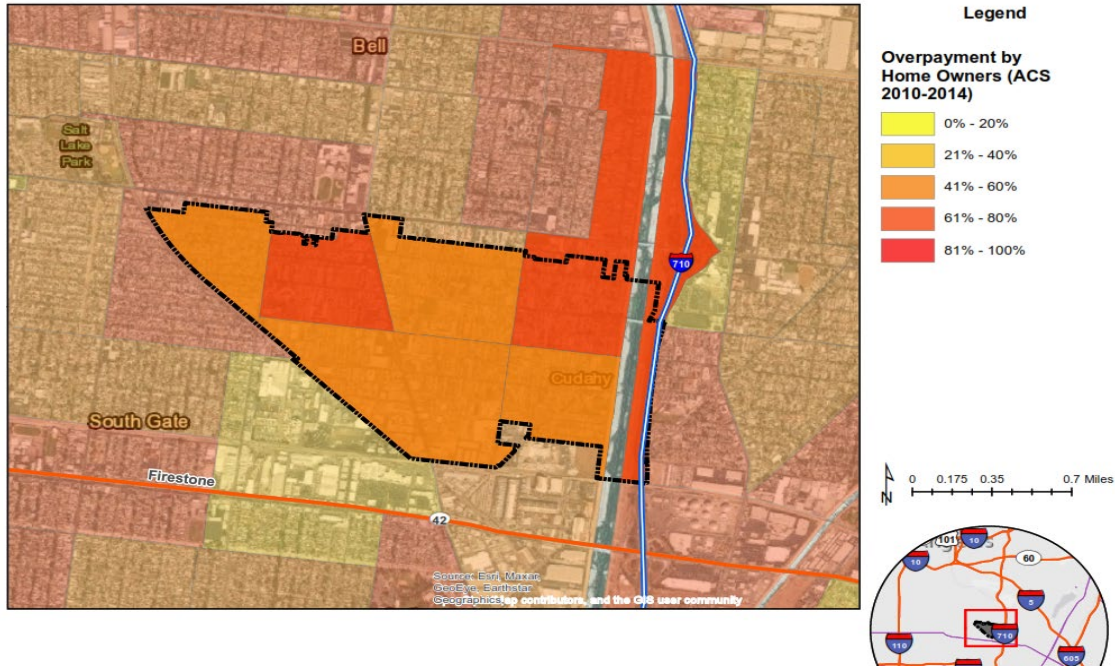
Households by Poverty Status



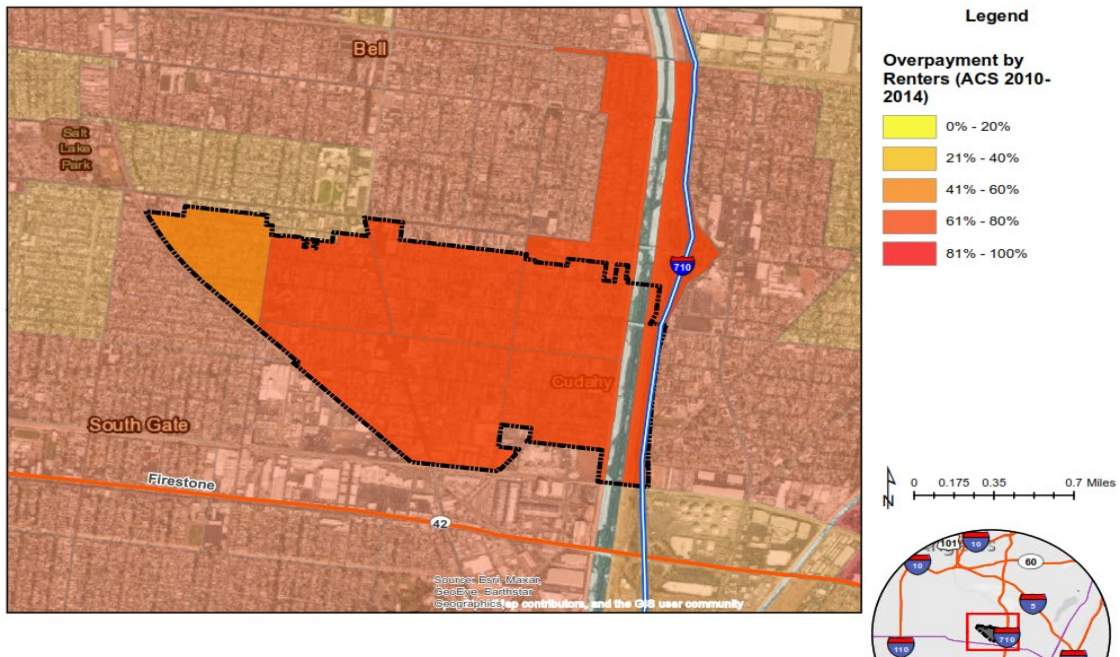
American Community Survey 2014-2018 5-year estimates.



Map 8.28 – Overpayment by Homeowners (ACS, 2015 – 2019) Tract



Map 8.29 – Overpayment by Renters (ACS, 2010 -2014) Tract

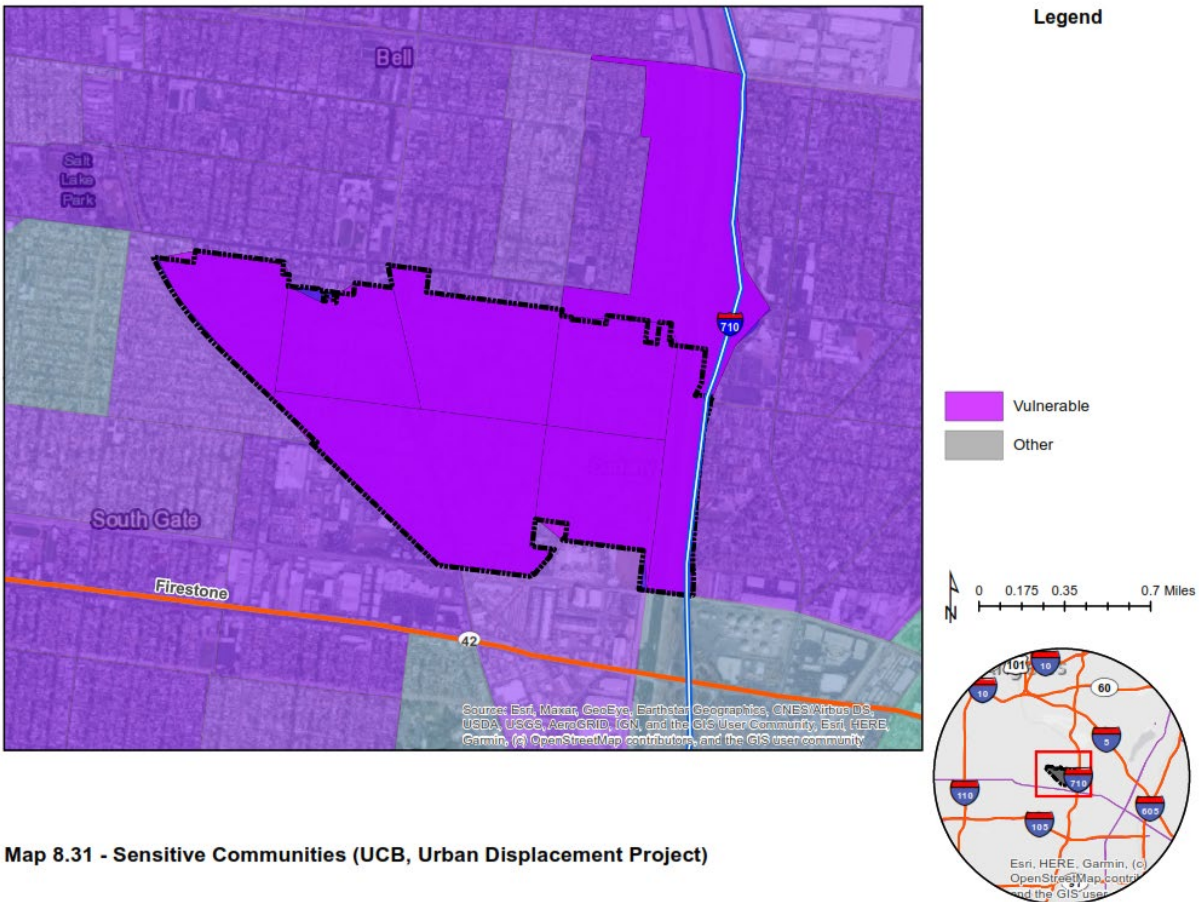




Map 8.30 – Location Affordability Index (HUD) – Tract

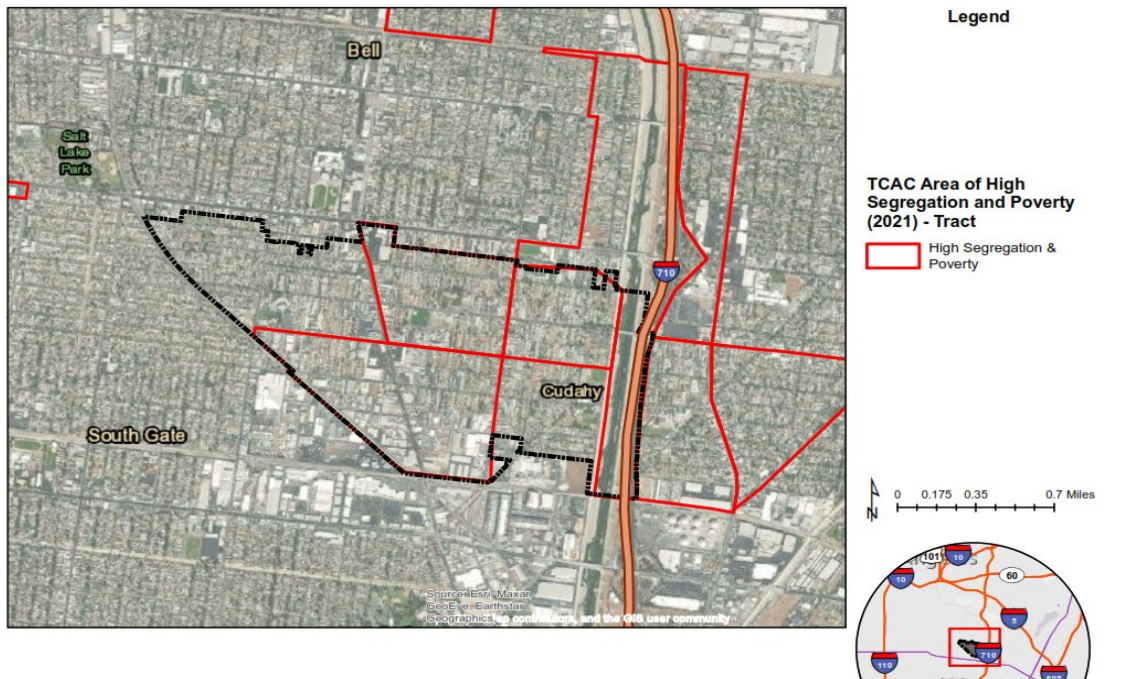
Unable to download the data from the AFFH data viewer website, therefore, this map is not available.

Map 8.31– Sensitive Communities (UCB, Urban Displacement Project)



Map 8.31 - Sensitive Communities (UCB, Urban Displacement Project)

Map 8.32 – Areas of High Segregation and Poverty (2021) – Tract



Racially or Ethnically Concentrated Areas of Poverty R/ECAPs 2009 – 2013

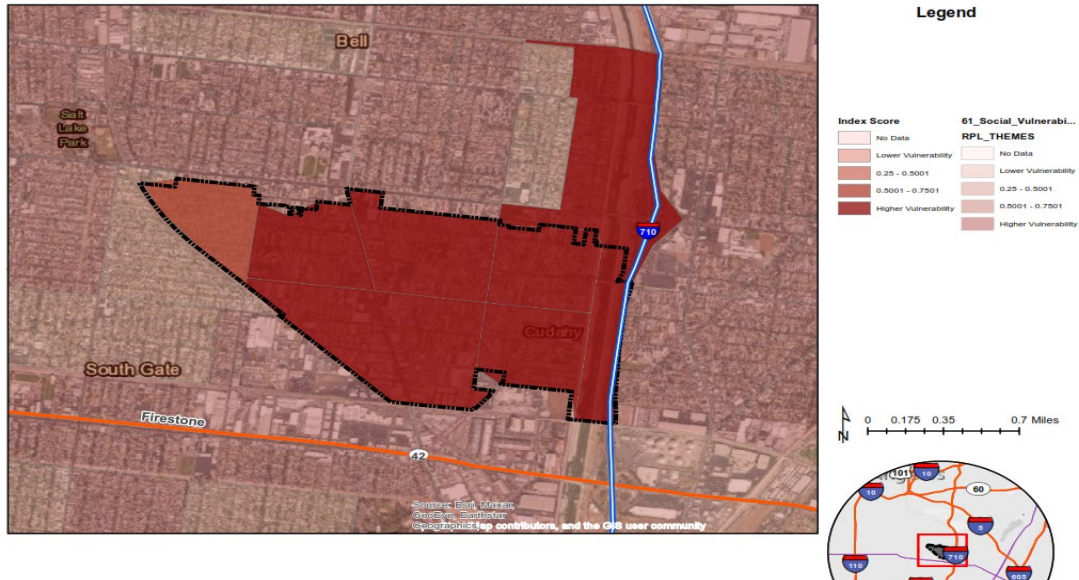
To assist communities in identifying racially/ethnically concentrated areas of poverty (R/ECAPs), HUD has developed a census tract-based definition of R/ECAPs. The definition involves a racial/ethnic concentration threshold and a poverty test. The racial/ethnic concentration threshold is straightforward: R/ECAPs must have a non-white population of 50 percent or more.

Regarding the poverty threshold, Wilson (1980) defines neighborhoods of extreme poverty as census tracts with 40 percent or more of individuals living at or below the poverty line. Because overall poverty levels are substantially lower in many parts of the county, HUD supplements this with an alternate criterion. Thus, a neighborhood can be a R/ECAP if it has a poverty rate that exceeds 40% or is three or more times the average tract poverty rate for the metropolitan/micropolitan area, whichever threshold is lower. Census tracts with this extreme poverty that satisfy the racial/ethnic concentration threshold are deemed R/ECAPs.

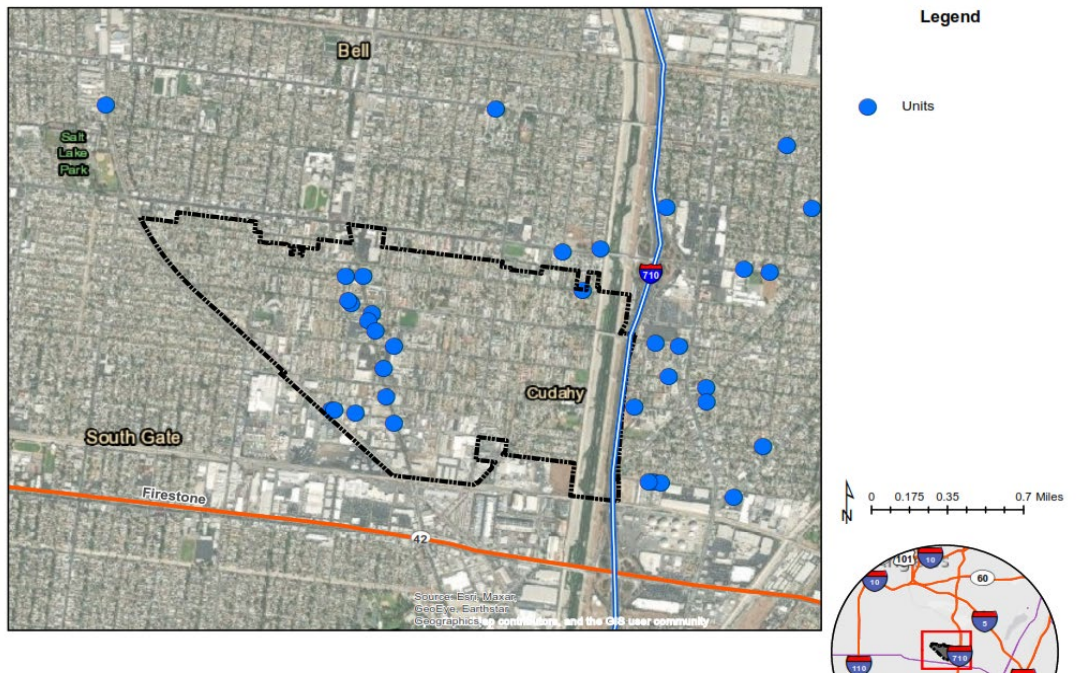
One of the mandates of AB 686, Affirmatively furthering Fair Housing is to identify and transform racially and ethnically concentrated areas of poverty (R/ECAP) into areas of opportunity. It appears from Map 8.33 that the city needs to set achievable goals designed to transform all its census tracts into areas of opportunities.

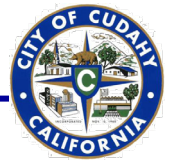


Map 8.35 – Social Vulnerability Index (CDC, 2018) – Tract

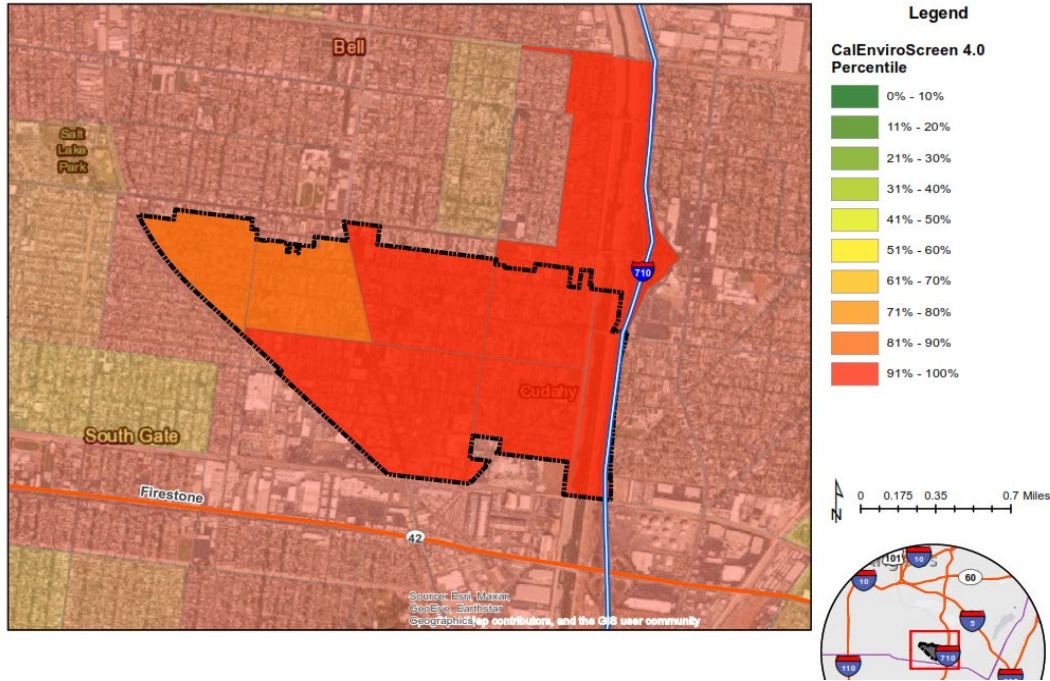


Map 8.36 – Mobile Home Parks (HIFLD, 2018)





Map 8.37 – CalEnviroScreen 4.0, 2021 – Tract



SB 535

Disadvantaged communities refer to the areas throughout California which most suffer from a combination of economic, health, and environmental burdens. These burdens include poverty, high unemployment, air and water pollution, presence of hazardous wastes as well as high incidence of asthma and heart disease.

Disadvantaged communities in California are specifically targeted for investment of proceeds from the State’s cap-and-trade program. These investments are aimed at improving public health, quality of life and economic opportunity in California’s most burdened communities at the same time reducing pollution that causes climate change.

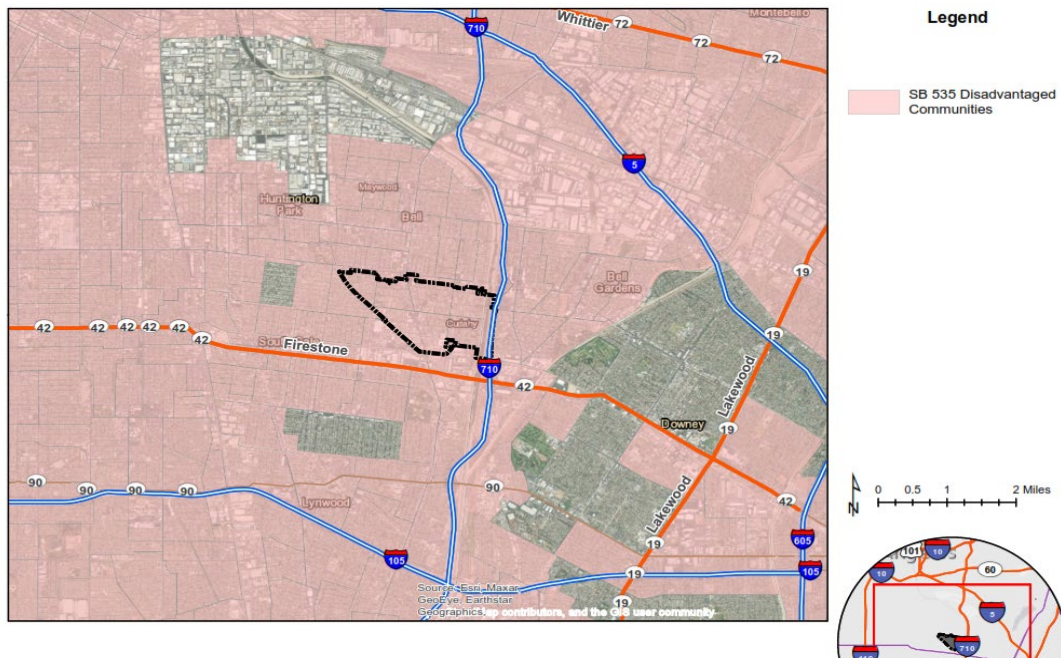
Authorized by the California Global Warming Solutions Act of 2006 (AB 32), the cap-and-trade program is one of several strategies that California uses to reduce greenhouse gas emissions that cause climate change. The funds must be used for programs that further reduce emissions of greenhouse gases.

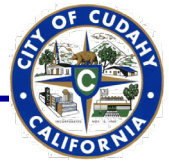
In 2012, the Legislature passed Senate Bill 535 (de Leon), directing that 25 percent of the proceeds from the Greenhouse Gas Reduction Fund go to projects that provide a benefit to disadvantaged communities. The legislation gave CalEPA responsibility for identifying those communities. In 2016, the Legislature passed AB 1550 (Gomez), which now requires that 25 percent of proceeds from the fund be spent on projects located in disadvantaged communities.



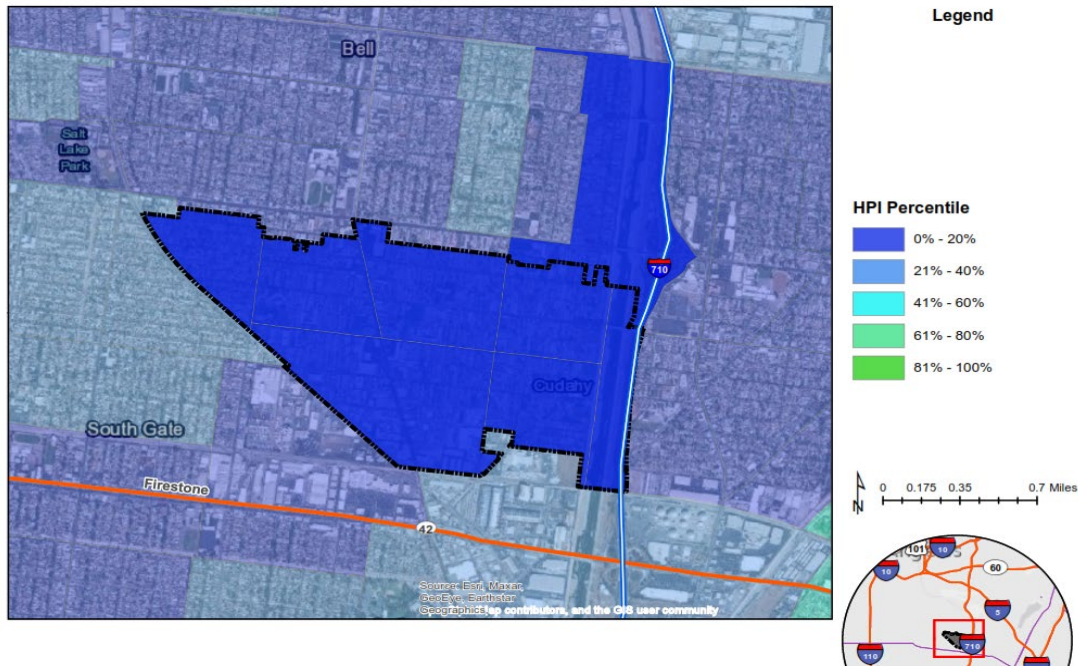
As indicated in Map 8.31, the City of Cudahy is a disadvantaged community based on SB 535. What this means for the City of Cudahy is that in the areas of environmental and social justice, a history of unfair treatment of communities, predominantly communities of people of color and/or low-income residents can be remedied. These communities have been subjected to disproportionate impacts from one or more environmental hazards, socio-economic burdens, or both. Residents have been excluded in policy setting or decision-making processes and have lacked protections and benefits afforded to other communities by the implementation of environmental and other regulations, such as those enacted to control polluting activities.

Map 8.38 – SB 535 Disadvantaged Communities





Map 8.39 – Healthy Places Index (PHASC, 2021) - Tract



The Healthy Places Index is structured to highlight the community conditions shaping health outcomes in neighborhoods across California. It is designed to showcase extraordinary data that properly frames and recognizes equity issues communities are experiencing, while also offering policy solutions to improve health for all. To ensure that everyone can live a healthy life, the HPI is a crucial resource for guiding informed prioritization of public and private investments, resource allocations, program planning and service delivery.

The HPI applies a positive, asset-based frame for community conditions that influence health while simultaneously offering a unique granularity of detailed data down to the census tract level across California. The methodology of the HPI score is also unique, as its eight Policy Action Area containing a total of 25 individual indicators are weighted to maximize the overall score’s association with life expectancy at birth. Additionally, the HPI offers detailed information on specific and actionable policy solutions to address community conditions across eight policy action areas.

The HPI score is the sum of its eight weighted Policy Action Areas: Economic, Education, Transportation, Social, Neighborhood, Housing, Clean Environment, and Healthcare Access. The final HPI scores are then assigned a percentile rank, with ranks closer to 100 indicating healthier community conditions, and ranks closer to 0 indicating less healthy community conditions.

As a city, Cudahy falls within the 0% to 20% percentile of all cities in the county of Los Angeles. What this means is that 80% of the communities in the county exceed the city’s health potential value. Therefore, the City of Cudahy is not considered a city with high health potential. This can



be due to a variety of factors such as: economy, education, transportation, social, neighborhood, housing, clean environment, and healthcare and healthy food access.