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December 3, 2021

State Department of Housing and Community Development
C/O Land Use and Planning Unit
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Re: City of San Gabriel Revised Draft 6th Cycle Housing Element HCD Submittal

To: State Department of Housing and Community Development

Please find enclosed one hard copy of the Revised Public Review Draft of the City of San Gabriel's 6th Cycle Housing Element for HCD's review. The City released this revised draft for two weeks of public review ahead of resubmitting to HCD. We respectfully request a 30-day expedited review by HCD considering the implications of AB 1398.

We look forward to your review and comments on the revised draft document. Also included is an electronic copy.

Please contact me at (626) 308-2806, ext. 4628, stewasart@sgch.org or Jennifer Murillo at (805) 959-1345, jennifer@lisawiseconsulting.com should you have any questions.

Sincerely,

Samantha Tewasart
Planning Manager
City of San Gabriel

6th Cycle Housing Element

City of San Gabriel

Prepared by:
Lisa Wise Consulting, Inc.
Draft | November 2021

LWC



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Section I Introduction

I.A Community Context

Founded in 1771 and incorporated in 1913, the City of San Gabriel is a culturally diverse community and home to about 40,000 people. The city is just over four-square miles and is bounded by its neighboring communities of San Marino, Alhambra, Rosemead, Temple City, and unincorporated portions of Los Angeles County.

San Gabriel prides itself on its high performing school system, growing economic opportunities, and rich cultural and historical landmarks. The city is home to the San Gabriel Mission, a tourist destination and active parish, the Mission District, anchored by four local museums, and Valley Boulevard, which hosts numerous markets, eateries, and services representative of the region's diverse Asian communities.

San Gabriel is a suburban community with commercial districts lining San Gabriel Boulevard, Las Tunas Drive, and Valley Boulevard. New construction is underway and will provide more residential, commercial, and mixed-use spaces to support a thriving community.

I.B Housing Element Purpose

The State of California has stated that the availability of decent and suitable housing for every California family is “a priority of the highest order” (California Government Code §54220). This objective has become increasingly urgent in recent years as communities across the state, including San Gabriel, struggle to meet the housing needs of all their residents. State Housing Element Law, established in 1969, recognizes the vital role local governments play in the supply and affordability of housing and requires all cities and counties in California establish a long-range plan to meet their fair share of regional housing needs. Cities are charged with planning for the welfare of their citizens, including ensuring that the existing and projected demands for housing are adequately met.

*High housing costs — and related housing instability issues — **increase health care costs** (for individuals and the state), **decrease educational outcomes** (affecting individuals, as well as the state's productivity), **and make it difficult for California businesses to attract and retain employees.***

— State of California 2025 Statewide Housing Assessment

The housing element is the primary tool used by the State to ensure local governments are appropriately planning for and accommodating enough housing across all income levels. This Housing Element covers the planning period 2021-2029. The housing element is a mandatory

part of a jurisdiction's General Plan but differs from other General Plan elements in two key aspects. The housing element must be updated every eight years for jurisdictions within a metropolitan planning organization (MPO) on a four-year regional transportation plan (RTP) cycle, such as the Southern California Association of Governments (SCAG). The housing element must also be reviewed and approved (i.e., certified) by the California Department of Housing and Community Development (HCD) to ensure compliance with statutory requirements.

At the time of publication, the COVID-19 crisis has impacted San Gabriel in significant ways. The pandemic has made the issue of housing security even more acute as residents face job loss, housing cost pressures, and disparate health impacts from the pandemic. On a practical level, this Housing Element has had to respond to these conditions by transitioning the public outreach process to reflect the limitations brought on by COVID-19. These actions are detailed in this report. From a policy perspective, the impact on housing security has shown that many of San Gabriel's residents have only tenuous access to housing and the need to secure more housing alternatives for all members of San Gabriel's populations.

I.C Organization of the Housing Element

Per California Government Code §65580-65589, a housing element must consist of the following components:

- **Review of the Previous Housing Element:** An evaluation of the results of the goals, policies, and programs adopted in the previous Housing Element that compares projected outcomes with actual achieved results.
- **Housing Needs Assessment:** An analysis of the existing and projected housing needs of the community. It provides a profile of socio-demographic information, such as population characteristics, household information, housing stock, tenure, and housing affordability. The assessment also considers local special housing needs, such as, seniors, farmworkers, homeless, large households, and female-headed households.
- **Inventory of Adequate Sites:** An inventory listing adequate sites that are suitably zoned and available within the planning period to meet the City's fair share of regional housing needs across all income levels.



- **Housing Resources:** An identification of resources to support the development, preservation, and rehabilitation of housing.



- **Housing Constraints:** An assessment of impediments to housing production across all income levels covering both governmental (e.g., zoning, fees, etc.) and nongovernmental (e.g., market, environmental, etc.).



- **Housing Plan:** This section provides a statement of the community's goals, quantified objectives, and policies to maintain, preserve, improve, and develop housing, as well as a schedule of implementable actions to be taken during the planning period to achieve the goals, objectives, and policies. Quantified objectives for new construction, rehabilitation, and conserved units by income category (i.e., very low, low, moderate, and above moderate) are included to make sure that both the existing and the projected housing needs are met, consistent with the City's share of the Regional Housing Needs Allocation (RHNA).



Section II provides a summary of the projected housing need. Section III summarizes the adequacy of housing sites and identifies housing resources. Section IV contains the housing plan. The comprehensive research and analysis supporting the development of Section IV, Housing Plan, are compiled in appendices to this Housing Element. These appendices contain the full set of information used to inform the City's goals, policies, and programs:

- Appendix A: Housing Needs Assessment
- Appendix B: Sites Inventory and Methodology
- Appendix C: Housing Constraints
- Appendix D: Existing Programs Review
- Appendix E: Public Participation Summaries

I.D Data Sources and Methods

This Housing Element was updated in accordance with California Department of Housing and Community Development (HCD) guidelines for the 6th Housing Element Cycle, incorporating additional considerations required under new State housing-related legislation. Specific documents are referenced throughout the Housing Element, including but not limited to the San Gabriel 2004 General Plan (Ingredients for Success), Zoning Code, the Mission District Specific Plan, Valley Boulevard Neighborhoods Sustainability Plan, and the Homelessness Response Plan. The analyses and findings in this document relied on data compiled from various sources, including:

- US Census Bureau (American Community Survey)
- California Department of Housing and Community Development (HCD)
- California Department of Finance (DOF)
- US Department of Housing and Urban Development (HUD)
- Consumer Financial Protection Bureau (CFPB)
- Southern California Association of Governments (SCAG) pre-certified data

This document was also informed by information provided by residents, business groups, local institutions, City staff, and elected officials.

I.E Summary of Public Participation

Public participation is crucial in shaping San Gabriel's housing strategy. Understanding the needs of the community enables the development of housing strategies that are most appropriate and effective. Public outreach also allows the City to identify concerns unique to certain stakeholders that may not have been initially apparent. As part of the development of this Housing Element, the City's public participation program included two public outreach meetings, one joint study session with the City Council and Planning Commission, direct outreach to representatives from all economic segments of the community, and community-wide notifications through various communication outlets (e.g., email, social media, Grapevine Newsletter, etc.), and public hearings with the Planning Commission and City Council. For detailed public outreach summaries and meeting materials, please see Appendix E.

Public Outreach Events

In addition to be available via direct contact (e.g., email, phone, in person by appointment consistent with COVID-19 protocols), the City conducted the following public outreach events to solicit input on the Housing Element update:

- Public Outreach Meeting #1 (Introductory, Information Gathering): Monday, April 12, 2021 (Virtual 6:30 p.m.)

- Public Outreach Meeting #2 (Review Technical Analysis – Draft Needs Assessment, Housing Constraints Analysis, and Existing Programs Review): Monday, May 10, 2021 (Virtual 6:30 p.m.)
- City Council & Planning Commission Joint Study Session (Discuss Draft Housing Element): September 30, 2021 (Virtual 6:30 p.m.)
- Planning Commission Public Hearing: January 10, 2022 (*tentative*)
- City Council Public Hearing: February 1, 2022 (*tentative*)

The goal of the first outreach meeting was informing the public of the purpose and update process for the Housing Element, providing an overview of the city's demographics and housing needs, and offering an opportunity to provide input at a very early stage in the process. The second outreach meeting focused on providing a high-level overview of the technical analysis that would be used to support the development of the City's housing goals, policies, and programs together with receiving public input received. This allowed the draft needs assessment, housing constraints analysis, and existing programs evaluation to be reviewed and commented on ahead of preparing the draft Housing Element. The draft technical assessment components (housing needs assessment, housing constraints, and existing programs review) were compiled in a "Preliminary Report" and published publicly in April 2021.

The joint study session with City Council and Planning Commission was held to discuss the draft Housing Element. Prior to the meeting, the City prepared a staff report summarizing the draft Housing Element to facilitate review and understanding of key aspects in the draft Housing Element. The joint study session provided an opportunity for elected and appoint officials with a role in adoption of the Housing Element to give feedback ahead of public hearings. Since these were also public meetings, community members and stakeholders were encouraged to attend and were provided an opportunity to give input. The agenda was provided in English, Spanish, Chinese, and Vietnamese. In addition to Council and Commission comments, 10 public comments were received during this study session.

Due to the ongoing COVID-19 crisis, all public outreach events were held virtually. The City was available to provide translation and interpretation services at all events upon request. The agenda for the City Council and Planning Commission joint study session on the draft Housing Element was provided in English, Spanish, Chinese, and Vietnamese. Notifications of the public outreach events were distributed to the City's email database as well as information and updates provided via City newsletters (e.g., Grapevine and Community Development Quarterly). The City also contacted the following stakeholders and organizations that provide housing and related support services in the community to encourage participation in outreach events and throughout the process:

- Housing Rights Center
- San Gabriel Valley Habitat for Humanity

- Asian Youth Center
- La Casa de San Gabriel Community Center
- YMCA San Gabriel Valley, Intervale Senior Services
- The East Los Angeles Valley Community Union
- Herald Community Center
- National CORE and Hope Through Housing Foundation
- Los Angeles Homeless Services Authority
- San Gabriel Valley Council of Governments
- Union Station Homeless Services

Attendees at each of the public outreach meetings included Planning Commissioners, City staff, and members of the public.

Affirmatively Furthering Fair Housing Targeted Outreach

In addition to be previously listed outreach efforts, the City conducted targeted outreach to solicit input on the affirmatively furthering fair housing (AFFH) analysis (Appendix F). Working with the City's Community Services Department, the following list of contacts representing various non-profit organizations and economic segments and neighborhoods of the community was developed:

- American Legion Post 748
- AYSO Region 40
- Ballet Folklorico Sol De Fuego
- San Gabriel Mission Parish- Troop 261
- Gabrielino Band of Mission Indians - Kizh Nation
- Junipero Serra Senior Citizens Club
- Knights of Columbus
- Native Sons of the Golden West, Ramona Parlor #109
- God's Church Inc.
- Origami Creations
- San Gabriel Historical Association
- San Gabriel Women's Foundation
- SGV Music Theatre- Spotlighters

- Sewing Circle
- Creative Art Group
- Girl Scouts Troop 1831
- Soroptimist San Gabriel- Alhambra- San Marino
- Victory Outreach
- San Gabriel Mission Cub Scout Pack 261
- San Gabriel Dance Association
- LA Host Lions Club- Cub Scout Pack 2168
- San Gabriel Valley Habitat for Humanity
- Asian Youth Center
- La Casa de San Gabriel Community Center
- Herald Christian Health Center
- Housing Rights Center
- YMCA San Gabriel Valley
- Los Angeles Homeless Services Authority (LAHSA) - Union Station Homeless Services SPA 3
- San Gabriel Valley Council of Governments
- St. Anthony's Christian Service
- Family Promise of San Gabriel Valley
- Salvation Army San Gabriel Corps

While some of these groups were also directly notified of the public outreach meetings, this more expansive list was necessary to broaden the public engagement effort and reach all communities and populations within city. These organizations are located across the city, but many are in the southern portion of the city which is disproportionately impacted by fair housing issues (e.g., higher concentrations of lower to moderate income households, not highest resource area, more overcrowding, and more vulnerable to displacement) (see Affirmatively Furthering Fair Housing Analysis, Appendix F).

These groups were directly contacted via mail, email, and telephone based on the contact information the City had on file. Letters and emails included Chinese and Spanish translations. Comments received during this effort are summarized in the following section.

Comments

During the Housing Element update process, the City received comments in both oral and written formats. Comments were provided prior to drafting the technical analysis to support development of the Housing Element, during public review of the technical analysis components that were released for review ahead of drafting the Housing Element, and during the 60-day public review period for the draft Housing Element.

Comments received are summarized below.

- Housing in San Gabriel is very expensive. It is difficult for families and working people to afford to live in San Gabriel. Long-term renters with dual incomes cannot afford to buy a home in San Gabriel.
- Affordable housing is critical, especially for members of the community who work in San Gabriel. There is enthusiasm for a plan to accommodate greater affordable housing in the city.
- Commissioners discussed the importance of meeting the City's housing goals while maintaining San Gabriel's neighborhood characteristics and existing quality of life.
- The City should explore a variety of housing development types, including lower density multi-family typologies, to meet its housing goals.
- Some strategies to consider in the 6th Cycle include increasing investment in connecting people experiencing hardships or overpayment with resources to address their hardships, such as homeownership programs or a way to lower transportation costs for people who need to travel for work.
- The City has not yet collected affordable housing fees (fees are due at time of building permit issuance), but affordable housing fees collected by the City in the future would be committed to specific affordable housing projects throughout San Gabriel.
- One Commissioner expressed concern in meeting the City's RHNA through the sites inventory alone. The Housing Element Update team discussed multiple ways the City can provide adequate capacity for its RHNA, including ADU projections and recently permitted and entitled projects.
- Desire to streamline ADUs and make ADUs more affordable to produce. However, some commenters were concerned about impacts of ADUs (e.g., parking on the street) and that ADUs may be unable to provide affordable housing due to high construction costs.
- Suggestions to modify standards in the R-1 Zone to allow multi-family housing or decrease the minimum lot size and front and rear setbacks to allow more detached single-family homes instead of attached units; however, concerns about changing standards in the R-1 Zone were also voiced.
- Various residents were concerned about the effects of SB 9 (Atkins).
- Commenters expressed concern with impacts of increased population on City services, traffic, and infrastructure.

- Desire to preserve the historic and suburban character of San Gabriel.
- Desire to protect privacy and concern with multi-story buildings adjacent to low density homes.
- Support for an inclusionary housing program was voiced by multiple commenters as a direct method of delivering affordable units.
- Some comments expressed support for a safe parking program, but one Council member voiced concern about serving those not currently living in San Gabriel and requested more information about who would be served by safe parking.
- Support for anti-displacement information dissemination program. Information must be multilingual, and dissemination of information should use organizations that are effective in distributing information widely within the community.
- Ensure that housing sites identified are not included in the City's Parks and Open Space Master Plan.
- Review potential site along Arroyo Drive; this site had a recent proposal for 22 units.
- Consider housing on church properties.
- There is strong demand for housing; units sell very quickly. Consider converting offices into apartments.
- Consider reexamining the Mission District Specific Plan to encourage more investment.
- Support reduction of open space standards in Zoning Code, particularly the standard for the R-2 Zone.
- Promote affordable ownership units. Consider partnering with non-profits, such as Habitat for Humanity to help provide lower-income ownership housing to help mitigate displacement.
- Affordable rental units are needed.
- Explore the possibility of converting market rate housing to affordable housing to meet RHNA.
- There is concern about overcrowded housing conditions and the impact it has on children, youth, and seniors. There needs to be space and time to exercise, which is difficult when parents work extra hours to afford living in San Gabriel.
- Concern that housing becomes too expensive for residents to afford and then properties remain unoccupied.

Integration of Comments into the Housing Element

The following summarizes how the feedback received during the process was incorporated into the Housing Element:

Comments provided have been incorporated in the updated Housing Element, specifically through the Housing Needs Assessment (Appendix A), the Sites Inventory and Methodology (Appendix B), and through programs. Additionally, programs such as residential code enforcement help to maintain and improve the quality of housing and neighborhoods and programs resulting from the Housing Constraints analysis (Appendix C) would facilitate the development of a variety of types of housing, including housing for special needs populations. Lastly, programs include support for those who are housing cost burdened through City advertisement and promotion of various LADCA programs (e.g., rental assistance, home ownership program, etc.) and anti-displacement information and resources dissemination.

- The housing constraints appendix (Appendix C) analyzes potential impediments to the production of various types of housing. Multiple programs have been included to address constraints to the production of housing and encourage a variety of housing types, such as programs to eliminate the minimum floor area standard, modify open space and parking requirements, and allow emergency shelters, transitional and supportive housing, and low barrier navigation centers consistent with state law.
- Programs are included to connect residents with resources, including promotion and distribution of information on LADCA resources and Homeownership Program (HOP), services provided by the Housing Rights Center, and dissemination of anti-displacement information.
- Projected ADUs are included in the RHNA capacity analysis, and through an ADU program the City will promote ADUs with a multilingual ADU Guidebook, publicize funding available to help reduce costs to build ADUs, and monitor ADU production to ensure targets are met.
- The housing sites inventory analysis considered various factors in site selection including that the site has available infrastructure, the parcel is not subject to a Mills Act contract (i.e., historic property), and is not a property where housing would conflict with the identified future opportunities in the City's Parks and Open Space Master Plan.
- Programs for inclusionary housing and safe parking are included.
- The program for anti-displacement information dissemination program has been modified to identify that information must be multilingual, and dissemination of information should use organizations that are effective in distributing information widely within the community.
- Sites were reviewed and modified to ensure there was no conflict with the City's Parks and Open Space Master Plan. Sites along Washes that are opportunities for future linear parks were reduced in projected development capacity to account for park space. This includes the site along Arroyo Drive (AIN: 5346-011-004).
- The sites inventory includes vacant and underutilized properties, including some parcels with churches or office buildings. These sites have been analyzed and are considered viable sites based on the age and/or condition of the existing structure, high demand for housing, development trends, and laws that continue to facilitate housing production (e.g., AB 1851 that reduces parking requirements for housing on religious institution properties). Program 11 has been included to facilitate housing on religious institution properties.

- Program 13 has been included to reexamine the Mission District Specific Plan to determine modifications to encourage more investment.
- Program 20 has been included to facilitate home ownership opportunities for low-income households through partnerships with affordable housing developers and non-profit organizations (e.g., Habitat for Humanity).

Additional data points and clarifications were also integrated into the technical appendices based on discussions with community members and representatives.

I.F Relationship to Other General Plan Elements

The Housing Element is one of seven mandatory elements of the City's General Plan, a long-range vision document that provides guidance for future development in San Gabriel. City Council adopted its revised General Plan, Ingredients for Success, in 2004. For the General Plan to provide effective guidance on land use issues, the goals, policies, and programs of each element must be internally consistent with other elements. This Housing Element builds upon the existing General Plan and is consistent with its goals and policies. Various Housing Element programs require Zoning Code and specific plan amendments, and some will require amendments to the General Plan for consistency (e.g., rezone program and standardize maximum heights program). As those Housing Element programs are implemented, the General Plan will be amended concurrently to ensure consistency across planning documents. In the event an element of the General Plan is amended, the City will consider the impacts of the amendment on the other elements to maintain consistency across all documents.

I.G Other Statutory Requirements

Water and Sewer Priority

Government Code §65589.7 requires each public agency or private entity providing water or sewer services to grant a priority for the provision of these services to proposed developments that include lower income housing units. In San Gabriel, sewer services are provided by the City and water services are provided by five water agencies; however, most water service is provided by the San Gabriel County Water District. The City has not denied, applied conditions, or reduced the amount of sewer service for a development that includes housing affordable to lower-income households consistent with state law. The City will adopt written policies and procedures that grant a priority for sewer hook-ups and service to developments that help meet San Gabriel's share of the regional need for lower-income housing.

Government Code §65589.7 also requires adopted housing elements to be immediately delivered to all public agencies or private entities that provide water or sewer services for municipal and industrial uses, including residential. The City will provide the adopted Housing Element to the five water agencies immediately upon adoption.

Section II Projected Housing Need

II.A Introduction/Overview of SCAG Methodology

State Housing Element law (Government Code §65580 et. seq.) requires regional councils of governments to identify for each member jurisdiction its "fair share allocation" of the Regional Housing Needs Assessment provided by the California Department of Housing and Community Development (HCD). In turn, each city and county must demonstrate the capacity to accommodate their local share of regional housing needs in the community's housing element. Each jurisdiction's responsibility for meeting the overall regional housing need is established as a Regional Housing Needs Allocation (RHNA).

The Southern California Association of Governments (SCAG), the council of governments for the San Gabriel area, adopted its 6th Cycle RHNA allocation methodology in March 2020. SCAG considered several factors in preparing the methodology, which weighed both projected and existing need. Projected need was informed by household growth, future vacancy need, and replacement need, while existing need considered transit accessibility, job accessibility, and residual need in disadvantaged communities. The distribution of the RHNA across the four income categories factored in a social equity adjustment, which allocated a lower proportion of lower-income RHNA to jurisdictions that already had a high concentration of such households in comparison to the County, as well as the goal to Affirmatively Further Fair Housing (AFFH), which adjusted the distribution of RHNA in jurisdictions considered either very low or very high resource areas.

II.B Los Angeles County Income Limits

The projected housing needs are broken down by income category based on definitions in the California Health and Safety Code (§50079.5). HCD calculates "extremely low", "very low", "low", "median", "moderate", and "above moderate" income limits, and publishes these limits at the county level. Los Angeles County's 2020 income limits for households of one to four persons are shown in Table II-1. See Appendix A, Table A-4, for a table listing income limits for households of up to eight persons.

Table II-1: Los Angeles County 2020 Income Limits

Number of Persons in Household	1	2	3	4
Extremely Low	\$23,700	\$27,050	\$30,450	\$33,800
Very Low	\$39,450	\$45,050	\$50,700	\$56,300
Low	\$63,100	\$72,100	\$81,100	\$90,100
Median	\$54,100	\$61,850	\$69,550	\$77,300
Moderate	\$64,900	\$74,200	\$83,500	\$92,750

II.C Regional Housing Needs Allocation

The RHNA for San Gabriel is shown in Table II-2. The City has a total allocation of 3,023 units for the October 2021 to October 2029 planning period.

Table II-2: 6th Cycle RHNA

Area/Income	San Gabriel		Los Angeles County		SCAG	
	Number of Units	Percent	Number of Units	Percent	Number of Units	Percent
Total	3,023	100%	812,060	100%	1,341,827	100%
Very Low¹	846	28%	217,273	27%	351,796	26%
Low	415	14%	123,022	15%	206,807	15%
Moderate	466	15%	131,381	16%	223,957	17%
Above Moderate	1,296	43%	340,384	42%	559,267	42%
¹ The City estimates 50% of the Very Low RHNA households would qualify as extremely low income (i.e., 423 extremely low-income units).						
Source: SCAG, City of San Gabriel, LWC						

The City of San Gabriel is not responsible for the actual construction of these units. San Gabriel is, however, responsible for creating a regulatory environment in which the private market could build unit types included in their State housing allocation. This includes the creation, adoption, and implementation of General Plan policies, zoning standards, and/or economic incentives to encourage the construction of various types of units.

Section III Housing Resources

III.A Introduction

There are a variety of resources available to support the City in implementation of its housing strategy, landowners and developers seeking to provide housing, and residents in need to housing assistance in San Gabriel. This section provides a summary of land available to accommodate future housing in the city. The full site inventory analysis is contained in Appendix B. This section also includes a list of local, regional, state, and federal programs that provide financial and related assistance to support the City in meeting its housing goals.

III.B Land Resources

A critical part of the Housing Element is the sites inventory, which identifies a list of sites that are suitable for future residential development. State law mandates that each jurisdiction ensure availability of an adequate number of sites that have appropriate zoning, development standards, and infrastructure capacity to meet its fair share of regional housing need (i.e., RHNA) at all income levels. The inventory is a tool that assists in determining if the jurisdiction has enough land to meet its RHNA given its current regulatory framework.

Identification of Sites Suitable for Housing

The sites identified in the site inventory (Appendix B) are comprised of parcels located in various areas and zones within the City. Due to the built out nature of San Gabriel, critical areas for housing and redevelopment are underutilized commercial and mixed-use. Each site has undergone an assessment to determine development potential and residential unit capacity given zoning standards and development trends. For detailed information, please see Appendix B.



Summary of Adequate Sites

Table III-1 summarizes the City's methods for satisfying its RHNA. Based on accessory dwelling unit (ADU) projections, entitled and proposed projects, and available 6th Cycle sites, the City has excess capacity in moderate and above-moderate income categories. The City has a shortfall in the lower income categories and has identified potential parcels for rezoning to address this shortfall (see Section IV, Housing Plan, for program details). The resulting rezoning would shift some of the projected moderate-income units into the lower income category (see Table B-9).

Assumptions and methodology for this determination and a detailed list of sites are included in Appendix B.

Table III-1: Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	846	415	466	1,296	3,023
ADUs	31	18	93	4	62	208
Entitled/Proposed Projects ¹	-	-	56	12	1,196	1,264
Remaining RHNA	See Very Low	797	266	450	38	1,551
Site Inventory	See Very Low/Low	463		1,031	81	1,575
Surplus / (Shortfall)	See Very Low/Low	(600)		581	43	24

¹ Considers net new units only.

Source: City of San Gabriel, LWC

III.C Financial and Administrative Resources

The following section contains a list of financial, administrative, and other resources to help the City address its housing needs. Availability of these resources is dependent on governmental priorities, legislation, and continued funding, which may be subject to change at any time.



City Resources

- Permanent Local Housing Allocation (PLHA) Grant Funding:** The City has been allocated \$187,992 for the first year of its five-year PLHA grant allocation through the Los Angeles County Development Authority (LACDA). The City expects similar amounts to be received annually over the five-year period. On October 6, 2020, the City Council directed the first year's allocation to be used for pre-development costs associated with the potential affordable housing development located at 405 South Del Mar Avenue.
- Homelessness Response Plan:** The City adopted a two-year Homelessness Response Plan in January 2021, which identifies strategies and actions that can leverage local resources while aligning with Los Angeles County Homeless Initiative Strategies to maximize effectiveness in reducing homelessness. This adopted Plan may also provide funding opportunities, as having an adopted homeless plan has been a requirement for receiving Measure H funds. Measure H, passed in 2016, is a one-quarter of a percent sales tax increase across Los Angeles County for funding homeless services and short-term housing in addressing the homeless crisis across the County.
- Affordable Housing Fees:** When developers request the application of the Planned Development Overlay, the City requires a development agreement to be negotiated. During that process, it is the City's practice to require the developer to pay affordable housing fees if on-site affordable housing units are not included in the project. Recently,

the City approved the payment of \$7,189.54 per unit (\$1,100,000 total) from the San Gabriel Plaza project (approved in March 2020). The fee is required to be paid prior to building permit issuance and deposited into the City's new Affordable Housing Fund. These funds are to be used for affordable housing projects throughout San Gabriel.

San Gabriel Valley Resources

- **San Gabriel Valley Habitat for Humanity (SGVHFH) Programs**
 - **Homeownership Program:** This program constructs new homes and renovates existing homes alongside Habitat Partner Homebuyers. SGVHFH sells affordable homes to low-income, first-time homeowners.
 - **Home Repair Program:** This program provides low-income homeowners with critical interior and exterior home repair assistance.
 - **Veteran Services:** This program helps qualifying homebuyers with an affordable mortgage to build, purchase, and/or repair their homes.
- **San Gabriel Valley Council of Governments (SGVCOG):** The SGVCOG provides services and programs that support housing in the San Gabriel Valley. Currently, the SGVCOG is leading various efforts to address homelessness, including pursuing funding to provide services to address the immediate need and assist individuals facing homelessness. Through the SGVCOG, the City is administering a \$15,000 Homeless Prevention and Diversion Grant.
- **San Gabriel Valley Regional Housing Trust (SGVRHT):** A joint powers authority to fund and finance the planning and construction of homeless housing, and extremely low, very low, and low-income housing projects. The City of San Gabriel is a member of the SGVRHT.

Regional Resources

- **Los Angeles County Development Authority (LACDA) Programs**
 - **First Home Mortgage Program:** Southern California Home Financing Authority (SCHFA) is a joint powers authority between Los Angeles and Orange Counties to create first-time homebuyer programs for low to moderate income households. This program helps provide loan and down payment assistance for low- to moderate- income households, and it is administered by LACDA and the Public Finance Division of the County of Orange.
 - **Home Ownership Program (HOP):** This program provides financing to low-income families looking to purchase an existing home in Los Angeles County.
 - **Affordable Homeownership Opportunities Program (AHOP):** This program provides first-time homebuyer down payment assistance to low- and moderate-income households who are unable to purchase a new home. After meeting criteria established by the lender providing the first mortgage loan, LACDA provides financial assistance via a secondary mortgage, with all payments deferred until sale, transfer, or refinancing.

- **Housing Choice Voucher Program (Section 8):** While the Housing Choice Voucher Program is a federally funded program, it is administered locally by public housing agencies, such as LACDA. The program provides assistance to very low-income families to afford decent, safe, and sanitary housing. Participants find their own housing to rent in the open market and pay a portion of their income towards rent. LACDA subsidizes the balance of the monthly rent in direct payments to the owner.
- **Homeless Incentive Program:** This program offers monetary incentives to encourage landlords to rent their available units to LACDA's Section 8 voucher holders. Funding is funded from a collaborative effort between multiple County agencies as part of the Homeless Prevention Initiative.
- **L.A. County Housing Innovation Fund (LACHIF) II:** LACHIF is a revolving loan fund of approximately \$70 million administered by LACDA in partnership with participating community lenders. Loans are made to finance acquisition and predevelopment costs for affordable housing developments in Los Angeles County. Both non-profit and for-profit borrowers are eligible for LACHIF II loans.
- **Los Angeles County Neighborhood Housing Services (NHS) Programs and Services**
 - **Mission-Driven Real Estate Program:** This program assists underserved communities across Los Angeles County with the purchase and sale of residential as well as commercial real estate properties. NHS provides access to capital for down payment assistance, developing real-estate properties, and acquiring vacant or distressed properties.
 - **Construction Management Services:** This program provides homeowners and contractors with technical assistance from NHS's construction team. Assistance includes bid process management, contractor selection, project oversight, and conflict resolution services. Additionally, NHS's project team can assist in home inspections, home safety awareness, lead abatement & code compliance, and refinancing assistance.
 - **Affordable Lending:** This program provides direct lending to underserved communities. Interested families can work with an NHS Lending Counselor to find an affordable loan option. NHS Lending Counselors can access special programs at the local, state, and federal level which provides loans to qualified families.
 - **Financial Education and Counseling:** This program educates families on building financial capacity, knowledge of financial services and products, credit management, avoiding predatory lending practices, tenant and homeowner education. This program consists of a series of classes, clinics, workshops, and one-on-one counseling sessions to provide families with the resources for them to become and remain informed homeowners.

- **Los Angeles County Housing Resources Center:** Created in 2007, this portal helps people list and find affordable, special needs, accessible, and/or emergency housing within the County of Los Angeles. This web-based service is supported by a toll-free call center and helps provide information to the general public as well as professionals seeking vital housing resources for clients.

State Resources

- **Affordable Housing and Sustainable Communities Program (AHSC):** Administered by the Strategic Growth Council, this program provides grants and/or loans to fund land-use, housing, transportation, or land preservation projects that support infill and compact development that reduce greenhouse gas emissions.
- **CalHome:** HCD provides grants to local public agencies and non-profit housing developers to assist first-time homebuyers with down payment assistance through deferred-payment loans, rehabilitation, homebuyer counseling, self-help mortgage assistance, or other technical assistance. \$57 million available in State CalHome program.
- **California Emergency Solutions and Housing (CESH):** This program provides funds for a variety of activities to assist persons experiencing or at risk of homelessness, such as housing relocation and stabilization services (including rental assistance), operating subsidies for permanent housing, flexible housing subsidies, emergency housing operating support, and homeless delivery systems.
- **Homekey:** This program provides funding to protect Californians experiencing homelessness who are impacted by COVID-19.
- **Housing for a Healthy California (HHC) Program:** This program creates supportive housing for recipients of or those eligible for health care provided through the California Department of Health Care Services' Medi-Cal program.
- **Housing Navigator's Program:** This grant program funds housing navigators to help young adults aged 18 to 21 years secure and maintain housing, with priority for individuals in the foster care system.
- **Infill Infrastructure Grant Program (IIG):** This program promotes infill housing development by providing grant funding, in the form of gap assistance, for infrastructure improvements required for qualifying multi-family or mixed-use residential development.
- **Joe Serna, Jr. Farmworker Housing Grant (FWHG) Program:** This program provides deferred payment loans for both owner-occupied and rental housing for agricultural workers, with a priority for lower income households.
- **Local Housing Trust Fund (LHTF) Program:** This program provides matching funds to local or regional housing trust funds for the creation, preservation, and rehabilitation of affordable housing, transitional housing, or emergency shelters.
- **Mills Act:** The Mills Act is an economic incentive programs for the restoration and preservation of qualified historic buildings by private property owners. It grants local governments the authority to enter into contracts with owners of qualified historic properties who actively participate in the restoration and maintenance of their historic

properties while receiving property tax relief. San Gabriel administers a Mills Act program, which furthers housing affordability by reducing property taxes and preserving existing housing stock.

- **Mobilehome Park Rehabilitation and Resident Ownership Program (MPRROP):** This program provides financing to support the preservation of affordable mobilehome parks through conversion of the park to an ownership model.
- **Multifamily Housing Program (MHP):** This program provides deferred payment loans for the construction, preservation, and rehabilitation of permanent and transitional rental housing for lower-income households.
- **National Housing Trust Fund:** This program provides deferred payment or forgivable loans for the construction of permanent housing for extremely low-income households. The covenant is for 55 years.
- **Permanent Local Housing Allocation (PLHA) Program:** This program provides a permanent source of funding to all local governments in California to help cities and counties implement plans to increase affordable housing stock. Funding for this program is provided through a \$75 recording fee on real estate transactions. Also see discussion above under Local Resources.
- **Predevelopment Loan Program (PDLP):** This program provides financing to cover pre-development costs to construct, preserve, or rehabilitate assisted housing.
- **Supportive Housing Multifamily Housing Program (SHMHP):** This program provides low interest deferred loan payments to developers building affordable rental housing that contain supportive housing units.
- **Transit-Oriented Development (TOD) Housing Program:** This program provides low-interest loans as gap financing for higher density affordable rental housing near transit.
- **Veterans Housing and Homelessness Prevention Program (VHHP):** This program supports the acquisition, construction, rehabilitation, and preservation of affordable multi-family housing for veterans and their families.
- **Golden State Acquisition Fund:** This \$93 million fund provides low-cost financing aimed at supporting the creation and preservation of affordable housing across the state.
- **California Housing Finance Agency (CalHFA):** CalHFA offers a variety of low-cost loan programs to support the development of affordable multi-family rental housing, mixed-income housing, and special needs housing.
- **California Housing Finance Agency (CalHFA), Mortgage Credit Certificate Program:** The MCC program is a homebuyer assistance program designed to help lower-income families afford home ownership. The program allows home buyers to claim a dollar-for-dollar tax credit for a portion of mortgage interest paid per year, up to \$2,000. The remaining mortgage interest paid may still be calculated as an itemized deduction.

- **Elderlink:** A senior care referral service licensed by the Department of Public Health. This organization provides independent and free personalized senior care placement services to fully screened and approved nursing home, board and care, and assisted living facilities.

Federal Resources

- **HOME Program:** Participating jurisdictions may use HOME funds for a variety of housing activities, according to local housing needs. Eligible uses of funds include tenant-based rental assistance; housing rehabilitation; assistance to homebuyers; and new construction of housing. HOME funding may also be used for site acquisition, site improvements, demolition, relocation, and other necessary and reasonable activities related to the development of non-luxury housing. Funds may not be used for public housing development, public housing operating costs, or for Section 8 tenant-based assistance, nor may they be used to provide non-federal matching contributions for other federal programs, for operating subsidies for rental housing, or for activities under the Low-Income Housing Preservation Act.
- **Community Development Block Grant (CDBG):** Federal funding for housing programs is available through the U.S. Department of Housing and Urban Development (HUD). The City uses its CDBG funds for the improvement and development of housing, public infrastructure and facilities, and provision of various services. San Gabriel participates in the CDBG program through the County of Los Angeles, which applies to HUD for funds on behalf of the City and other non-entitlement jurisdictions. The City's CDBG allocation for Fiscal Year 2020-2021 was \$358,594, and the Fiscal Year 2021-2022 allocation estimate is \$298,863.
- **Section 108 Loan Guarantee Program:** Allows CDBG entitlement jurisdictions to leverage their annual grant allocations to access low-cost financing for capital improvement projects. Eligible activities include housing, economic development, public facility, and infrastructure. This program is often used to catalyze private investment in underserved communities or as gap financing.
- **Section 811 Project Rental Assistance:** HUD offers long-term project-based rental assistance through a NOFA published by the California Housing Finance Agency (CalHFA).
- **Emergency Solutions Grants (ESG) Program:** This program provides funding for cities, counties, and states to (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly rehouse homeless individuals and families, and (6) prevent families/individuals from becoming homeless.
- **Veterans Affairs Supportive Housing (VASH) Program:** HUD-VASH is a collaborative program between HUD and VA combines HUD housing vouchers with VA supportive services to help veterans who are homeless and their families find and sustain permanent housing.

- **Low-Income Housing Preservation and Residential Home Ownership Act (LIHPRHA):** This program requires all eligible HUD Section 236 and Section 221(d) projects at risk of conversion to market-rate rentals from mortgage pre-payments be subject to LIHPRHA incentives, which include subsidies to guarantee an eight percent annual return on equity.
- **Low-Income Housing Tax Credit:** Administered through the California Tax Credit Allocation Committee (TCAC), the Low-Income Housing Tax Credit (LIHTC) subsidizes the acquisition, construction, and rehabilitation of affordable housing by providing a tax credit to construct or rehabilitate affordable rental housing for low-income households.
- **Continuum of Care (CoC) Program:** The Continuum of Care (CoC) Program is designed to promote communitywide commitment towards ending homelessness. It provides funding to nonprofits, State, and local governments to provide shelter and services to people experiencing homelessness.
- **U.S. Department of Agriculture (USDA) Housing Programs:** This program provides homeownership opportunities for individuals and below market-rate loans/grants to public and non-profit organizations for new construction, preservation, or rehabilitation of farmworker/rural multi-family rental housing.

III.D Opportunities for Energy Conservation

The cost of energy can greatly impact housing affordability, as energy costs can constitute a significant portion of total housing costs. High energy costs also particularly impact low-income households that are less likely to have the ability to cover increased expenses.

Southern California Edison (SCE) provides electricity services for the City of San Gabriel. Southern California Edison assists low-income customers through several programs including:

- **CARE (California Alternate Rates for Energy):** This program reduces energy bills for eligible participants by about 30 percent. Qualifications are based on whether any person living in the home participates in a list of public assistance programs or household income guidelines.
- **FERA (Family Electric Rate Assistance):** Family Electric Rate Assistance is SCE's rate reduction program for large households of three or more people with low- to middle-income. Qualifications are based on household income guidelines.
- **Arrearage Management Plan (AMP) Program:** This program is a debt forgiveness payment plan for residential CARE and FERA customers who have past due bills (at least 90 days old) totaling \$500 or greater. In exchange for making on-time payment on the current monthly bill, AMP will forgive 1/12 of the eligible total past due amount.
- **Capitation Fee Program:** This program reimburses organizations helping income-qualified customers gain assistance through the CARE or FERA program. Organizations dedicating resources to enrolling individuals and families in these programs can be entitled to capitation fees to offset expenses.

- **California LifeLine Program:** This program may provide a discount on phone services to residents receiving energy bill discounts through the CARE program.
- **Grid Alternatives' Energy for All Program:** This program provides no-cost solar for single family homeowners with limited or fixed incomes.

Additionally, the City has an Energy Action Plan (EAP), which was adopted in 2012. The EAP was developed in partnership with the SGVCOG and Southern California Edison. The EAP will accomplish several important things for San Gabriel:

- Make it easier for residents and businesses to finance energy efficient improvements and save money on energy bills.
- Provide a roadmap for reducing the City's energy bills.
- Reduce the City and community's impact on the environment.
- Provide the City with critical baseline data that the State requires for cities to address greenhouse gas emissions.
- Enable the City to get additional grants.
- Serve as a foundation for future planning efforts such as general plan updates, climate action plans, Housing Element updates, zoning code updates, among others.

The City offers a streamlining checklist for small residential solar to facilitate approval of residential solar projects consistent with state law.

Other conservation programs available on a regional, state, and federal level are described below.

San Gabriel Valley Energy Resources

- **San Gabriel Valley Energy Wise Partnership (SGVEWP) Energy Assessment Screen for your Home (EASY) Program:** This program provides residents a free energy assessment to identify opportunities to reduce home energy usage and costs.

State Energy Resources

- **California Department of Community Services & Development Programs Low-Income Weatherization Program (LIWP):** California's Low-Income Weatherization Program (LIWP) provides low-income households with solar photovoltaic (PV) systems and energy efficiency upgrades at no cost to residents. LIWP is the only program of its kind in California that focuses exclusively on serving low-income households with solar PV and energy efficiency upgrades at no cost. The program reduces greenhouse gas emissions and household energy costs by saving energy and generating clean renewable power. LIWP currently operates three program components: Multi-Family, Community Solar, and Farmworker Housing. According to CDS's Nov. 2020 Low-Income Weatherization Program Impact Report, LIWP has received \$212 million from the Greenhouse Gas Reduction Fund since 2014. Note: The multi-family energy efficiency & renewables program component is estimated to end in June 2022.

- **California Public Utilities Commission Energy Savings Assistance Program (ESA):** ESA provides no-cost weatherization services to low-income households who meet the CARE income guidelines. Services provided include attic insulation, energy efficient refrigerators, energy efficient furnaces, weatherstripping, caulking, low-flow showerheads, water heater blankets, and door and building envelope repairs which reduce air infiltration.

Federal Energy Resources

- **Federal Housing Administration Energy Efficient Mortgage Program (EEM):** This program helps families save money on their utility bills by enabling them to finance energy efficient improvements with their FHA-insured mortgage. The EEM program recognizes that an energy-efficient home will have lower operating costs, making it more affordable for the homeowners. Cost-effective energy improvements can lower utility bills and make more income available for the mortgage payment.

Section IV Housing Plan

IV.A Introduction

The housing plan of the Housing Element serves as the City's strategy for addressing its housing needs. This section describes the housing goals, policies, and programs of the Housing Element for the City of San Gabriel.



Goals are aspirational purpose statements that indicate the City's direction on housing-related needs. Each goal encompasses several policies, which are statements that describe the City's preferred course of action among a range of other options. Each goal also includes programs, which are actionable steps taken to implement the policies and further the City's progress towards its goals. Some programs contain quantified objectives, which refer to the number of units that are expected to be constructed, preserved, or rehabilitated through the program during the planning period. These quantified objectives represent measurable outcomes that can be used to benchmark the success of each program.

This Housing Element contains institutional changes intended to significantly increase the amount and type of housing for all income levels in San Gabriel. These efforts are expected to be initiated throughout the planning period, which is from October 15, 2021 to October 15, 2029. In accordance with state law, the City will also evaluate the progress and effectiveness of these programs on an annual basis. Together, these initiatives reflect the City's commitment to increasing affordable housing and improve existing housing conditions.

IV.B Goal A: Facilitate the Development of Housing and Provide for a Range of Housing Types

Policies

- a) Accommodate the City's fair share of the regional housing needs.
- b) Promote and encourage the development of housing of various types, designs, forms of ownership, and sizes.
- c) Encourage the use of innovative land use techniques and construction methods to minimize housing costs and facilitate a range of housing types without compromising basic health, safety, and aesthetic considerations.
- d) Encourage development of accessory dwelling units by publicizing the City's accessory dwelling unit program.
- e) Facilitate and encourage residential development through lot consolidation incentives including density increases.
- f) Work cooperatively with neighboring cities, Los Angeles County, and the Southern California Council of Governments (SCAG) to ensure that the region addresses its fair share of housing and promotes sustainable land use and transportation planning.

- g) Cooperate with and seek the advice of developers, builders, financial institutions, community groups, nonprofit agencies, and interested community members on housing needs and the solutions to housing problems.
- h) Promote infill housing development in appropriate locations.
- i) Promote housing options that allow residents to age in place such as multi-generational housing, multi-family housing, senior housing, and residential care.

Programs

1. RHNA Housing Sites Implementation; Rezone Program

To accommodate the remaining lower-income RHNA of 600 units, the City will identify and rezone a minimum of 20 acres of vacant land or land with redevelopment potential to a maximum density of 40 units per acre and a minimum density of at least 30 units per acre by October 15, 2024. Rezoned sites will permit owner-occupied and rental multi-family uses by right pursuant to Government Code §65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households. Rezoned sites shall allow 100 percent residential use and shall require residential use to occupy at least 50 percent of the floor area in a mixed-use project. Each potential rezone site has the capacity to accommodate at least 16 units and will be available for development in the planning period where water, sewer, and dry utilities can be provided. Appendix B identifies potential parcels for rezoning; these sites comprise 20.5 acres currently identified for moderate and above moderate-income RHNA, both of which have excess capacity. One of the potential sites for rezoning is located in the highest resource areas (i.e., north of Las Tunas Drive and west of San Gabriel Boulevard).

- Objective: The City will amend the Zoning Code to create the opportunity for at least 600 units of housing for lower income households.
- Timeframe: Sites rezoned by October 15, 2024
- Responsible Agency: Community Development Department

2. Rezone Re-Used Sites

Under AB 1397, certain rezoning requirements apply if a lower income housing site identified in Appendix B was identified as a housing site (for any income level) in a previous housing element's site inventory. The following vacant and nonvacant lower income sites are subject to the rezoning requirements:

- Vacant lower income sites that have been included in at least two consecutive housing element sites inventories.
- Nonvacant lower income sites that have been included in a prior housing element sites inventory.

The City will amend the Zoning Code to allow development by right pursuant to Government Code §65583.2(i) when 20 percent or more of the units are affordable to lower income households on sites identified in Table IV-1 to accommodate lower income RHNA that were previously identified in past housing element(s).

Table IV-1: Re-Used Sites to be Rezoned

AIN	Parcel Size (ac)	Zone	Lower Income Units Capacity
5346011004	1.56	R-3 A (MDR-3) ¹	22
¹ Although multi-family family is allowed by right in the R-3 A (MDR-3) Zone, senior housing requires a conditional use permit. <i>Source: City of San Gabriel, LWC</i>			

- Objective: The City will update the Zoning Code to rezone sites re-used from prior Housing Elements.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

3. Accessory Dwelling Units (ADUs)

Given the scarcity of developable land remaining in San Gabriel, integrating Accessory Dwelling Units (ADUs) in existing residential neighborhoods is a means for the City to accommodate additional affordable rental housing. ADUs can be particularly effective in addressing the needs of extremely-low-income households since these units may be occupied by extended family members with no rent charged or may be rented at a below market-rate rent due to their small size and/or configuration. The City will amend the specific plans to clearly identify that ADUs are allowed in zones where residential is allowed. To encourage and facilitate the provision of additional ADUs, the City will continue to publicize and promote this program, the newly developed ADU Guidebook in multiple languages, and available funding for ADUs, such as the CalHFA ADU Grant Program that provides up to \$25,000 to reimburse homeowners for predevelopment costs necessary to build and occupy an ADU. Also, the City will monitor ADU production and affordability and implement additional action to incentivize ADU production if target ADU numbers are not being met.

- Objective: The City will publicize and promote ADUs through the City's website, newsletters, email distribution lists, social media, and cable television channel. Based on past trends and expanded promotion efforts, the City anticipates about 208 ADUs over the 2021-2029 planning period.
- Timeframe:
 - Produce an ADU Guidebook in multiple language (2021)

- Provide ADU information and resources, including funding opportunities on the City's webpage (2021 and updated as any changes occur)
- Promote ADUs via email blasts and social media (annually)
- Amend specific plans to clearly allow ADUs in all zones where residential is allowed (2022-2023)
- Develop a monitoring program to ensure the City is meeting ADU construction targets (2022); if ADU targets are not being met by June 2025, the City will review and revise efforts to increase ADU construction (e.g., fee waivers, pre-approved ADU site/floor plans, etc.) no later than December 2025.
- Responsible Agency: Community Development Department

4. Mixed-Use Zones

The City allows mixed-use developments with a combination of residential and commercial uses in the C-1 and C-3 zones and various zones in the Mission District and Valley Boulevard specific plan areas. The specific plan areas allow mixed-use development at higher densities compared to other areas of the city, and the City currently has 15 mixed-use projects in the entitlement phase. If financial assistance is available, a focus of these funds will be to provide financial incentives (e.g., reductions in development fees, assistance with off-site improvement costs, etc.) for development of affordable housing on sites where mixed-use is allowed.

- Objective: The City will continue to promote development in the mixed-use areas in conjunction with its vacant and underutilized site inventory. The City will provide information regarding mixed-use development opportunities on the website and will notify local affordable housing developers annually.
- Timeframe: Provide site inventory on City's website (2021 and updated as rezoning occurs); notify local affordable housing developers of sites inventory status (annually)
- Responsible Agency: Community Development Department

5. Vacant and Underutilized Sites Inventory

Using the 6th Cycle site inventory, the City will update and maintain an inventory of sites for prospective residential development on a regular basis. The City will ensure this inventory is available to the public and the local development community, in conjunction with information on density increases and other regulatory concessions available through the City's Density Bonus program. The City will coordinate with the State's electronic inventory, as appropriate.

- Objective: The City will maintain a current inventory of vacant and underutilized sites potentially available for residential development. This

inventory will be made available to interested individuals, including San Gabriel residents and residential developers.

- Timeframe: Annually update status of sites in the sites inventory; annually inform residents and residential developers of sites inventory status and density bonus and other regulatory concessions available
- Responsible Agency: Community Development Department

6. Sites Monitoring and Reporting

Consistent with SB 166 (No Net Loss), the City will monitor housing sites to ensure adequate sites to accommodate the remaining unmet RHNA by each income category are maintained at all times.

- Objective: The City will track each site in the inventory and report annually to the City Council on the adequacy of available sites compared to the progress made towards meeting the RHNA.
- Timeframe: Annually track status of identified sites and report to City Council
- Responsible Agency: Community Development Department

7. Housing Developer Outreach

The City will conduct targeted engagement with local housing developers, both private and nonprofit, to promote housing development on available sites. The City will create and keep an updated a list of housing developers, including any new regional developers, and conduct annual outreach to inform developers of City initiatives, local incentives, and site availability to encourage and facilitate housing development.

- Objective: Over the course of the planning period, the City will reach out to at least five residential developers with development experience in the San Gabriel Valley. Outreach will occur over email, phone, or in-person meetings. The City will discuss potential strategies the City may consider to further facilitate development with residential developers to get input on effectiveness and other potential strategies to consider.
- Timeframe: Annually
- Responsible Agency: Community Development Department

8. Incentives for Lot Consolidation

In 2004, the City adopted the Mission District Specific Plan, which includes incentives for the consolidation of lots zoned for multi-family residential use. Within the boundaries of the specific plan, allowable density is increased by 67% for properties in the MDR-2 and MDR-3 zones that are at least 32,670 square feet (0.75 acre) in size. Additionally, the Valley Boulevard Specific Plan, adopted in 2006, has a minimum lot size requirement of 22,000 square feet for mixed use projects in certain zones (MU-T and MU-C), thus encouraging the consolidation of smaller parcels to achieve this standard.

- Objective: The City will retain these lot consolidation incentives in the specific plans. The City will make its vacant and underutilized site inventory available to developers and the public to aid in identifying opportunities for lot consolidation.
- Timeframe: Annually inform residents and developers of sites inventory status and lot consolidation incentives available
- Responsible Agency: Community Development Department

9. Infrastructure Grants

Current infrastructure systems require continued maintenance and investment to support the impacts of increased housing development (e.g., sewer system). The City will pursue grant funding for infrastructure that supports infill development across the city (e.g., Infill Infrastructure Grant, etc.), but will prioritize grant applications for infrastructure projects that serve properties south of Las Tunas Drive where low and moderate-income households are most prevalent.

- Objective: The City will be awarded infrastructure grant funding (e.g., Infill Infrastructure Grant, etc.) that facilitates the production of housing in San Gabriel and private investment in the areas south of Las Tunas Drive.
- Timeframe: Annually evaluate notices of funding availability; submit at least one grant application every two years until an award is received
- Responsible Agency: Community Development Department/Public Works

10. Objective Design Standards

Consistent with state law, including SB 35 and SB 330, the City will adopt objective design standards for multi-family and mixed-use projects. This effort will evaluate and address subjective standards and findings required for approval in both the Zoning Code, specific plans, and the City's Design Guidelines. The purpose of these standards is to expedite the approval process for such projects and support the City in meeting its housing goals.

- Objective: The City will adopt objective design standards for multi-family and mixed-use projects and amend required findings for approval to eliminate subjectivity consistent with state law.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

11. Religious Institutions Outreach

The City has experienced church sites redeveloped for housing, and some sites include existing religious institution uses. To facilitate the development of housing on these sites, the City will conduct direct outreach to those properties to inform property owners and operators about AB 1851 and any other regulations that encourage housing development on these sites.

- Objective: The City will reach out to each religious institution sites owners or operators annually. Outreach will occur over email, phone, or in-person meetings.
- Timeframe: Annually
- Responsible Agency: Community Development Department

12. Valley Boulevard Specific Plan Minimum Densities

Developments in the MU-T and MU-C zones of the Valley Boulevard Specific Plan (VBSP) are reflecting average densities of 61 to 69 units per acre. Although the development is occurring at higher densities, the City will establish minimum densities in the MU-T and MU-C zones ensuring sites are developed at densities to meet realistic capacity assumptions.

- Objective: The City will amend the VBSP to establish minimum densities for the MU-T and MU-C zones.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

13. Mission District Specific Plan Evaluation and Update

Certain zones within the Mission District Specific Plan (MDSP) have not attracted reinvestment or redevelopment. The City will assess and update the MDSP to encourage redevelopment.

- Objective: The City will assess and update the MDSP to encourage redevelopment.
- Timeframe: 2022-2024
- Responsible Agency: Community Development Department

IV.C Goal B: Promote and Encourage the Provision of Affordable Housing Opportunities to Meet the Needs of Lower- and Moderate-Income Households

Policies

- a) Encourage a wide range of housing types, prices, and ownership forms in new construction.
- b) Facilitate the development of housing for lower- and moderate-income households by private and non-profit developers.
- c) Support the development of cost saving and energy-conserving construction techniques.
- d) Facilitate the inclusion of units for lower- and moderate-income families through the Inclusionary Housing Ordinance.
- e) Support efforts of private lenders to provide responsible alternative financing methods to make home ownership available to a greater number of households.

- f) Continue to encourage and facilitate density bonuses and other incentives for housing development incorporating units for low- and moderate-income households.
- g) Discourage the conversion of existing apartment units to condominiums where such conversion will diminish the supply of low- and moderate-income housing.
- h) Support and pursue programs and funding sources designed to maintain and/or improve the affordability of existing housing units to low- and moderate-income households.

Programs

14. Density Bonus Ordinance

Density bonuses incentivize development at greater intensities, allowing land and construction costs to be spread across more housing units and ultimately reducing per-unit costs. In addition to the higher densities, this ordinance allows incentives such as reduced parking or other modifications to development standards help to facilitate the production of affordable housing. The City is currently undergoing analysis to update its Density Bonus Ordinance to comply with more recent state law.

- Objective: The City will amend the Density Bonus Ordinance pursuant to new state law. The City will further promote the program via the City's website, newsletter, and cable television channel.
- Timeframe: 2021-2022
- Responsible Agency: Community Development Department

15. Enhanced Density Bonus Ordinance

The City will evaluate increasing density bonus provisions for projects that include affordable housing above that required by state law (e.g., above the 50 percent bonus pursuant to AB 2345). Unless constrained by infrastructure or other limitations determined through the City's evaluation, the City will proceed with adopting an enhanced density bonus program.

- Objective: The City will evaluate an enhanced density bonus program.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

16. Inclusionary Housing

The City will evaluate an inclusionary housing program, which would typically require provision of affordable housing on-site, provision of affordable housing off-site, or payment of an affordable housing in-lieu fee. The analysis will assess market conditions and the capacity for private development to generate below market rate units. Based on the analysis, the City will adopt an inclusionary housing ordinance. The City has contracted with a consultant to conduct this analysis and prepare an inclusionary housing ordinance.

- Objective: The City will adopt an Inclusionary Housing Ordinance.
- Timeframe: 2021-2022

- Responsible Agency: Community Development Department

17. Housing Choice (Section 8) Rental Assistance Program

The Housing Choice (Section 8) Rental Assistance Program is administered by the Los Angeles County Development Authority (LACDA). This program assists very low-income, elderly and disabled households by paying the difference between 30 percent of an eligible household's income and the actual rental cost. During calendar year 2020, there were 223 Housing Choice Voucher program participants that resided in San Gabriel. The City will continue to promote participation of eligible San Gabriel residents in the County-administered Housing Choice Rental Assistance Program.

- Objective: The City will advertise availability of the Housing Choice Rental Assistance Program on its website, newsletters, email blasts, social media, cable television channel as well as handouts at City Hall and other public buildings and facilities. Since Housing Choice vouchers are portable, the number of vouchers used in the city will vary over time.
- Timeframe: Provide LACDA Housing Choice Rental Assistance Program link on the City's website (2021); promote the Program via newsletters, email blasts, social media, and other methods (annually)
- Responsible Agency: LACDA; Community Development Department

18. Los Angeles County Housing Innovation Fund II

The Los Angeles County Housing Innovation Fund (LACHIF) II is a revolving loan fund of approximately \$70 million administered by the Los Angeles County Development Authority (LACDA) in partnership with participating community lenders. The LACHIF II can be used to finance acquisition and predevelopment costs associated with affordable housing developments.

- Objective: The City will make non-profit and private developers aware of the availability of Los Angeles County Housing Innovation Fund II financing and encourage its use where feasible to facilitate the development of affordable housing in San Gabriel.
- Timeframe: Annually provide LACHIF II information to affordable housing developers
- Responsible Agency: LACDA

19. Home Ownership Program

San Gabriel residents are eligible to participate in the Los Angeles County Development Authority's (LACDA's) Home Ownership Program (HOP) funded under the Federal HOME program to assist low-income households to purchase their first homes. HOP provides loans of up to 20 percent of the initial purchase price or \$75,000, whichever is lower. In addition, the borrower is required to have a minimum of one percent of the down payment

and complete an educational course in homeownership from an approved HUD counseling agency. During 2013-2021, there were three properties funded by HOP in San Gabriel. The City will continue to promote participation of eligible San Gabriel residents in the HOP.

- Objective: The City will advertise the availability of HOP through its website, newsletters, email blasts, social media, cable television channel as well as handouts at City Hall and other public buildings and facilities.
- Timeframe: Provide LACDA HOP Program link on the City's website (2021); promote the Program via newsletters, email blasts, social media, and other methods (annually)
- Responsible Agency: LACDA

20. Low-Income Household Ownership Opportunities

The City will partner with affordable housing developers and/or non-profit organizations (e.g., Habitat for Humanity, etc.) to facilitate the production of home ownership opportunities for low-income households in San Gabriel, including potential opportunities for extremely low-income households and special needs housing. The City will partner through available funding (e.g., PLHA grant, affordable housing fees, etc.), fee waivers or deferrals, regulatory concessions, assistance with pursuing funding applications, or other means.

- Objective: The City will partner with an affordable housing developer and/or non-profit organization to facilitate the production of ownership housing for lower income households.
- Timeframe: Outreach to potential affordable housing developer and non-profit partners (2022-2023); establish partnership and move forward with housing opportunities (2024-2026)
- Responsible Agency: Community Development Department

IV.D Goal C: Remove Government Constraints to the Maintenance, Improvement, and Development of Housing

Policies

- a) Affirmatively further housing goals through City codes, ordinances, and policies that enable housing production and enhance the housing quality of life for all residents.
- b) Ensure that Zoning Code provisions do not adversely impact the housing needs of residents with special needs, including the elderly and persons with disabilities.
- c) Continue to expedite the processing and review time by the City to the maximum extent possible, while also providing special processing assistance for affordable housing projects.

Programs

21. Zoning for Emergency Shelters, Transitional and Supportive Housing, and Low Barrier Navigation Centers

To assist in the development of housing for extremely low-income and special needs households, the City will take the following actions:

- **Emergency Shelters:** The City will amend Zoning Code §153.162(O) to remove or modify subjective requirements for emergency shelters (i.e., size and location of waiting and intake areas subject to review and approval of Community Development Department; exterior lighting and provision of security guards to be approved by the Police Department) so only objective standards apply. The City will also amend the emergency shelter parking requirement so it does not impose more parking than required for other residential or commercial uses within the same zone and requires sufficient parking for emergency shelter staff (e.g., one parking space per employee and agency vehicle).
- **Transitional and Supportive Housing:** The City will amend the Zoning Code to clarify and expand the allowance for transitional and supportive housing consistent with state law, including AB 2162. The City will remove Zoning Code §153.240.D, which requires a Conditional Use Permit for a licensed group home of six or fewer people. The City will also amend the Valley Boulevard Specific Plan to permit small family care homes in the MU-C/R and R-C zones and amend the Zoning Code and specific plans to allow large family care homes by right where multi-family is allowed by right (i.e., R-2, R-3, MDR-2, MDR-3, MU-C/R, and R-C zones).
- **Low Barrier Navigation Centers:** Low Barrier Navigation Centers are housing-first, low-barrier, service-enriched shelters focused on moving people into permanent housing. They provide temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, and housing. Low Barrier Navigation Centers must be allowed by-right in all residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multi-family uses. The City will amend the Zoning Code to allow Low Barrier Navigation Centers by-right in these areas consistent with AB 101 (Government Code §65660 et seq.).
 - Objective: Amend the Zoning Code to facilitate establishment of emergency shelters, transitional and supportive housing, and Navigation Centers throughout the planning period.
 - Timeframe: 2022-2023
 - Responsible Agency: Community Development Department

22. Safe Parking Program

A safe parking program is operated on a property outside of the public right-of-way and managed by a social service provider that provides individuals and families with vehicles a safe place to park overnight while working towards a transition to permanent housing. To assist this extremely low-income and special needs population, the City will amend the Zoning Code to allow for safe parking programs in appropriate zones and subject to appropriate City permit and review processes.

- Objective: The City will update the Zoning Code to allow for the Safe Parking program.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

23. Standardize Maximum Heights

The maximum height for commercial buildings in the C-1 and C-3 zones is two stories/25 feet taller than for mixed-use buildings in the same zones. Allowing mixed-use buildings to have the same maximum height of five stories/70 feet instead of three stories/45 feet would provide opportunities to produce more residential units while adhering to the maximum building height allowed. Furthermore, C-1 and C-3 zoning is located along San Gabriel Boulevard and in areas south of Las Tunas Drive where private investment and revitalization is being targeted. The City will amend the Zoning Code to apply a consistent maximum allowed height in the C-1 and C-3 zones regardless of use.

- Objective: Amend the Zoning Code to ensure consistency of maximum allowed heights across commercial zones.
- Time frame: 2022-2023
- Responsible Agency: Community Development Department

24. Eliminate Residential Floor Area Limit in C-1 and C-3 Zones

To provide more opportunity and flexibility to accommodate housing, remove the 50 percent maximum of total net lot area standard that applies to residential uses in mixed-use projects in the C-1 and C-3 zones.

- Objective: The City will amend the Zoning Code to eliminate this standard.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

25. Eliminate Minimum Floor Area Standard

While the City's minimum floor area standards have not proved to be a constraint on housing development based on market demand for larger units, they could potentially constrain housing development in the future depending on demographic and market trends for smaller units. To increase multi-family housing opportunities, the City will amend the Zoning Code to eliminate the requirement for minimum floor area by unit type.

- Objective: Amend the Zoning Code to remove the minimum floor area requirement.
- Time frame: 2022-2023
- Responsible Agency: Community Development Department

26. Modify Open Space and Parking Requirements

The City will conduct a feasibility assessment of its open space and parking requirements on the production of housing, including the production of moderate and lower-income units. Based on the results of the feasibility assessment, the City will amend the open space and parking requirements in the Zoning Code to facilitate the production of housing units. Specifically, the requirement for two covered parking spaces for each multi-family unit and open space requirements for multi-family units will be modified.

- Objective: Evaluate current open space and parking standards and amend the Zoning Code given assessment.
- Time frame: 2022-2023
- Responsible Agency: Community Development Department

27. Assess Single-Room Occupancy Requirements

The City will prepare a map showing the parcels that meet the City's requirements for single-room occupancy (SRO) developments (i.e., in the M-1 Zone, minimum lot size of 18,000 square feet, and not adjacent to the R-1 Zone). The City will then evaluate whether any of the mapped parcels are vacant or have redevelopment potential. If appropriate, based on the results of this assessment, the City will amend SRO requirements in the Zoning Code to facilitate the production of SROs.

- Objective: Assess the SRO requirements in the Zoning Code.
- Time frame: 2022-2023
- Responsible Agency: Community Development Department

28. Minor Modifications

As identified in the Housing Constraints analysis (Appendix C), a minor modification application requires abutting property owners' consent and limits minor modifications to certain standards. The City will analyze the minor modifications provisions and make amendments, as appropriate to facilitate application submittal and City review.

- Objective: Amend the minor modifications provisions in the Zoning Code.
- Time frame: 2022-2023
- Responsible Agency: Community Development Department

29. Water and Sewer Providers

In accordance with Government Code §65589.7, immediately following City Council adoption, the City will deliver to all public agencies or private entities that provide water or sewer services to properties within San Gabriel a copy of the 2021-2029 Housing Element. The City will also adopt written policies and procedures that grant priority for sewer hook-ups to developments that include lower-income housing units.

- Objective: Adopted 6th Cycle Housing Element distributed to water providers and written policies and procedures for sewer priority adopted.
- Time frame: Immediately after Housing Element adoption
- Responsible Agency: Community Development Department

30. SB 35 Process

The City will develop an application form and checklist and written policy or project review and approval guidelines to specify the SB 35 (2017) streamlining approval process and standards for eligible projects as set forth under Government Code §65913.4 and consistent with HCD Updated Streamlined Ministerial Approval Process Guidelines.

- Objective: SB 35 eligibility checklist and application form prepared and provided on the City's website.
- Time frame: 2022
- Responsible Agency: Community Development Department

31. Employee Housing

The City will amend the Zoning Code and specific plans to allow employee housing consistent with Health and Safety Code §17021.5 and 17021.6.

- Objective: Zoning Code amended to allow employee housing consistent with state law.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

IV.E Goal D: Conserve and Maintain the Existing Affordable Housing Stock

Policies

- a) Continue to investigate and pursue housing rehabilitation programs and funding sources offered by the State and Federal governments.
- b) Promote the use of rehabilitation assistance programs to alleviate deteriorated or deteriorating housing conditions.
- c) Encourage investment of public and private resources to alleviate neighborhood deterioration trends.
- d) Continue to encourage property owners to improve or rehabilitate owner-occupied and rental housing where feasible.

- e) Promote the removal and replacement of those substandard units that cannot be rehabilitated.
- f) Use public information and assistance programs to encourage repair before major damage occurs.
- g) Continue to encourage the maintenance of sound owner-occupied and renter-occupied housing.

Programs

32. Residential Code Enforcement

Code enforcement efforts in San Gabriel focus on bringing substandard housing units into compliance with City and State building and property maintenance codes. The City's Neighborhood Improvement Services Division incorporates traditional code enforcement with community education and empowerment. Using an array of new tools, including concentrated code enforcement, tree planting, cleanup programs, educational outreach, and other initiatives, the Division takes a proactive approach to increase the City's effectiveness in improving the quality of housing and neighborhoods in San Gabriel.

- **Objective:** The Neighborhood Improvement Services Division will continue to bring its varied resources to bear on enforcing City and State building and property maintenance codes, with an emphasis on eliminating substandard housing conditions so that all San Gabriel residents may enjoy decent, safe and sanitary housing. Over the last three years, the City successfully closed 141 cases related to housing unit/property conditions and use complaints, averaging 47 annually. The City aims to maintain this level of case load and compliance, targeting 376 successfully closed cases over the planning period. These cases would address housing units and properties for all income levels, but not all would necessitate rehabilitation. The City estimates that 37 residential units require major rehabilitation. Therefore, the City's quantified objectives for rehabilitation through this program are 40 units spread equally across moderate-income households and below:
 - Extremely low-income units/households: 10
 - Very low-income units/households: 10
 - Low-income units/households: 10
 - Moderate income units/households: 10
- **Timeframe:** Ongoing with annual reporting to City Council on number of substandard housing units improved as a result of the program
- **Responsible Agency:** Community Development Department

33. Encourage Preservation of Existing Rental Housing Stock

San Gabriel is a majority renter city, and condominium conversions can raise the cost of housing and take affordable multi-family rental housing off the market. To preserve the existing rental housing stock, the City will adopt an ordinance that identifies requirements for condominium conversions (e.g., tenant notifications, structural requirements, compliance with zoning standards, etc.). In preparing the ordinance, the City will consider establishing a citywide rental vacancy threshold for condominium conversions (e.g., condominium conversions may only be processed if the citywide apartment vacancy rate exceeds five percent for a period of at least 90 days).

- Objective: The City will adopt a Condominium Conversion Ordinance.
- Timeframe: 2022-2023
- Responsible Agency: Community Development Department

34. Preservation of Assisted Housing Developments

The preservation of existing affordable housing in the community is an important goal for San Gabriel. There are two units in the city with affordability covenants, although neither of these units is at risk of conversion over the next 10 years (covenants extend until 2046). The City will continue to monitor the status of assisted housing developments to ensure their affordability controls are maintained for the longest period possible.

- Objective: The City will continue to monitor the status of assisted residential developments in San Gabriel by maintaining contact with the projects' owners or representatives.
- Timeframe: The City will contact owners or representatives every five years
- Responsible Agency: Community Development Department

35. Rehabilitation Grants

Periodically review City eligibility for various federal and State programs that will provide rehabilitation and maintenance assistance for lower-income units and special needs groups. The City shall submit applications for programs for which the City is eligible, as appropriate.

- Objective: The City will research, evaluate, and apply for rehabilitation grant funding.
- Timeframe: Annually evaluate notices of funding availability; submit at least one grant application every two years
- Responsible Agency: Community Development Department

Policies

- a) Promote governmental efforts to provide equal opportunity housing for existing and projected demands in San Gabriel.
- b) Identify segments of the population that have special housing needs and develop programs to serve those needs (i.e., single parents, elderly, disabled, large family, minority and homeless populations).
- c) Promote representative citizen participation on the formation, implementation and review of housing programs.
- d) Promote the City's new material featuring all local and regional anti-displacement resources, tenants' rights information, and fair housing services.
- e) Enforce the right of first refusal for residents displaced through redevelopment of existing housing stock as required by Government Code §66300(d)(2)(D)(ii).

Programs**36. Housing Information and Referral Services**

The Los Angeles County Housing Resource Center is a web-based information clearinghouse for information on affordable, special needs, accessible, and emergency housing within the County of Los Angeles. The project is managed by the Los Angeles County Development Authority. The City maintains a link on its website to the Housing Resource Center.

- Objective: San Gabriel residents will continue to be made aware of and have access to the referral and informational services offered by the Los Angeles County Development Authority (LACDA). The City will continue to provide a link on its website to the Los Angeles County Housing Resource Center website, which offers information about available housing assistance programs.
- Timeframe: Annually ensure link to the Los Angeles County Housing Resource Center on the City's website is functioning properly
- Responsible Agency: Community Development Department and Los Angeles County Development Authority (LACDA)

37. Inventory of Affordable Housing Funding Sources

As part of its previous Housing Element, the City prepared a comprehensive inventory of available sources of funds for affordable housing activities. The City will update and maintain this inventory so it is available to prospective housing developers. City staff will identify and prepare applications for appropriate funding sources to support affordable housing activities. As discussed above, these sources include CDBG, Section 8 Project-Based Rental Assistance, the Mills Act program, and various state programs such as Low-Income Housing Tax Credits (LIHTC) and the Multi-family Housing Program.

- Objective: The City will update and maintain the inventory of affordable housing funding sources and make it available to developers and will identify and apply for, when appropriate, funding sources to support affordable housing activities.
- Timeframe: Inform developers of funding sources available (annually); evaluate notices of funding availability (annually); submit grant applications (at least one every two years)
- Responsible Agency: Community Development Department

38. Fair Housing

The Housing Rights Center provides the following client services: tenant and landlord counseling; advocacy and collaboration in support of fair housing opportunities for all; public outreach and education regarding fair housing rights; specialized property owner, management and lender training; and discrimination complaint processing, investigation and litigation. The City will raise awareness of the Housing Rights Center and the services it provides, along with other fair housing resources available. Also see Anti-Displacement Information Dissemination Program.

- Objective: The City will advertise the services of the Housing Rights Center through the City's newsletters, website, email blasts, social media, cable television channel as well as handouts at City Hall and other public buildings and facilities. The City will continue to promote fair housing practices and refer fair housing complaints to the Housing Rights Center.
- Timeframe: Provide links in addition to the Housing Rights Center link on the City's website, such as U.S. Department of Housing and Urban Development Fair Housing/Equal Opportunity in coordination with anti-displacement resources (2022); promote the Housing Rights Center services via newsletters, email blasts, social media, and other methods (annually)
- Responsible Agency: Housing Rights Center and Community Development Department

39. Reasonable Accommodation

Reasonable accommodations are a means of addressing the special needs of the disabled population. The City has established a reasonable accommodation procedure and will continue to administer reasonable accommodation requests. The City will amend the findings required for a reasonable accommodation request to streamline review and approval, apply objective findings, and remove references to inapplicable standards (i.e., there is no concentration requirement for housing for persons with disabilities).

- Objective: The City will amend findings for reasonable accommodations and continue to administer the reasonable accommodation provisions of the Zoning Code.

- Timeframe: Amend findings (2022-2023); report to City Council on number of reasonable accommodation requests submitted and the status of each (i.e., approved, denied (and reason for denial), or under review) (annually)
- Responsible Agency: Community Development Department

40. Anti-Displacement Information Dissemination

The City will create communications materials to effectively distribute information regarding local and regional tenants' rights resources, as well as other relevant resources, in a user-friendly manner. The City will engage in a robust communications campaign to better inform residents, especially those who are harder to reach and potentially at-risk of displacement, of these new materials. Information will be multilingual, and the City will coordinate with organizations and local groups to ensure effective distribution of information community wide.

- Objective: The City will produce anti-displacement materials and conduct outreach to notify potentially at-risk households of such resources.
- Timeframe: Materials produced and translated into multiple languages, including Chinese and Spanish, and initial communication campaign (2021-2022); continue to distribute materials on an annual basis
- Responsible Agency: Community Development Department

41. Prioritize Future Parks and Open Space in Lower Opportunity Areas

The San Gabriel Parks and Open Space Master Plan (August 2018) identified future parks and open space opportunities throughout the city. The City will prioritize future parks and open space efforts and improvements in the lower opportunity areas in the southern portion of the city.

- Objective: Complete parks and open space improvements and/or increase access to parks and open space opportunities in the southern portion of the city
- Time frame: 2024-2029
- Responsible Agency: Community Services Department, Public Works Department, Community Development Department

42. Target Housing Development in Highest Resource Areas

The City will outreach to property owners of housing sites in the highest resource areas (i.e., TCAC composite score), located north of Las Tunas Drive and west of San Gabriel Boulevard. In this outreach, the City will provide written material to property owners of identified sites describing potential residential capacity for the site, available incentives, including density bonuses and available funding.

- Objective: Develop affordable housing in highest resource areas
- Time frame: 2022 (initial outreach); 2024 (post-rezoning outreach)

- Responsible Agency: Community Development Department

43. Intergovernmental Environmental Impacts Reduction

The City will work with other governmental agencies such as Caltrans to contain traffic emissions and mitigate air quality impacts, such as through sound walls or other measures along Interstate 10.

- Objective: Contact Caltrans to begin discussion (2022); continue working with Caltrans or other agencies on mitigation measures (annually)
- Time frame: 2022-2029
- Responsible Agency: Community Development Department, Public Works Department

44. Lower Opportunity Area Environmental Issue Identification and Action

The City will work with the Human Equity, Access and Relations (HEAR) Commission to successfully outreach and gather information on environmental and health factors most acutely impacting residents in the southern portion of the city with lowest CalEnviroScreen and TCAC scores. The City will develop an action plan to address the identified issues, including prioritization, timeframe for implementation, responsible party(ies), and funding sources.

- Objective: Develop and implement actions to address environmental health issues most effectively in lowest resource areas
- Time frame: Develop outreach plan and conduct outreach (2022); develop action plan (2023); implement action plan (2024-2029)
- Responsible Agency: Community Development Department

IV.G Quantified Objectives

Table IV-2 presents the City's quantified objectives for construction, preservation, and rehabilitation for the 2021 – 2029 planning period that will be achieved through the policies and programs described above.

Table IV-2: Quantified Objectives

Program Type/Affordability	Extremely Low ¹	Very Low	Low	Moderate	Above Moderate	Total
New Construction	423	423	415	466	1,296	3,023
Rehabilitation	10	10	10	10	0	40
Conservation/Preservation	-	-	-	-	-	-
Total	433	433	425	476	1,296	3,063

¹ The City estimates 50% of the very low-income households would qualify as extremely low income.

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Appendix A: Housing Needs Assessment

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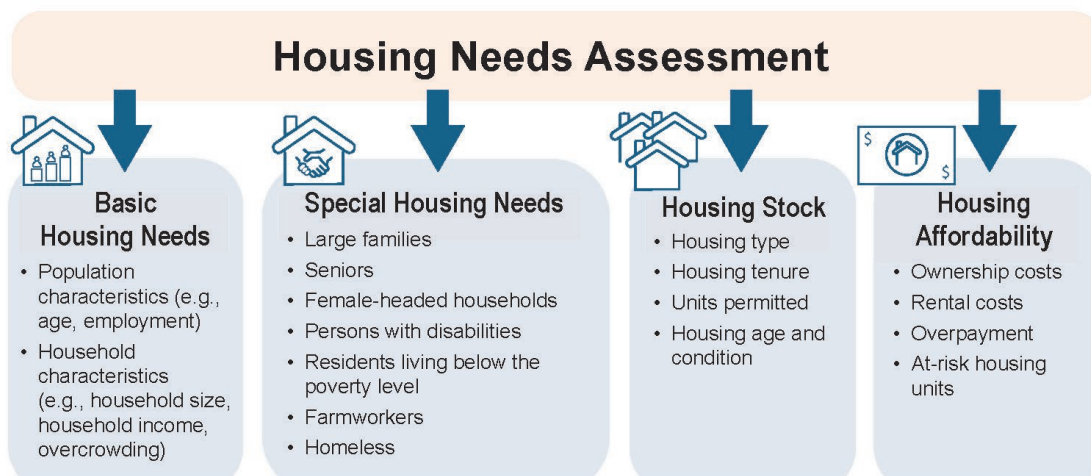
Section A.1 Introduction and Summary

A.1.1 Introduction

This section forms the foundation for understanding San Gabriel’s housing needs. It analyzes a range of demographic, economic, and housing-related variables to determine the extent and context of the City’s housing-related need. Information gathered through this section provides a basis from which to build housing goals, policies, and programs to address those needs.



This section includes an analysis of the City’s population, special needs groups, employment, housing stock, and housing affordability.



The main source of data used to form the majority of this section is HCD pre-certified local housing data provided by SCAG, which relies primarily on the American Community Survey 2014-2018, California Department of Finance, HUD’s Comprehensive Housing Affordability Strategy (“CHAS”) data, and California Department of Developmental Services.

A.1.2 Summary

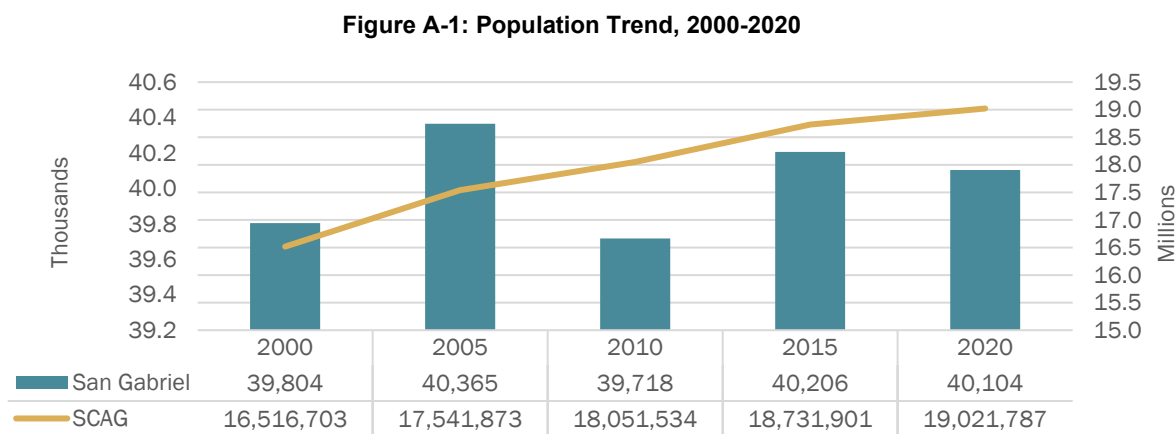
Housing needs are determined by a city's population and its existing housing stock and provides context for developing housing policy, such as which types of housing and its affordability levels are most needed in the community. The following summaries key data from this housing needs assessment.

- San Gabriel is a majority-renter city. Of total occupied units, 55.4 percent are renter-occupied.
- San Gabriel has a lower-income population than the County. The City's 2018 median household income was \$57,863, which is 10 percent lower than the County. 18.4 percent of households in San Gabriel are extremely low-income, and over half (58 percent) of all San Gabriel households are low-income households (earn less than 80 percent of area median income (AMI)).
- Conversely, rents are slightly higher in San Gabriel than in the County. The 2018 median rent paid in San Gabriel was \$1,425 per month.
- Nearly six out of 10 San Gabriel renters are housing cost-burdened, meaning they spend 30 percent or more of gross income on housing costs. Almost 32 percent are severely cost-burdened, meaning they spend 50 percent or more of gross income on housing costs.
- Renter-occupied households are more likely to be overcrowded than owner-occupied households. 12.1 percent of renter households live in overcrowded housing conditions.
- San Gabriel has an older population. The median age is 41.3 years, higher than in the County (36.2 years). Seniors (65 and above) make up 16.1 percent of the population. Out of the total senior population, approximately two-thirds are considered low-income. Seniors are a special needs group because they are more likely to be on a fixed income while requiring higher levels of care.
- Almost 15 percent of households have five or more people, while about 16 percent are one-person households. San Gabriel's housing stock is 48 percent three or more bedrooms and 15 percent one-bedroom or fewer. Therefore, the housing mix is adequate to accommodate larger families, but there is a lower stock of smaller units.
- From 2000 to 2018, San Gabriel permitted a total of 346 units, the majority of which were single-family units. Compared to the larger Southern California Association of Governments (SCAG) region, San Gabriel has consistently permitted fewer units per 1,000 residents.
- San Gabriel's housing stock is generally older than that of the overall SCAG region. 52.3 percent of all units in San Gabriel are older than 60 years old, compared to 32.1 percent of units in the SCAG region. An aging housing stock can represent poorer living standards and incur more expensive repair costs.

Section A.2 Population Characteristics

A.2.1 Population

San Gabriel had a total population of 40,104 in 2020, including 452 living in group quarters according to the California Department of Finance. The chart below illustrates the population trend in San Gabriel over the past 20 years. During this period, San Gabriel’s population grew by 0.8 percent while the SCAG region grew by 15 percent (or an annual growth rate of less than 0.1 percent compared to 0.7 percent for the region).



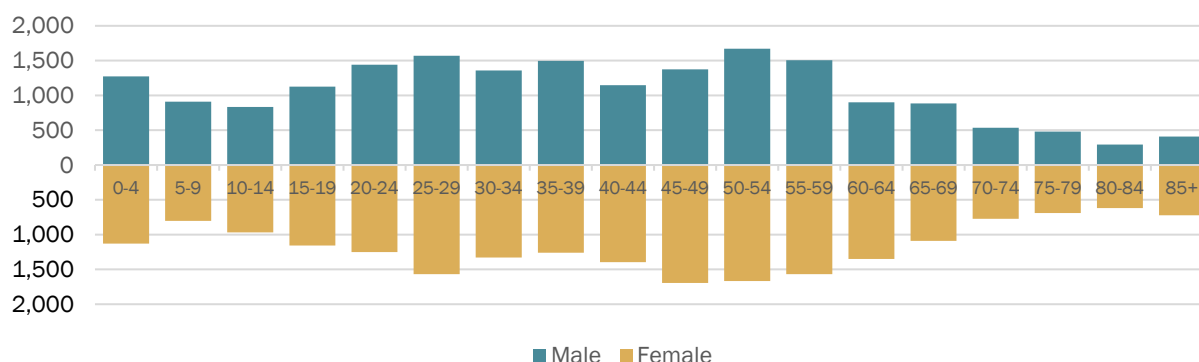
Source: SCAG 2020 Pre-Certified Local Housing Data (CA DOF E-5 Population and Housing Unit Estimates)

A.2.2 Age

Age is an important factor that impacts a city’s housing needs, as preferences and requirements change when people get older. In addition, different age groups will have different housing needs depending on a variety of factors, such as household size, income level, and living preferences. A city with a large population of children relative to the adult population will need more housing for large households, while a city with a large population of young adults might require more affordable studio and one-bedroom units. Similarly, having a larger senior population may indicate the need for housing that is ADA accessible or smaller units for seniors who seek to down-size.

The share of San Gabriel’s population which is under 18 years of age is 18.2 percent while the seniors (65 and above) make up 16.1 percent of the population. The median age in San Gabriel is 41.3 years, higher than that of Los Angeles County (36.2 years). The population of San Gabriel is 47.7 percent male and 52.3 percent female.

Figure A-2: Current Population by Age and Sex

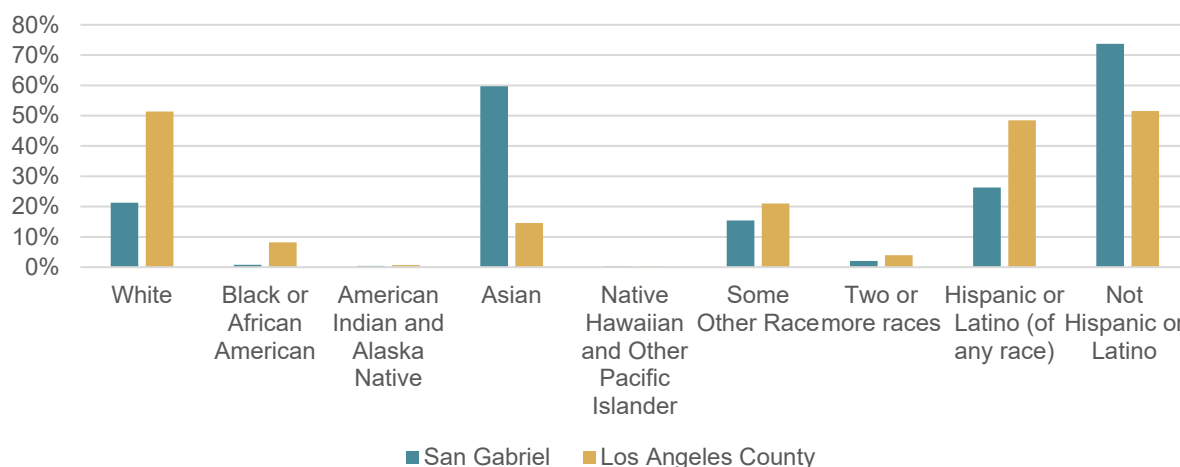


Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

A.2.3 Race/Ethnicity

The largest racial group in San Gabriel is Asian, representing 60 percent of the total population. 26 percent of the population of San Gabriel is Hispanic or Latino (of any race), compared to 48 percent of the population of Los Angeles County.

Figure A-3: Current Population by Race and Ethnicity



Note: "Hispanic or Latino" can be defined as a person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.

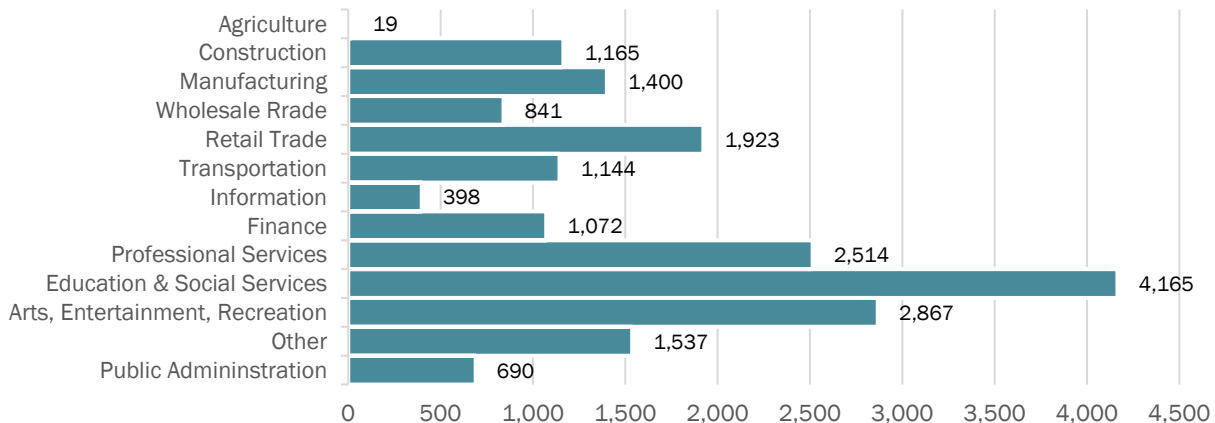
Source: American Community Survey 2014-2018 5-year estimates, DP05

A.2.4 Employment

There are 19,735 workers living within San Gabriel who work across 13 major industrial sectors made up of groupings of two-digit North American Industry Classification System (NAICS) codes. The chart below provides more detailed employment information. The most prevalent industries

are Education & Social Services, which includes Health Care, with 4,165 employees (21.1 percent of total) and Arts, Entertainment, Recreation, which includes Food Service and Accommodations, with 2,867 employees (14.5 percent of total). Agriculture is the least prevalent employment industry, employing less than 0.1 percent of employees.

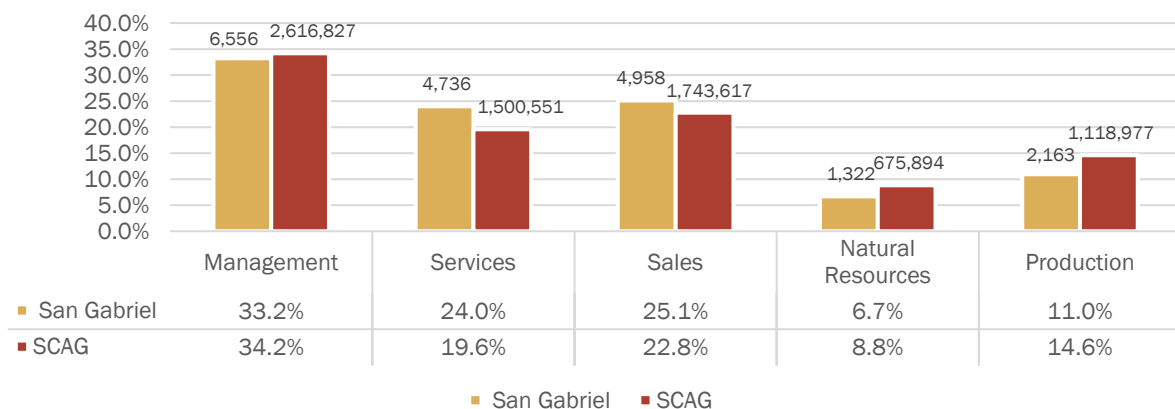
Figure A-4: Employment by Industry



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates using groupings of 2-digit NAICS codes)

In addition to understanding the industries in which the residents of San Gabriel work, it is also possible to analyze the types of jobs they hold. Of all job types, the most prevalent occupational category in San Gabriel is Management, in which 6,556 (33.2 percent of total) employees work. The second-most prevalent type of work is in Sales, which employs 4,958 (25.1 percent of total) residents of San Gabriel.

Figure A-5: Employment by Occupation



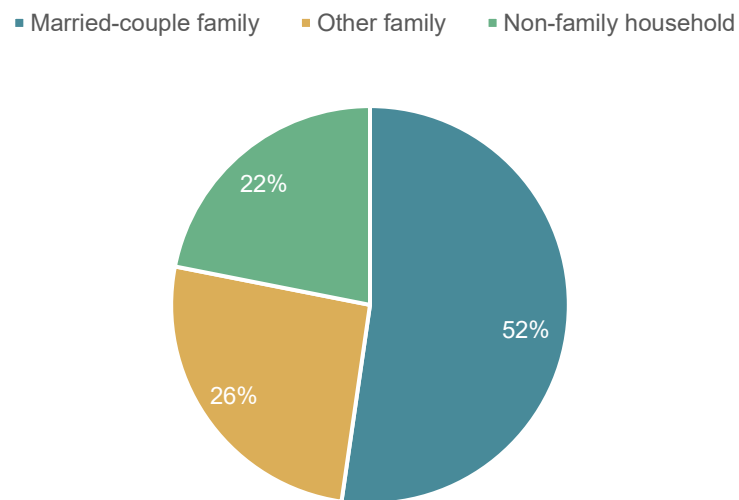
Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates using groupings of SOC codes)

Section A.3 Household Characteristics

A.3.1 Household Type

Of the 12,063 total households in San Gabriel, 6,308 (or 52 percent) consist of married-couple families, 3,113 (or 26 percent) consist of “Other” family, and 2,642 (or 22 percent) consist of non-family households. “Other” family represents households with one or more related persons with no spouse present. This can include single parent households or grandparents with children.

Figure A-6: Household Composition



Source: ACS 5-year estimates (2018), S2501

A.3.2 Household Size

In San Gabriel, the largest share of households (33 percent) consists of a household with four or more people, while the lowest share of households (16 percent) consists of just one person. San Gabriel has a lower share of single-person households than the SCAG region overall (16 percent compared to 23.4 percent).

Table A-1: Household Size

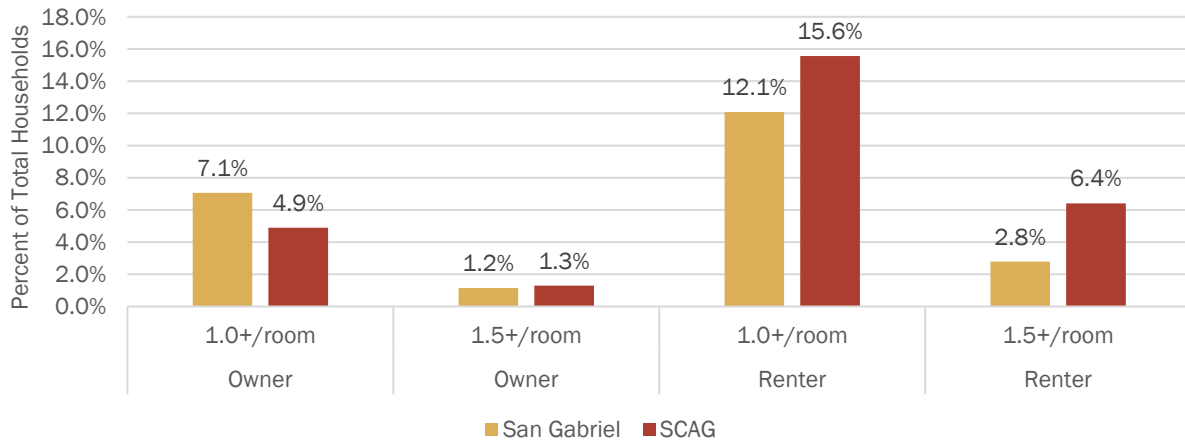
	Total	%
1-person household	1,945	16%
2-person household	3,323	28%
3-person household	2,842	24%
4-or-more-person household	3,953	33%
Total occupied housing units	12,063	-
<i>Source: ACS 5-year estimates (2018), S2501</i>		

A.3.3 Overcrowding

Overcrowding is defined by the Census as a unit in which more than one person occupies a room (excluding bathrooms and kitchens), while units occupied by more than 1.5 people are considered severely overcrowded. These circumstances can occur due to a lack of adequate affordable housing and housing costs becoming greater relative to household income. Families, especially larger ones and those with lower income, may choose to double-up or rent rooms in order to alleviate the financial burden and allocate more income for other necessities. Overcrowding can result in poor living conditions and lead to more rapid deterioration of the property. Therefore, maintaining proper levels of occupancy by preventing overcrowding can improve overall quality of life for all residents.

In San Gabriel, renter-occupied households are more likely to be overcrowded than owner-occupied households. 12.1 percent of renter households are overcrowded (807 households), and 2.8 percent are severely overcrowded (186 households); while 7.1 percent of owner-occupied households are overcrowded (380 households), and 1.2 percent are severely overcrowded (62 households). Across rental-occupied households, rates of overcrowding and severe overcrowding in San Gabriel are lower than the SCAG region. For owner-occupied households, rates of overcrowding are higher than the SCAG region, while severe overcrowding in owner-occupied households is similar between San Gabriel and the SCAG region. This is similar to the comparison to Los Angeles County, where San Gabriel's severely overcrowded rate is lower than the county, but the overcrowded rate is similar (see Appendix F, Affirmatively Furthering Fair Housing, Section F.2.5).

Figure A-7: Crowding by Extent and Tenure



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year)

A.3.4 Household Income

Household income is a critical component of housing affordability. Income impacts the decision to rent versus own, the size of unit, and location of housing. Overall, household income in San Gabriel is lower than that of Los Angeles County. San Gabriel's median household income in 2018 was \$57,863, which is 10 percent lower than the County's median income of \$64,251. The mean income in San Gabriel (\$83,228) is 12 percent lower than in Los Angeles County (\$94,484).

Table A-2: Household Income

	San Gabriel	Los Angeles County
Median Income	\$57,863	\$64,251
Mean Income	\$83,228	\$94,484
Source: ACS 5-year estimates (2018), S1901		

The RHNA addresses housing challenges for four income categories defined by their respective proportion of the county area median income (AMI). The table below defines these income categories.

Table A-3: Income Categories as a Percentage of AMI

	% of AMI
Extremely Low	0-30%
Very Low	30-50%
Low	50-80%
Moderate	80-120%
Above Moderate	>120%
Source: Department of Housing and Community Development, 2020	

The following table shows the 2020 income limits for the four income categories in Los Angeles County. The above moderate category includes all households earning above the upper limit of the moderate-income category.

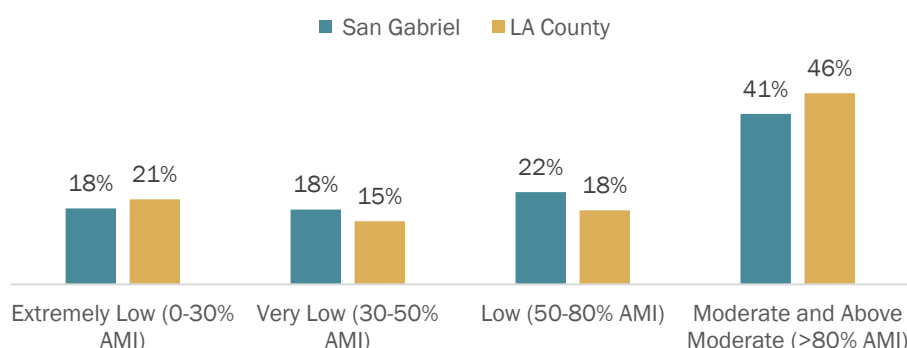
Table A-4: Los Angeles County 2020 Annual Income Limits by Household Size

Number of Persons in Household:		1	2	3	4	5	6	7	8
Los Angeles County Area Median Income: \$77,300	Extremely Low	23,700	27,050	30,450	33,800	36,550	39,250	41,950	44,650
	Very Low Income	39,450	45,050	50,700	56,300	60,850	65,350	69,850	74,350
	Low Income	63,100	72,100	81,100	90,100	97,350	104,550	111,750	118,950
	Median Income	54,100	61,850	69,550	77,300	83,500	89,650	95,850	102,050
	Moderate Income	64,900	74,200	83,500	92,750	100,150	107,600	115,000	122,450

Source: Department of Housing and Community Development, 2020

Using data from the American Community Survey (ACS), HUD compiles a dataset called the Comprehensive Housing Affordability Strategy (CHAS) that allows local governments to more easily analyze their regional housing issues. The most recently available CHAS dataset indicated that over half (58 percent) of all households (7,295 households) in San Gabriel earn less than 80 percent of AMI. The distribution of household income levels is similar to that of the County's.

Figure A-8: Household Income Distribution



Source: HUD CHAS, 2012-2016

Because income is one of the main components of housing stability, ensuring adequate housing for households considered extremely low-income (below 30 percent of AMI) can be especially challenging. According to the CHAS data, 18.4 percent of households in San Gabriel are extremely low-income. The race/ethnicity with the highest share of extremely low-income households is Asian and other, non-Hispanic (22.1 percent). In the SCAG region, the race/ethnicity with the highest share of extremely low-income households is Black, (27.1 percent compared to 17.7 percent of total households). Note that the total number of households in the table below differs slightly because the CHAS data uses ACS 2012-2016 data while the rest of this appendix uses ACS 2014-2018 data.

Table A-5: Extremely Low-Income Housing Needs

	Total Households	Households below 30% HAMFI	Share below 30% HAMFI
White, non-Hispanic	1,864	219	11.7%
Black, non-Hispanic	124	10	8.1%
Asian and other, non-Hispanic	7,522	1,665	22.1%
Hispanic	2,870	380	13.2%
TOTAL	12,380	2,274	18.4%
Renter-occupied	6,560	1,670	25.5%
Owner-occupied	5,860	615	10.5%
TOTAL	12,420	2,285	18.4%
Note: HAMFI refers to Housing Urban Development Area Median Family Income			
Source: SCAG 2020 Pre-Certified Local Housing Data (HUD CHAS, 2012-2016)			

A.3.5 Special Housing Needs

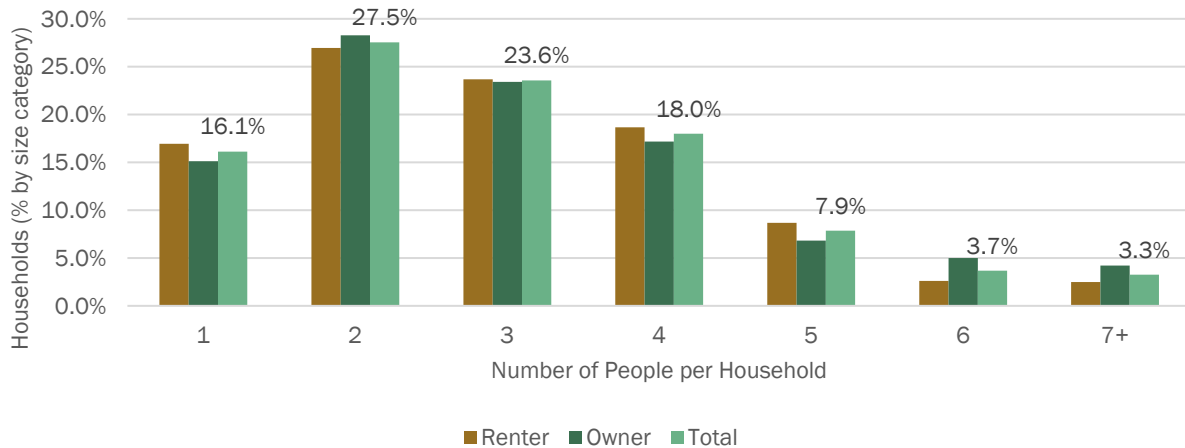
Certain segments of the population encounter more difficulty in finding decent, affordable housing due to special circumstances. Special needs may be related to one's employment type and income, family characteristics, medical condition or disability, or household characteristics. These households may require special accommodations, such as on-site supportive services, unique building design, or spatial accommodations. The special needs categories assessed in this section include large families, seniors, female-headed households, people with disabilities, farmworkers, and people experiencing homelessness.

Large Families

Large families are family households that consist of five or more people. Larger households require larger dwelling, such as three-, four-, or five-bedroom units. Because this housing type is in shorter supply and costs more than smaller units, housing affordability can be a challenge. Lower-income large families may also opt to live in smaller units to save money, putting them at risk of overcrowding.

The following chart illustrates a larger range of household sizes in San Gabriel by housing tenure. The most common household size consists of two people (27.5 percent) and the second-most common household consists of three people (23.6 percent). San Gabriel has a lower share of single-person households than the SCAG region overall (16.1 percent compared to 23.4 percent) and a similar share of 7+ person households than the SCAG region overall (3.3 percent compared to 3.1 percent).

Figure A-9: Households by Household Size



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Per the chart above, 14.9 percent of all households in San Gabriel, or 1,783 households, are considered large households (those that contain five or more members). Adequate housing for such households would consist of at least a 3-bedroom unit, assuming the unit has a living room and dining room. According to the table below, 48 percent of San Gabriel's housing units are 3-bedrooms or more. Therefore, the housing mix in San Gabriel is considered adequate to accommodate larger household sizes.

Table A-6: Housing Units by Number of Bedrooms

	Housing Units	%
No bedroom	333	3%
1 bedroom	1,563	12%
2 bedrooms	5,040	38%
3 bedrooms	4,328	33%
4 bedrooms	1,624	12%
5 or more bedrooms	346	3%
Total	13,234	-
Note: 16% of households are 1-person households (see Table A-1)		
Source: American Community Survey 2014-2018, 5-year estimates, Table DP04		

Senior Households

Elderly households are defined as households consisting of at least two people who are either or both at least 62 years of age. Senior households are defined as households with one or more persons over the age of 65 years. These households have particular housing needs, such as housing affordability, as the elderly typically live on a fixed or limited income and incur higher

healthcare costs. Seniors are also more likely to have a physical disability and require specific accommodations. Adequate housing for these households includes housing that is:

- Safe
- Accessible
- Able to accommodate live-in caretakers or provide on-site services
- In proximity to shopping, medical services, and transportation

There are several different types of housing appropriate for seniors, including:

- **Senior Apartment:** Age-restricted housing for older adults who are able to live without assistance.
- **Independent Living:** Housing that provides assistance such as meal preparation, housekeeping, and transportation. These facilities typically provide residents with convenient access to medical care if needed.
- **Assisted Living:** A residential community that provides similar services as above, as well as assists residents with Activities of Daily Living (ADLs), such as bathing, dressing, and eating.
- **Nursing Home:** A licensed facility that provides 24-hour nursing care, room and board, and custodial care. Nursing homes typically provide the highest level of care outside of hospitals.
- **Skilled Nursing Facility (SNF):** A nursing home that provides in-patient rehabilitation staffed by trained medical providers. Patients do not typically require long-term care.

Although there are a variety of housing options, many of the choices that provide higher levels of care can be out of reach for people living on limited means. Therefore, lower-income seniors are more likely to live in housing that does not adequately meet their needs.

Approximately two-thirds of San Gabriel's senior population is considered low-income. Of San Gabriel's 2,795 elderly households, 66.4 percent earn less than 80 percent of AMI. 25.4 percent of the elderly population are considered extremely low-income and earn less than 30 percent of AMI (compared to 24.2 percent in the SCAG region), while 44.9 percent of these senior households earn less than 50 percent of AMI (compared to 30.9 percent in the SCAG region). Various programs have been included to facilitate housing opportunities for seniors, including Accessory Dwelling Units (ADUs), and other programs to remove government constraints to housing.

Table A-7: Elderly Households by Income and Tenure

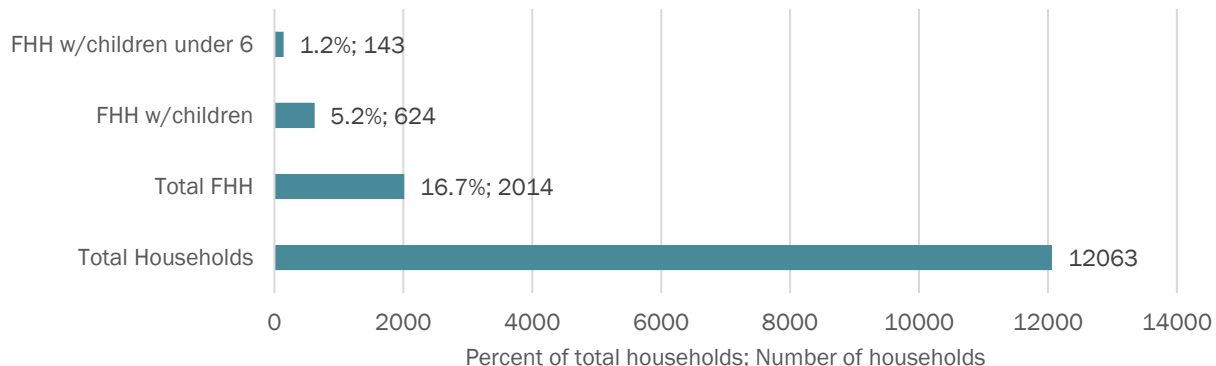
		Owner	Renter	Total	Percent of Total Elderly Households:
Income category, relative to surrounding area:	< 30% HAMFI	305	405	710	25.4%
	30-50% HAMFI	220	325	545	19.5%
	50-80% HAMFI	350	250	600	21.5%
	80-100% HAMFI	135	80	215	7.7%
	> 100% HAMFI	625	100	725	25.9%
	Total	1,635	1,160	2,795	-
Note: HAMFI refers to Housing Urban Development Area Median Family Income					
Source: SCAG 2020 Pre-Certified Local Housing Data (HUD CHAS, 2012-2016)					

Female-headed Households

Female-headed households are households that do not have a male adult present. They can consist of both family and non-family households and may or may not have children. Female-headed households are considered special needs because they are more likely than the overall population to be in poverty. Because income is typically lower than a two-parent household with two income earners, single-parent households can experience more challenges finding affordable housing for their family. Consequently, high-quality childcare can be more difficult to secure when household income is already limited.

San Gabriel has a higher share of female-headed households than the SCAG region overall. Of San Gabriel's 12,063 total households, 16.7 percent are female-headed, compared to 14.3 percent in the SCAG region. 5.2 percent are female-headed and with children (compared to 6.6 percent in the SCAG region) and 1.2 percent are female-headed and with children under six years old (compared to 1.0 percent in the SCAG region).

Figure A-10: Female-Headed Households (FHH)



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Persons with Disabilities

People are considered to have a disability if they have one or more of the following:

- Difficulty seeing or hearing, such as blindness or deafness
- Difficulty performing basic physical activities, such as walking, climbing stairs, and lifting
- Difficulty learning, remembering, or concentrating
- Difficulty dressing, bathing, or getting around inside the home
- Difficulty going outside the home alone to shop or visit a doctor's office
- Difficulty working at a job or business

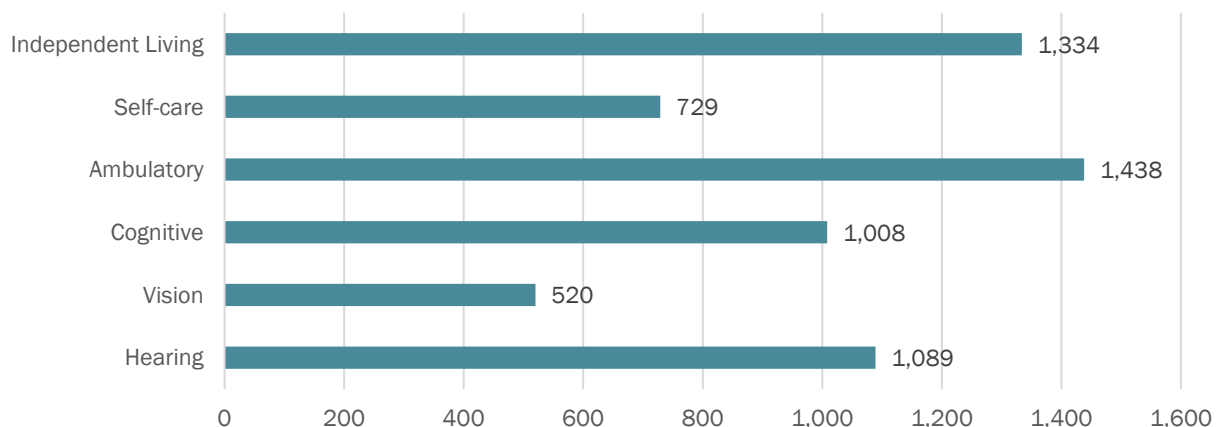
People with disabilities can face many barriers to securing accessible and affordable housing, including living on fixed and limited incomes, limited housing choices offering accessibility features, higher healthcare expenses, and potential discrimination. The need for adequate and accessible housing outstrips supply and availability. The majority of housing in most communities lack even basic mobility accessibility features such as ramps, extra-wide doors, raised toilets, and lowered counters.

Adequate housing for these households includes but are not limited to, housing that is:

- Safe
- Accessible
- Able to accommodate live-in caretakers or provide on-site services
- In proximity to shopping, medical services, and transportation
- Designed to facilitate mobility and independence

Disability data can provide valuable context for assessing current and future need for accessible housing units. Since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate. The most common types of disabilities in San Gabriel in 2018 were ambulatory disabilities followed by independent living disabilities. Of the total San Gabriel population, 2,950 people have a disability(ies) (ACS, 5-year estimates, 2018; Table B18101).

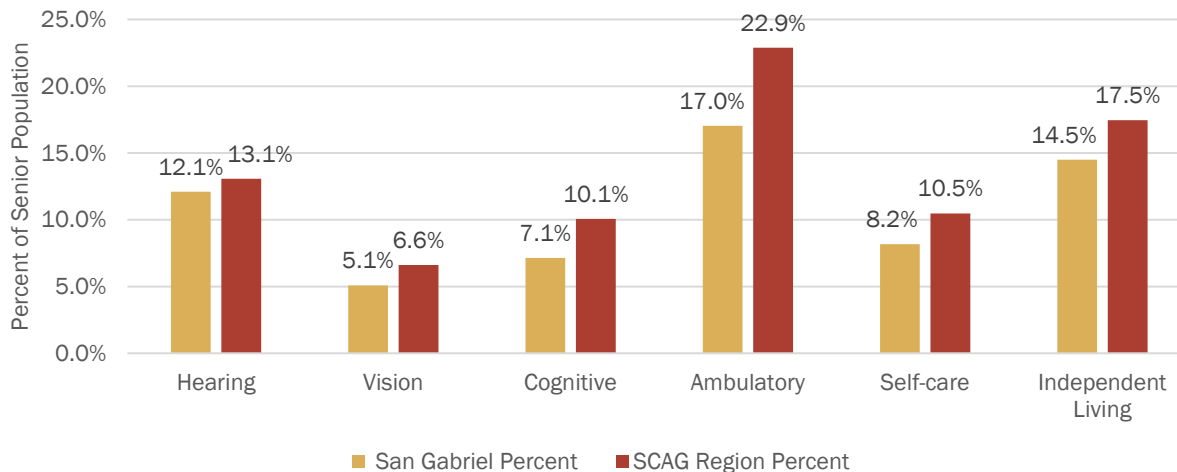
Figure A-11: Disability by Type



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Of the total senior population in San Gabriel, the most common types of disabilities in 2018 were also ambulatory disabilities (17.0 percent of the total senior population) and independent living disabilities (14.5 percent of the total senior population). Of the 65 years and older population, 1,770 seniors in San Gabriel have a disability (ACS, 5-year estimates, 2018; Table B18101).

Figure A-12: Disability by Type – Seniors (65 and over)



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Persons with Developmental Disabilities

According to Section 4512 of the California Welfare and Institutions Code, a "developmental disability" means a disability that originates before an individual attains age 18 years, continues or can be expected to continue indefinitely, and constitutes a substantial disability for that individual, which includes cerebral palsy, epilepsy, and autism.

Many developmentally disabled persons can live and work independently within a conventional housing environment. More severely disabled individuals require a group living environment where supervision is provided. The most severely affected individuals may require an institutional environment where medical attention and physical therapy are provided. Because developmental disabilities exist before adulthood, the first issue in supportive housing for the developmentally disabled is the transition from the person's living situation as a child to an appropriate level of independence as an adult.

The California Department of Developmental Services (DDS) currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of regional centers, developmental centers, and community-based facilities. DDS also provides data on developmental disabilities by age and type of residence. These data are collected at the ZIP-code level and were joined to the jurisdiction-level by SCAG. Totals may not match as counts below 11 individuals are unavailable and some entries were not matched to a ZIP code necessitating approximation. According to DDS, there are about 300 residents with a development disability in San Gabriel, most of whom are able to live in their own home with their parent or guardian.

Table A-8: Development Disabilities

By Residence:	Home of Parent/Family/Guardian	262
	Independent/Supported Living	5
	Community Care Facility	19
	Intermediate Care Facility	5
	Foster/Family Home	0
	Other	5
By Age:	0 - 17 Years	142
	18+ Years	158
Total		300
Note: This table has been modified due to correct an error in the pre-certified data		
Source: SCAG 2020 Pre-Certified Local Housing Data		

Understanding the employment status of people with disabilities may also be an important component in evaluating specialized housing needs. In San Gabriel, 42 percent of the population with a disability is employed, compared to 73 percent of the non-disabled population. About half of people with disabilities (52 percent) are not in the labor force.

Table A-9: Disability by Employment Status

	With a Disability	Percent of Total	No Disability	Percent of Total
Employed	453	42%	18,428	73%
Unemployed	62	6%	1,303	5%
Not in Labor Force	568	52%	5,447	22%
TOTAL	1,083	-	25,178	-

Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Housing for People with Disabilities

Transitional/supportive housing can provide support and housing for people with disabilities (see Appendix C for a discussion of how the City permits transitional/supportive housing). There is one transitional housing facility in San Gabriel: Homes for Life/Athena Home. Athena Homes is a clustered Transition-Age-Youth (TAY) housing program that was developed in collaboration with the Los Angeles County Department of Mental Health, the County Department of Children and Family Services, and the County Community Development Commission. The program serves residents from 18 to 21 years old. Residents are emancipated youth from the foster care system. During the two-year program, residents benefit from an extensive array of services and life skills training to assist them in preparing for independent living or structured living apartments¹. Additionally, several facilities located in San Gabriel can provide care and housing for people with disabilities (e.g., San Marino Manor, Vista Cove Care Center, Live Oak Rehab Center).

The Eastern Los Angeles Regional Center located in Alhambra provides services for people with developmental disabilities in San Gabriel. It is one of seven regional centers in Los Angeles County operated by private nonprofit corporations that contract with DDS to coordinate services for people with developmental disabilities².

Additionally, the Los Angeles County Department of Public Social Services operates the In-Home Supportive Services (IHSS) program for low-income seniors or people with disabilities. This program provides support for individuals such as meal preparation, laundry, house cleaning, and personal care to enable them to live at home.

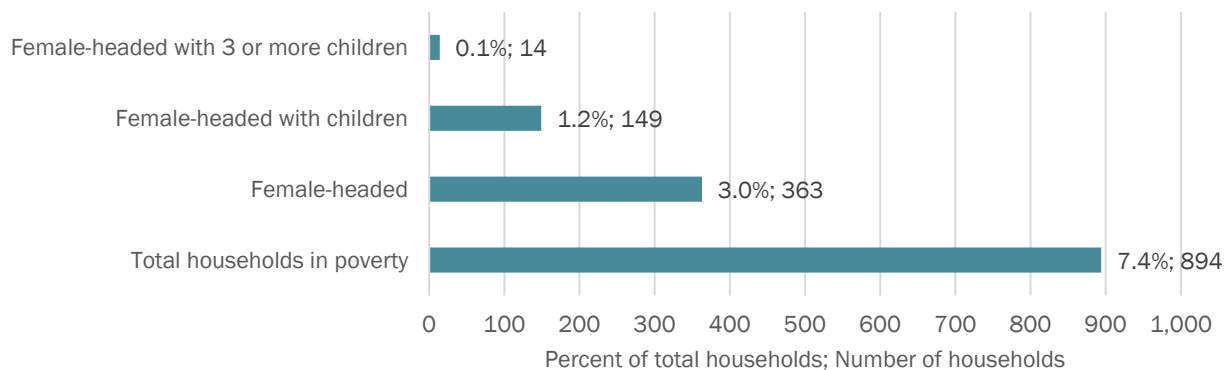
¹ <http://www.homesforlife.org/category/transition-age-youth-housing/>

² <https://www.sgprc.org/>

Residents Living Below the Poverty Level

For individuals living below the poverty level, housing stability can be precarious as their low incomes make them very high risk for homelessness. Poverty thresholds, as defined by the ACS, vary by household type and size. In 2018, a single individual under 65 was considered in poverty with an income below \$13,064 per year while the threshold for a family consisting of two adults and two children was \$25,465 per year. In San Gabriel, 7.4 percent of total households are experiencing poverty, compared to 7.9 percent of households in the SCAG region.

Figure A-13: Households by Poverty Status



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Farmworkers

Farmworkers are considered a special needs group because these workers traditionally earn low-paying wages while frequently live in overcrowded and substandard housing conditions. 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. Because of their predominantly low incomes, housing affordability is an acute need for farmworkers.

Farmworkers account for less than one percent of all workers in San Gabriel in 2018. Farmworker households are among the existing households counted as part of the CHAS housing needs and estimates of existing and projected housing needs produced by SCAG. Consequently, resident low-income farmworker households would be included among all households. Resident farmworker housing needs would be counted as part of lower income households experiencing problems of overpaying, overcrowding, and substandard housing.

Table A-10: Farmworkers by Occupation

San Gabriel	Percent of total San Gabriel workers:	SCAG Total	
41	0.21%	57,741	Total jobs: Farming, fishing, and forestry occupations
15	0.11%	31,521	Full-time, year-round jobs: Farming, fishing, and forestry occupations
<i>Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates using groupings of SOC codes)</i>			

Table A-11: Employment in the Agricultural Industry

San Gabriel	Percent of total San Gabriel Workers	SCAG Total	
19	0.10%	73,778	Total in agriculture, forestry, fishing, and hunting
0	0.00%	44,979	Full-time, year-round in agriculture, forestry, fishing, and hunting
<i>Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates using groupings of NAICS codes)</i>			

Homeless Persons

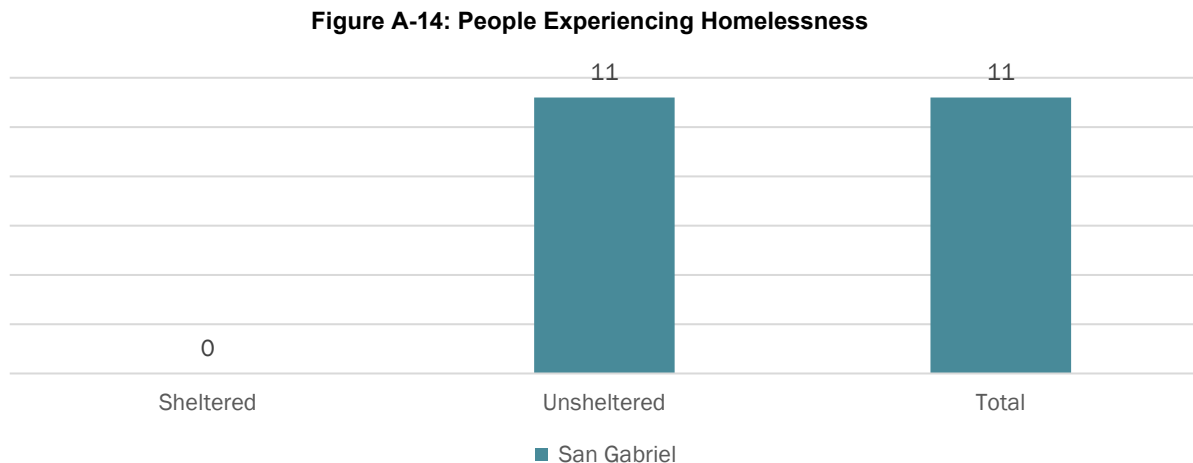
People experiencing homelessness are one of the most vulnerable special needs groups assessed due to the diversity of causes and difficulty in providing sufficient and coordinated treatment. Homelessness can result from a wide range of factors, such as housing unaffordability, job loss, and lack of services and treatment for mental illness and/or substance abuse. Despite the variety of causes, the provision of affordable housing, especially subsidized units for single individuals, can greatly contribute to the long-term solution of addressing homelessness.

As part of a community-wide effort to address homelessness, San Gabriel is part of the Los Angeles Continuum of Care (CoC), which is a regional planning body funded by HUD that coordinates housing and services funding across its partner jurisdictions. The lead agency is the Los Angeles Homeless Services Authority (LAHSA). In order to estimate the number of people experiencing homelessness in a region, HUD requires each CoC to conduct an annual or biannual count of its sheltered and unsheltered population known as the Point-in-Time (PIT) count estimate. Though one of the most important tools in combatting homelessness, the PIT count is likely to undercount the number of people experiencing homelessness as this effort is volunteer-driven and the count may miss people who are not visible at the time of the survey. In addition, the estimate must make assumptions about the number of individuals residing in certain dwelling types, such as tents, RVs, and makeshift shelters, as volunteers cannot see inside these areas.

Because of the precariousness of people experiencing homelessness, the count of these individuals can vary over the course of the year and over extended periods of time. According to

the PIT count, there were an estimated 11 persons experiencing homelessness in San Gabriel in 2020. All people experiencing homelessness in San Gabriel were unsheltered. A safe parking programs is included to help address the needs people experiencing homelessness in the city.

People Experiencing Homelessness



Source: SCAG 2020 Pre-Certified Local Housing Data

Emergency Shelters/Transitional Housing

At this time, there are no emergency shelters or shelters for domestic violence victims located in San Gabriel. The Governmental Constraints section discusses how the City's zoning code permits emergency shelters. A program is included to address emergency shelters and low barrier navigation centers consistent with state law.

Resources for People Experiencing Homelessness

In January 2021, the City adopted a two-year Homelessness Response Plan, which identifies goals and supporting actions that are in alignment with Los Angeles County Homeless Initiative to maximize regional effectiveness in reducing homelessness. This adopted Plan may also provide funding opportunities, as having an adopted homeless plan has been a requirement for receiving Measure H funds from Los Angeles County to fund homeless services and short-term housing.

Additionally, as a member of the Los Angeles CoC, LAHSA is able to provide homeless services to all individuals requiring support within San Gabriel's jurisdiction. LAHSA also partners with the City of Los Angeles and County of Los Angeles, including the Department of Public Health, the Department of Health Services, and the Department of Mental Health. Through this partnership, people experiencing homelessness can access a wide range of services, including emergency shelters, transitional and permanent housing, homeless prevention rental assistance, hotel/motel vouchers, community health clinics, and general wraparound supportive services.

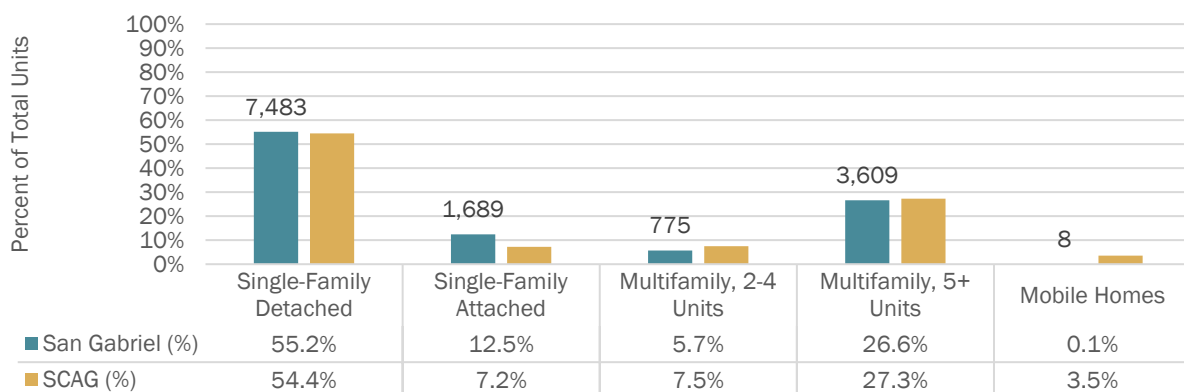
Section A.4 Housing Stock Characteristics

A.4.1 Housing Type and Vacancy

The chart below provides information on the housing stock in San Gabriel, which has a total of 13,564 housing units. The most common housing type in San Gabriel is single-family detached with 7,483 units. The share of all single-family units in San Gabriel is 67.6 percent, which is greater than the 61.7 percent share in the SCAG region. Of the total housing units in San Gabriel, 12,614 are occupied, which equates to a 7.0 percent total vacancy rate. According to the American Community Survey, the homeowner vacancy rate is 3.4 percent and the rental vacancy rate is 2.5 percent (ACS, 5-year estimates, 2019; Table DP04). The average household size (as expressed by the population to housing unit ratio) is 3.14.

However, vacancy rates vary by tenure. San Gabriel's homeowner vacancy rate is 3.4 percent, while the rental vacancy rate is 2.5 percent, which suggests a higher demand for rental units. As described in Section A.4.2, San Gabriel has a higher share of renters compared to the region.

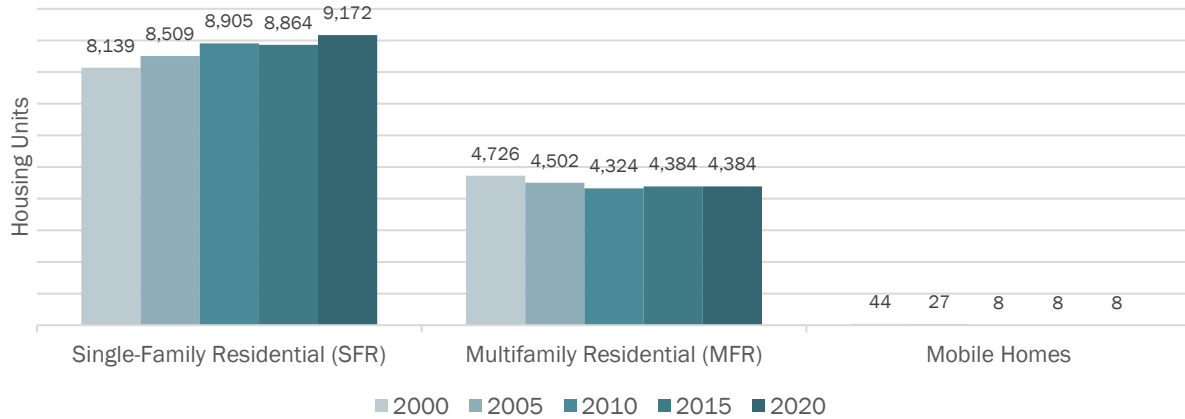
Figure A-15: Housing Type



Source: SCAG 2020 Pre-Certified Local Housing Data (CA DOF E-5 Population and Housing Unit Estimates)

Over the past two decades, there has been more construction of single-family residential units than multi-family residential units in San Gabriel. From 2000 to 2020, single-family residential units increased by 13 percent (or 1,033 units), multi-family residential units decreased by seven percent (or 342 units), and mobile units decreased by 82 percent (or 36 units).

Figure A-16: Housing Type Trend



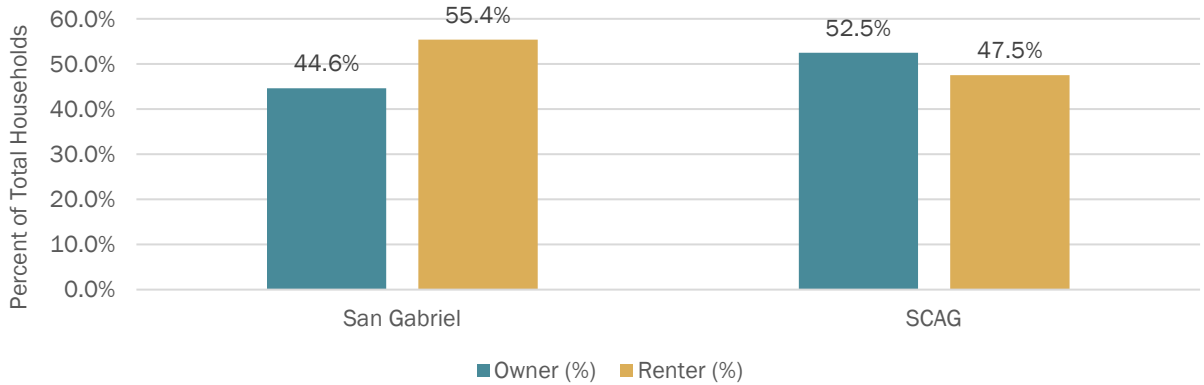
Source: SCAG 2020 Pre-Certified Local Housing Data (CA DOF E-5 Population and Housing Unit Estimates)

A.4.2 Housing Tenure

Housing security can depend heavily on housing tenure (i.e., whether homes are owned or rented). In addition, lower-income rental households tend to experience a higher degree of housing problems as defined by the Census, such as overpaying, overcrowding, and substandard housing. Renters are also more economically vulnerable than homeowners, as renters do not build equity through asset ownership like homeowners do. Communities with higher rental populations should therefore consider the unique needs of renters versus owners.

Of San Gabriel's total housing stock, 44.6 percent are owner-occupied and 55.4 percent are renter-occupied. San Gabriel has a higher share of renters than the SCAG region overall. Compared to the region, San Gabriel has a larger proportion of residents who are more likely to experience housing problems and are not accruing wealth through homeownership. The Housing Plan (Section IV) includes a program for the preservation of existing rental housing stock.

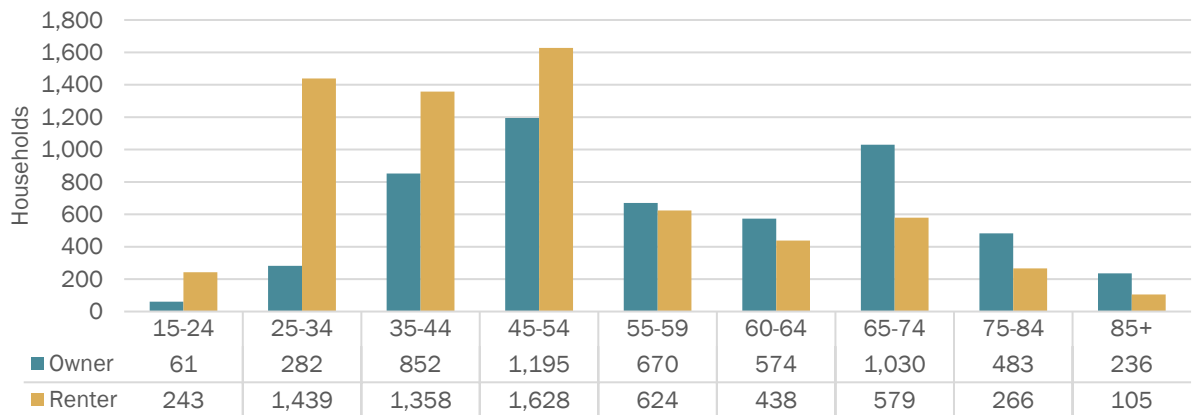
Figure A-17: Housing Tenure



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

In many communities, housing tenure varies substantially based on the age of the occupants. In San Gabriel, the age group where renters outnumber owners the most is 25-34 (by 67.2 percent). The age group in which owners most outnumber renters is 85+ (by 38.4 percent).

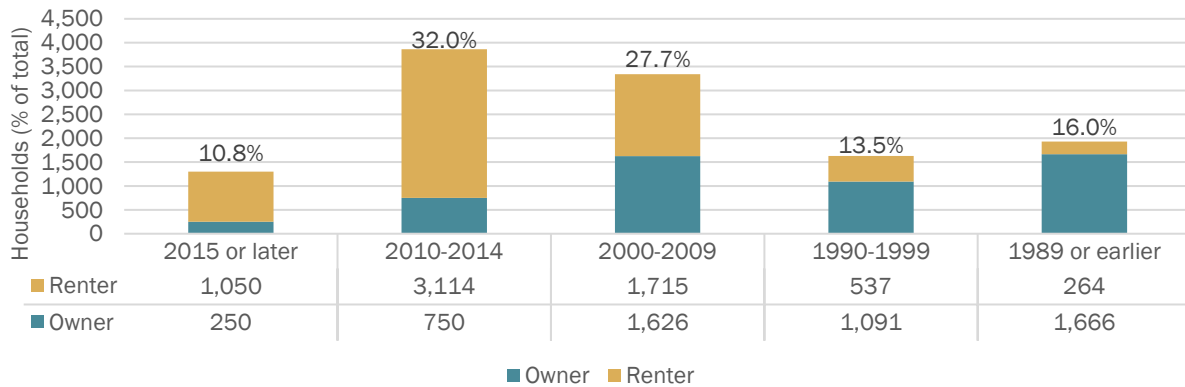
Figure A-18: Housing Tenure by Age



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Across the SCAG region, the most common move-in period was 2010-2014 (31.9 percent) followed by 2000-2009 (26.1 percent). Similarly, in San Gabriel, the period during which most people started living in their current residence was 2010-2014 (32.0 percent) followed by 2000-2009 (27.7 percent). As expected, the group with the most distant move-in period has the highest proportion of owners, who are less likely to move from home to home.

Figure A-19: Housing Tenure by Year Moved to Current Residence



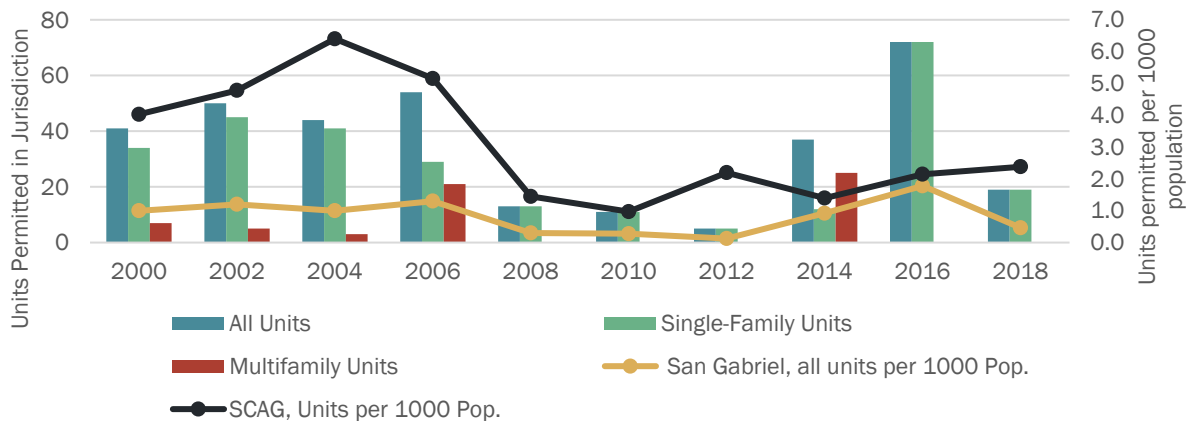
Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

A.4.3 Housing Units Permitted

From 2000 to 2018, San Gabriel permitted a total of 346 units, the majority of which were single-family units. Total permits issued decreased during the Great Recession but has increased since. Compared to the larger SCAG region, San Gabriel has consistently permitted fewer units per 1,000 residents.

Housing Units Permitted

Figure A-20: Housing Units Permitted



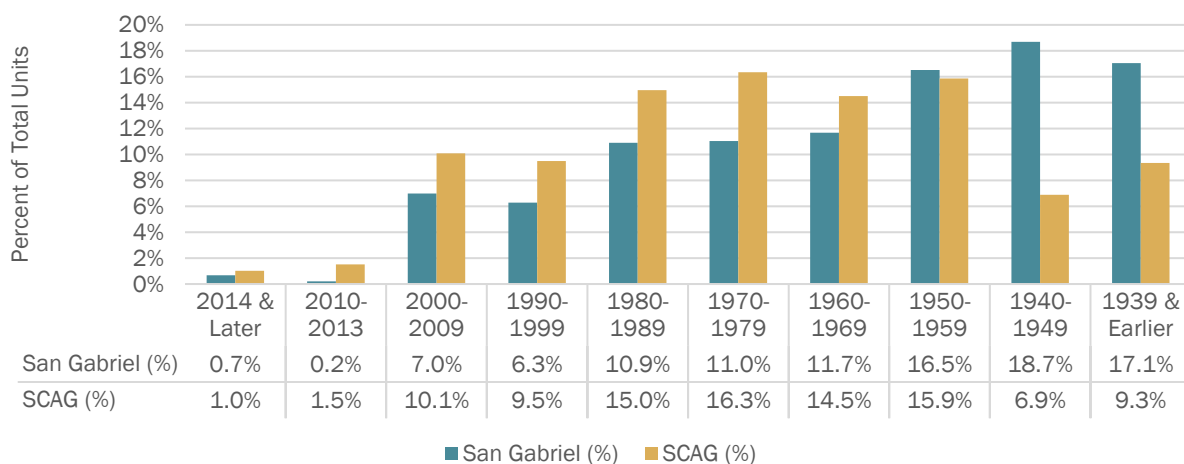
Source: SCAG 2020 Pre-Certified Local Housing Data (Core Logic/Data Quick)

A.4.4 Housing Age and Condition

The age of housing stock is a key indicator of the community's overall housing condition. As homes get older, there is a greater need for maintenance, repair, and/or replacement of key infrastructure systems. If not properly addressed, an aging housing stock can represent poorer living standards, incur more expensive repair costs and, under certain conditions, lower overall property values.

52.3 percent of all units in San Gabriel are older than 60 years old, compared to 32.1 percent of units in the SCAG region. The greatest share of San Gabriel's housing units was built between 1940 to 1949, while in the SCAG region more units were built between 1970 to 1979 than any other time. Therefore, San Gabriel's housing stock is generally older than that of the overall SCAG region.

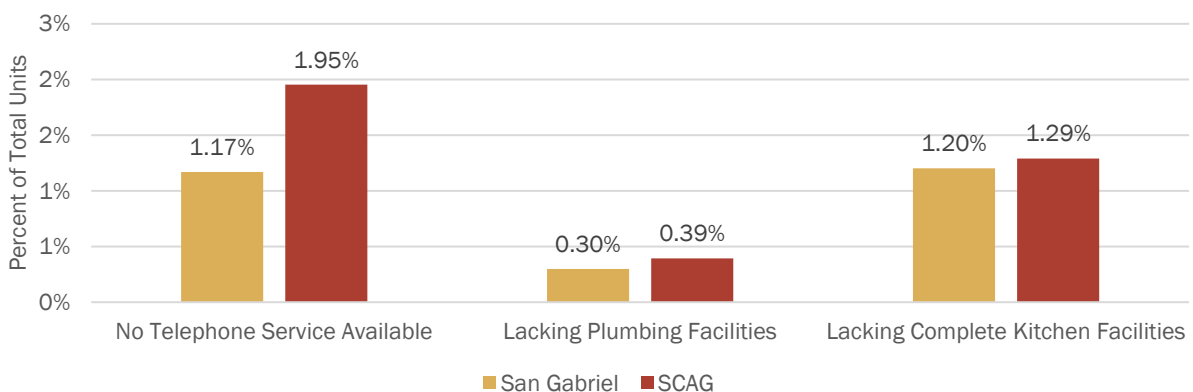
Figure A-21: Housing Units by Year Structure Built



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

The ACS includes surveys with three factors of what may be considered substandard housing. Of all the housing units in San Gabriel, 1.17 percent (141 units) lack telephone service, 0.30 percent (36 units) lack plumbing facilities, and 1.20 percent (145 units) lack complete kitchen facilities.

Figure A-22: Substandard Housing



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

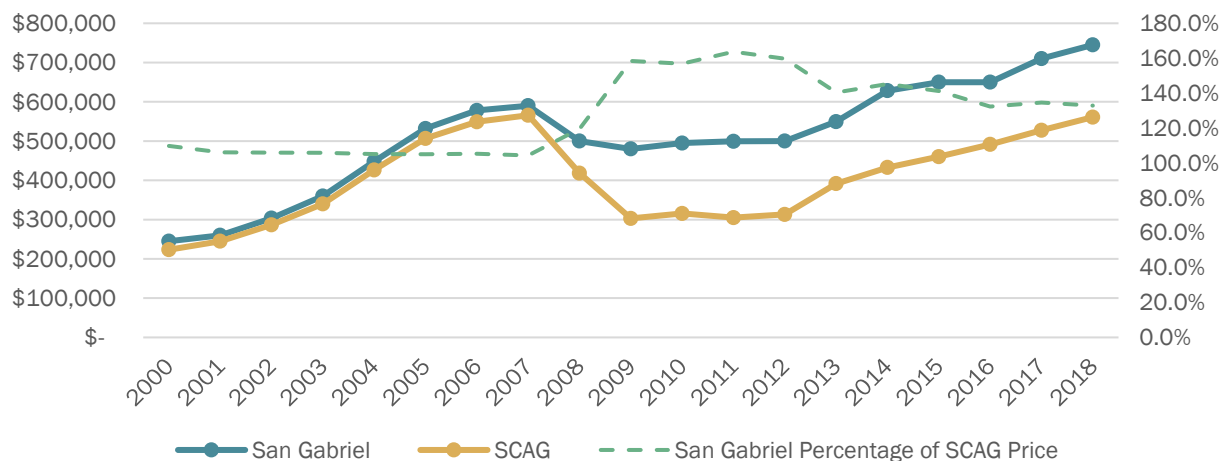
The City's Neighborhood Improvement Services (Code Enforcement) Division estimates that 37 residential units in San Gabriel require major rehabilitation. This estimate is based on the Code Enforcement staff's processing of code compliance cases and familiarity with San Gabriel neighborhoods and buildings. Code Enforcement staff identified that housing units are not left dilapidated or abandoned possibly due to the relatively high cost of real estate in San Gabriel. The City will implement programs to address substandard housing conditions, including continued residential code enforcement (Program 32) and seeking funding for rehabilitation and maintenance assistance for lower income and special needs housing (Program 35).

Section A.5 Housing Costs and Affordability

A.5.1 Ownership Costs

In 2018, San Gabriel's median home sales price was \$745,000, the highest home sale price between 2000 and 2018. During this time period, the median home sales price in San Gabriel increased 204 percent while median sales price in the SCAG region increased 151 percent. Compared to the SCAG region, prices in San Gabriel have ranged from a low of 104.3 percent of the region median in 2007 and a high of 163.7 percent in 2011.

Figure A-23: Median Homes Sales Prices for Existing Homes



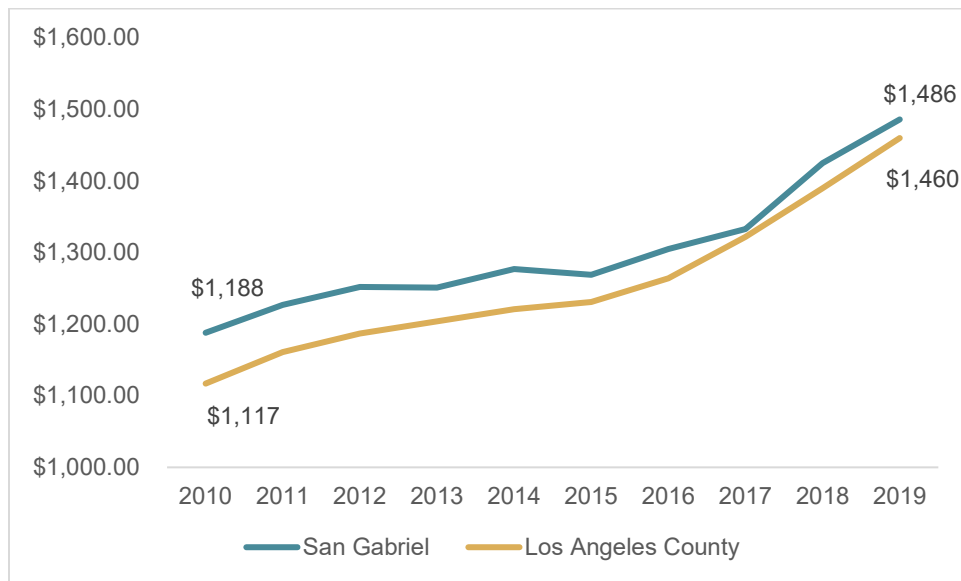
Note: SCAG median home sales price calculated as household-weighted average of county medians

Source: SCAG 2020 Pre-Certified Local Housing Data (SCAG Local Profiles, Core Logic/Data Quick)

A.5.2 Rental Costs

San Gabriel rents are slightly higher than rents in Los Angeles County. As shown below, the median rent paid in San Gabriel in 2019 was \$1,486. Over the past 10 years, rents in San Gabriel have increased 25.1 percent while rents in Los Angeles County have increased 30.7 percent.

Figure A-24: Median Rent



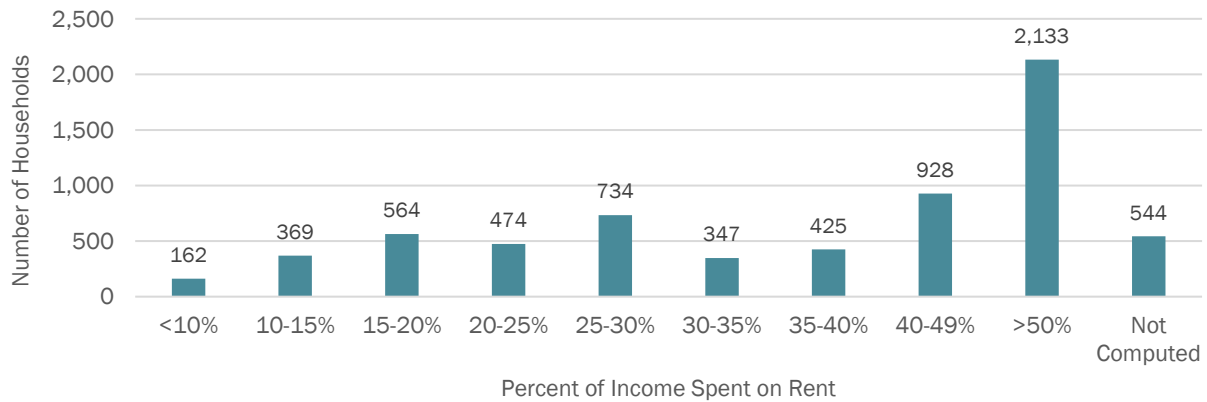
Source: ACS 5-year estimates, 2010-2019

A.5.3 Overpayment

A standard measure of housing affordability can be determined by comparing the cost of market rate housing to the price residents can afford to pay for housing based on their income levels. State and federal standards specify that households spending more than 30 percent of gross annual income on housing are considered to have a housing cost burden. Severe overpaying occurs when households pay 50 percent or more of their gross income for housing. When a household is overpaying for housing costs, the household has less disposable income for other necessities, including health care, food, and clothing. In the event of unexpected circumstances, such as loss of employment and health problems, lower-income households with a burdensome housing cost are more likely to become homeless or be forced to double-up with other households. Homeowners with a housing cost burden have the option of selling their homes and becoming renters. Renters, on the other hand, are vulnerable and subject to constant changes in the housing market.

San Gabriel residents experience a higher rate of housing overpayment than the overall SCAG region. Nearly six out of ten renters in San Gabriel are housing cost-burdened. Across San Gabriel's 6,680 renter households, 3,833 (57.4 percent) spend 30 percent or more of gross income on housing cost, compared to 55.3 percent in the SCAG region. Additionally, 2,133 renter households in San Gabriel (31.9 percent) are severely cost-burdened and spend 50 percent or more of gross income on housing cost, compared to 28.9 percent in the SCAG region.

Figure A-25: Spending on Rent



Source: SCAG 2020 Pre-Certified Local Housing Data

Housing overpayment can affect households across all income levels. However, a lower-income household spending the same percentage of income on housing as a higher-income household will likely experience a more acute sense of cost burden. The below table indicates the number of households in San Gabriel by their income category and their share of income spent on housing. As expected, lower-income households are more likely to be housing cost-burdened than higher-income households. Programs are included to promote and encourage the provision of affordable housing opportunities to meet the needs of lower- and moderate-income households. Specifically, 4,909 lower income households or 69 percent of all lower income households are overpaying for housing.

Table A-12: Cost Burden by Income

	Households by Share of Income Spent on Housing Cost:		
Income	<30%	30-50%	>50%
< 30% HAMFI	11%	17%	71%
30-50% HAMFI	24%	32%	44%
50-80% HAMFI	52%	38%	11%
80-100% HAMFI	81%	15%	4%
> 100% HAMFI	89%	10%	1%
Note: HAMFI refers to Housing Urban Development Area Median Family Income)			
Source: SCAG 2020 Pre-Certified Local Housing Data (HUD CHAS, 2012-2016)			

The below chart provides an analysis of San Gabriel's renter households (for which income data is available) by spending on rent by income bracket. Similar to the above trends by income level, lower-income households spend a higher share of income on housing (e.g., over 50 percent) while high-income households are more likely to spend under 20 percent of income on housing.

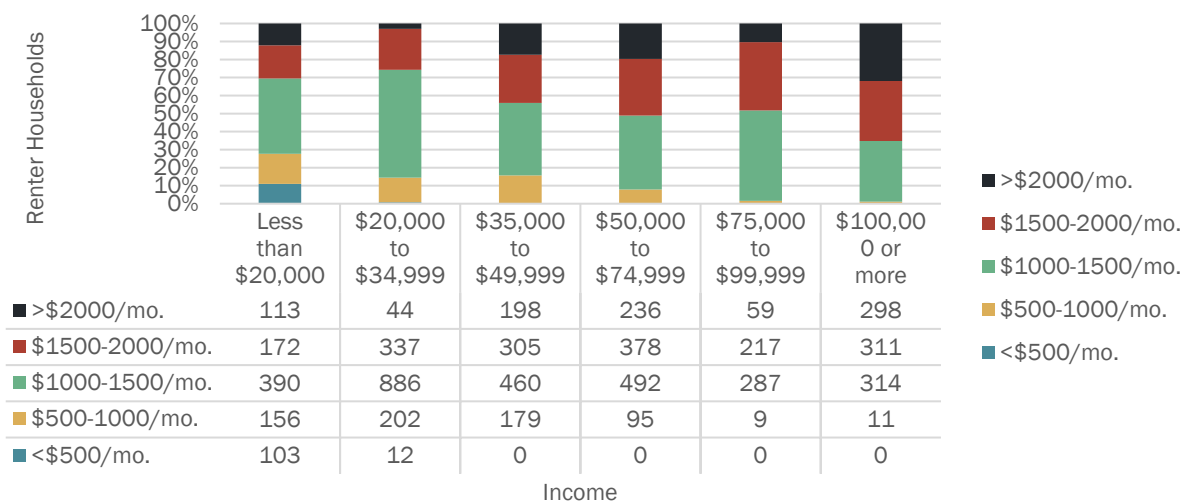
Figure A-26: Spending on Rent by Income



Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

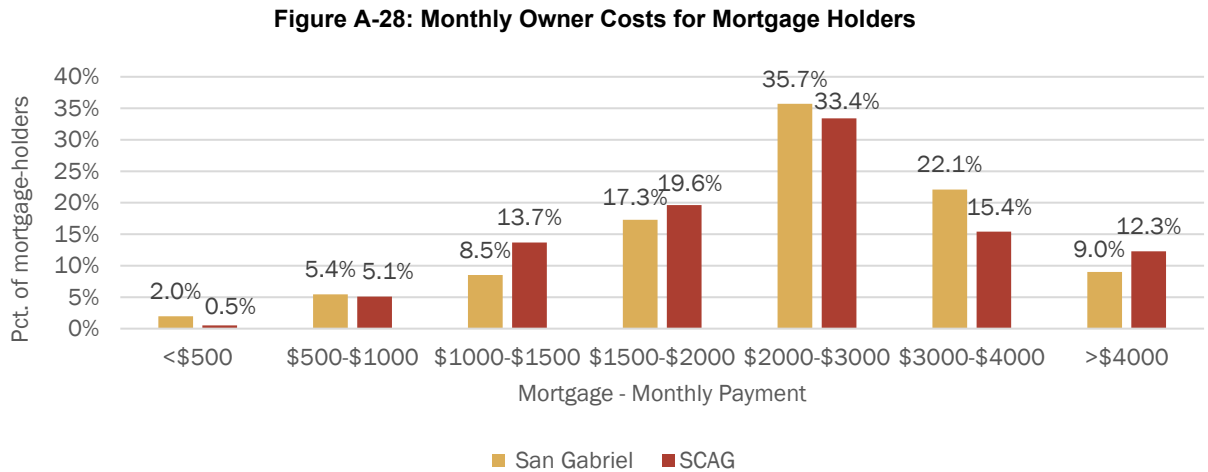
The below chart depicts overall cash rent paid by household incomes. As expected, lower-income households spend less on rent while higher-income households spend more on rent. As noted above, despite paying less on total housing costs, lower-income households are much more likely to spend a significant portion of their total income on housing. Rent categories range from less than \$500 per month (1.8 percent of San Gabriel renters) to greater than \$2,000 per month (15.1 percent of San Gabriel renters). The most common rent category in San Gabriel is \$1,000 to \$1,500 per month with 45.2 percent of renters.

Figure A-27: Household Income by Total Rent (Cash)



Source: SCAG 2020 Pre-Certified Local Housing Data (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 44.6 percent of San Gabriel households (compared to 52.5 percent in the SCAG region). The most commonly occurring mortgage payment in San Gabriel is \$2,000 to \$3,000 per month, which is the same in the SCAG region.

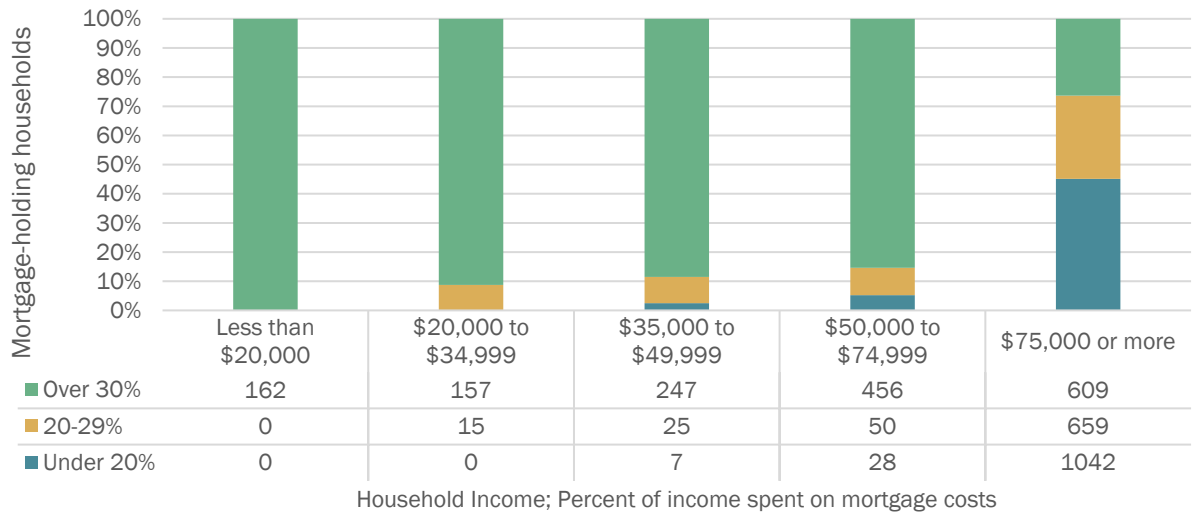


Source: SCAG 2020 Pre-Certified Local Housing Data (American Community Survey 2014-2018 5-year estimates)

Mortgage-holding households in San Gabriel can be broken down by income and the percentage of income spent on mortgage costs. As expected, lower-income households spend a higher share of income on housing costs, while higher-income households spend a lower share of income on housing. The income category representing the largest share of mortgage-holders is \$75,000 or more (2,310 households), and the most prevalent share of income spent on mortgage costs is over 30 percent (1,631 households), which means that a large share of mortgage-holders is cost-burdened. Specifically, 1,850 owner households (33.5 percent of owner households) in San Gabriel are cost burdened³.

³ HUD Comprehensive Housing Affordability Strategy (CHAS), 2013-2017.

Figure A-29: Costs for Mortgage Holders by Income



Source: SCAG 2020 Pre-Certified Local Housing Data

Table A-13: San Gabriel Ability to Pay for Housing for Extremely Low, Very Low, Low, and Moderate Income Households and Fair Market Rents

	Number of Persons in Household			
	1	2	3	4
Extremely Low				
Annual Income Limit	\$23,700	\$27,050	\$30,450	\$33,800
Monthly Income	\$1,975	\$2,254	\$2,538	\$2,817
Max. Monthly Gross Rent ¹	\$593	\$676	\$761	\$845
Max. Purchase Price 5% down ²	\$109,250	\$126,750	\$144,500	\$162,000
Max. Purchase Price 20% down ³	\$146,500	\$170,250	\$194,000	\$217,750
Very Low				
Annual Income Limit	\$39,450	\$45,050	\$50,700	\$56,300
Monthly Income	\$3,288	\$3,754	\$4,225	\$4,692
Max. Monthly Gross Rent ¹	\$986	\$1,126	\$1,268	\$1,408
Max. Purchase Price 5% down ²	\$191,500	\$220,750	\$250,250	\$279,500
Max. Purchase Price 20% down ³	\$257,250	\$296,500	\$336,250	\$375,500
Low				
Annual Income Limit	\$63,100	\$72,100	\$81,100	\$90,100
Monthly Income	\$5,258	\$6,008	\$6,758	\$7,508
Max. Monthly Gross Rent ¹	\$1,578	\$1,803	\$2,028	\$2,253
Max. Purchase Price 5% down ²	\$315,250	\$362,250	\$409,250	\$456,250
Max. Purchase Price 20% down ³	\$423,250	\$486,500	\$549,500	\$612,750
Median				
Annual Income Limit	\$54,100	\$61,850	\$69,550	\$77,300
Monthly Income	\$4,508	\$5,154	\$5,796	\$6,442
Max. Monthly Gross Rent ¹	\$1,353	\$1,546	\$1,739	\$1,933
Max. Purchase Price 5% down ²	\$268,000	\$308,500	\$348,750	\$389,500
Max. Purchase Price 20% down ³	\$360,000	\$414,500	\$468,500	\$523,250
Moderate				
Annual Income Limit	\$64,900	\$74,200	\$83,500	\$92,750
Monthly Income	\$5,408	\$6,183	\$6,958	\$7,729
Max. Monthly Gross Rent ¹	\$1,623	\$1,855	\$2,088	\$2,319
Max. Purchase Price 5% down ²	\$324,500	\$373,000	\$421,750	\$470,000
Max. Purchase Price 20% down ³	\$436,000	\$501,250	\$566,750	\$631,500
Notes:				
¹ 30% of income devoted to maximum monthly rent or mortgage payment, including utilities, taxes, and insurance				
² Assumes 95% loan (i.e., 5% down payment) @ 2.875% annual interest rate and 30-year term				
³ Assumes 80% loan (i.e., 20% down payment) @ 2.875% annual interest rate and 30-year term				
Source: Zillow Mortgage Calculator				

A.5.4 At-Risk Housing Assessment

“At-risk” assisted housing units are multi-family rental housing units that receive government assistance and are eligible to convert to market-rate units due to termination of a rent subsidy contract, mortgage prepayment, or other expiring use restrictions within 10 years of the beginning of the housing element planning period (2021 – 2031). San Gabriel has two units assisted by public funds (in Las Casas Apartments), and neither unit is at risk of conversion to market rate until 2046⁴. Although the units are not at-risk, a program is included for the City to maintain contact with the project’s owner or representatives well in advance of the covenants expiring to ensure units are preserved.

⁴ SCAG 2020 Pre-Certified Local Housing Data and Final RHNA Methodology Data Appendix

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Appendix B: Sites Inventory & Methodology

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Section B.1 Introduction

B.1.1 Overview and Purpose

According to California Government Code §65580-65589, the housing element must include an inventory of adequate sites that are zoned and available within the planning period to meet the jurisdiction's fair share of regional housing needs across all income levels. The sites inventory, in addition to projected accessory dwelling units (ADUs) and entitled or in process development projects, assists in determining if the jurisdiction has enough developable land to meet its Regional Housing Needs Allocation (RHNA), given its current regulatory framework and market conditions. This Appendix details the sites inventory and supporting analysis methodology and assumptions.



B.1.2 Regional Housing Needs Allocation

Jurisdictions must provide sufficient land to accommodate enough housing for all economic segments of the community. Compliance is determined by the jurisdiction's ability to provide adequate development capacity through appropriate development regulations and land use policies. The number of new units that must be accommodated is established through each jurisdiction's share of the region's projected housing needs for the planning period. This share for each jurisdiction is called the Regional Housing Needs Allocation (RHNA).

Southern California Association of Governments (SCAG), a regional planning agency, is responsible for distributing the RHNA to each jurisdiction within its six-county region (including the County of Los Angeles).¹ The RHNA is distributed by income category. For the 2021-2029 Housing Element update, San Gabriel is allocated a RHNA of 3,023 units as follows:

- Very Low Income (less than 50 percent of AMI): 846 units (28 percent)
- Low Income (50 to 80 percent of AMI): 415 units (14 percent)
- Moderate Income (80 to 120 percent of AMI): 466 units (15 percent)
- Above Moderate Income (greater than 120 percent of AMI): 1,296 units (43 percent)

For this Housing Element planning period, October 15, 2021 through October 15, 2029, the City must ensure the availability of adequate residential sites to accommodate these units. This Appendix provides an overview of the methodology used to evaluate the adequacy of sites within

¹ Southern California Association of Governments (SCAG) covers a six-county region, including Los Angeles, Orange, Riverside, San Bernardino, Ventura, and Imperial.

San Gabriel and identifies such sites for future residential development to fulfill the City's share of regional housing needs.

B.1.3 Data

The sites inventory analysis used data provided by the City, such as GIS data and building permit/entitlement information. The following is an overview of the data used:

- City and County-level parcel GIS data, including General Plan land use designation, zoning district, ownership, existing land use, existing number of units, age of building, etc.
- ADU applications
- Entitled projects and projects in the entitlement phase
- Prior housing element site inventories
- Annual Progress Reports to HCD during the 5th Cycle
- Zoning Code allowed density and floor area ratio standards (FAR)

Section B.2 Future Residential Development Potential

B.2.1 Accessory Dwelling Units

New state laws in effect since January 1, 2018 have significantly eased the development standards and streamlined the approval process for Accessory Dwelling Units (ADUs). As a result, the City has experienced an increase in ADU applications and production in recent years. Table B-1 shows the number of building permits issued for ADUs and ADU applications approved in San Gabriel in 2018 through 2021.

Table B-1: Permitted and Approved ADU Applications

Year	Permitted ADUs	Approved ADUs
2018 - 2020		
2018	10	42
2019	19	41
2020	16	75
Total	45	158
Annual Average	15	53
Monthly Average	1.25	4.4
2021		
2021 (Jan through Sept)	36	55
2021 (Jan through Sept) Monthly Average	4.0	6.1
2021 (Projected) Total	48	73
Trends		
2018 - 2021 (Jan through Sept)		
Monthly Average	1.8	4.7
Annual Average	22	56
2019 - 2021 (Jan through Sept)		
Monthly Average	2.2	5.2
Annual Average	26	62
<i>Source: City of San Gabriel</i>		

Since building permit data lags planning approvals, planning approvals are documented in Table B-1 as that reflects most current market conditions and trends for ADUs in San Gabriel. Data from 2021 (January through September) is provided to show continuing trends with 36 ADUs permitted, an average of four per month, or a projected total of approximately 48 ADUs permitted annually. Permitted ADUs average approximately 45 percent of approved ADUs from the prior year, although 2021 ADUs permitted through September already represent 48 percent of approved ADUs in 2020. While ADU permits issued remain lower than the number of the previous year's approvals, ADUs permitted in the first three quarters of 2021 are more than double, and trending toward more than triple, the 2018 to 2020 annual average. Based on the strong upward trend for ADU permitting, the City assumes an average of 26 ADUs per year, which is 54 percent of the projected number of ADU permits for 2021. This would result in a total of 208 ADUs over the eight-year planning period and is further supported through the City's ADU Program (Program 3), described below.

The City has adopted an ADU Ordinance consistent with current state law, and prepared an easy-to-read ADU Guidebook in 2021 that will be translated into multiple languages to promote ADU production. Under Program 3, the City will publicize and promote the ADU Guidebook through multiple languages via the City’s website, newsletters, email distribution lists, social media, and cable television channel. Additionally, to help increase the percentage of approved ADUs that have building permits issued, the City will promote the availability of funding for construction of ADUs, including the recently available CalHFA ADU Grant Program that provides up to \$25,000 to reimburse homeowners for predevelopment costs necessary to build and occupy an ADU. Through this Program, the City will also monitor ADU production and affordability throughout the planning period and implement additional action if target ADU numbers are not being met.

SCAG conducted a regional ADU affordability analysis to provide local governments in the region with assumptions for ADU affordability that can be used to assign projected ADUs to income categories. SCAG’s analysis relies on a survey of rents of 150 existing ADUs conducted between April and June 2020. The ADU affordability assumptions identified in the SCAG analysis for the Los Angeles County II region were applied to ADUs projected over the planning period.

Table B-2: Affordability per SCAG ADU Survey

Income Level	Percent	ADU Projections
Extremely Low	15.0%	31
Very Low	8.5%	18
Low	44.6%	93
Moderate	2.1%	4
Above Moderate	29.8%	62
Total		208
<i>Source: SCAG, City of San Gabriel</i>		

B.2.2 Entitled and Proposed Developments

Because the RHNA projection period for the 2021-2029 Housing Element begins on June 30, 2021, housing developments that have already been proposed or received entitlement and are not expected to be issued a certificate of occupancy until July 1, 2021, but are expected to be completed before the end of the planning period (October 15, 2029), can be credited toward the RHNA. Table B-3 lists those projects that meet those criteria and can be credited toward the 6th Cycle RHNA.

Table B-3: Entitled and Proposed Developments

Address	Status	Units by Income Level			
		Low	Moderate	Above Moderate	Total Net New ¹
101 W. Valley Blvd.	Under construction	-	-	87	87
201-217 S. San Gabriel Blvd.	Approved; in plan check / Entitlement phase ²	-	12 ³	167	178
101 E. Valley Blvd.	Under construction	-	-	81	81
850-860 E. Valley Blvd.	Under construction	-	-	49	49
400-420 W. Valley Blvd.	Under construction	-	-	127	124
300 E. Valley Blvd.	Under construction	-	-	68	51
250-252 S. Arroyo Dr.	Under construction	-	-	12	11
220 S. San Gabriel Blvd.	Approved	-	-	153	152
700-800 S. San Gabriel Blvd.	Approved	-	-	243	243
1975 S. Del Mar Ave.	Entitlement phase/under review	-	-	35	35
1616 Euclid Ave./1619 Walnut St.	Approved; in plan check	-	-	38	36
223 E. Live Oak St.	Entitlement phase/under review	-	-	12	9
600 S. San Gabriel Blvd	Entitlement phase/under review	-	-	18	18
205 E. Valley Blvd.	Entitlement phase/under review	-	-	51	51
810 E. Valley Blvd.	Entitlement phase/under review	-	-	7	4
1956 Strathmore Ave.	Approved; in plan check	-	-	6	3
328 E. Live Oak St.	Under construction	-	-	10	9
306 San Marcos St.	Under construction	-	-	8	7
1551 Prospect Ave.	Entitlement phase/under review	-	-	6	2
324 E. Las Tunas Dr.	Entitlement phase/under review	-	-	14	14
322 S. Arroyo Dr.	Approved; in plan check	-	-	9	5
116 W. Marshall St.	Under construction	-	-	7	6
1962 Denton Ave.	Approved	-	-	6	5
405 South Del Mar Ave.	Entitlement phase/under review	56 ⁴	-	-	56
319 S. Pine St	Entitlement phase/under review	-	-	12	12
1308 Stevens Ave.	Under construction	-	-	4	3

Table B-3: Entitled and Proposed Developments

Address	Status	Units by Income Level			
		Low	Moderate	Above Moderate	Total Net New ¹
1526 Stevens Ave.	Entitlement phase/under review	-	-	5	2
216/220 E. Broadway	Entitlement phase/under review	-	-	10	8
238 S. San Marino	Approved; in plan check	-	-	3	2
131 E. Newby Dr.	Approved; in plan check	-	-	2	1
Subtotal Gross		56	12	1,250	N/A
Subtotal Net New		56	12	1,196	1,264
¹ Certain projects are located on parcels with existing residential units where the existing residential units will be demolished for a project with a larger number of units. All existing units that will be demolished are market rate units; no units to be demolished are subject to a recorded covenant, ordinance, or law that restricts rent levels to affordable to low-income households or subject to any other form of rent or price control by the City. Only the net new number of units are counted toward the RHNA. ² 159 units (12 moderate and 147 above moderate) are approved and in plan check. An application to add 20 more above moderate units within the approved square footage is in the entitlement phase. ³ Moderate income units will be deed restricted and are entitled through development approval. Project is currently in building permit plan check. ⁴ Lower income units will be deed restricted and entitlements are anticipated to be approved in Fall 2022. <i>Source: City of San Gabriel</i>					

Entitled and proposed developments would result in 1,256 net new units, and most of these projects provide above moderate housing units.

B.2.3 Assumptions

Density

Table B-4 summarizes density for multi-family and mixed-use zones that allow residential at densities appropriate to analyze for lower and moderate-income housing units.

Table B-4: Density for Zones that Allow Residential

Zone	Dwelling Units Per Acre
R-3	Max. 25 units/acre
C-1	Max. 25 units/acre
C-3	
MDR-2 (R-2 G)	Max. 12 units/acre ¹ 20 units/acre if lot size is at least 32,670 sq. ft. and lot width is at least 150 ft. ²
MDR-3 (R-3 A)	Max. 24 units/acre 40 units/acre if lot size is at least 32,670 sq. ft and lot width is at least 150 ft. ²
MDV (MD)	N/A

Table B-4: Density for Zones that Allow Residential

Zone	Dwelling Units Per Acre
MDG (GMD)	
MDC-1 (C-1 M)	
MDC-3 (C-3 M)	
MU-T (SP-MU/T)	
MU-C (SP-MU/C)	
MU-C/R (SP-MU/CR)	Min. 20 unit/acre Max. 40 units/acre ³
R-C (SP-MFR)	Min. 20 unit/acre Max. 40 units/acre
¹ If lot width is less than 150 ft., R-2 Zone standards apply (i.e., 11 units/acre; see Constraints Table C-3). ² The higher density for larger lot sizes is intended to encourage lot consolidation. ³ In MU-C/R, the units per acre standard applies only to 100% residential projects and FAR standard only applies to mixed-use projects. Source: City of San Gabriel Zoning Code, Mission District Specific Plan, Valley Boulevard Sustainability Plan	

Realistic Capacity and Development Trends

Table B-5 summarizes assumptions for realistic residential development capacity based on recent development trends from in process, approved, entitled, and/or permitted projects within San Gabriel. Although there are instances in which sites are developing at above 80 percent maximum allowed density, and even more than 100 percent of maximum allowed density in the C-1 and SP-MU/CR districts, the analysis conservatively assumed no parcel would develop at greater than 80 percent maximum capacity. Furthermore, where minimum density standards exist, those minimums were applied (i.e., SP-MU/CR and SP-MFR).

Although there are no recent development trends in certain zones within the Mission District Specific Plan (MDSP), a capacity assumption of 10 units per acre was applied. Ten units per acre is the low end of the density range for multi-family residential projects the City is receiving applications for throughout the city; density ranges from a low of 9.1 units per acre to 94 units per acre. Program 13 requires the City to assess the MDSP and make amendments to facilitate and encourage more investment and redevelopment in that area.

Table B-5: Zones Realistic Residential Development Capacity Assumptions

Zone	Projects In Process, Approved, Entitled, and/or Permitted	Average Development Trends Capacity	Realistic Capacity Assumption ¹
R-3	<ul style="list-style-type: none"> - 223 E. Live Oak St. (21 units/acre)* - 810 E. Valley Blvd. (28 units/acre)* - 1956 Strathmore Ave. (24 units/acre) - 328 E. Live Oak St. (17 units/acre) - 1551 Prospect Ave. (16 units/acre)* 	83% of maximum allowed density (21 units/acre)	80% of maximum allowed density (20 units/acre)

Table B-5: Zones Realistic Residential Development Capacity Assumptions

Zone	Projects In Process, Approved, Entitled, and/or Permitted	Average Development Trends Capacity	Realistic Capacity Assumption ¹
	<ul style="list-style-type: none"> - 1962 Denton Ave. (22 units/acre) - 319 S. Pine St. (23 units/acre)* - 1308 Stevens Ave. (24 units/acre) - 1526 Stevens Ave. (22 units/acre)* - 216/220 E. Broadway (16 units/acre)* - 238 S. San Marino (11 units/acre) 		
C-1	<ul style="list-style-type: none"> - 201-217 S. San Gabriel Blvd. (62 units/acre) - 220 S. San Gabriel Blvd. (42 units/acre) - 700-800 S. San Gabriel Blvd. (42 units/acre) - 600 S. San Gabriel Blvd. (23 units/acre)* - 324 E. Las Tunas Dr. (29 units/acre)* 	158% of maximum allowed density (40 units/acre)	80% of maximum allowed density (20 units/acre)
C-3	None	N/A	80% of maximum allowed density (20 units/acre)
R-3 A (MDR-3)	<ul style="list-style-type: none"> - 250-252 S. Arroyo Dr. (20 units/acre) - 306 San Marcos St. (17 units/acre) - 322 S. Arroyo Dr. (19 units/acre) 	78% of maximum allowed density (18.72 units/acre)	78% of maximum allowed density (18.72 units/acre)
MD (MDV)	None	N/A	10 units/acre
C-1 M (MDC-1)	None	N/A	10 units/acre
C-3 M (MDC-3)	None	N/A	10 units/acre
SP-MU/T	<ul style="list-style-type: none"> - 101 W. Valley Blvd. (39 units/acre) - 101 E. Valley Blvd. (94 units/acre) - 205 E. Valley Blvd. (74 units/acre)* 	69 units/acre	80% of average development capacity (55 units/acre)
SP-MU/C	<ul style="list-style-type: none"> - 850-860 E. Valley Blvd. (56 units/acre) - 400-420 W. Valley Blvd. (49 units/acre) - 300 E. Valley Blvd. (65 units/acre) - 1616 Euclid Ave./1619 Walnut St. (75 units/acre) 	61 units/acre	80% of average development capacity (49 units/acre)
SP-MU/CR	<ul style="list-style-type: none"> - 1975 S. Del Mar Ave. (61 units/acre)* - 116 W. Marshall St. (25 units/acre) 	108% of maximum allowed density (43 units/acre)	20 units/acre (minimum density required)
SP-MFR	None	N/A	20 units/acre (minimum density required)
<p>Note: See Table B-3 for project affordability levels.</p> <p>* Projects are in the entitlement phase/under review.</p> <p>¹ The projected capacity for some sites were reduced below the realistic capacity assumption based on unique site conditions or constraints (e.g., Wash along a portion of a site)</p> <p>Source: City of San Gabriel, LWC</p>			

The C-1 and C-3 zones require mixed-use projects to have a minimum of 25 percent of the floor area for residential. The SP-MU/CR Zone has a minimum density standard, requiring residential of at least 20 units per acre to be part of a mixed-use development. Therefore, any mixed-use project in these zones would be required to provide the minimum residential square footage or density. Current development trends show a range of densities from 23 to 62 units per acre in the C-1 Zone and 25 to 61 units per acre in the SP-MU/CR Zone. The realistic capacity assumption for sites in these mixed-use zones is conservative at 20 units per acre.

While development in the SP-MU/T and SP-MU/C zones is occurring at higher densities (average densities of 61 to 69 units per acre), units are projected at 80 percent of average densities. To ensure sites in these zones are developed at densities to meet realistic capacity assumptions, the City will establish minimum densities in these zones (Program 12).

Furthermore, Program 24 has been included to remove the 50 percent maximum of total net lot area that applies to residential uses in mixed-use projects located in the C-1 or C-3 zones. This will allow for more flexibility in accommodate housing in these zones.

Although standalone commercial projects are allowed in mixed use zones, the City only receives approximately one application annually for a 100 percent commercial project. With the declining trend of brick-and-mortar retail coupled with COVID-19 pandemic impacts and continued demand for housing, the likelihood of 100 percent commercial projects is not expected to increase in the near future. In fact, development trends from throughout the regional market suggest that developers are pursuing projects in mixed use zones with either minimal or no commercial component. The realistic capacity assumptions for mixed-use zones identified in Table B-5 are conservative, reflecting required minimum densities or lower densities than demonstrated trends.

Projects that are below maximum density are constrained by various factors, including but not limited to the City's parking and open space requirements. As discussed in Appendix C, the zoning standards for parking and open space should be assessed as to their impact on housing feasibility. Program 26 has been included for the City to conduct this assessment and revised parking and open space standards based on the assessment findings. Modifications to these standards will further facilitate the production of housing.

B.2.4 Methodology

To create the adequate sites inventory, the City developed a comprehensive, iterative methodology to screen parcels for near-term development. The methodology is comprised of several phases described below.

Phase 1.A: Development on Vacant Residential Sites

First, the City identified all vacant residentially-zoned parcels in multi-family zones. Parcels were determined to be vacant if they had an assessed land improvement value of zero. Additionally, any sites that were previously identified in 5th Cycle Housing Element and had not (re)developed were carried forward in this phase.

Phase 1.B: Redevelopment Potential on Nonvacant, Currently Non-Residential Sites

Since San Gabriel is generally built out and does not have much available vacant land, nonvacant sites will comprise a substantial portion of the sites inventory. Commercial and mixed-use zoned parcels that allow residential uses were analyzed for redevelopment potential using a ratio of improvement value to land value. The relationship of improvement value to land value is a widely accepted indicator of property utilization and whether redevelopment potential exists; however, this metric is important to supplement with other data to confirm viability of redevelopment. Land and the improvement values were identified based on Los Angeles County Assessor property tax assessment values.

The following was performed on a parcel basis to determine potential as a site:

1. Divide roll improvement value by roll land value, yielding an Improvement to Land Value Ratio (I:L Ratio).
2. Parcels with an I:L Ratio below 1.0 were considered a potential site¹.
3. Building(s) (if any) was built in 1980 or earlier (and therefore over 40 years of age).

In addition to improvement to land value and age of building(s) (if any), nonvacant sites were further screened (see Phase 2), underwent a site-by-site assessment (see Phase 4), and were analyzed relative to existing uses (see B.2.5, Suitability of Nonvacant Sites).

Phase 2: Screening

Parcels that passed through Phase 1 were then screened using the criteria below:

1. Lot size is greater than or equal to 0.25 acres
2. The parcel does not have a current entitlement and is not under review (i.e., not included in Table B-3)
3. Current use type is not a park, utility, school, other public use with no redevelopment potential, gas station, fast food chain, or multi-family residential use
4. The parcel is not subject to a Mills Act contract (i.e., historic property)

Phase 3: Categorization

Eligible parcels were assessed to determine which income levels they can accommodate. Each parcel was determined to be able to accommodate a specific income category given its maximum

¹ The Institute of Urban and Regional Development (IURD) at the University of California, Berkeley suggests that an I:L Ratio of below 1.0 is an appropriate factor to facilitate identification of underutilized commercial properties.

allowable density standards. The lower income category threshold is consistent with the default density for San Gabriel pursuant to Government Code §65583.2.

Table B-6: Income Levels by Density

Density Allowed by Zone	Income Level
< 20 dwelling units/acre	Above moderate
20 – 29 dwelling units/acre	Moderate
30+ dwelling units/acre	Lower
<i>Source: LWC, HCD</i>	

For zones with no maximum density, current development trends were used to inform income level categorization. In the mixed-use zones of the Mission District Specific Plan, there are no current development trends; therefore, a low realistic capacity has been assumed (see Table B-5), and those sites have been categorized as above moderate income. Due to the high-density trends observed in the Valley Boulevard Specific Plan mixed-use zones of MU/T and MU/C (61 to 69 units per acre, see Table B-5), sites in those zones have been categorized as lower income.

Per HCD guidance, sites accommodating lower-income housing should be between 0.5 and 10 acres. All sites originally considered lower income but whose lot size is smaller than 0.5 or larger than 10 acres were categorized for moderate income housing. Additionally, sites smaller than 0.17 acres were categorized as above moderate income due to limitations with the number of units that could be developed.

Phase 4: Site-by-Site Assessment

Despite the screening analysis, some potential sites had existing development or other conditions (e.g., ownership, etc.) that preclude them from the site inventory. The analysis included a site-by-site assessment and refinement of sites depending on additional information from direct observation or firsthand experience from City staff. Furthermore, some sites that were screened out of the results (e.g., less than 0.25 acres) were determined to be suitable housing sites based on property owner or developer interest or other firsthand experience from City staff. Those sites were added to the inventory with the appropriate income categorization.

Additionally, some potential sites were found to have other conditions (e.g., irregular shape, accessibility issues/landlocked, etc.) that could preclude them from the site inventory. Potential sites were also evaluated against the future opportunity sites in the San Gabriel Parks and Open Space Master Plan (Figure 22). Sites selected do not conflict with the Parks and Open Space Master Plan future opportunity sites, and those located along Washes where opportunity for linear parks exists were reduced in projected development capacity to reflect potential future park space. This analysis included an evaluation of environmental and infrastructure constraints, which are described in Appendix C, Section C.4. All identified sites have access to infrastructure and utilities. Where parcels could be consolidated into sites to address conditions, namely accessibility,

consolidated sites were identified. Consolidated sites have the same owner and are compliant with the size screening criteria.

In addition to the improvement to land value (I:L) ratio screening described in Phase 1.B, the City analyzed potential sites to determine if existing uses would constitute an impediment to residential development. For example, well-performing commercial centers and sites that had I:L ratios below 1.0 were not included as sites. Development trends (see Table B-5) on nonvacant sites were considered in the determination of sites. Market conditions in San Gabriel are demonstrating viability of nonvacant site redevelopment for both residential and mixed-use projects as shown by current development trends. See Section B.2.5 for additional discussion on suitability of nonvacant sites.

One of the identified sites has a single-family home (Site A). This is a low intensity developed parcel where a substantial number of additional units could be added with the adjacent parcel under the same ownership (R-3A Zone). This existing unit is not subject to a recorded covenant, ordinance, or law that restricts rent levels to affordable to low-income households or subject to any other form of rent or price control by the City.

Phase 5: Parcels in Prior Housing Elements

Vacant parcels from both the 4th and 5th Cycles and non-vacant parcels from the 5th Cycle can be reused in this Housing Element (the 6th Cycle) to accommodate lower-income housing, but they must be rezoned to allow projects with at least 20 percent of the units affordable to lower income households to be by-right. Figures B-1 and B-2 and Table B-8 show all 6th Cycle sites and any site previously identified as a site in the 4th and 5th Cycle. A program is included to rezone reused sites identified for lower income consistent with AB 1397.

B.2.5 Suitability of Nonvacant Sites

Since San Gabriel is generally built out, the sites inventory is comprised largely of nonvacant sites. Nonvacant sites are relied on to accommodate more than 50 percent of the City's lower income RHNA, therefore, the City also analyzed whether substantial evidence exists to support that existing uses on identified lower income sites will be discontinued during the planning period (2021-2029).

Nonvacant parcels included as sites are underutilized with primarily surface parking and commercial buildings where the existing uses are of marginal economic viability and the structures are at or near the end of their useful life. This includes sites with structures (if any) that were built before 1980 (over 41 years old) and the parcel has a low improvement to land value (i.e., below 1.0). The declining trend of brick-and-mortar retail coupled with COVID-19 pandemic impacts has dramatically impacted the viability of many commercial uses, and properties with commercial and other low-intensity uses are being converted into multi-family and residential mixed-use projects in San Gabriel. These conversions are occurring based on the strong demand for housing and lack of vacant land. Redevelopment projects are exceeding minimum required densities where

the City has standards for minimum residential square footage or density in various zones (e.g., C-1, C-3, SP-MU/CR, SP-MFR). Furthermore, the City has established incentives for lot consolidation which have resulted in higher density developments, particularly in the Valley Boulevard Specific Plan Area, on consolidated vacant and nonvacant parcels.

Development trends demonstrate the intensification of underutilized commercial properties into multi-family and high-density residential mixed-use projects. Table B-5 identifies recent development projects and shows average density trends in both residential and mixed-use zones; most of these projects are on nonvacant sites. Existing uses on pipeline project parcels include the following:

- Retail stores with parking lot
- Restaurants with parking lot
- Commercial plazas, multi-family units, parking lot
- Greenhouse buildings for nursery
- Bowling alley with parking lot
- Automotive repair buildings
- Church, related buildings, parking lot
- Residential units
- Single-family homes

Redevelopment of sites with similar conditions to the identified sites is occurring in San Gabriel, and recent applications and entitlements consist of residential mixed-use or residential-only projects in almost all cases; the City receives only approximately one application annually for a 100 percent commercial project. Recently, the City approved a 243-unit mixed-use development (42 units per acre) in the C-1 Zone, and there are mixed-use projects under construction in the MU/T and MU/C zones ranging from 39 to 94 units per acre. These projects are being constructed on sites that had existing retail stores, restaurants, commercial uses, residential units, and surface parking lots; similar conditions to the identified nonvacant sites that are also low intensity development (e.g., single-story commercial) and surface parking.

Other existing uses on nonvacant sites include low intensity uses, some of which have expressed interest to the City of adding residential on the property. Specifically, church sites have been included based on church sites proposing the addition of residential units (i.e., 319 S. Pine St. pipeline project) and reflective of AB 1851 that facilitates the provision of housing on religious institution property. AB 1851 prohibits cities from requiring the replacement of parking spaces lost due to the construction of housing units, eliminating up to 50 percent of the required number of spaces (Government Code §65913.6). Program 11 has been included for the City to conduct outreach to religious institution property owners and operators to inform them of AB 1851 and other applicable regulations that encourage housing development.

Furthermore, the Los Angeles office market continued to see rising vacancies and lower rental rates. Office growth has been stronger in other locations, such as Downtown Los Angeles and Pasadena, where locations are desirable in terms of regional access compared to San Gabriel. Additionally, potential long-term impacts on how office space will be utilized with the shift to remote work during the COVID-19 pandemic were considered. Identified sites, including those with existing office uses, consist of older buildings with low improvement values where higher intensity residential mixed-use is allowed.

The screening for potential sites considered these trends and utilized conservative assumptions in projecting units well below observed densities for residential and mixed-use projects. Lastly, the City is unaware of any leases that would perpetuate existing uses or prevent the development of housing on nonvacant sites during the planning period.

The following table lists the existing uses on lower income sites, including potential sites for rezoning, which are anticipated to be discontinued during the planning period (2021-2029) based on development trends, market conditions, and redevelopment potential (e.g., building age, property condition, etc.). While some lower income sites are vacant, many lower income sites are surface parking lots with underutilized and/or underperforming commercial uses where significant development intensity can be achieved (e.g., Valley Boulevard Specific Plan).

Table B-7: Existing Uses on Lower Income Sites and Potential Sites for Rezoning for Lower Income

AIN	Address	Zone	Site	Existing Use	Lower Income Unit Capacity ¹
5346011004	N/A (S ARROYO DR)	R-3 A	A	Vacant	22
5346011006	35 N HAMPTON CT	R-3 A	A	Single-family home	3
5372019022	1105 E VALLEY BLVD	SP-MU/C	-	Store and surface parking	27
5369026033	517 E VALLEY BLVD	SP-MU/C	-	Store (vacant) and surface parking	26
5372008052	1530 S CHARLOTTE AVE	SP-MU/C	-	Store and surface parking	57
5372019027	1029 E VALLEY BLVD	SP-MU/C	-	Vacant	111
5360014043	531 W VALLEY BLVD	SP-MU/C	-	Vacant	31
5371002040	1846 S SAN GABRIEL BLVD	SP-MU/CR	-	Stores and surface parking	11
5370014002	1702 S DEL MAR AVE	SP-MU/T	-	Stores (vacant) and surface parking	43
5370002047	625 DEWEY AVE	SP-MU/T	-	Church and surface parking	48
5369018039	125 E VALLEY BLVD	SP-MU/T	-	Church and surface parking	29
5370002012	617 DEWEY AVE	SP-MU/T	-	Commercial parking lot	55
Subtotal Excluding Potential Rezone Parcels					463
5373028013	N/A (S SAN GABRIEL/ S GLADYS AVE between SANTA FE AVE and EL MONTE ST)	C-1	B	San Gabriel Nursery and Florist and surface parking	26
5373028029		C-1	B		
5373028015		C-1	B		
5373028027		C-1	B		

Table B-7: Existing Uses on Lower Income Sites and Potential Sites for Rezoning for Lower Income

AIN	Address	Zone	Site	Existing Use	Lower Income Unit Capacity ¹
5373028012		C-1	B		
5373028011		C-1	B		
5373028025		C-1	B		
5373028014		C-1	B		
5373028028		C-1	B		
5373028026		C-1	B		
5373028016		C-1	B		
5373028018		C-1	B		
5373028021		C-1	B		
5373028022		C-1	B		
5373028019		C-1	B		
5373028017		C-1	B		
5373028020		C-1	B		
5367018026	137 S SAN GABRIEL BLVD	C-1	-	Local market and surface parking	51
5367017022	650 E LAS TUNAS DR	C-1	-	Automotive repair and surface parking	44
5362016005	320 CLARY AVE	C-1	-	Warehouse (stone and cabinets)	42
5387008070	1245 E LAS TUNAS DR	C-1	-	Automotive repair and surface parking	38
5374027023	101 S SAN GABRIEL BLVD	C-1	-	Automotive, parking lot	28
5374027014	100 S SAN GABRIEL BLVD	C-1	-	Automotive repair and surface parking	27
5367012014	206 E LAS TUNAS DR	C-1	-	Offices/stores and surface parking	26
5362022012	222 W LAS TUNAS DR	C-1	-	Offices and surface parking	24
5363026033	397 W LAS TUNAS DR	C-1	-	Office/store and surface parking	24
5367014017	316 E LAS TUNAS DR	C-1	-	Offices and surface parking	21
5367018021	708 E LAS TUNAS DR	C-1	-	Stores and surface parking	19
5367018022	115 S SAN GABRIEL BLVD	C-1	-	Stores and surface parking	17
5374025026	835 E LAS TUNAS DR	C-1	-	Bank and surface parking	17
5387009007	1351 E LAS TUNAS DR	C-1	-	Parking lot	15
5374027016	136 S SAN GABRIEL BLVD	C-1	-	Vacant commercial building and surface parking	15
5387039021	1140 E LAS TUNAS DR	C-3	-	Mortuary and surface parking	38
5387005001	1145 E LAS TUNAS DR	C-3	-	Offices/stores and surface parking	22
5389001001	900 S SAN GABRIEL BLVD	C-3	-	Offices and surface parking	16

Table B-7: Existing Uses on Lower Income Sites and Potential Sites for Rezoning for Lower Income

AIN	Address	Zone	Site	Existing Use	Lower Income Unit Capacity ¹
5346025025	809 W SANTA ANITA ST	C-3 M	-	Manufacturing building and surface parking	50
5346030006	722 W SANTA ANITA ST	C-3 M	-	Industrial building and surface parking	24
5346030025	808 W SANTA ANITA ST	C-3 M	-	Industrial building and surface parking	20
Subtotal Potential Rezone Parcels¹					613
Total					1,076
¹ For rezoned sites, a minimum density of 30 units per acre is applied consistent with Program 1. Additional site information included in Table B-10. Source: City of San Gabriel, Los Angeles County Assessor, LWC					

Furthermore, to encourage the redevelopment of nonvacant sites with higher-density residential uses, the City has multiple programs to provide financial assistance, incentives, and regulatory concessions to facilitate more intensive residential development. These include:

- Program 4: Promote development in mixed-use zones and focus financial assistance (e.g., reductions in development fees, assistance with off-site improvement costs, etc.) for affordable housing on sites where mixed-use is allowed
- Program 8: Continue to offer incentives for lot consolidation (e.g., increased density)
- Program 12: Establishing minimum densities in the Valley Boulevard Specific Plan where they do not currently exist
- Program 13: Evaluate and update the Mission District Specific Plan to facilitate housing
- Program 23: Increase the allowed building height for mixed-use projects in C-1 and C-2 zones to be the same as 100 percent commercial buildings
- Program 24: Eliminate residential floor area limit in C-1 and C-2 zones
- Program 26: Modify open space and parking requirements

As described above, many of the housing sites have underperforming commercial spaces and/or low intensity uses which are anticipated to redevelop based on trends, market conditions, and interest expressed to City staff for redevelopment. Additionally, the City will take efforts to continue to encourage redevelopment of nonvacant sites through various programs. Therefore, considering development trends, declining demand for commercial spaces, and Housing Element programs, nonvacant uses are likely to discontinue during the planning period.

Section B.3 Adequacy of Residential Sites in Meeting RHNA

The following table summarizes the City's methods for satisfying its RHNA (Table B-8). Based on ADU projections, entitled and proposed projects, and available sites, the City has excess capacity in moderate and above-moderate income categories and a shortfall in the lower income categories.

Table B-8: Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	846	415	466	1,296	3,023
ADUs	31	18	93	4	62	208
Entitled/Proposed Projects ¹	-	-	56	12	1,196	1,264
Remaining RHNA	See Very Low	797	266	450	38	1,551
Site Inventory ¹	See Very Low/Low	463		1,031	81	1,575
Surplus / (Shortfall)	See Very Low/Low	(600)		581	43	24

¹ Considers net new units only.

Source: City of San Gabriel, LWC

The City has identified potential parcels for rezoning to address the lower income shortfall, which would shift some of the projected moderate and above moderate-income sites into the lower income category. If the potential candidate parcels are rezoned in accordance with Program 1, the City would have a surplus in all income categories as shown in Table B-9.

Table B-9: Residential Development Potential and RHNA – WITH POTENTIAL REZONING

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	846	415	466	1,296	3,023
ADUs	31	18	93	4	62	208
Entitled/Proposed Projects ¹	-	-	56	12	1,196	1,264
Remaining RHNA	See Very Low	797	266	450	38	1,551
Site Inventory ¹	See Very Low/Low	1,076		685	51	1,812
Surplus / (Shortfall)	See Very Low/Low	13		235	13	261
¹ Considers net new units only. Source: City of San Gabriel, LWC						

B.3.1 Housing Sites Map

The following maps, Figures B-1 and B-2, show the inventory of sites by income category. Sites that were also included in the 4th and 5th Cycle Housing Elements are identified with a bold border.

Figure B-1: 6th Cycle Housing Element Site Inventory Map by Income Category (Northern Portion of San Gabriel)

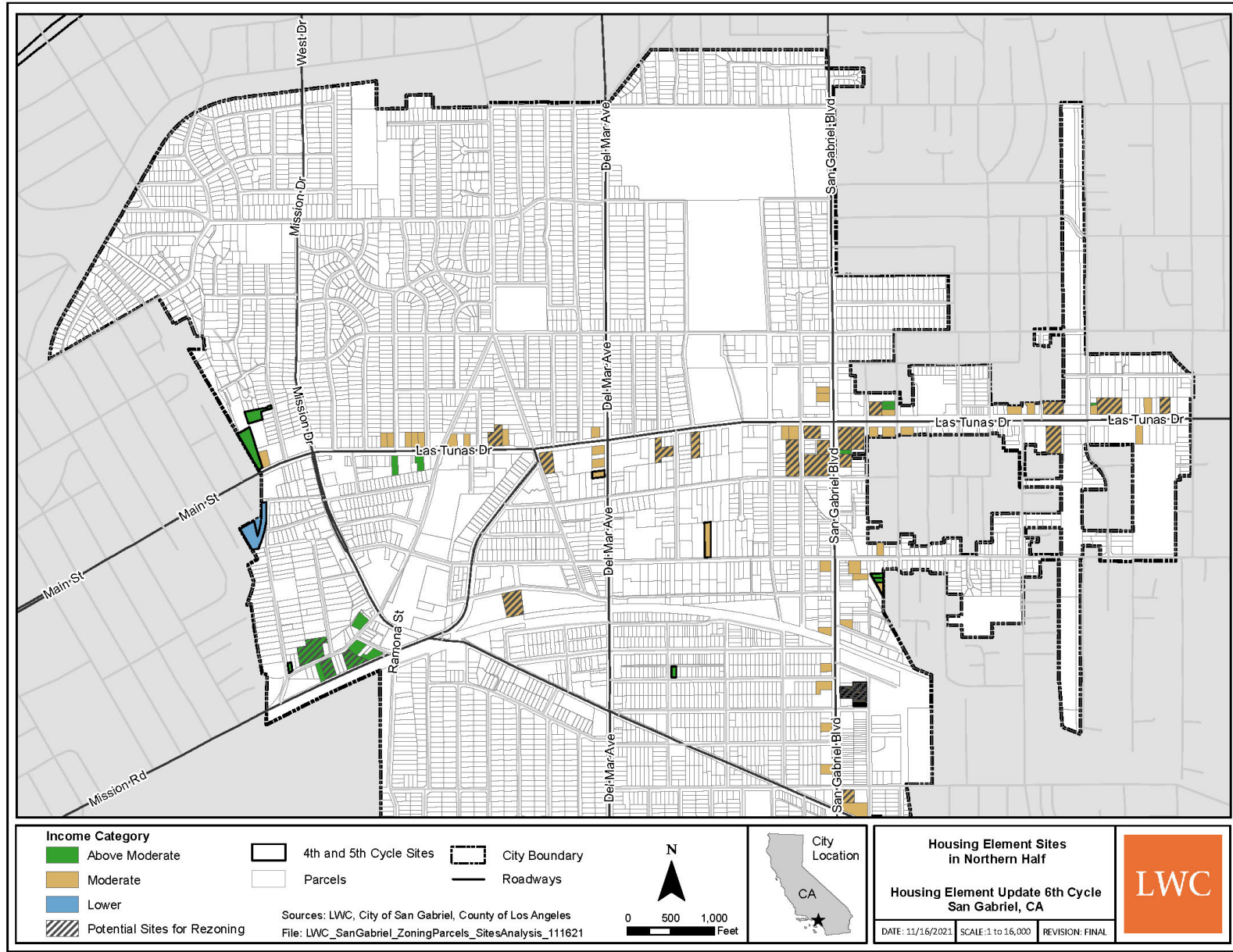
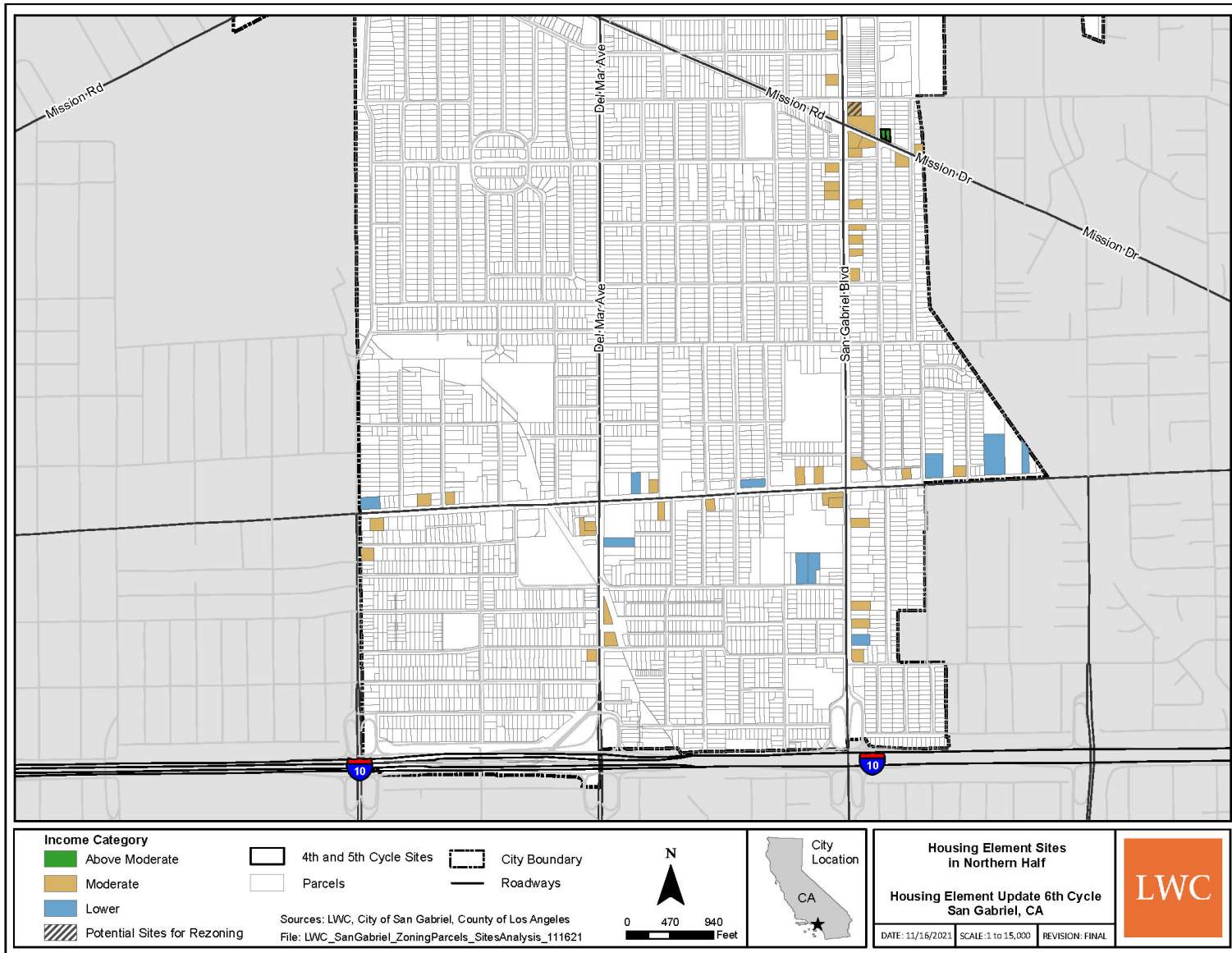


Figure B-2: 6th Cycle Housing Element Site Inventory Map by Income Category (Southern Portion of San Gabriel)



B.3.2 Housing Sites Table

The following table lists the parcels in the City's housing sites inventory with unit capacity by income category.

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5370014002	SP-MU/T	CSP	0.77	0.79	1954	-	Stores (vacant) and surface parking	-	43	-	-	43
5370002047	SP-MU/T	CSP	0.86	0.37	1976	-	Church and surface parking	-	48	-	-	48
5369018039	SP-MU/T	CSP	0.52	0.32	1952	-	Church and surface parking	-	29	-	-	29
5370002012	SP-MU/T	CSP	1.00	0.02	1985 (parking lot)	-	Commercial parking lot	-	55	-	-	55
5369031015	SP-MU/T	CSP	0.45	0.44	1958	-	Stores and surface parking	-	-	25	-	25
5370001004	SP-MU/T	CSP	0.44	0.43	1964	-	Stores and surface parking	-	-	24	-	24
5369031022	SP-MU/T	CSP	0.44	0.12	1958	-	Stores and surface parking	-	-	24	-	24
5360020027	SP-MU/T	CSP	0.39	0.58	1961	-	Store and surface parking	-	-	22	-	22
5370001016	SP-MU/T	CSP	0.35	0.74	1964	-	Stores and surface parking	-	-	20	-	20
5370011003	SP-MU/T	CSP	0.35	0.43	1949	-	Store and surface parking	-	-	19	-	19
5369018021	SP-MU/T	CSP	0.32	0.63	1958	-	Stores (vacant) and surface parking	-	-	18	-	18
5360020023	SP-MU/T	CSP	0.29	0.45	1952	-	Stores and surface parking	-	-	16	-	16
5371002040	SP-MU/CR	CSP	0.55	0.50	1946	-	Stores and surface parking	-	11	-	-	11
5371002016	SP-MU/CR	CSP	0.49	0.40	1920	-	Store	-	-	10	-	10
5371001031	SP-MU/CR	CSP	0.48	0.01	1963	-	Commercial Parking Lot	-	-	10	-	10
5371002042	SP-MU/CR	CSP	0.44	0.76	1974	-	Offices (vacant) and surface parking	-	-	9	-	9
5360015049	SP-MU/CR	CSP	0.46	0.64	1978	-	Retail/office and surface parking	-	-	9	-	9
5370016018	SP-MU/CR	CSP	0.46	0.27	1965	-	Automotive repair and surface parking	-	-	9	-	9

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5371002038	SP-MU/CR	CSP	0.39	0.36	1964	-	Automotive repair and surface parking	-	-	8	-	8
5370016013	SP-MU/CR	CSP	0.33	0.22	1923	-	Church and surface parking	-	-	7	-	7
5360017001	SP-MU/CR	CSP	0.32	0.61	1946	-	Stores and surface parking	-	-	6	-	6
5360037030	SP-MU/CR	CSP	0.32	0.14	1964	-	Automotive repair and surface parking	-	-	6	-	6
5372019022	SP-MU/C	CSP	0.55	0.23	1924	-	Store and surface parking	-	27	-	-	27
5369026033	SP-MU/C	CSP	0.54	0.22	1955	-	Store (vacant) and surface parking	-	26	-	-	26
5372008052	SP-MU/C	CSP	1.16	0.10	1935	-	Store and surface parking	-	57	-	-	57
5372019027	SP-MU/C	CSP	2.27	0.00	-	-	Vacant	-	111	-	-	111
5360014043	SP-MU/C	CSP	0.63	0.00	-	-	Vacant	-	31	-	-	31
5360024029	SP-MU/C	CSP	0.47	0.33	1970	-	Restaurant and surface parking	-	-	23	-	23
5372008019	SP-MU/C	CSP	0.37	0.69	1953	-	Commercial Parking Lot	-	-	18	-	18
5370007017	SP-MU/C	CSP	0.28	0.52	1958	-	Stores and surface parking	-	-	14	-	14
5372007058	SP-MU/C	CSP	0.28	0.19	1948	-	Office and surface parking	-	-	14	-	14
5360025032	SP-MFR	CSP	0.45	0.66	1955	-	Industrial buildings and surface parking	-	-	9	-	9
5346011004	R-3 A	HDR	1.56	0.00	-	A (1.79 acres)	Vacant	YES	22	-	-	22
5346011006	R-3 A	HDR	0.23	0.11	1947		Single-family home		3	-	-	3
5367024009	R-3	HDR	0.68	0.00	-	-	Vacant	YES	-	13	-	13
5364005044	R-1	LDR	0.64	0.00	-	-	Vacant	YES	-	-	2	2
5364017008	R-1	LDR/GC	1.17	0.00	-	-	Vacant	YES	-	-	1	1
5368008021	R-1	LDR	0.17	0.00	-	-	Vacant	YES	-	-	1	1

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5346027055	MD	GC	0.47	0.83	1923	-	Church and surface parking	-	-	-	4	4
5346025025*	C-3 M	GC	1.68	0.78	1955	-	Manufacturing building and surface parking	-	-	-	16	16
5346030006*	C-3 M	GC	0.78	0.59	1951	-	Industrial building and surface parking	-	-	-	8	8
5346030025*	C-3 M	GC	0.65	0.68	1951	-	Industrial building and surface parking	-	-	-	6	6
5346030026	C-3 M	GC	0.46	0.55	1940	-	Office building and surface parking	-	-	-	4	4
5346030015	C-3 M	GC	0.39	0.61	1953	-	Offices and surface parking	-	-	-	4	4
5346030020	C-3 M	GC	0.31	0.72	1955	-	Industrial building and surface parking	-	-	-	3	3
5346024048	C-3 M	GC	0.11	0.00	-	-	Vacant	YES	-	-	1	1
5373022001	C-3	GC	0.16	0.00	-	-	Vacant	YES	-	-	3	3
5389001005	C-3	GC	0.15	0.00	-	-	Vacant	YES	-	-	3	3
5373022002	C-3	GC	0.14	0.00	-	-	Vacant	YES	-	-	3	3
5389001004	C-3	GC	0.12	0.00	-	-	Vacant	YES	-	-	2	2
5387039021*	C-3	GC	1.27	0.17	1958	-	Mortuary and surface parking	-	-	25	-	25
5387005001*	C-3	GC	0.75	0.00	1939	-	Offices/stores and surface parking	-	-	15	-	15
5389001001*	C-3	GC	0.52	0.31	1958	-	Offices and surface parking	-	-	10	-	10
5373024010	C-3	GC	0.49	0.43	1953	-	Office/store and surface parking	-	-	10	-	10
5372001005	C-3	GC	0.48	0.96	1976	-	Office and surface parking	-	-	10	-	10
5368013026	C-3	GC	0.48	0.83	1973	-	Manufacturing building and surface parking	-	-	10	-	10

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5372002030	C-3	GC	0.44	0.39	1946	-	Offices/stores and surface parking	-	-	9	-	9
5387002016	C-3	GC	0.37	0.27	1952	-	Store/Warehouse and surface parking	-	-	7	-	7
5368021002	C-3	GC	0.36	0.15	1946	-	Store and surface parking	-	-	7	-	7
5372001003	C-3	GC	0.36	0.99	1959	-	Offices/stores and surface parking	-	-	7	-	7
5372003023	C-3	GC	0.35	0.67	1950	-	Offices and surface parking	-	-	7	-	7
5372001032	C-3	GC	0.35	0.44	1955	-	Offices and surface parking	-	-	7	-	7
5372003007	C-3	GC	0.35	0.66	1946	-	Restaurant and surface parking	-	-	7	-	7
5372001006	C-3	GC	0.35	0.96	1963	-	Automotive repair and surface parking	-	-	7	-	7
5368014024	C-3	GC	0.31	0.10	1957	-	Restaurant, bar and surface parking	-	-	6	-	6
5368006029	C-3	GC	0.29	0.41	1962	-	Restaurant and surface parking	-	-	6	-	6
5373025022	C-3	GC	0.28	0.69	1946	-	Store and surface parking	-	-	6	-	6
5372003030	C-3	GC	0.28	0.45	1965	-	Office and surface parking	-	-	6	-	6
5387003029	C-3	GC	0.27	0.07	1963	-	Offices and surface parking	-	-	5	-	5
5389001047	C-3	GC	0.25	0.18	1946	-	Automotive repair and surface parking	-	-	5	-	5
5372003002	C-3	GC	0.25	0.80	1957	-	Office and surface parking	-	-	5	-	5
5373022003	C-3	GC	0.18	0.00		-	Vacant	YES	-	4	-	4
5373024028	C-3	GC	0.30	0.05	1970	-	Warehouse and surface parking	-	-	3	-	3
5362003007	C-1 M	GC	0.40	0.39	1956	-	Warehouse and surface parking	-	-		4	4

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5362003029	C-1 M	GC	0.37	0.54	1969	-	Restaurant and surface parking	-	-	-	4	4
5374025003	C-1	GC	0.17	0.56	2013	-	Retail store storage and surface parking	-	-	-	3	3
5374025004	C-1	GC	0.17	0.00	1960	-	Vacant	-	-	-	3	3
5374027015	C-1	GC	0.17	0.02	1947	-	Store and surface parking	-	-	-	3	3
5373028009	C-1	GC	0.09	0.00	-	-	Vacant	YES	-	-	2	2
5387008028	C-1	GC	0.05	0.00	-	-	Vacant	-	-	-	1	1
5373028013*	C-1	GC	0.09	0.00	-	B (1.18 acres)	San Gabriel Nursery and Florist and surface parking	YES	-	2	-	2
5373028029*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028015*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028027*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028012*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028011*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028025*	C-1	GC	0.09	0.00	-			YES	-	2	-	2
5373028014*	C-1	GC	0.08	0.00	-			YES	-	2	-	2
5373028028*	C-1	GC	0.08	0.00	-			YES	-	2	-	2
5373028026*	C-1	GC	0.07	0.00	-			YES	-	1	-	1
5373028016*	C-1	GC	0.07	0.00	-			YES	-	1	-	1
5373028018*	C-1	GC	0.04	0.00	-			YES	-	1	-	1
5373028021*	C-1	GC	0.04	0.00	-			YES	-	1	-	1
5373028022*	C-1	GC	0.04	0.00	-			YES	-	1	-	1
5373028019*	C-1	GC	0.04	0.00	-			YES	-	1	-	1
5373028017*	C-1	GC	0.04	0.00	-			YES	-	1	-	1
5373028020*	C-1	GC	0.04	0.00	-			YES	-	1	-	1

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5367018026*	C-1	GC	1.72	0.83	1967	-	Local market and surface parking	-	-	34	-	34
5367017022*	C-1	GC	1.46	0.26	1962	-	Automotive repair and surface parking	-	-	29	-	29
5362016005*	C-1	GC	1.40	0.50	1949	-	Warehouse (stone and cabinets)	-	-	28	-	28
5387008070*	C-1	GC	1.26	0.30	1959	-	Automotive repair and surface parking	-	-	25	-	25
5374027023*	C-1	GC	0.92	0.06	1967	-	Automotive, parking lot	-	-	18	-	18
5374027014*	C-1	GC	0.90	0.04	1931	-	Automotive repair and surface parking	-	-	18	-	18
5367012014*	C-1	GC	0.87	0.33	1925	-	Offices/stores and surface parking	-	-	17	-	17
5362022012*	C-1	GC	0.80	0.33	1948	-	Offices and surface parking	-	-	16	-	16
5363026033*	C-1	GC	0.79	0.49	1942	-	Office/store and surface parking	-	-	16	-	16
5367014017*	C-1	GC	0.69	0.34	1960	-	Offices and surface parking	-	-	14	-	14
5367018021*	C-1	GC	0.65	0.79	1958	-	Stores and surface parking	-	-	13	-	13
5367018022*	C-1	GC	0.56	0.67	1960	-	Stores and surface parking	-	-	11	-	11
5374025026*	C-1	GC	0.56	0.28	1978	-	Bank and surface parking	-	-	11	-	11
5387009007*	C-1	GC	0.52	0.02	1958	-	Parking lot	-	-	10	-	10
5374027016*	C-1	GC	0.51	0.01	1949	-	Vacant commercial building and surface parking	-	-	10	-	10
5372006061	C-1	GC	0.47	0.30	1969	-	Restaurant and surface parking	-	-	9	-	9
5364005046	C-1	GC	0.45	0.59	1938	-	Stores and surface parking	-	-	9	-	9
5367017021	C-1	GC	0.42	0.28	1962	-	Used car dealer	-	-	8	-	8

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5387034037	C-1	GC	0.41	0.41	1948	-	Office and surface parking	-	-	8	-	8
5374028023	C-1	GC	0.40	0.58	1963	-	Restaurant and surface parking	-	-	8	-	8
5387009022	C-1	GC	0.39	0.36	1940	-	Office and surface parking	-	-	8	-	8
5368034014	C-1	GC	0.37	0.46	1928	-	Office/Store and surface parking	-	-	7	-	7
5368034009	C-1	GC	0.37	0.72	1946	-	Offices/stores (vacant) and surface parking	-	-	7	-	7
5367032021	C-1	GC	0.37	0.68	1976	-	Convenience stores and surface parking	-	-	7	-	7
5367002004	C-1	GC	0.35	0.67	1958	-	Office/Store and surface parking	-	-	7	-	7
5368034001	C-1	GC	0.34	0.25	1965	-	Store (vacant) and surface parking	-	-	7	-	7
5363025009	C-1	GC	0.34	0.55	1941	-	Automotive repair and surface parking	-	-	7	-	7
5362022001	C-1	GC	0.34	0.00		-	Vacant	-	-	7	-	7
5363026012	C-1	GC	0.33	0.47	1955	-	Office and surface parking	-	-	7	-	7
5362022002	C-1	GC	0.32	0.06	1978	-	Offices and surface parking	-	-	6	-	6
5367017002	C-1	GC	0.31	0.30	1949	-	Automotive repair and surface parking	-	-	6	-	6
5374029025	C-1	GC	0.31	0.23	1963	-	Automotive repair and surface parking	-	-	6	-	6
5363020003	C-1	GC	0.30	0.61	1957	-	Offices and surface parking	-	-	6	-	6
5363019022	C-1	GC	0.30	0.84	1923	-	Office/Store and surface parking	-	-	6	-	6
5363020023	C-1	GC	0.30	0.73	1941	-	Local market and surface parking	-	-	6	-	6
5363020022	C-1	GC	0.30	0.05	1941	-	Surface parking lot	-	-	6	-	6

Table B-10: Housing Sites Inventory

AIN	Zone	General Plan	Parcel Size (ac)	I:L Ratio ¹	Year Built	Site	Vacant/Existing Use	4 th & 5 th Cycle Site ²	Income Category			Total New Units
									Lower	Moderate	Above Moderate	
5363019025	C-1	GC	0.29	0.66	1959	-	Restaurant and surface parking	-	-	6	-	6
5363034013	C-1	GC	0.29	0.76	1931	-	Office/Store and surface parking	-	-	6	-	6
5374028024	C-1	GC	0.26	0.00	1945	-	Office and surface parking	-	-	5	-	5
5373003022	C-1	GC	0.26	0.31	1950	-	Automotive repair and surface parking	-	-	5	-	5
5367033001	C-1	GC	0.26	0.60	1947	-	Store	-	-	5	-	5
5367002005	C-1	GC	0.26	0.58	1958	-	Office and surface parking	-	-	5	-	5
5363025011	C-1	GC	0.25	0.36	1941	-	Offices and surface parking	-	-	5	-	5
5362023010	C-1	GC	0.25	0.00	-	-	Vacant	YES	-	5	-	5
5374025025	C-1	GC	0.22	0.41	1957	-	Store/ warehouse and surface parking	-	-	4	-	4
5387008029	C-1	GC	0.18	0.25	1923	-	Automotive, store, and surface parking	-	-	4	-	4
5389001003	C-3	GC	1.02	0.66	1951	-	Car wash, gas station, surface parking ³	-	-	20	-	20
Total									463	1,031	81	1,575

* Potential parcels for rezoning to accommodate lower income units.

¹ Improvement to Land Value Ratio.

² All parcels previously identified as housing sites were included in both the 4th and 5th Cycle Housing Elements.

³ Although this site includes a gas station, the City has been receiving development interest and inquiries to develop this site.

Source: City of San Gabriel, LWC

Appendix C: Housing Constraints

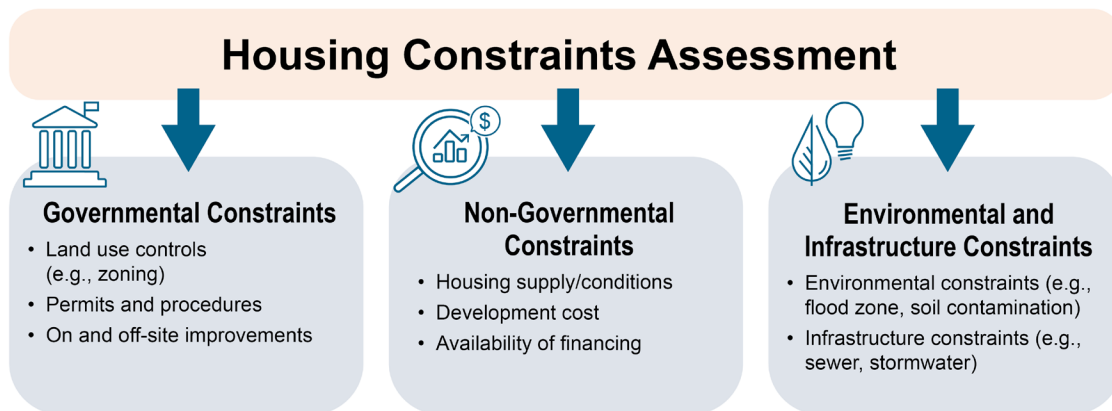
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Section C.1 Introduction and Summary

C.1.1 Introduction

This Appendix covers local governmental, non-governmental, and environmental and infrastructure constraints to housing production in San Gabriel.



C.1.2 Summary

City policies and regulations, such as the Zoning Code, and market factors outside of the City's control affect the quantity and type of residential development that occurs in San Gabriel. The following summarizes key governmental and nongovernmental constraints to housing development as detailed in this Appendix.

Governmental Constraints

- Minimum dwelling unit size requirements preclude the development of smaller units, which can be more affordable.
- Mixed-use projects in commercial zones (C-1 and C-3) may only be three stories / 45 feet tall, while commercial projects in these zones may be up to five stories / 70 feet tall.
- Open space requirements per unit are relatively high and may reduce the amount of area that can be dedicated to housing. Although alternatives, such as off-site provision of open space and in-lieu fees are offered, this requirement may still lower the number of housing units produced.
- Parking standards, including rates and configuration (e.g., garage required for multi-family) could result in higher priced housing units.

- Subjective design guidelines, while limited in their applicability to multi-family projects due to state law (SB 330), could result in uncertainty for developers and a longer permit review process in the future.

Nongovernmental Constraints

- Economic conditions in San Gabriel suggest a fairly competitive housing market that favors the development of for-sale housing over rental housing.
- San Gabriel is generally built out, so future housing development will likely be redevelopment projects that require demolishing existing structures, improvements, and uses. The lack of available vacant land may constrain housing production due to the increase costs associated with redevelopment.

Section C.2 Governmental Constraints

C.2.1 Introduction

Local policies and regulations can affect the quantity and type of residential development. Since governmental actions can constrain the development and the affordability of housing, state law requires the housing element to "address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing" (Government Code §65583(c)(3)).

The City's primary policies and regulations that affect residential development and housing affordability include: the Zoning Code, the General Plan, development processing procedures and fees, on and off-site improvement requirements, and the California Building and Housing Codes. In addition to a review of these policies and regulations, an analysis of the governmental constraints on housing production for persons with disabilities is included in this Section.

C.2.2 Land Use Controls

This section provides an overview of the City's land use controls and their relation to the City's housing supply.

General Plan Land Use Designations

The City adopted the Comprehensive General Plan in 2004. Chapter 1 of the General Plan is the Land Use Element which directs the location and form of future development in the city.

The General Plan includes six land use designations that allow a range of residential development types, at a variety of densities (see Table C-1).

Table C-1: City General Plan Residential Land Use Designations

General Plan Designation	Description
Low Density Residential	Primarily single-family homes on a single parcel, occasionally including two homes (attached or detached) on a larger parcel.
Medium Density Residential	Low-scale, multi-family dwellings, predominately on sites less than an acre in area.
High Density Residential	Multiple-family dwellings, preferably on sites one acre or larger in size, primarily of two-story construction, and of three-story construction for higher density projects granted a density bonus and/or which maximize ground level outdoor recreational space.
Village Commercial	Various convenience services and products for the surrounding residential neighborhood within roughly a ¼ to 1/3 mile radius. Small grocery stores, cafes, bakeries, drug stores, barber, and beauty shops, dry cleaners, dentist and doctor's offices, legal and accounting offices, etc. are examples of permitted uses.
General Commercial	All forms of retail, service, office, recreation/amusement and other commercial businesses which provide goods and services for the local population and those businesses which are targeted towards visitors and commuters. Individual uses may be located on individual parcels, or preferably together within single, integrated centers, along a major arterial roadway.
Commercial Specific Plan (Mission District Specific Plan & Valley Boulevard Specific Plan)	This designation applies to two areas, which each have a distinct character and for which special land use and development strategies are needed to capitalize on the special advantages inherent in each of these areas. The designation signals the City's intent to develop Specific Plans for each of these areas, to define a land use planning program which will accomplish the City's special objectives for these areas.
<i>Source: San Gabriel General Plan</i>	

Zoning Districts

The Zoning Code is Chapter 153 of the San Gabriel Municipal Code and has been updated intermittently since 1995. The Zoning Code and Zoning Map are available on the City's website consistent with Government Code §65940.1(a)(1)(B). This Section analyzes the Zoning Code and the zones which allow residential development as well as the Mission District Specific Plan and the Valley Boulevard Neighborhoods Sustainability Plan. Table C-2 lists the zones that allow residential development, including mixed-use, with a description of each.

Table C-2: Zones that Allow Residential

Zone	Description
Single-Family Residence	The Single-Family Residence Zone is intended to protect the low-density character of single-family residential neighborhoods
Limited Two-Family Residence	The Limited Two-Family Residence Zone is intended to protect the low-density character of single-family residential neighborhoods while allowing for an additional single-family dwelling on lots in the zone.
Low Density Multiple-Family Residence	The Low Density Multiple-Family Residence Zone is intended to encourage smart growth by ensuring new residential structures do not exceed the scale of their surroundings and compensate for density through the provision of adequate open space.
Multiple-Family Residence	The Multiple-Family Residence Zone is intended to encourage smart growth by ensuring new residential structures do not exceed the scale of their surroundings and compensate for density through the provision of adequate open space.
Retail Commercial	The Retail Commercial Zone is intended to provide for the continued use and development of low-scale, local community-oriented retail sales and service uses. All permanent uses within this district must be located within an entirely enclosed structure. Typical uses include neighborhood-oriented retail and personal service businesses, small professional offices, and other businesses that generate low volumes of vehicle traffic. Mixed-use, (i.e., a mix of commercial/residential uses) is allowed subject to applicable permit requirements.
General Commercial	The General Commercial Zone is intended to provide for the continued use and expansion and new development of a wide variety of commercial enterprises, professional and medical offices, entertainment uses, and similar businesses. The zone is located along major roadway corridors to encourage uses that serve the local and regional markets. Mixed-use, (i.e., a mix of commercial/residential uses) is allowed subject to applicable permit requirements.
<i>Source: San Gabriel Zoning Code</i>	

Specific Plans

Mission District Specific Plan: The Mission District Specific Plan was adopted in 2004 and is intended to expand the range of land uses permitted in the Mission District while also increasing allowed development intensities. The Plan promotes residential and commercial uses in the Mission District through mixed-use development and live/work spaces. While planning for denser the development, the Plan also outlines preservation strategies and design standards to reinforce the historic character of the Mission District.

Valley Boulevard Sustainability Plan: The Valley Boulevard Sustainability Plan was adopted in 2006 and amended in 2013. The objectives of the Plan include to promote walkability through encouraging mixed-use and compact development, linking development to transportation options, and providing housing close to employment, schools, parks, and community services. Many of the zoning designations within the Plan allow for residential or mixed-use development.

Development Standards

Development standards can constrain new residential development if the standards make it economically unfeasible or physically impractical to develop a particular lot, or there are not suitable parcels which meet the development criteria for building form, massing, height, and density in a particular zone.

Through its Zoning Code, the City enforces minimum site development standards for new residential uses. Tables C-3 through C-6 summarize the basic standards for the City's zones, including specific plans, that allow residential development.

Table C-3: Development Standards in Zones that Allow Residential Development

Zone		Min. Lot Area	Density	Max. FAR	Min. Setbacks (ft.)			Max. Height	Max. Lot Coverage
					Front	Side	Rear		
Single-Family Residence	R-1	7,260 sq. ft. ¹	N/A	0.35	20	16 (Min of 6 ft. on any one side) Street side: 12	25	One story: 18 ft. Two story: 28 ft.	35%
Limited Two-Family Residence	R-1A	5,500 sq. ft.	N/A	0.35	20	One story: 6 ² Two story: 10 Street side: 12	20	2 stories (28 ft.)	35%
Low Density Multiple-Family Residence Zone	R-2	7,920 sq. ft.	3,960 sq. ft. of lot area per dwelling unit (i.e., 11 units/acre)	N/A	20	Single-story: 5 Two-story: 10; 15 for buildings >28 ft. in height Street side: 12	10 (20 if abutting R-1)	2 stories (35 ft.)	55%
Multiple-Family Residence Zone	R-3	5,000 sq. ft.	1,742 sq. ft. of area per dwelling unit (i.e., 25 units/acre)	N/A	15 ³	10; 15 for buildings >28 ft. in height Street side: 10	10 (20 if abutting R-1) ³	3 stories (35 ft.)	60%
Retail Commercial Zone	C-1	N/A	1,742 sq. ft. per dwelling unit (i.e., 25 units/acre); if abutting R-1, R-2: 3,960 sq. ft. per dwelling unit (i.e., 11 units/acre)	1.0 ⁴	0	Abutting C-1, C-3, M-1: 0 Abutting any other zone: 5	10	3 stories or 45 ft., whichever is lower ⁵	Abutting R-1, R-2: 55% Abutting any other zone: 60%
General Commercial Zone	C-3			1.0 ⁴	0	Abutting C-1, C-3, M-1: 0 Abutting any other zone: 10	Abutting C-1, C-3, M-1: 10 Abutting any other zone: 15		
¹ If a lot in the R-1 Zone has an area of 13,000 sq. ft. or more with adequate provisions for ingress and egress additional one-family dwellings and allowable accessory buildings can be approved through a CUP approval provided, however, the minimum site area shall be 6,500 sq. ft. of lot area for each one-family dwelling.									
² Lots greater than 10,000 sq. ft. and 70 ft. of lot frontage: Additional 1 ft. per 1,000 sq. ft. over 10,000 sq. ft.									
³ Additional 3 ft per story for buildings over 1 story.									
⁴ This FAR applies to mixed-use projects only. Multi-family residential uses shall be a minimum of 25% of the total net lot area, but shall not exceed 50% of the total net lot area (Zoning Code §153.164(C)(3)).									
⁵ This height limit applies to residential mixed-use only; commercial buildings are allowed 5 stories or 70 feet, whichever is lower.									
Source: San Gabriel Zoning Code									

Table C-4: Additional Development Standards

Zone		Min. Dwelling Unit Size (sq. ft.) ¹	Min. Open Space
Single-Family Residence	R-1	1-bed dwelling: 1,000 2-bed dwelling: 1,150 3-bed dwelling: 1,300 4-bed dwelling, 1,450 ²	N/A
Low Density Multiple-Family Residence Zone	R-2	1-bed: 880 1-bed & den or 2-bed: 1,100	500 sq. ft. for each bedroom ³
Multiple-Family Residence Zone	R-3	2-bed & den or 3-bed: 1,320 Bedroom (excl. closets): 125	400 sq. ft. for each bedroom ³
Retail Commercial Zone	C-1	1-bed: 880 2-bed: 1,100	100 sq. ft. per each residential unit; plaza, community garden, or other open space area required for mixed-use developments > 3 acres
General Commercial Zone	C-3	3-bed: 1,320 ⁴	

¹ These standards do not apply to ADUs.

² For each dwelling with more than 4 bedrooms, an additional 150 sq. ft. of floor area per bedroom shall be provided.

³ The Mission District Specific Plan requires 400 sq. ft. of open space for each bedroom in Grapevine Residential (R-2) and 300 sq. ft. for each bedroom in Arroyo Residential (R-3).

⁴ Decreases shall be permitted for units designated for people 62 years or older or lower income households (Zoning Code §153.163(C)(6)).

* The Valley Boulevard Specific Plan includes a 600 sq. ft. minimum unit size for live/work units, and the Mission District Specific Plan includes a 750 sq. ft. minimum unit size for live/work units.

Source: San Gabriel Zoning Code, Mission District Specific Plan, Valley Boulevard Sustainability Plan

Table C-5: Development Standards in Mission District Specific Plan¹

Zone		Min. Lot Area	Density	Max. FAR	Min. Setbacks (ft.)			Max. Height	Max. Lot Coverage
					Front	Side	Rear		
Villa Residential	MDR-1	7,260 sq. ft.	6 units/acre	0.35	20	4 Street side: 8	15	15	35%
Grapevine Residential	MDR-2	10,000 sq. ft.	12 units/acre ² 20 units/acre if lot size is at least 32,670 sq. ft. and lot width is at least 150 ft. ³	N/A	15% of net lot depth	15 ft. or less building height: 5 16-28 ft. building height: 10 Street side: 10	20% of net lot depth	28	55%
Arroyo Residential	MDR-3	10,000 sq. ft.	24 units/acre 40 units/acre if lot size is at least 32,670 sq. ft and lot width is at least 150 ft. ³	N/A	15	24 ft. or less building height: 10 25-36 ft. building height: 15 37-48 ft. building height: 20 Street side: 12	15% of net lot depth	48	60%
Mission District Village	MDV	N/A	N/A	1.0	0	0	10 (abutting non-residential zone)	40	N/A
Garden Mission District	MDG						20 (abutting residential zone)		
The Marketplace	MDC-1						10		
The Mill	MDC-3	N/A	N/A	1.0	10% of net lot depth	0 Street side: 10% of net lot width	10% of net lot depth	40	N/A

¹ Standards for mixed-use identified in zones where residential is only permitted in a mixed-use development.

² If lot width is less than 150 ft., R-2 Zone standards apply (see Table C-3).

³ The higher density for larger lot sizes is intended to encourage lot consolidation.

Source: Mission District Specific Plan

Table C-6: Development Standards in Valley Boulevard Sustainability Plan¹

Zone		Min. Lot Area	Density	Max. FAR	Min. Setbacks (ft.)			Max. Height	Max. Lot Coverage
					Front	Side	Rear		
Mixed-Use Transit Oriented Development	MU-T	22,000 sq. ft.	N/A	3.0	0 ²	0 ³	15 (adjoining residential) 5 (adjoining commercial or office)	5 stories (67 ft) if 50,000+ sq. ft. of retail, 4 stories if <50,000 sq. ft. of retail; 3 stories if adjoining single family	90% (<300 ft. depth) 80% (>300 ft. site depth)
Mixed-Use Corridor	MU-C	22,000 sq. ft.	N/A	2.0	0 ²	0 ³			
Mixed-Use Corridor / Residential	MU-C/R	N/A	20-40 units/acre ⁴	2.0 ⁴	0	Adjoining single family: 8 (4 stories), 10 (5+ stories) Adjoining multi-family: 6 (4 stories), 8 (5+ stories) Adjoining commercial or office: 5	8 (4 stories) 10 (5+ stories)	5 stories (67 ft); 3 stories if adjoining single family	60% ⁵
Multi-Family Residential Corridor	R-C	N/A	20-40 units/acre	N/A	0	Adjoining single family: 8 (4 stories), 10 (5+ stories) Adjoining multi-family: 6 (4 stories), 8 (5+ stories) Adjoining commercial or office: 5		5 stories (67 ft); 3 stories if adjoining single family	60% ⁵
Residential Neighborhood Conservation	R-NC	Refers to Zoning Code							45%

¹ Standards for mixed-use identified in zones where residential is only allowed in a mixed-use development.

² Except for areas used for public outdoor dining/arcade, where the max. setback shall be 10 ft.

³ Except for areas used by adjoining businesses for shared driveway access of a max. of 15 ft. width.

⁴ In MU-C/R, the units per acre standard applies only to 100% residential projects and FAR standard only applies to mixed-use projects.

⁵ Bonus with multiple individual entrances to ground level units. Direct entrance to ground floor units shall mean that the unit has its primary entrance on the exterior of the building, as opposed to being located on a common interior hallway:

- Direct entrance to 40+% of ground floor units = 80% lot coverage.
- Direct entrance to 30–40 % of ground floor units = 75% lot coverage.
- Less than 30% = 60% lot coverage.

Source: Valley Boulevard Sustainability Plan

The basic development standards allow a moderate amount of density and intensity, however, the maximum height for commercial buildings in the C-1 and C-3 zones is two stories/25 feet taller than for mixed-use buildings in the same zones. Allowing mixed-use buildings to have the same maximum height of five stories/70 feet instead of three stories/45 feet could provide opportunities to produce more residential units while adhering to the maximum building height allowed.

The minimum unit size standards could also constrain the number of units produced. Standards for a minimum gross floor area per unit, beyond what the Building Code determines for habitable space, are somewhat unique in comparison to other jurisdictions statewide. While these standards may not have proven to be a constraint on housing development historically based on market demand for larger units, they could potentially constrain housing development of smaller, more affordable units in the future depending on demographic and market trends.

Additionally, the required open space standards are relatively high (e.g., 800 square feet of open space for a two-bedroom unit in the R-3 Zone), which could constrain the amount of developable land per project. Although, the Code allows reductions in required open space, it would require Planning Commission approval (up to 50 percent reduction may be granted at the Planning Commission's discretion) or the City to set up an off-site dedication or an in-lieu fee program (§153.115), limiting the likelihood of reductions to required open space.

Programs are included in the Housing Plan (Section IV) to address these governmental constraints.

Parking Requirements

Tables C-7 and C-8 display the parking rates for residential land uses in the Zoning Code, Mission District Specific Plan, and the Valley Boulevard Sustainability Plan. The parking requirements for the Mission District Specific Plan are identical to the parking requirements in the Zoning Code.

Table C-7: Residential Parking Rates - Zoning Code and Mission District Specific Plan

Residential Use	Required Number of Spaces
Single Family	2 covered parking spaces
Multi-Family	Minimum 2 car garage / unit + 1 guest space for every 3 units
Senior Citizen Housing	0.75 spaces / unit (covered or uncovered)
Live/Work Space	2 spaces / dwelling + 1 space / 750 square feet of office space + 1 guest space for every 3 units
Residential Mixed Use	1 covered space/bedroom + 1 guest space for every 3 units Units designated for Senior Citizens (62 and older) must provide 0.75 spaces per unit, covered or uncovered.

Source: San Gabriel Zoning Code, Mission District Specific Plan

Table C-8: Residential Parking Rates - Valley Boulevard Sustainability Plan

Zone	Required Number of Spaces
Mixed-Use Transit (MU-T)	1 space per unit for 0–1 bedroom
Mixed-Use Corridor (MU-C)	2 spaces per unit for 2+ bedroom (tandem parking allowed for residential uses)
Mixed-Use Corridor/Residential (MU-C/R)	
Multi-Family Residential Corridor (R-C)	1 guest space per 5 units
Residential Neighborhood Conservation (R-NC)	See Table C-7, above.
<i>Source: Valley Boulevard Sustainability Plan</i>	

The Zoning Code’s parking requirements are slightly higher than similar jurisdictions (e.g., guest parking), and covered parking (i.e., garages) is required for multi-family parking spaces. The spaces required and cost associated with providing two spaces in a garage for multi-family units could reduce the number of units that could be built and/or result in higher priced units. Additionally, it could discourage smaller units (e.g., studios and one-bedroom units) as the parking required is the same regardless of unit size. Zoning Code §153.220.H (Parking reduction) provides options to reduce parking requirements by between five and 40 percent (e.g., being proximate to transit, incorporating transportation demand and trip reduction measures, providing shared parking, providing motorcycle or bicycle parking, etc.); however, these parking reductions must be approved by Planning Commission through a conditional use permit process. Therefore, the requirement for the two covered parking spaces for each multi-family unit is considered to be a constraint. Program 26 requires the analysis of both the open space and parking standards to assess their impacts on housing feasibility and modify the standards to facilitate housing production.

Design Standards and Guidelines

Design standards and guidelines are evaluated as they have the potential to increase development costs and extend the permitting process. Zoning Code §153.046 (Architecture) dictates various architecture standards for the R-1 Zone. The section includes some objective standards relating to garage structures, exterior siding, and roofing material. Zoning Code §153.066 (Architectural Design) identifies one architectural-related standard for the R-1A Zone. The Section states, “If an integrated garage is proposed to be located in the front of a house, then the garage portion shall be set back an additional 10 feet from the average front line of the house portion. Lots greater than 10,000 square feet and 70 feet of lot frontage are excluded from this requirement.” This is an objective standard and flexibility is provided for larger lots.

Outside of the Zoning Code, the City has two design guideline manuals related to housing development: Single-Family Residential and Multi-Family Residential. Both documents contain nearly the same set of design principles such as shelter, transition, balance, integrity, detail, substance, etc. that are paired with example images. Each of the design principles is described in very general terms with no specific dimensions for applicants to apply to projects. For example, in the Multi-Family Residential Guidelines, the design principle of balance provides the following,

“Building massing and site design should maintain pleasing proportions, and should balance mass with setback and screening, avoiding monumental symmetry.” Guidelines such as these are subjective, only providing vague direction on building design. The lack of specificity could lead to a protracted approval process and potentially a denial based on guideline interpretation. Senate Bill 330 precludes jurisdictions from denying or reducing the permitted density of a housing development project based on subjective development and design standards.

The Mission District Specific Plan requires architectural treatment to “prevent any negative impacts resulting from building massing from affecting the neighboring single-family homes” and identifies potential mitigation as roof pitch and orientation, window placement, balcony location, and location of second story and theme elements but no standards are provided (Table 4.7 – Standards, A.6). Chapter 7 of the Mission District Specific Plan provides architectural design standards focused on replicating architecture of three distinct periods of San Gabriel’s history: The Spanish Colonial Period, The Mission Revival Period, and the Spanish Colonial Revival Period. Tables with over 20 standards for each period, covering architectural features such as exterior parapet walls, roof configuration, tower domes, and lighting fixtures are included. Many of these are objective standards that could be applied without City discretion; however, the City may consider refinement so all critical standards are described objectively to ensure application to residential projects is consistent with the Housing Accountability Act.

A program to develop objective design standards is included in the Housing Plan (Program 10).

Provisions for a Variety of Housing

The City has adopted provisions in its Zoning Code that facilitate a range of residential development types. Table C-9 provides a list of housing types and the zones in which they are permitted, require a conditional use permit, or are not permitted.

Table C-9: Housing Types Permitted by Zone

Housing Type	Zoning Code						Mission District Specific Plan							Valley Boulevard Specific Plan				
	R-1	R-1A	R-2	R-3	C-1	C-3	MDR-1	MDR-2	MDR-3	MDV	MDG	MDC-1	MDC-3	MU-T	MU-C	MU-C/R	R-C	R-NC
Single Family	P	P	P	P	N/A	N/A	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	Refers to Zoning Code
Accessory Dwelling Units	P	P	P	P	N/A	N/A	P	P	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Manufactured Housing	P	P	P	P	N/A	N/A	P	P	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Multi-Family	N/A	N/A	P ¹	P ¹	N/A	N/A	N/A	P	P	N/A	N/A	N/A	N/A	N/A	N/A	P	P	
Residential Mixed Use	N/A	N/A	N/A	N/A	P ²	C	N/A	N/A	N/A	C	C	C	C	P ³	P ³	P ³	N/A	
Live/Work Space	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	P	N/A	P	P	P ⁴	P ⁴	P ⁴	N/A	
Senior Housing	N/A	N/A	N/A	N/A	N/A	N/A	C	C	C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
SRO developments ⁵	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Residential care facilities housing 6 or fewer persons	N/A	N/A	P	P	N/A	N/A	N/A	P	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Licensed family care homes, foster homes, or group homes serving 6 or fewer individuals	P	P	P	P	N/A	N/A	P	P	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Licensed family care homes, foster homes, or group homes serving 7 or more individuals	C	C	C	C	N/A	N/A	C	C	C	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Nursing care and intermediate care institutions, handicapped or infirm	N/A	N/A	N/A	N/A	C	C	N/A	N/A	N/A	N/A	N/A	C	N/A	N/A	N/A	N/A	N/A	

Table C-9: Housing Types Permitted by Zone

Housing Type	Zoning Code						Mission District Specific Plan							Valley Boulevard Specific Plan				
	R-1	R-1A	R-2	R-3	C-1	C-3	MDR-1	MDR-2	MDR-3	MDV	MDG	MDC-1	MDC-3	MU-T	MU-C	MU-C/R	R-C	R-NC
institutions, child care institutions																		
Transitional and supportive housing	N/A	N/A	N/A	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Emergency shelters	N/A	N/A	N/A	N/A	N/A	P	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
Farmworker Housing ⁶	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	
<p>P = Permitted C = Conditionally Permitted N/A = Not Permitting/Not Specified</p> <p>¹ Includes group dwellings. ² Unless any individual use or single component of the project requires a conditional use permit. ³ Residential uses on second and higher levels. ⁴ At ground level of mixed-use projects and consistent with the development standards of the Specific Plan. ⁵ SROs are allowed by conditional use permit in the M-1 Zone. See section on SROs below. ⁶ See section on Farmworker housing below.</p> <p><i>Source: San Gabriel Zoning Code, Mission District Specific Plan, Valley Boulevard Specific Plan</i></p>																		

Accessory Dwelling Units (ADUs): Zoning Code §153.047 (Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (Junior ADUs)) provides supplemental standards for new ADUs, converted ADUs, and Junior ADUs. These standards were updated in January 2020 to reflect recent state law amendments. Although ADUs must conform to single-family residential design guidelines, which include subjective guidelines (see Design Standards and Guidelines section), the City is facilitating the development of ADUs through a streamlined site plan review process that is consistent with state law. The City is also commissioning the preparation of an ADU Guidebook to help applicants understand ADU/JADU requirements. While ADUs are allowed in all zones where residential is allowed, to provide additional clarity, the City should specify the allowance for ADUs and JADUs in the specific plans where residential, including mixed-use, is allowed. This is included in the ADU program (Program 3).

Manufactured Housing: The City allows manufactured housing in various residential zones (see Table C-9). Specifically, a manufactured home on a foundation is treated as a conventional single-family home consistent with Government Code §65852.3. Therefore, the City is not treating manufactured housing in a manner that is inconsistent with state law.

Single-Room Occupancy (SROs): A Single Room Occupancy (SRO) unit is considered a small, affordable housing unit that can serve as an entry point into the housing market for people who previously experienced homelessness. SROs are allowed in the M-1 (Light Manufacturing) Zone with a conditional use permit. Please see Section C.2.4 (Permit and Procedures) for a discussion of the conditional use permit process and required findings. Zoning Code §153.162(P) provides supplemental standards for SROs, including the following:

- Not located adjacent to the R-1 Zone.
- Not located closer than 300 feet to another SRO.
- SRO units must be efficiency units that may include a complete private bath and kitchen but do not have a separate bedroom. The maximum size for an SRO unit is 500 square feet.
- A minimum lot size of 18,000 square feet and a minimum street frontage of 90 feet are required.
- Not exceed a density of 1,742 square feet of net lot areas for each unit (i.e., 25 units per acre).
- SRO buildings must not occupy more than 60% of the total net lot area.
- Not exceed a maximum height of three stories or 45 feet.
- Have a minimum common open space area of 100 square feet per unit.
- A front yard of not less than 15 feet.
- A side yard of not less than 10 feet.

- A rear yard of not less than 20 feet.
- Average income of residents must not exceed 40 percent of area median income.
- Off-street parking of 0.5 spaces per unit plus one space for on-site management is required.

Certain standards for SROs deviate from typical standards in the M-1 Zone. For example, the M-1 Zone does not have a minimum lot size while SROs are required to have a minimum lot size of 18,000 square feet. Although, SROs may be one story or 10 feet taller than a typical building in the M-1 Zone, SROs must comply with a minimum lot size requirement, slightly larger setbacks, and a building coverage requirement, which would not apply to other developments in the M-1 Zone. The density standard, which is consistent with maximum density in the R-3 Zone, allows 10 units to be built on an 18,000 square foot lot. While most jurisdictions have supplemental development standards for SROs, the minimum lot size and not being allowed adjacent to the R-1 Zone could constrain the development of SROs in San Gabriel. A program will have the City map identifying qualifying parcels for SROs to evaluate sufficiency of these standards and to facilitate the development of SROs.

Emergency Shelters/Low Barrier Navigation Centers: Emergency shelters are allowed as a permitted by-right use without discretionary review in the C-3 Zone (see Table C-9). The C-3 Zone is located along San Gabriel Boulevard and Las Tunas Drive. These areas have the best transit access, specifically San Gabriel Boulevard where the City of Montebello Route 20 bus line provides service with 15-minute headways and connects to the greater transit system. Route 20 bus stops are well-distributed along San Gabriel Boulevard with coverage at all major intersections¹. The San Gabriel Boulevard corridor contains commercial and service uses such as convenience and grocery shopping, a community center, and medical facilities.

Zoning Code §153.162(O) provides supplemental standards for emergency shelters, which include the following:

- Not be located adjacent to the R-1 Zone.
- Located within one-quarter mile of a bus stop.
- Located within a two-mile radius of a hospital.
- The number of beds shall not exceed one per 130 square feet of gross floor area.
- Off-street parking shall be based on demonstrated need, but the City may not require more than one parking space per 200 square feet of gross floor area.

¹ San Gabriel Parks and Open Space Master Plan, August 2018.

- The size and location of exterior and interior on-site waiting and client intake areas shall be subject to the review and approval of the Community Development Department.
- The shelter shall have full-time on-site management.
- The shelter shall be located no closer than 300 feet to another emergency shelter.
- The maximum length of stay of any person shall be six months.
- An exterior lighting plan shall be submitted for the review and approval of the Police Department.
- Security guards, as recommended by the Police Department, shall be provided during the hours that the emergency shelter is open.

The proximity requirement of within one-quarter mile of a bus stop and the prohibition on sites adjacent to the R-1 Zone was evaluated to determine whether adequate sites for emergency shelters were available in San Gabriel. Since bus stops are located at approximately one-quarter mile increments along South San Gabriel Boulevard and Las Tunas Drive, this requirement does not pose a constraint². Also, only a portion of C-3-zoned parcels on the east side of San Gabriel Boulevard between Wells Street and Fairview Avenue are adjacent to the R-1 Zone. Therefore, multiple parcels would meet these criteria and are included in the sites inventory as candidate sites for housing development over the planning period. These parcels include the following:

- 950 S San Gabriel Blvd. (AIN 5372-001-006)
- 802 E Mission Rd. (AIN 5371-001-005)
- 816 E Mission Rd. (AIN 5372-001-003)
- 900 S San Gabriel Blvd. (AIN 5389-001-001)
- 823 S San Gabriel Blvd. (AIN 5368-021-002)
- 717 S San Gabriel Blvd. (AIN 5368-014-024)
- 601 S San Gabriel Blvd. (AIN 5368-013-026)
- 523 S San Gabriel Blvd. (AIN 5368-006-029)
- 424 S San Gabriel Blvd. (AIN 5373-025-022)
- 818 E Broadway (AIN 5373-024-010)

² San Gabriel Parks and Open Space Master Plan, August 2018, Figure 17: Public Transit.

These parcels have existing buildings (e.g., commercial, light industrial) and surface parking that have the potential to be repurposed into emergency shelters (see Appendix B).

According to the 2020 Point-in-Time (PIT) count, there were 11 people experiencing homelessness in San Gabriel (see Appendix A, Figure A-14). The above standards limit one bed to 130 square feet of floor area; therefore 1,430 square feet of floor area could be used to house the 11 people experiencing homelessness. Based on the maximum lot coverage standard (55 to 60 percent), a minimum 2,600 square foot lot would be required. The multiple parcels in the C-3 Zone identified as underutilized and included in the sites inventory are all over 5,000 square feet and could therefore accommodate an emergency shelter with more than sufficient capacity to serve the 11 people experiencing homelessness.

Some of the required standards for emergency shelters are not subjective (i.e., size and location of waiting and intake areas subject to review and approval of Community Development Department; exterior lighting and provision of security guards to be approved by the Police Department). Program 21 has been included for the City to remove or revise these standards so they are objective. The minimum separation requirement of 300 feet is allowed by state law, which prohibits any separate requirement greater than 300 feet (Government Code §65583(a)(4)(A)(v)). Although the standards limit required parking to no more than one space per 200 square feet of gross floor area, which would be at least seven parking spaces for a 1,430 square foot facility, that could result in a higher parking rate than is required for general commercial uses (i.e., one space per 250 or 300 square feet of gross floor area). Program 21 includes that the City revise parking standards to ensure they do not impose more parking than is required for other residential or commercial uses within the same zone and also require sufficient parking for emergency shelter staff (e.g., require one parking space per employee and agency vehicle).

Additionally, the City's Zoning Code does not specifically address Low Barrier Navigation Centers pursuant to AB 101 (Government Code §65660 et seq.). Low Barrier Navigation Centers are Housing First, low-barrier, service-enriched shelters focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing. Low Barrier Navigation Centers must be allowed by-right in all residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multi-family uses. A program is included to address the permitting for Low Barrier Navigation Centers.

Transitional Housing and Supportive Housing: Supportive and transitional housing should be allowed in all zones that allow residential uses and subject to the same development standards that apply to other residential uses of a similar type within these zones. The Zoning Code permits both transitional housing and supportive housing types in the R-3 Zone; however, group homes, licensed family care, and other similar uses are allowed in various other zones (see Table C-9 and Housing for Persons with Disabilities). These uses could be consolidated and clarified through amendments to the Zoning Code and specific plans. Furthermore, supportive housing must be allowed by-right in zones where multi-family and mixed-uses are permitted, including

nonresidential zones that allow multi-family uses if the proposed development meets certain criteria (AB 2162). This would require the City to expand zones where supportive housing is currently allowed (e.g., R-2, C-1 zones, etc.) and is reflected in the housing programs (Program 21).

Farmworker (Employee) Housing: The Zoning Code does not explicitly allow farmworker housing in any zone. The Zoning Code has not been amended to comply with Health and Safety Code §17021.5 and 17021.6. Section 17021.5 generally requires employee housing for six or fewer persons to be treated as a single-family structure and residential use. Section 17021.6 generally requires that employee housing consisting of no more than 36 beds in group quarters designed for use by a single family or household to be treated as an agricultural use. No conditional use permits, zoning variances, or other zoning clearance are to be required. As shown in Table A-10, there are 15 full-time year-round farming, fishing, and forestry occupations in San Gabriel, which presents a low demand for this residential housing type. However, Program 31 has been included for the City to amend the Zoning Code and specific plans to allow employee housing consistent with Health and Safety Code §17021.5 and 17021.6.

Housing for Persons with Disabilities

The Lanterman Developmental Disabilities Services Act (Sections 5115 and 5116) of the California Welfare and Institutions Code declares that mentally and physically disabled persons are entitled to live in normal residential surroundings. This classification includes facilities that are licensed by the State of California to provide permanent living accommodations and 24 hour primarily non-medical care and supervision for persons in need of personal services, supervision, protection, or assistance for sustaining the activities of daily living. It includes hospices, nursing homes, convalescent facilities, and group homes for minors, persons with disabilities, and people in recovery from alcohol or drug addictions. The use of property as a licensed residential care facility for the care of six or fewer persons must be considered a residential use that is permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes than otherwise required for homes in the same district.

As shown in Table C-9, different categories of facilities (i.e., six or fewer persons and seven or more persons) are permitted in various zones throughout the city. As discussed under Transitional Housing and Supportive Housing, these uses could be consolidated and clarified through amendments to the Zoning Code and specific plans. Additionally, §153.240.D (Licensed family care homes) under Conditional Use Permits stipulates that a conditional use permit is required for a licensed family care home, foster home, or group home serving six or fewer people; this is inconsistent with Table C-9 and should be removed from the Zoning Code; this is included in the program for transitional and supportive housing (Program 21). Furthermore, the Valley Boulevard Specific Plan should be amended to allow small family care homes as permitted in the MU-C/R and R-C zones where multi-family is permitted by right, and the Zoning Code should be amended to allow large family care homes by right where multi-family is allowed by right instead of requiring a Conditional Use Permit or not being allowed (i.e., R-2, R-3, MDR-2, MDR-3, MU-C/R, and R-C

zones). Otherwise, these uses would be treated differently from similar residential uses in those zones and considered to be a constraint on the development of housing for persons with disabilities. Program 21 includes these amendments.

The Zoning Code does not include any spacing or separation requirements between housing for persons with disabilities. Also, the Zoning Code defines “family” as “a single residential unit or a person or group of persons living together as a domestic unit in a single residential unit.” This definition poses no constraints to housing for persons with disabilities.

Persons with disabilities normally have certain housing needs that include accessibility of dwelling units, access to transportation, employment, and commercial services; and alternative living arrangements that include on-site or nearby supportive services. San Gabriel ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility.

Reasonable Accommodation

Zoning Code §153.484 – 153.490 establish a formal procedure for individuals with disabilities seeking equal access to housing to request a reasonable accommodation as provided by fair housing law and establish criteria to be used when considering such requests. The Code allows a reasonable accommodations request to be made by any person with a disability, their representative, or any entity, when the application of a zoning law or other land use regulation, policy, or practice acts as a barrier to fair housing opportunities. The following are the required findings for a reasonable accommodation request:

- The subject housing will be used by a person with a disability.
- The request is necessary to make specific housing available to a person with a disability.
- The requested reasonable accommodation would not impose an undue financial or administrative burden on the City.
- The reasonable accommodation would not require a fundamental alteration in the nature of a City program or law, including but not limited to land use and zoning.
- The impact on surrounding uses does not negatively impact the public health, safety, and welfare.
- The physical attributes of and any proposed changes to the subject property and structures are necessary and appropriate.
- There are no alternative reasonable accommodations which may provide an equivalent level of benefit and greater adherence to the Code.
- The reasonable accommodation would not result in a concentration of uses not otherwise allowed in a residential neighborhood, to the detriment of the residential character of that neighborhood.

To streamline reasonable accommodation reviews, the last four findings should be consolidated and revised to reduce subjectivity and reference to standards not applicable to reasonable accommodations. This would eliminate the last finding as the City does not have any concentration standard applicable to housing for persons with disabilities. The updated finding language could read: *“The reasonable accommodation is the minimum departure from the requirements of this Zoning Code necessary, consistent with the findings above”*. The program addressing reasonable accommodation includes incorporated amendments to streamline the findings and eliminate reference to concentration of use standard(s) that are not applicable to reasonable accommodations (Program 39).

Incentives for Affordable Housing

Zoning Code §153.450 – 153.462 cover the City’s density bonus provisions and incentives for very low income, low income, moderate income, and senior housing, which were adopted in 2006. There have been substantial changes to State density bonus laws since 2006 (e.g., allowance for up to 50 percent density bonus (AB 2345)); therefore, these sections should be updated to come into conformance with current state law. The City has an executed contract for a consultant to update the City’s density bonus provisions, and this work is expected to begin in 2021.

Other Local Ordinances

The City does not have other ordinances, such as an inclusionary housing ordinance, short-term rental ordinance, or growth control ordinance or other growth control measures, that directly impact the cost and supply of residential development. A program is included for the City to adopt an inclusionary housing ordinance after appropriate analysis is conducted (Program 16).

C.2.3 Building and Housing Codes and Enforcement

The City adopted the 2019 California Building Code (CBC) with minor amendments relating to invalidating permits if site work has not commenced within 180 days, plan review fees being paid at the time of submission, construction fencing standards, and swimming pool enclosures and safety devices.

The City’s Neighborhood Improvement Services Division is responsible for code enforcement. The Division ensures that properties within the city comply with all municipal, zoning, and building codes as well as assist with health and safety issues. The Division incorporates traditional code enforcement with community education and empowerment. Proactive measures, such as drive-by inspections occur equitably based on the City’s knowledge of housing structures or properties most in need of repair. Code enforcement is also conducted on a complaint-driven basis. These approaches are supplemented with other efforts such as tree planting, cleanup programs, and educational outreach to increase the effectiveness of improving housing in San Gabriel.

C.2.4 Permits and Procedures

The time required to process a project varies greatly from one entitlement to another and is directly related to the size and complexity of the proposal, as well as the number of actions or approvals needed to complete the process. Table C-10 identifies approvals and/or permits that could be required for planning entitlements along with their corresponding approval body. It should be noted that each project would not have to obtain each permit/approval (e.g., small scale projects consistent with General Plan and zoning standards do not require General Plan Amendments, Zone Changes, or Variances).

Table C-10: Permit/Procedure and Approval Authority

Permit/Approval Type	Approval Authority
Site Plan Review	Community Development Director (Design Review Commission if needed)
Precise Plan of Design	City Staff (Design Review Commission if needed)
Minor Modification	Community Development Director
Conditional Use Permit	Planning Commission
Variance	Planning Commission
Zone Change	City Council
General Plan Amendment	City Council
Source: San Gabriel Zoning Code	

Table C-11: Estimated Approval Timelines

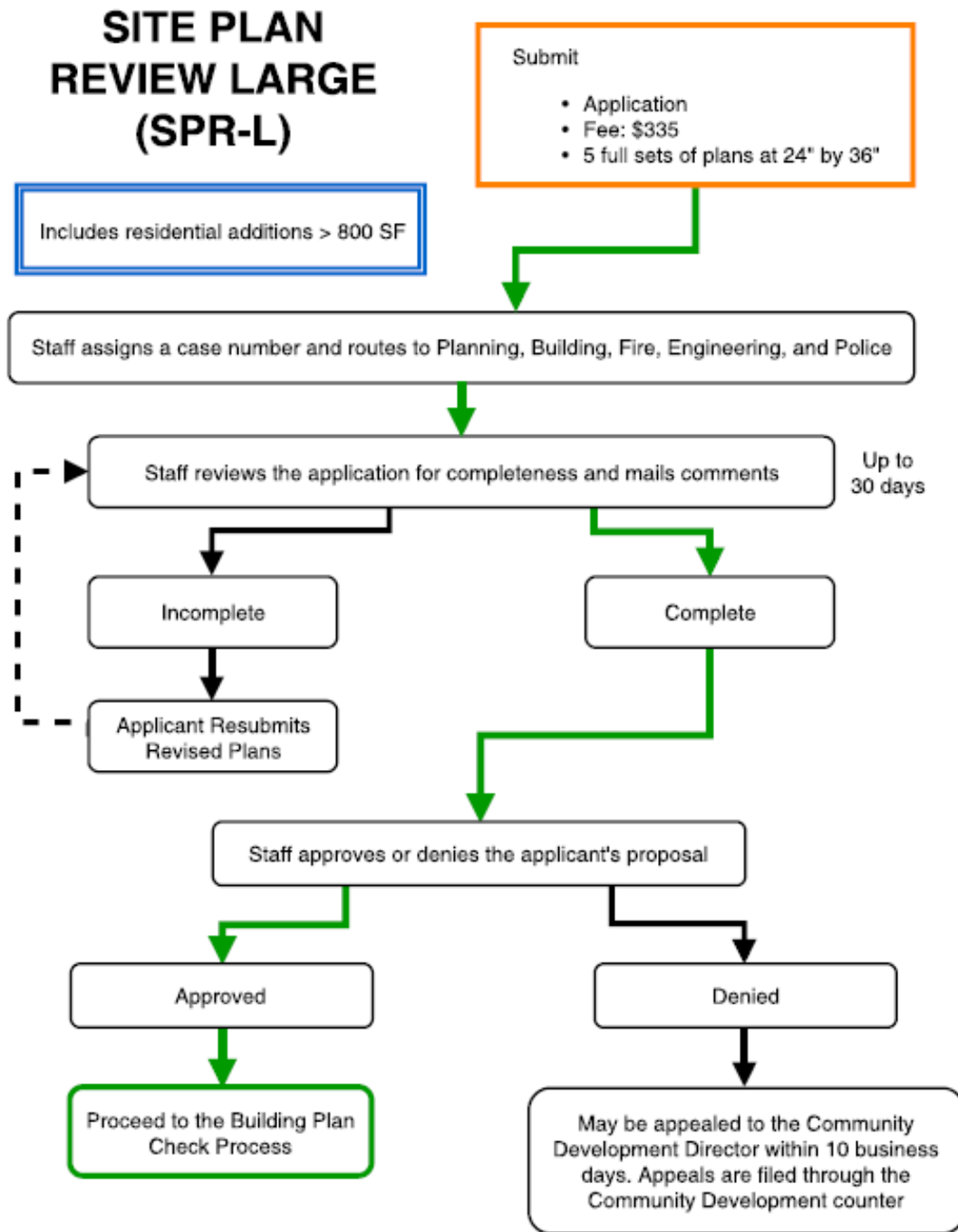
Permit/Approval Type	Estimated Approval Timelines
Site Plan Review	90-120 days*
Design Review – Staff (Single-Family and Multi-Family <5 units)	30-60 days
Design Review – Design Review Commission (Multi-Family 5+ units)	1 month after deemed complete; 6 months from date of submittal
Conditional Use Permit	1 month after deemed complete; 6 months from date of submittal
Residential Plan Check	30 days
* ADUs are processed in accordance with State-mandated timeframes. New single-family homes require Design Review Commission approval. Source: City of San Gabriel	

Additionally, the time lapse between project approval and building permit issuance varies. However, recently the City has been observing a lapse of approximately two to three months between project approval and building permit issuance for multi-family and mixed-use projects; however, more complex projects may take a longer period to prepare full construction set of plans. For example, a multi-family project at 144 St. Francis Street was approved on June 24, 2019, and the building permit submittal was on August 26, 2019. A mixed-use project at 850-860 E. Valley

Boulevard with 49 residential units was approved on January 23, 2017, and the building permit submittal was on October 24, 2017.

Site Plan Review: Site Plan Review applies to residential additions, ADUs, and new single-family residences in the R-1 Zone. Consistent with the City's 2020 ADU Ordinance and state law, applications for ADUs shall be considered and approved ministerially without discretionary review or hearing, and the City will act on the application within 60 days from the date receives a complete application if there is an existing dwelling on the lot (Zoning Code §153.047(W)). The process for site plan review is shown in Figure C-1, except that new single-family homes require Design Review Commission approval. As noted in Table C-11, the estimated approval time for site plan review is 90 to 120 days, but ADUs are processed in accordance with State-mandated timeframes. The required site plan review findings are the same as those required for design review approval (see discussion under Design Review, below).

Figure C-1: Site Plan Review Process



Source: City of San Gabriel

Design Review: Design Review applies to new single-family residences not in the R-1 Zone and multi-family and mixed-use developments. Zoning Code §153.350 – 153.358 establish the purpose, applicability, criteria, and process for design review. Similar to design review procedures in other nearby jurisdictions, the intent is to ensure the implementation of urban design policies and principles consistent with the General Plan, promote the highest quality of architectural design for the public benefit and improvement of the community environment, and ensure consistent application of the City’s design guidelines. The Code dictates thresholds of design review, either by the Community Development Director or the Design Review Commission, as summarized below.

Community Development Director:

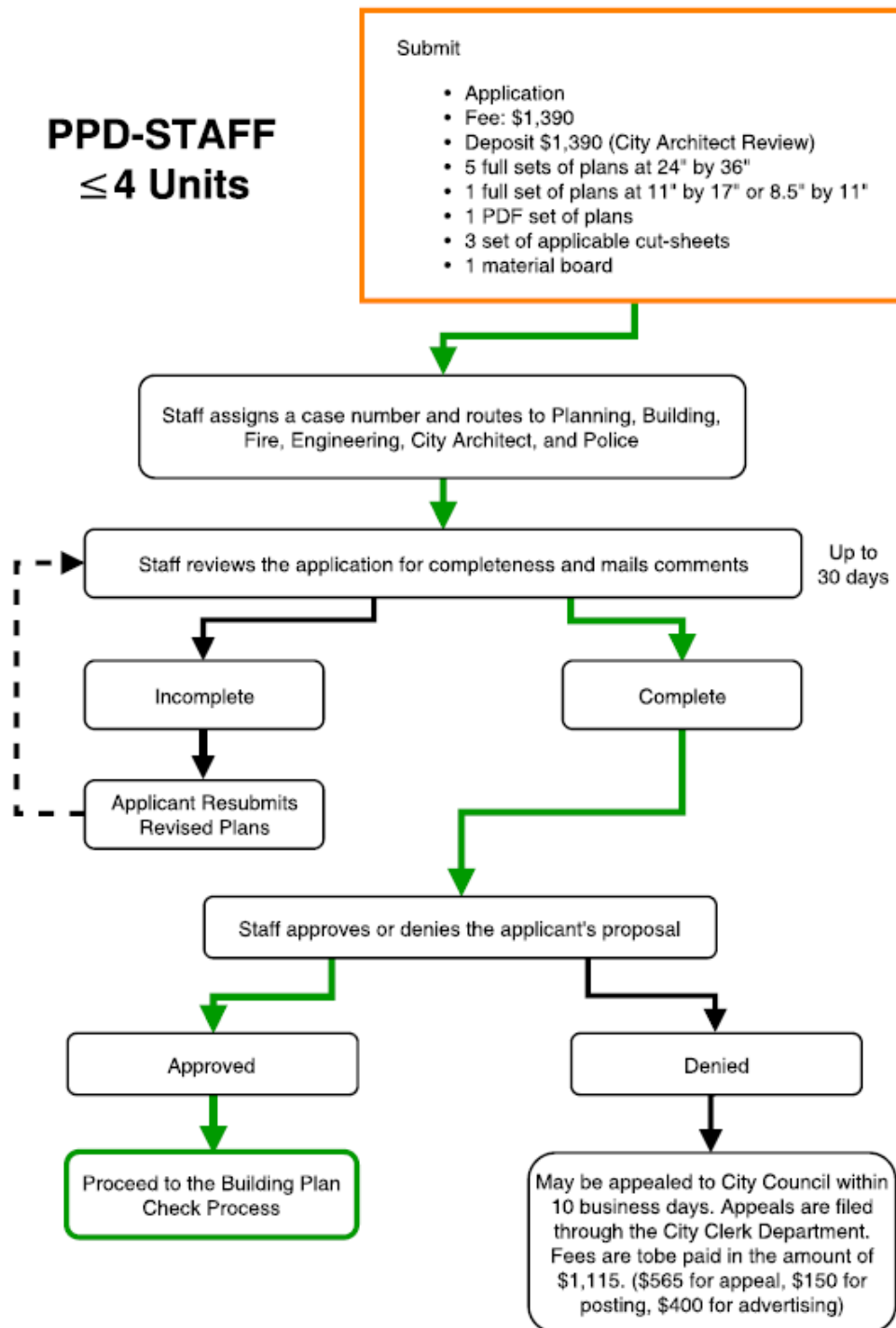
- Additions to rear of property or façade changes/additions that create visual impacts from the public right-of-way in R-1 Zone.
- Accessory dwelling units.
- Single family projects, not in the R-1 Zone.
- Multi-family projects of four or fewer units.

Design Review Commission (DRC):

- New second stories in the R-1 Zone.
- New single-family homes in the R-1 Zone.
- Multi-family projects of five or more units.

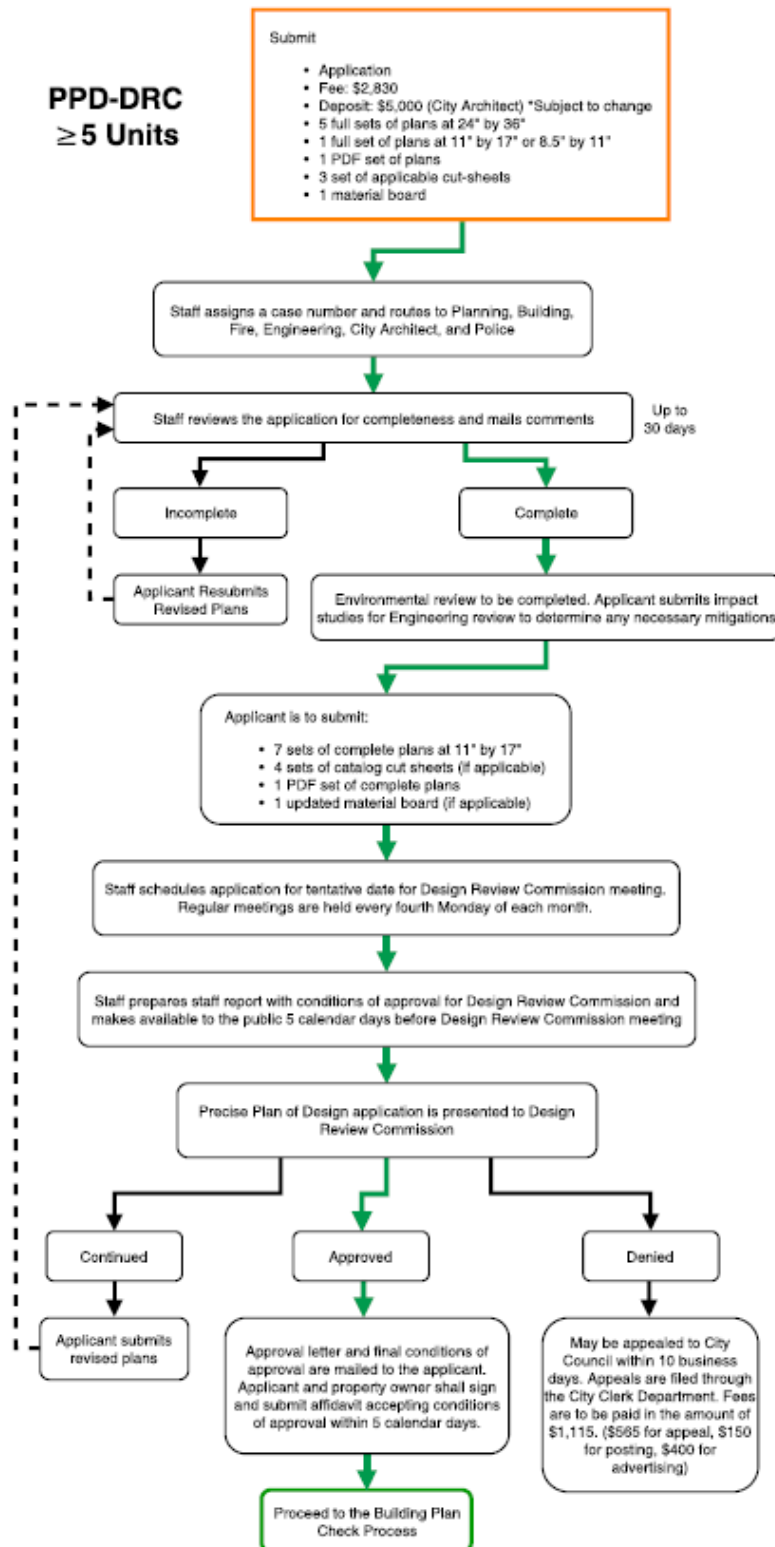
The design review processes for both Community Development Director (i.e., staff) and DRC approvals are shown in Figures C-2 and C-3. The processes are typical with a 30-day completeness review followed by any required environmental review and then action by the review authority. Design review applications only require one hearing. As noted in Table C-11, the estimated approval time is 30 to 60 days for staff-level design review and one month after deemed complete or six months from submittal for DRC-level design review.

Figure C-2: Design Review Process – Staff Approval



Source: City of San Gabriel

Figure C-3: Site Plan Review Process – DRC Approval



Source: City of San Gabriel

The evaluation criteria or required findings for design review approval include some subjective criteria, including the following (Zoning Code §153.355):

- Are architecturally harmonious, consistent with the scale and impact of similarly sited properties in the same neighborhood and zoning classification, and carry out the intent of the City's design guidelines.
- Provide a degree of amenity characterized by generous landscaping of open spaces and parking lots consistent with the City design guidelines...
- Provide proper transition between the subject parcels and adjoining properties, including proper streetscape, architectural scale, massing, proportion and harmony; landscape palette, sound and vibration control, buffering, private protections...

As discussed in the analysis of City design standards and guidelines, subjective findings could lead to a protracted review process and potentially a denial based on interpretation. Senate Bills 35 (Streamlined Approval Process) and 330 (Housing Accountability Act) limit the applicability of subjective standards and findings to housing developments. While the processes and timelines are not considered a constraint, subjective evaluation criteria could pose a constraint during the entitlement process. Program 10 is included for the City to develop objective design standards and amend the design review evaluation criteria across the Zoning Code, specific plans, and design guidelines to ensure only objective findings are applicable to housing developments consistent with state law.

Conditional Use Permit: Zoning Code §153.240 – 153.248 establish the applicability and process for conditional use permits (CUPs). The Planning Commission must review all CUPs at a public hearing. An approved CUP may also have conditions imposed at the discretion of the Planning Commission and must meet typical findings, such as consistency with the General Plan, adequate street access, and not detrimental to the public health, safety, and welfare. No CUP is required for multi-family residential uses. As discussed under Housing for Persons with Disabilities, Code §153.240.D should be deleted as it is inconsistent with allowed uses.

Minor Modifications: Zoning Code §153.440 – 153.447 establish the process to apply for a modification to certain development standards. The Community Development Director has the authority to approve minor modifications, which allow deviations to the following standards:

- Rear yard, side yard, lot coverage, floor area ratio, driveway, or parking stall size up to 20 percent (limited to 10 percent in the R-1 Zone).
- Fence, wall, hedge, sign, swimming pool, and storage regulations up to 20 percent.
- Reduction of other than ADA-required accessible parking by two spaces, but not above 10 percent of the total parking requirement. Not to be used to reduce the number of spaces required when new buildings or new parking areas are being constructed.

The City requires the applicant to submit written consent to the modification from all property owners abutting the property and within 65 feet of the property, or a statement indicating which property owners refused to provide such consent. This is not a typical requirement for minor modifications; alternatively, the City could reduce the applicant's burden by conducting the noticing and holding a hearing if requested by any noticed property owner. Additionally, the City may consider allowing minor modifications to apply to any measurable standard to provide further flexibility to facilitate housing. A program addressing amendments to minor modifications is included in the Housing Plan (Section IV).

SB 35 Processing: The City does not have a process specific to SB 35 but would process such requests in compliance with state law and HCD guidelines. A program has been included for the City to prepare an SB 35 eligibility checklist and form identifying submittal requirements consistent with state law.

Permit and Development Fees

The City's permit and development fees are available on the City's website consistent with Government Code §65940.1(a)(1)(A).

Table C-12 details the City's Planning Fees, and Table C-13 lists the City's Impact Fees.

Table C-12: Planning Fees

Service/Permit Type	Fee Amount
Conditional Use Permit	\$3,219
Density Bonus Application	\$1,865 + deposit fee for monitoring + actual cost for consultant fees (City Attorney, Economic Consultant, etc.)
CEQA Exemption	\$85
CEQA Negative Declaration	Deposit fee + outside costs
CEQA Staff Review of EIR	Deposit fee + outside costs
Minor Modifications	\$1,180
Pre-Application Review	\$1,550
Precise Plan of Design (Staff Initial Review)	\$1,835 + \$5,000 deposit
Precise Plan of Design (Staff Revised Application)	\$1,468
Precise Plan of Design (DR Commission Initial Review)	\$3,980 + \$5,000 initial deposit
Precise Plan of Design (DR Commission Revised Application)	\$3,184
Site Plan Review (Staff Review)	\$987
Site Plan Review (DRC Review)	\$1,223 + \$5,000 initial deposit
Variance	\$3,362
<i>Source: City of San Gabriel, Planning and Zoning Fees, July 2021</i>	

Table C-13: Impact Fees

Impact Type	Fee Amount ¹
Police Facility	\$994.46
Fire Facility	\$299.62
Open Space	\$3,735.99
Traffic	
New Residence in R-1	\$3,031.70
New Residence in R-2	\$2,425.36
New Residence in R-3	\$1,819.02
2 nd Unit	\$1,819.02
Senior Unit	\$1,212.67
Sewer	
R-1 (Single-Family Residence)	\$5,236.65
R-2 (Low Density Multi-Family)	\$2,620.03
R-3 (Multi-Family Residential)	\$1,745.91
2 nd Unit (1/2 of R-2)	\$1,311.78
Senior Unit (1/2 of R-3)	\$874.13
¹ All fees are charged on a per unit basis.	
<i>Source: City of San Gabriel, Impact Fee Schedule, Effective August 1, 2021</i>	

Table C-14: Impact Fees for Single-Family and Multi-Family Housing

	Single-Family (R-1)	Multi-Family (R-2, two units)	Multi-Family (R-3, three units)	Senior Housing (R-3, 3 units)
Total Impact Fees	\$13,298.42	\$20,150.92	\$25,785.00	\$21,350.61
Per Unit Impact Fees	\$13,298.42	\$10,075.46	\$8,595.00	\$7,116.87

Source: City of San Gabriel, Impact Fee Schedule, Effective August 1, 2021

Table C-14 shows that multi-family units have lower fees on a per unit basis compared to single-family units with senior housing impact fees being the lowest. Therefore, impact fees do not present a constraint to the development of housing.

C.2.5 On and Off-site Improvements

Sections 152.25 – 152.28, within Chapter 152: Subdivision Regulations, cover various required improvements for subdivisions. The required improvements include:

- Size of lots must conform to the Zoning Code requirements. Every lot hereafter created, established, or altered in the R-1, R-1A, R-2, and R-3 zones shall have a width of not less than 50 feet at the front setback line.
- The width, grade, and location of streets and alleys must conform with other established or dedicated streets and alleys and with any applicable City or County Street Master Plan.
- Public utilities, fire hydrants, sewers, drainageways, and easements shall be properly located and provided.
- Street trees shall be located and of a type approved by the Community Development Director.

All sidewalks, curbs, gutters, pavement, streetlights, drainage structures, sanitary sewers, public utilities, and laterals to the property line are required to be constructed at the expense of the subdivider. The required improvements are typical for new, residential development. However, development in San Gabriel is infill on existing (consolidated) lots. Consequently, streets have already been constructed to the maximum widths and there are existing curbs and gutter, in locations where housing sites are identified (Appendix B). Additionally, the City offers a waiver from the undergrounding of utilities if a proven hardship prevents the undergrounding.

Section C.3 Non-Governmental Constraints

Market factors over which a local government has only limited ability to control can influence the jurisdiction's capacity to develop more housing. These market-related constraints include land cost, construction cost, and the availability of financing. An assessment of these non-governmental constraints can inform the development of potential actions that can ameliorate its impact.

C.3.1 Housing Supply/Conditions

Market Overview: For-Sale

As shown in the Needs Assessment (Appendix A, Figure A-23), the financial crisis of 2007/2008 and the ensuing Great Recession caused home values in San Gabriel to drop 19 percent from 2007 to 2009. San Gabriel home values have since rebounded past their pre-Recession levels. As of 2018, the median sales value for a single-family home in San Gabriel was \$745,000, compared to \$500,000 in 2008 (49 percent increase). Though similar in level to the SCAG region through 2007, San Gabriel's home sale price remained more resilient throughout the Recession period. Home sales price in the SCAG region, however, dropped 46 percent between 2007 and 2009 but has since trended similarly to San Gabriel.

Since the beginning of the recovery from the Great Recession in 2013, interest rates have been maintained at low levels of 3.5 to 4.5 percent. Due to the COVID-19 pandemic, however, national 30-year mortgage rates have dropped to historically low levels, declining to 2.7 percent in late 2020. When interest rates are low, capital investment and housing production generally increase, and more people are likely to take out a mortgage than when interest rates are higher. In addition, consumers are able to borrow more money for the same monthly payment. Extremely low interest rates are one of the factors that has led to overall increased home values in San Gabriel above what has been seen in the past several years. Coupled with the general desire during the pandemic to move from denser to more spacious neighborhoods, the housing market will likely continue to be competitive in the near future.

Market Overview: Rental

As shown in the Needs Assessment (Appendix A, Figure A-24), San Gabriel rents are similar to rents in Los Angeles County. The median rent paid in San Gabriel in 2019 was \$1,486. Over the past 10 years, rents in San Gabriel have increased 25 percent while rents in Los Angeles County have increased 31 percent.

Per the Needs Assessment (Appendix A, Figure 27), the most common rent category across all San Gabriel renters is \$1,000 to \$1,500 per month, which represents 45.2 percent of renters. Rent categories range from less than \$500 per month (1.8 percent of San Gabriel renters) to more than \$2,000 per month (15.1 percent of San Gabriel renters). While lower-income households spend a larger proportion of their income on rent, they generally spend less on rent overall.

C.3.2 Development Costs

Land Costs

Due to the lack of vacant property in the city, a residual land value analysis was used to estimate the price of land in San Gabriel. The analysis used comparables recently sold within the past year (2020 and 2021). Individual lots ranged from \$13 to \$35 per square foot, or about \$585,000 to \$1,511,000 per acre. Lot sizes ranged from approximately 6,500 to 16,700 square feet. Residential multi-family land in the city is estimated to cost an average of \$24 per square foot or about \$1,033,000 per acre.

Though there was some raw land sale activity in San Gabriel, the city is generally built out. The lack of available land in San Gabriel is considered a constraint to development, as housing production will most likely occur on more expensive opportunity sites for redevelopment. A developer will need to pay for the existing on-site improvement before demolishing it, resulting in a cost premium over vacant land. In addition, sites with existing uses will most likely incur more costs due to the removal of the on-site structures.

Construction Costs

According to a March 2020 report published by the Turner Center for Housing Innovation at UC Berkeley, construction costs for multi-family housing in California have climbed 25 percent between 2009 and 2018. This increase is in part due to the higher cost of building materials, such as wood, concrete, and steel, as well as prevailing wage requirements. According to RSMeans, construction costs (including materials and labor but excluding soft costs such as fees) for a small apartment complex in the San Gabriel area ranged between \$146 to \$172 per square foot in 2020. Construction costs can vary depending on the type of development, ranging from more expensive steel-frame Type I construction to more affordable wood-frame Type V. Due to the smaller scale, single family homes tend to be more expensive to construct on a per square foot basis than multi-family. This cost can fluctuate depending on the type and quality of amenities to the property, such as expensive interior finishes, fireplace, swimming pool, etc.

Soft costs are the costs that are not directly incurred by the physical construction of the development. These costs include services for architectural, consultant, and legal services, as well as permitting requirements and impact fees. They generally range from 15 to 30 percent of total development costs but can fluctuate depending on local fees and exactions. Please refer to the Permit and Development Fees section, above, for a discussion of the City's required permit and development fees.

C.3.3 Availability of Financing

The availability of financing can impact rates of homeownership. The ability to secure financing can be influenced by several factors, including creditworthiness, debt-to-income ratio, and the restrictiveness of mortgage lending standards. Reviewing data collected through the Home Mortgage Disclosure Act (HMDA) can reveal the role the lending market has had on local home sales. Home purchase loans in 2019 are summarized in the table below.

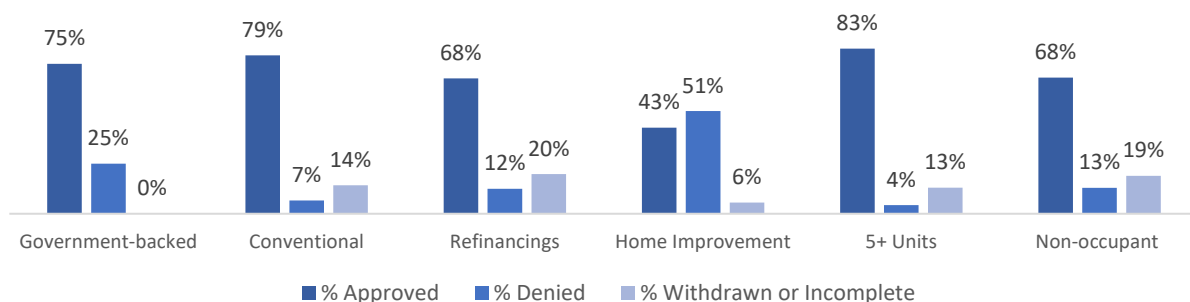
Almost all traditional home loan applications (between government-backed and conventional) in 2019 were for conventional loans, for a total of 201 home loan applications across both types. This disparity could be driven from high home values in San Gabriel as government-backed loan programs typically have a maximum loan amount. The approval rate for conventional loans was 79 percent.

In competitive housing environments when purchasing a new home may be out of reach for some, home renovations can be a desirable and more affordable way to add value to property. There were 72 home improvement applications in 2019. The approval rate for these types of applications was only 43 percent.

Table C-15: Total Home Loan Applications

Type	Total Applications
Government-backed	4
Conventional	197
Refinancing	529
Home Improvement	72
5+ Units	23
Non-occupant	116
Source: HMDA, 2019	

Figure C-4: Home Loan Application Disposition



Source: HMDA, 2019

C.3.4 Summary

Economic conditions in San Gabriel suggest a fairly competitive housing market. Residential developments can garner higher home sale prices than across SCAG region, though rental prices are similar to that of the County. As such, San Gabriel has market conditions that favor the development of for-sale housing. Rental housing projects would need to meet return metrics in order to be considered viable. Due to high housing demand, however, San Gabriel is generally built out, so future housing development will be redevelopment projects that require demolishing existing structures, improvements, and uses. The lack of available vacant land may constrain housing production due to the increase costs associated with redevelopment.

Section C.4 Environmental and Infrastructure Constraints

C.4.1 Environmental Constraints

San Gabriel is a fully urbanized community on a gently sloping valley floor without significant open space resources. Two existing watercourses, the Alhambra Wash and the Rubio Wash, cross the city. Each has been placed in a box culvert as the result of flood control improvements of the 1930s and 1940s.

Historical and Archeological Resources

San Gabriel is the site of one of the original 21 missions in Father Junipero Serra's chain of California missions. Before the Spanish settled in the area, it was the site of a Native American settlement. As a result, excavation in the City may uncover artifacts from these previous settlements, particularly near the Mission and along the Alhambra Wash. If such a find were to occur, it could cause significant delays in construction.

C.4.2 Infrastructure Constraints

Streets and Circulation

San Gabriel's street system was originally designed for low-density development. However, traffic conflicts in the Mission District exist where streets are narrow and radiate out from the Mission rather than following the grid pattern prevalent further north and south of the City. There was also a significant traffic conflict with a freight train rail line that crossed the middle of the city from east to west at grade. These traffic conflicts have been eliminated by the Alameda Corridor-East transportation and infrastructure project which was completed in 2018 and relocated the rail line in a depressed trench.

With the adoption of San Gabriel's revised General Plan in 2004, the City established its commitment to require better quality design, more walkable and attractive streets, and more pedestrian friendly neighborhoods. Since the General Plan was adopted, the Mission District Specific Plan and the Valley Vision Neighborhood Sustainability Plan have been created to implement that vision. Each of the plans require developers to provide certain streetscape amenities (e.g., landscaping, hardscape, lighting, street furniture, etc.) to create a distinctive sense of place and a more walkable environment. The Valley Boulevard Specific Plan also provides for the incorporation of traffic calming strategies into the design of pedestrian and streetscape improvements. The adopted standards ensure that developers can quickly identify and meet the City's expectations without exhausting time with submittal of multiple design proposals. Lastly, the City charges traffic impact fees based on trips generated by the project (see Permit and Development Fees section, above).

As San Gabriel is generally a built-out city, housing developments on sites identified in the sites inventory (Appendix B) would not require expansion or improvement of existing street or circulation facilities as the traffic impact fee would address any such. Furthermore, a program for infrastructure grants is included to help fund necessary street system improvements without placing a higher cost burden on residential development through traffic impact fees.

Water

In San Gabriel, water services are provided by five water agencies; however, most water service is provided by the San Gabriel County Water District (SGCWD). The SGCWD's Draft 2020 Urban Water Management Plan analyzes the projected water demand in five-year increments over the next 25 years. Projected water demands for lower income households are included in these projected water demands. The analysis found that SGCWD will be able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive drought period. Therefore, housing developments on sites identified in the sites inventory (Appendix B) would not require expansion or improvement of existing water facilities.

Sewer

The City prepared a comprehensive study of the public sewer system in 2009. The City's sewer collection system is made up of a network gravity system that consists of approximately 72 miles of pipes and 1,380 manholes. According to the 2009 Sewer Master Plan, the City has capacity deficiencies in the existing sewer system that would occur based on growth assumptions in the City's General Plan. A new Sewer Master Plan will be completed in 2021.

The City currently collects a Sewer Connection Fee for new connections to the system, a Sewer Impact Fee, and an annual Sewer User Fee. The Impact Fee is collected for new developments based on the proposed developments share of upgrading the deficient downstream system that it discharges to. See the Permit and Development Fees section, above, for itemized impact fees. Housing developments on sites identified in the sites inventory (Appendix B) would not require expansion or improvement of existing sewer facilities as the Sewer Connection Fee would address any such expansions or improvements. Furthermore, a program for infrastructure grants is included to help fund necessary sewer system improvements without placing a higher cost burden on residential development through the Sewer Connection Fee.

Noise

The major noise sources in the City are the San Bernardino (I-10) Freeway, the railroad, and the major arterial streets (i.e., San Gabriel Boulevard, Del Mar Avenue, Las Tunas Drive, and Valley Boulevard). Commercial and industrial uses line the arterial streets and most of the railroad tracks. However, some residential neighborhoods abutting the railroad right-of-way have no sound attenuation barriers. The Alameda Corridor-East project has resulted in noticeable reduction in noise levels as the project involved grade separations (i.e., lowering of the railroad tracks). The freeway also impacts residential areas immediately adjacent to it, although this impact has been mitigated to some extent by the sound walls erected by State Department of Transportation

(CalTrans). If new homes in multi-family zones (R-2 and R-3) are proposed within 1,000 feet of the I-10 freeway, within 500 feet of any rail line, and within 200 feet of any arterial street, the applicant is required to submit an acoustical analysis to the City. The acoustical analysis must identify any methods necessary to ensure noise within interior living spaces is no more than 45 decibels (Zoning Code §153.090, 153.110, and 153.117(H)(1)). Furthermore, the Mission District Specific Plan includes noise mitigation measures to reduce noise impacts (e.g., paying fair share project costs for noise attenuation measures to existing sensitive receptors); however, long-term noise impacts are still identified as significant and unavoidable with mitigation.

Appendix D: Existing Programs Review

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Section D.1 Existing Housing Programs Review

This Appendix documents the implementation status of the current Housing Element programs. The main purpose is to evaluate which programs were successful and should be continued, and which programs were ineffective and should be eliminated or modified.



Many of the City's current Housing Element programs were successfully completed or include effective ongoing City efforts. These programs have facilitated housing such as Accessory Dwelling Units (ADUs) that provide housing options for special needs populations, like the elderly, and multigenerational households. Lot consolidations incentives and mixed-use zoning standards have resulted in higher density developments, especially in the Valley Boulevard Specific Plan area. The City has also continued to promote available Los Angeles County Development Authority (LACDA) housing programs and resources to the community.

Therefore, almost all existing programs are recommended to be continued with some modifications to improve effectiveness based on the housing needs assessment (Appendix A), housing constraints analysis (Appendix C), and/or reflect state law or other programmatic changes since the last Housing Element adoption. The only program recommended to be deleted is the Housing Summit Program (existing Program 5), which is replaced with a more cost-effective housing developer outreach program. Please see Table D-1 for the analysis of existing programs.

Table D-1: Existing Housing Element Programs Review

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
Program Category 1: Provision of a Broad Range of Housing Types					
1. Senior Housing Units and Second Units	<p>A senior housing unit is an accessory dwelling unit not exceeding 640 square feet that is attached or detached from the primary residence on a parcel zoned for residential use. The unit may contain a kitchen or kitchen facilities and is intended for the sole occupancy of one or two adults. The primary occupant must be 62 years of age or older. Senior housing units are permitted on all residentially zoned properties, subject to the approval of a CUP. Nine senior housing units have been approved since 1996.</p> <p>Second units are defined as detached or attached dwelling units which provide complete independent living facilities for one or more persons. Second units are permitted on any residentially zoned property that has a minimum lot size of 7,260 square feet. Approximately 32 second units have been approved since these code revisions were adopted, or approximately three per year.</p> <p>Given the scarcity of developable land remaining in San Gabriel, integrating senior housing units and second units in existing residential neighborhoods is a means for the City to accommodate additional affordable rental housing. The development of senior and second units is effective in dispersing affordable housing throughout the City. Senior housing and second units are particularly effective in addressing the needs of extremely-low-income households since these units may be occupied by extended family members with no rent charged or may be rented at a rate affordable to extremely-low-income households due to their small size. To</p>	<p>The City will continue to implement the program. To publicize and promote the program, the City will inform residents via the City's website, newsletter, and cable television channel. Based on past trends and expanded promotion efforts, the City anticipates developing about 24 senior or second units over the eight-year planning period.</p>	San Gabriel Community Development Department	<p>The City deleted its second units regulations and replaced them with an ADU ordinance in compliance with state law in January 2020. Senior housing unit requirements were also removed and are now encompassed by ADU consistent with state law. Since 2018, the City has received about 58 ADU applications per year.</p> <p>Information is made available through zoning handouts for single family zoned properties. The City continues to approve senior units and second units. Information is also available through the City's website.</p>	Modify: City to continue publicizing and promoting ADUs and Junior ADUs, including through the use of a new Guidebook. City to amend specific plans to include the allowance for ADUs and Junior ADUs.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	encourage and facilitate the provision of additional second units and senior units the City will publicize and promote this program via the City's website, newsletter, and cable television channel.				
2. Zoning for Emergency Shelters/ Transitional and Supportive Housing	<p>An emergency shelter is a facility that provides shelter to homeless families and/or individuals on a limited, short-term basis, typically six months or less.</p> <p>Transitional housing is temporary (typically six months to two years) housing for a homeless individual or family who is transitioning to permanent housing. Transitional housing often includes a supportive services component, such as job skills training, or rehabilitation counseling, to allow individuals to gain necessary life skills in support of independent living. Supportive housing may be permanent and includes services to assist residents with their daily necessities. The City will continue to facilitate the establishment of these uses, which are permitted by-right in the R-3 zone subject to the same development standards as for other residential uses of the same type in the R-3 zone.</p>	Continue to facilitate establishment of emergency shelters and transitional and supportive housing throughout the planning period.	San Gabriel Community Development Department	<p>Zoning code amendments adopted in 2011 to allow emergency shelters and transitional and supportive housing.</p> <p>No applications for transitional or supportive housing were received in 2019.</p>	<p>Modify: Assess emergency shelter requirements and amend as needed. Expand the allowance for supportive and transitional housing consistent with state law. Delete Zoning Code §153.240.D which requires a Conditional Use Permit for a licensed group home of six or fewer people.</p>
3. Density Bonus Ordinance	The price of raw land and any necessary improvement is a key component of the total cost of housing. The diminishing supply of land available for residential construction combined with a fairly steady demand for such development has served to keep the cost of land fairly high, particularly in desirable areas like San Gabriel. Another factor related to construction costs is the number of units built at one time. As the number increases, overall cost per unit generally decreases as builders are able to take advantage of the economies	The City will continue to offer density bonuses to affordable housing projects pursuant to the Density Bonus Ordinance. The City will further promote the program via the City's website, newsletter, and cable television channel.	San Gabriel Community Development Department	<p>In 2020, the California Legislature updated Density Bonus Law to allow, among other things, a 50% density bonus for affordable projects.</p> <p>The City's last update to density bonus provisions was in 2006.</p>	<p>Modify: City to update its density bonus ordinance to comply with recent State updates.</p>

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	of scale. Higher density allows land costs to be spread across more housing units, thereby reducing per-unit costs. This type of cost reduction is of particular benefit when density bonuses are used for the provision of affordable housing. In 2006 the City amended the Code in conformance with current state density bonus law (SB 1818), and two density bonus projects were approved in the previous planning period. In addition to the higher densities this ordinance allows incentives such as reduced parking or other modifications to development standards help to facilitate the production of affordable housing.				
4. Review and Modification of Development Standards	<p>The City adopted several code revisions in 2006 to streamline the development review process for housing projects in the City which have continued to promote housing. These include allowing second unit housing by right without discretionary approvals given minimum development standards in single-family residential neighborhoods; elimination of the pre-application review process for multi-family housing projects which has reduced processing time for applicants by an average of 30 days; adoption of the Mission District Specific Plan that allows for more varied uses, including residential uses, which were previously not permitted; adoption of an ordinance to grant density bonuses for affordable housing units and/or senior housing; and adoption of the Valley Boulevard Specific Plan that includes increased residential densities and revised code language that provide incentives for mixed-use development.</p> <p>In 2009, the City adopted a series of additional amendments to the San Gabriel Municipal Code (SGMC) called "Quick Wins" which focused on simplifying several development standards and making it easier to do</p>	Review and update outdated sections of the Zoning Code on an annual basis. This will provide an opportunity to analyze the impact of proposed changes to development standards on housing affordability and production.	San Gabriel Community Development Department	In FY 2017-2018, the Planning Division brought forward new ordinances and revisions to the Zoning Code, included an ADU Ordinance in compliance with state law, which replaced second unit regulations. Also see Program 1.	Modify: Update based on governmental constraints analysis. Continue to review Zoning Code requirements and identify new opportunities to streamline development review.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	residential construction. Additional amendments are in process ("Greening the Code") which will include changes to development standards for multi-family and mixed-use developments. The City will continue to review Code requirements and seek to identify opportunities to streamline the development process throughout the planning period.				
5. Housing Summit	In 2004 and 2005, the City held a series of meetings in which local architects and developers were invited to presentations on topics such as the Mission District and Valley Blvd. Specific Plans and the City's residential design guidelines. These meetings helped to introduce these local professionals to the City's housing goals and objectives in these areas.	Over the course of the planning period, the City will hold at least two Housing Summits and invite the participation of at least five residential developers with development experience in the San Gabriel Valley. Through these dialogs, City staff will explain the development process in San Gabriel and provide information on the City's housing programs, including the density bonus program, and affordable housing goals. Staff will also review the City's past efforts to streamline the development process and discuss changes that are being considered to further facilitate development. The Housing Summits will also serve as an opportunity for developers to provide input on the development process and the challenges they face in developing housing in the San Gabriel Valley.	San Gabriel Community Development Department	This event has not yet been held.	Delete: Focus City efforts on cost-effective outreach with stakeholders and developers focused on housing sites (e.g., Valley Boulevard Specific Plan).

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
6. Incentives for Lot Consolidation	In 2004, the City adopted the Mission District Specific Plan, which includes incentives for the consolidation of lots zoned for multi-family residential use. Within the boundaries of the specific plan, allowable density is increased by 67% for properties in the R-2 and R-3 zones that are at least 32,670 square feet (0.75 acre) in size. Additionally, the Valley Blvd. Specific Plan, adopted in 2006, has a minimum lot size requirement of 22,000 square feet for mixed use projects, thus encouraging the consolidation of smaller parcels to achieve this standard.	The City will continue to encourage the consolidation of lots in order to achieve higher residential densities. The City will utilize the updated vacant and underused site inventory to identify areas where lot consolidation is possible and communicate this information to interested developers.	San Gabriel Community Development Department	The Mission District Specific Plan and Valley Boulevard Specific Plan continue to contain lot consolidation incentives. Many projects proposed in these specific plan areas include lot consolidations, but lot consolidations are more common in the Valley Boulevard Specific Plan. The City will continue to make its vacant and underused site inventory available to developers and the public to aide in identifying opportunities.	Continue
Program Category 2: Housing Affordability					
7. Section 8 Housing Assistance Program	The Section 8 Housing Assistance Payments Program is administered by the County of Los Angeles Housing Authority. The Housing Assistance Payments Program assists very low-income, elderly and disabled households by paying the difference between 30% of an eligible household's income and the actual cost of renting a unit. Rental assistance not only addresses housing affordability, but also overcrowding by allowing families that may be "doubling up" to afford their own housing. The City will continue to promote participation of eligible San Gabriel residents in the County-administered Section 8 Rental Assistance Program.	The City will advertise availability of the Section 8 Rental Assistance Program on its website, newsletter and cable television channel to promote participation of eligible San Gabriel residents in the County-administered Program. Since Section 8 vouchers are portable, the number of vouchers used in the city will vary over time.	County of Los Angeles Housing Authority; San Gabriel Community Development Department	The Los Angeles County Development Authority continues to encourage apartment owners to accept vouchers. The City advertises the program through its public outreach materials.	Continue: Update Los Angeles County Housing Authority to Los Angeles County Development Authority (LACDA)
8. Los Angeles County Housing Innovation Fund	In 2006, the Los Angeles County Board of Supervisors approved the Homeless Prevention Initiative which allocated \$20 million for the creation of an affordable housing revolving loan fund. The Los Angeles County	The City will make Non-Profit and For-Profit developers aware of the availability of Los Angeles County Housing Innovation Fund financing and	Low Income Investment Fund, Century Housing Corporation,	The City continues to make developers aware of these resources. The City advertises the program	Continue: Update to Los Angeles County Housing

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	<p>Housing Innovation Fund, LLC, a joint venture between the Low Income Investment Fund, Century Housing Corporation, and the Corporation for Supportive Housing, will administer the fund. The LACHIF can be used to finance acquisition and predevelopment activities associated with affordable housing development. The LACHIF can only be used for units that are reserved for households at or below 60% AMI as defined by the U.S. Department of Housing and Urban Development for the Los Angeles-Long Beach Metropolitan Statistical Area. Sixty percent of the LACHIF has been set aside to serve households with incomes at 60% or below of AMI. Forty percent of the LACHIF has been set aside to serve households with incomes at 35% or below of AMI. The maximum loan amount is \$5 million, which may include up to \$750,000 for predevelopment activities. LACHIF loans are to be paid back no later than 36 months after origination.</p> <p>Eligible entities include the City, Non-Profit developers, For-Profit developers and Limited Partnerships or Limited Liability Companies.</p>	encourage its use where feasible to facilitate the development of affordable housing.	and the Corporation for Supportive Housing	through its public outreach materials.	Innovation Fund II
9. Encourage Preservation of Existing Rental Housing Stock	The City will continue to encourage preservation of the existing rental housing stock and discourage condominium conversions, which can raise the cost of housing and take affordable multiple-family rental housing off the market. To preserve the affordable rental housing stock, the City's policy is to require condominium conversions to comply with all current development standards of the zones in which they are located, such as setbacks, parking and open space. Because condominium conversions often occur in older rental developments, the burden of bringing such properties into full compliance with contemporary development	The City will continue its policy of requiring condominium conversions to achieve full compliance with contemporary development standards as a means to discourage condominium conversions and preserve the affordable rental housing stock.	San Gabriel Community Development Department	<p>The City has received few inquiries in recent years about condominium conversion.</p> <p>The requirement that converted buildings be brought up to current development standards has been proven to be a deterrent to conversion. As the City will be assessing and amending various Zoning Code</p>	Modify: Adopt an ordinance addressing specific requirements and/or thresholds for condominium conversions to further prevent potential loss of existing rental stock.

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	standards has acted as a disincentive to conversion. There have been no condominium conversions in San Gabriel in over 20 years.			provisions to facilitate housing, additional methods to discourage condominium conversions should be considered.	
10. Home Ownership Program	San Gabriel residents are eligible to participate in the Los Angeles County Community Development Commission's Home Ownership Program (HOP) funded under the Federal HOME program to assist low-income households to purchase their first homes. HOP provides loans of up to 20% of the initial purchase price or \$60,000, whichever is least. The loans are shared equity loans with no monthly payments and payable upon sale, transfer, or refinance of the home. Under the program, eligible properties include single-family homes and attached or detached condominiums or townhomes. The property must be owner-occupied for the life of the loan. In addition, the borrower is required to have a minimum of 1% of the down payment and complete an educational course in homeownership from an approved HUD counseling agency.	The City will continue to participate in the County's Home Ownership Program. The City will advertise the availability of the program through its website, newsletter, and cable television channel as well as brochures.	Los Angeles County Community Development Commission (LACDC).	The City has continued to participate and promote the HOP with Los Angeles County through the City's website.	Continue
Program Category 3: Conserve Existing Affordable Housing					
11. Residential Code Enforcement	Code enforcement efforts in San Gabriel focus on bringing substandard housing units into compliance with City building and property maintenance codes. In 2002, the City reorganized the Code Enforcement Division into a more proactive Neighborhood Improvement Services Division incorporating traditional code enforcement with community education and empowerment. Using an array of new tools, including concentrated code enforcement, tree planting, cleanup programs, and other initiatives, this reorganization and more proactive approach increases the City's	The Neighborhood Improvement Division will continue to bring its varied resources to bear on enforcing City building and property maintenance codes, with an emphasis on eliminating substandard housing conditions so that all San Gabriel residents may enjoy decent, safe and sanitary housing.	N/A	Neighborhood Improvement Services (NIS) has consistently worked with the Community Development Department to ensure the public health, safety, and welfare of citizens is a top priority.	Continue

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	effectiveness in improving the quality of housing and neighborhoods in San Gabriel. The City also increased the size of its Code Enforcement staff by hiring an additional part-time Code Enforcement Officer.				
12.Preservation of Assisted Housing Developments	The preservation of existing affordable housing in the community is an important goal for San Gabriel. Earlier analysis (see Section II.F) indicates that there are two projects in the city with affordability covenants, although neither of these projects is at risk of conversion. Las Casas Apartments is the only assisted multi-family development in the City and is not at risk of conversion over the next ten years. The City will continue to monitor the status of these projects as well as all future assisted developments to ensure their affordability controls are maintained for the longest period possible.	The City will continue to monitor the status of assisted residential developments in San Gabriel by maintaining in close contact with projects owners.	San Gabriel Community Development Department	There is one existing assisted multi-family housing project in San Gabriel, Las Casas Apartments. This project was acquired by a non-profit tenant association under the HUD Title VI program in July 1996 and has a 55-year covenant that extends until 2051. A new facility is currently undergoing the entitlement process.	Continue
Program Category 4: Housing Opportunities/Fair Housing					
13. Mixed-Use Zones	Mixed-use developments with a combination of residential and commercial uses are conditionally permitted in the commercial C-1 and C-3 and Mission District Village zones. Specifically, multi-family residential uses are permitted on the second and third floors above ground floor commercial or office uses. Ground floor multi-family residential uses are permitted in mixed-use developments on a site in excess of three acres, subject to a CUP. In 2006, the City further facilitated the development of mixed-use projects with the adoption of the Valley Boulevard Specific Plan, which allows mixed-use projects by-right of up to five stories (as compared to three stories with a CUP under the previous code), up to 3.0 floor area ratio (as compared to 1.0 previously) and densities in excess of 40 units per acre (as compared to 25 units per acre previously).	The City will continue to promote development in the mixed-use areas. If financial assistance is available, a focus of these funds will be to provide financial incentives for development of affordable housing on sites where mixed-use is permitted. Incentives would likely take the form of land write-down assistance, or assistance with development fees and off-site development costs. In addition, the City offers density bonuses to mixed-use projects that include units affordable to low- and/or moderate-income households. The City may also provide fee	San Gabriel Community Development Department	The Mission District Specific Plan and Valley Boulevard Specific Plan allow mixed use development at higher densities than permitted by the Zoning Code. Mixed use is permitted in the C-1 Zone unless any individual use or single component of the project requires a conditional use permit. The City currently has 15 mixed-use projects in the planning, recently approved, or under construction stage.	Continue: Update program text to reflect current conditions

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
	Since 2003, two mixed-use projects providing 24 units have been built, while another providing 31 units is under construction. Another project with 11 units has been approved.	reductions and development assistance for affordable units. The City will provide information regarding mixed-use development opportunities on the website and will notify local affordable housing developers annually.			
14. Vacant and Underused Sites Inventory	As part of the 2013 Housing Element update and as required by state law, the City compiled an inventory of vacant and underused sites in all zones in which housing is permitted or conditionally permitted. This inventory will be maintained and provided to interested parties (including residents and developers), in conjunction with information on density increases and other regulatory concessions available through the City's density bonus program.	The City will maintain a current inventory of vacant and underused sites potentially available for residential development. This inventory will be made available to interested individuals, including San Gabriel residents and residential developers. Specifically, the City will utilize the site inventory to identify areas where lot consolidation is possible and communicate this information to interested developers.	San Gabriel Community Development Department	The 2013-2021 Housing Element provides an inventory of vacant and underused sites. This inventory is provided to interested parties, including residents and developers.	Modify: Provide the updated 6 th Cycle Housing Element site inventory to interested parties.
15. Housing Information and Referral Services	The Los Angeles County Housing Resource Center is a web-based information clearinghouse for information on affordable, special needs, accessible, and emergency housing within the County of Los Angeles. The project is managed by the Community Development Commission of the County of Los Angeles, which is the umbrella agency that includes the County's Housing Authority [HACoLA]. The City maintains a link on its website to the Housing Resource Center.	San Gabriel residents will continue to be made aware of and have access to the referral and informational services offered by the Los Angeles County Housing Authority. The City will continue to provide a link on its website to the Los Angeles County Housing Resource Center website, which offers information about available housing assistance programs.	San Gabriel Community Development Department and Los Angeles County Community Development Commission.	The City continues to make residents aware of the referral and informational services offered by the Los Angeles County Housing Authority	Modify: Update Los Angeles County Housing Authority to Los Angeles County Development Authority (LACDA)

Program Name & Number	Program Description	Objectives	Responsible Party	Evaluation	Modify / Delete / Continue
16. Inventory of Affordable Housing Funding Sources	As part of its previous Housing Element, the City prepared a comprehensive inventory of available sources of funds for affordable housing activities. The City will update and maintain this inventory so it is available to prospective housing developers. City staff identify and prepare applications for appropriate funding sources to support affordable housing activities. As discussed in Chapter III, these sources include CDBG, Section 8 Rental Assistance, the Mills Act program, and various state programs such as Low Income Housing Tax Credits (LIHTC) and the Multi-family Housing Program.	The City will update and maintain the inventory of affordable housing funding sources and make it available to developers and will identify and apply for, when appropriate, funding sources to support affordable housing activities.	San Gabriel Community Development Department	The City prepared a comprehensive inventory of available sources of funds for affordable housing activities. The City continues to update the list and will make it available to prospective housing developers and homeowners. These sources include CDBG, Section 8 Rental Assistance, the Mills Act program, and various State programs such as Low-Income Housing Tax Credits and the Multi-Family Housing Program	Continue
17. Fair Housing	<p>The Housing Rights Center provides the following client services: tenant and landlord counseling; advocacy and collaboration in support of fair housing opportunities for all; public outreach and education regarding fair housing rights; specialized property owner, management and lender training; and discrimination complaint processing, investigation and litigation.</p> <p>San Gabriel has conducted an initial review of zoning code and building code requirements and has not identified any barriers to the provision of accessible housing. In addition, a Reasonable Accommodation ordinance was adopted in the previous planning period.</p>	The City will advertise the services of the Housing Rights Center through the City's newsletter, website and cable television channel. The City will continue to promote fair housing practices, process requests for reasonable accommodation, and refer fair housing complaints to the Housing Rights Center.	Housing Rights Center	The City continues to provide residents with information about fair housing practices and to refer complaints to the Housing Rights Center	Modify: Update and expand based on current available resources / services. Separate Reasonable Accommodation Ordinance as its own program.

Appendix E: Public Participation Summaries

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Section E.1 Introduction

The City of San Gabriel is currently in the process of updating its Housing Element, which will guide the City in planning to meet its housing needs through the planning period of 2021-2029. The Housing Element is one component of the City's General Plan that provides the City with a roadmap for accommodating the projected number of housing units needed to safely and affordably house existing and future residents.



A key component of the Housing Element update process is robust public engagement to solicit information and feedback that will inform the City's housing context and strategies. Due to the COVID-19 pandemic and resulting shelter-in-place orders, the community engagement for the Housing Element Update was held virtually prior to July 2021 to allow the public to attend meetings and workshops from the safety of their homes.

This Appendix summarizes both the outreach efforts and comments received. It includes four main sections:

- **Outreach Strategy:** Provides an overview of the outreach strategy throughout Housing Element Update process.
- **Outreach Process:** Provides information on notification methods, materials developed, and summary of outreach methods conducted.
- **Summary of Outreach Meetings:** Provides an overview of the participants and public comments received.
- **Documentation:** Provides copies of the City's noticing materials, presentations, and other documents produced to support the outreach efforts.

Section E.2 Outreach Strategy

Since April 2021, the City conducted outreach through a variety of methods to proactively engage key stakeholder and the community broadly in the Housing Element Update. The City held public outreach meetings, as well as hosted study sessions and public hearings with the Planning Commission and City Council to solicit public feedback and checked in with the community at important project milestones. Throughout the process, the City posted links to recorded presentations and supplemental information online on the project webpage, directly contacted representatives from all economic segments of the community, and provided broad notifications through various communication outlets (e.g., email, social media, Grapevine Newsletter, etc.). The City was available to provide translation and interpretation services during all outreach and reasonable accommodation as needed.

San Gabriel held two public outreach meetings on the Housing Element Update. These discussions were included on regular Planning Commission agendas to involve Planning Commissioners and attendees of these regular meetings throughout the process. The goal of the first outreach meeting was informing the public of the purpose and update process for the Housing Element, providing an overview of the city's demographics and housing needs, and offering an opportunity to provide input at a very early stage in the process. The second outreach meeting focused on providing a high-level overview of the technical analysis that would be used to support the development of the City's housing goals, policies, and programs together with public input received. This allowed the draft needs assessment, housing constraints analysis, and existing programs evaluation to be reviewed and commented on ahead of preparing the draft Housing Element. The draft technical assessment components were compiled in a "Preliminary Report" and published publicly in April 2021. Public outreach meetings were also intended to gather input on housing goals that will inform policies and programs, and to provide a forum for community concerns.

The joint study session with City Council and Planning Commission was held to discuss the draft Housing Element. Prior to the meeting, the City prepared a staff report summarizing the draft Housing Element to facilitate review and understanding of key aspects in the draft Housing Element. The joint study session provided an opportunity for elected and appoint officials with a role in adoption of the Housing Element to give feedback ahead of public hearings. Since these were also public meetings, community members and stakeholders were encouraged to attend and were provided an opportunity to give input. The agenda was provided in English, Spanish, Chinese, and Vietnamese. In addition to Council and Commission comments, 10 public comments were received during this study session.

Interpretation services were available at each event upon request.

The timeframe of each outreach event is listed below:

- Public Outreach Meeting #1 (Introductory, Information Gathering): Monday, April 12, 2021

- Public Outreach Meeting #2 (Review Technical Analysis – Draft Needs Assessment, Housing Constraints Analysis, and Existing Programs Review): Monday, May 10, 2021
- City Council & Planning Commission Joint Study Session (Discuss Draft Housing Element): September 30, 2021
- Planning Commission Public Hearing: January 10, 2022 (*tentative*)
- City Council Public Hearing: February 1, 2022 (*tentative*)

Throughout this engagement effort, the City gathered feedback about housing needs, opportunities, constraints, and priorities from community members. The City also solicited general comments regarding the Housing Element Update process, the current housing crisis, feedback on proposed goals, and related City policies and programs to successfully guide the draft Housing Element.

The City also conducted direct outreach to housing stakeholders and organizations to solicit participation in the Housing Element update process. This included providing the draft technical analysis (needs assessment, housing constraints analysis, and existing programs review) for public review ahead of preparation of the draft Housing Element, and providing the draft Housing Element for comment more than three weeks prior to the City Council and Planning Commission joint study session. Groups contacted include:

- Housing Rights Center
- San Gabriel Valley Habitat for Humanity
- Asian Youth Center
- La Casa de San Gabriel Community Center
- YMCA San Gabriel Valley, Intervale Senior Services
- The East Los Angeles Valley Community Union
- Herald Community Center
- National CORE and Hope Through Housing Foundation
- Los Angeles Homeless Services Authority
- San Gabriel Valley Council of Governments
- Union Station Homeless Services

This summary documents the outreach activities completed to support the draft Housing Element. All outreach materials, including notifications and presentations, for the community meetings are included for reference at the end of this Appendix.

Section E.3 Outreach Process

As part of the outreach process, the City developed a project webpage and determined objectives for each outreach event (see Outreach Strategy above). The City then prepared presentation materials and notifications to engage the public and provide opportunities for community involvement and feedback.

E.3.1 Affirmatively Furthering Fair Housing Targeted Outreach

In addition to be previously listed outreach efforts, the City conducted targeted outreach to solicit input on the affirmatively furthering fair housing (AFFH) analysis (Appendix F). Working with the City's Community Services Department, the following list of contacts representing various non-profit organizations and economic segments and neighborhoods of the community was developed:

- American Legion Post 748
- AYSO Region 40
- Ballet Folklorico Sol De Fuego
- San Gabriel Mission Parish- Troop 261
- Gabrielino Band of Mission Indians - Kizh Nation
- Junipero Serra Senior Citizens Club
- Knights of Columbus
- Native Sons of the Golden West, Ramona Parlor #109
- God's Church Inc.
- Origami Creations
- San Gabriel Historical Association
- San Gabriel Women's Foundation
- SGV Music Theatre- Spotlighters
- Sewing Circle
- Creative Art Group
- Girl Scouts Troop 1831
- Soroptimist San Gabriel- Alhambra- San Marino
- Victory Outreach
- San Gabriel Mission Cub Scout Pack 261

- San Gabriel Dance Association
- LA Host Lions Club- Cub Scout Pack 2168
- San Gabriel Valley Habitat for Humanity
- Asian Youth Center
- La Casa de San Gabriel Community Center
- Herald Christian Health Center
- Housing Rights Center
- YMCA San Gabriel Valley
- Los Angeles Homeless Services Authority (LAHSA) - Union Station Homeless Services SPA 3
- San Gabriel Valley Council of Governments
- St. Anthony's Christian Service
- Family Promise of San Gabriel Valley
- Salvation Army San Gabriel Corps

While some of these groups were also directly notified of the public outreach meetings, this more expansive list was necessary to broaden the public engagement effort and reach all communities and populations within city. These organizations are located across the city, but many are in the southern portion of the city which is disproportionately impacted by fair housing issues (e.g., higher concentrations of lower to moderate income households, not highest resource area, more overcrowding, and more vulnerable to displacement) (see Affirmatively Furthering Fair Housing Analysis, Appendix F).

These groups were directly contacted via mail, email, and telephone based on the contact information the City had on file. Letters and emails included Chinese and Spanish translations. Comments received during this effort are summarized in Section I.E.

Figure E-1: Outreach Letter Excerpt



E.3.2 Presentations

The City prepared a PowerPoint presentation for the community meetings, study sessions, and public hearings. Each presentation included background information on the Housing Element, new legislation impacting the 6th cycle, housing needs and assessment, and an overview of the Regional Housing Needs Allocation (RHNA). Copies of the community meeting presentations are included at the end of this Appendix.

E.3.3 Housing Element Update Webpage

The Housing Element Update webpage (<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029>) was used to provide a project timeline, a resource for Housing Element information (e.g., meeting presentations, notices, and summaries; additional resources, etc.), and City contact information. The webpage is shown in Figure E-1. The project website was updated throughout the duration of the Housing Element Update to post new information about key milestones, presentation materials, and additional resources, among other Housing Element-related items. The City website, including the Housing Element Update webpage, is available in Chinese (Simplified and Traditional), Spanish, and Vietnamese. Furthermore, the City's website has been designed based on accessibility guidelines including easily legible font and other

website accessibility standards. Additionally, the City's ADA/504 Coordinator contact information is available on the City's website.

Figure E-2: Housing Element Update Webpage



E.3.4 Notifications

Utilizing the project database, email notifications for community meetings reached approximately 39 stakeholder contacts with known or functional email addresses. The City also used the *City Beat* email distribution list to encourage community feedback, which reaches approximately 1,600 subscribers. Furthermore, the City promoted the Housing Element Update through the Community Development Department's Development Quarterly newsletter (Spring 2021), which has over 1,700 subscribers. The notifications provided a link to the project website and City contact information.

The City also posted notifications about the Housing Element Update on the City's Facebook page.

Section E.4 Summary of Outreach Meetings

E.4.1 Public Outreach Meeting #1

Monday, April 12, 2021 at 6:30 pm

GoToMeeting Webinar / YouTube Streaming / Local Cable Public Access Channel 3

Introduction

On April 12, 2021, the City of San Gabriel held a virtual Outreach Workshop, the first of a series of public meetings for the 6th Cycle Housing Element Update. This workshop was the first item during the regular monthly Planning Commission meeting. The workshop was opened by Samantha Tewasart, Planning Manager, who welcomed attendees and gave an introduction of the Housing Element Update process. Ms. Tewasart introduced Jennifer Murillo, Senior Associate at Lisa Wise Consulting, Inc. (LWC), who presented on the following topics:

- Housing Element Basics
- New State Legislation
- Housing Element Update Process
- What is Affordable Housing?
- Housing in San Gabriel
- Regional Housing Needs Allocation (RHNA)

The presentation included the purpose of the Housing Element, components of a Housing Element, additional State requirements during the 6th Cycle, and the project timeline. The presentation also provided an overview of socio-economic data of San Gabriel that will provide context for future housing goals and programs.

The meeting then provided an opportunity for public comment to clarify any questions or provide any comments attendees might have about the Housing Element or the update process. The meeting was attended by four Planning Commissioners, Commission Secretary, legal counsel, one other presenter, and members of the public.

Format

The public meeting was facilitated by City staff, with assistance from LWC. Due to COVID-19 conditions, the meeting was held virtually via GoToMeeting for presenters and streamed live on the City's YouTube channel and cable Channel 3, Public Access Channel. Public comment could be submitted through email, consistent with the City's COVID-19 protocols for Planning Commission meetings.

Notifications of this Outreach Workshop were distributed by the City via email to their listserv of approximately **39 individuals** who consisted of residents and other stakeholders in San Gabriel.

The meeting was recorded and posted on the City's YouTube channel and the City's Housing Element Update webpage (<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021->

[2029](#)) so it could be viewed at any time. The City's project contact information was included in the presentation to facilitate additional comments or questions being provided at any time via phone or email.

Summary of Comments

The following is a summary of questions and comments received from Planning Commissioners during the Outreach Workshop. There were no additional public comments.

- Affordable housing is critical, especially for members of the community who work in San Gabriel. There is enthusiasm for a plan to accommodate greater affordable housing in the city.
- Commissioners discussed the importance of meeting the City's housing goals while maintaining San Gabriel's neighborhood characteristics and existing quality of life.
- One Commissioner expressed interest in understanding the projected population of the City given build out estimates under existing zoning and household size. These projections can inform the greater discussion regarding housing demand, while considering the needs of property owners and local businesses.
- One Commissioner commented that there is a lack of vacant land in the city that hasn't been developed at some time.

Comments provided have been incorporated in the updated Housing Element, specifically through the Housing Needs Assessment (Appendix A) and the Sites Inventory and Methodology (Appendix B). Additionally, programs such as residential code enforcement help to maintain and improve the quality of housing and neighborhoods in San Gabriel.

Screenshots

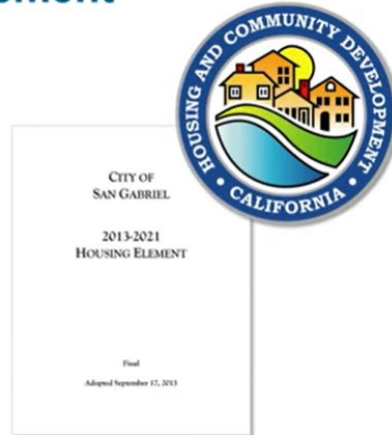
Screenshots from the Outreach Workshop are included below:



Purpose of the Housing Element

State Housing Element Law

- Intended to require jurisdictions to do their "fair share" around planning for adequate affordable housing
- Recognizes that housing is a critical need, and the government and private sector must work together to address it
- Cities are not required to build or initiate housing projects, but rather ensure zoning capacity exists to build housing



LWC

San Gabriel, Housing Element Update 7

Planning Commission - April 12, 2021 Meeting - City of San Gabriel

19 views • Streamed live on Apr 12, 2021



SHARE



SAVE



Housing Element Components

1. **Policy and Programs Review:** A performance evaluation of policies and programs from the current (5th Cycle) housing element
2. **Housing Needs Assessment:** A review of the existing and projected housing needs, with particular consideration for special needs populations
3. **Adequate Sites Inventory:** List of land suitable suitably zoned to accommodate the City's share of regional housing need
4. **Housing Resources Assessment:** Resources identified to support the development, preservation, and rehabilitation of housing
5. **Housing Constraints Assessment:** An assessment of governmental and non-governmental (market, environmental, etc.) constraints to housing development
6. **Implementation Plan:** Goals, policies, and programs for addressing the City's housing need

LWC

San Gabriel, Housing Element Update 9

Planning Commission - April 12, 2021 Meeting - City of San Gabriel

19 views • Streamed live on Apr 12, 2021



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E.4.2 Public Outreach Meeting #2

Monday, May 10, 2021 at 6:30 pm

GoToMeeting Webinar / YouTube Streaming / Local Cable Public Access Channel 3

Introduction

On May 10, 2021, the City of San Gabriel held a second virtual Outreach Workshop as part of a series of public meetings for the 6th Cycle Housing Element Update (HEU). This workshop was the first item during the regular monthly Planning Commission meeting. The workshop was opened by Samantha Tewasart, Planning Manager, who welcomed attendees and provided context on the Housing Element Update. Ms. Tewasart introduced Jennifer Murillo, Senior Associate at Lisa Wise Consulting, Inc. (LWC), who presented on the following topics:

- Housing Element Background and Basics
- HEU Preliminary Report

The Preliminary Report provided a high-level overview of the technical analysis conducted during the update process that will inform the development of housing policies and programs, including:

- **Housing Needs Assessment:** A review of San Gabriel's socioeconomic and housing stock conditions and corresponding housing needs
- **Housing Constraints Assessment:** An assessment of governmental, market-driven, and environmental constraints to housing development
- **Programs Review:** An evaluation of programs from the 5th cycle housing element
- **Housing Resources Assessment:** Resources available to support the development, preservation, and rehabilitation of housing

The meeting then provided an opportunity for public comment to clarify any questions or provide any comments attendees might have about the preliminary findings and the update process. The meeting was attended by five Planning Commissioners, Commission Secretary, legal counsel, City staff, and members of the public.

Format

The public meeting was facilitated by City staff, with assistance from LWC. Due to COVID-19 conditions, the meeting was held virtually via GoToMeeting for presenters and streamed live on the City's YouTube channel and cable Channel 3, Public Access Channel. Public comment could be submitted through email, consistent with the City's COVID-19 protocols for Planning Commission meetings.

Notifications of this Outreach Workshop were distributed by the City via email to their listserv of approximately **39 individuals** who consisted of residents and other stakeholders in San Gabriel.

The City also emailed housing stakeholders and organizations soliciting participation in the Housing Element update process and encouraging attendance at this virtual workshop. Email recipients included:

- Housing Rights Center
- San Gabriel Valley Habitat for Humanity
- Asian Youth Center
- La Casa de San Gabriel Community Center
- YMCA San Gabriel Valley, Intervale Senior Services
- The East Los Angeles Valley Community Union
- Herald Community Center
- National CORE and Hope Through Housing Foundation
- Los Angeles Homeless Services Authority
- San Gabriel Valley Council of Governments
- Union Station Homeless Services

The meeting was recorded and posted on the City's YouTube channel and the City's Housing Element Update webpage (<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029>) so it could be viewed at any time. The City's project contact information was included in the presentation to facilitate additional comments or questions being provided at any time via phone or email.

Summary of Comments

The following is a summary of questions and comments received from Planning Commissioners during the Outreach Workshop. There were no additional public comments.


- The City has not yet collected affordable housing fees (fees are due at time of building permit issuance), but affordable housing fees collected by the City in the future would be committed to specific affordable housing projects throughout San Gabriel.
- One Commissioner expressed concern in meeting the City's RHNA through the sites inventory alone. The Housing Element Update team discussed multiple ways the City can provide adequate capacity for its RHNA, including ADU projections and recently permitted and entitled projects.
- The City should explore a variety of housing development types, including lower density multi-family typologies, to meet its housing goals.
- Some strategies to consider in the 6th Cycle include increasing investment in connecting people experiencing hardships or overpayment with resources to address their hardships, such as homeownership programs or a way to lower transportation costs for people who need assistance for travel for work.
- One Commissioner inquired whether the Housing Element Update process will include an analysis of the implications of increased density on crime, fire, parking, and other issues. The Housing Element Update process itself does not contain an evaluation of impacts, but any resulting substantial rezoning program to increase density above what is currently outlined in the Zoning Code will trigger an environmental review.
- One Commissioner requested clarification on the consequences of not meeting the RHNA. The team clarified the difference between not having a housing element that has been certified by HCD and not being able to meet RHNA targets. The State has increased its

level of enforcement for housing element compliance. Jurisdictions that do not have a compliant housing element can be ineligible for State funding opportunities and may have their land use authority limited. On the other hand, the State understands that jurisdictions are not directly responsible for the production of housing and there is a possibility they will not be able to meet RHNA targets despite their best efforts. They must, however, show they are committed to removing regulatory barriers and are generally supportive of proposed housing development.

Comments provided have been incorporated in the updated Housing Element, specifically in the Sites Inventory and Methodology (Appendix B), which considers ADUs and entitled and in process projects in meeting RHNA capacity. Additionally, programs resulting from the Housing Constraints analysis (Appendix C), would facilitate the development of a variety of types of housing, including housing for special needs populations. Lastly, programs include support for those who are housing cost burdened through City advertisement and promotion of various LADCA programs (e.g., rental assistance, home ownership program, etc.) and anti-displacement information and resources dissemination.


Screenshots

Screenshots from the Outreach Workshop are included below:



Housing Needs Assessment

- 55.4% of households are renter occupied
- Rents are slightly higher than in the county
- Nearly 6 of 10 renters are housing cost-burdened (>30% of income on housing costs)
 - Almost 32% are severely cost-burdened (>50% of income on housing costs)
- Renter-occupied households are more likely to be overcrowded than owner-occupied households



Percent of Income Spent on Rent	Number of Households
<10%	162
10-15%	369
15-20%	564
20-25%	474
25-30%	734
30-35%	347
35-40%	425
40-45%	928
50-60%	2,133
>60%	544

American Community Survey 2014-2018 5-year estimates.

San Gabriel, Housing Element Update

Planning Commission - May 10, 2021 Meeting - City of San Gabriel

42 views • Streamed live on May 10, 2021

1 0 SHARE SAVE ...

Housing Constraints Assessment



Governmental:

- Minimum dwelling unit size precludes smaller units, which can be more affordable
- Mixed-use projects in commercial zones (C-1 and C-3) may only be 3 stories / 45 feet, while commercial projects may be up to 5 stories / 70 feet
- Per unit open space requirements are relatively high and may reduce the area that can be dedicated to housing

Zone		Min. Dwelling Unit Size (sq. ft.)	Min. Open Space
Low Density Multiple-Family Residence Zone	R-2	1-bed: 880	500 sq. ft. for each bedroom
		1-bed & den or 2-bed: 1,100	
Multiple-Family Residence Zone	R-3	2-bed & den or 3-bed: 1,320	400 sq. ft. for each bedroom
		Bedroom (excl. closets): 125	
Retail Commercial Zone	C-1	1-bed: 880	100 sq. ft. per each residential unit; plaza, community garden, or other open space area required for mixed-use developments > 3 acres
General Commercial Zone	C-3	2-bed: 1,100	
		3-bed: 1,320	

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San Gabriel, Housing Element Update 2016

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Section E.5 Documentation

E.5.1 E-Blast Notifications

City of San Gabriel communications@sgph.org [sign up](#) [unsubscribe](#)
to me

Wed, Apr 21, 7:22 PM

The latest news, events and updates from the City of San Gabriel.



[COVID-19 Vaccinations Now Available Age 16+](#)

COVID-19 vaccinations are now available for those 16 and older.

To make an appointment, please speak to your health provider or visit [LA County Public Health](#)'s website to find your nearest vaccination center. You may also visit [MyTurn.CA.gov](#) to make a reservation.

If you need assistance with registration, the City currently operates a hotline at 626.308.2616 on Tuesdays from 2:00 p.m. to 4:00 p.m. and on Wednesdays from 9:00 a.m. to 11:00 a.m. Bilingual assistance is available in Chinese, Spanish and Vietnamese.

You may also call the State hotline at 833.540.0473 from 8:00 a.m. to 8:30 p.m. seven days a week for assistance.



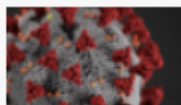
[In-Person Summer Camps](#)

In-person summer camp for ages 5 to 12 will be offered from June 14 to August 12 with swim days, virtual excursions and more.



[Housing Element: Submit Feedback](#)

Housing elements allow us to study our community's housing and demographic trends. Provide your feedback today.



[Get Updates on COVID-19](#)

Learn how COVID-19 is impacting our community, including information about the latest health order for our region.

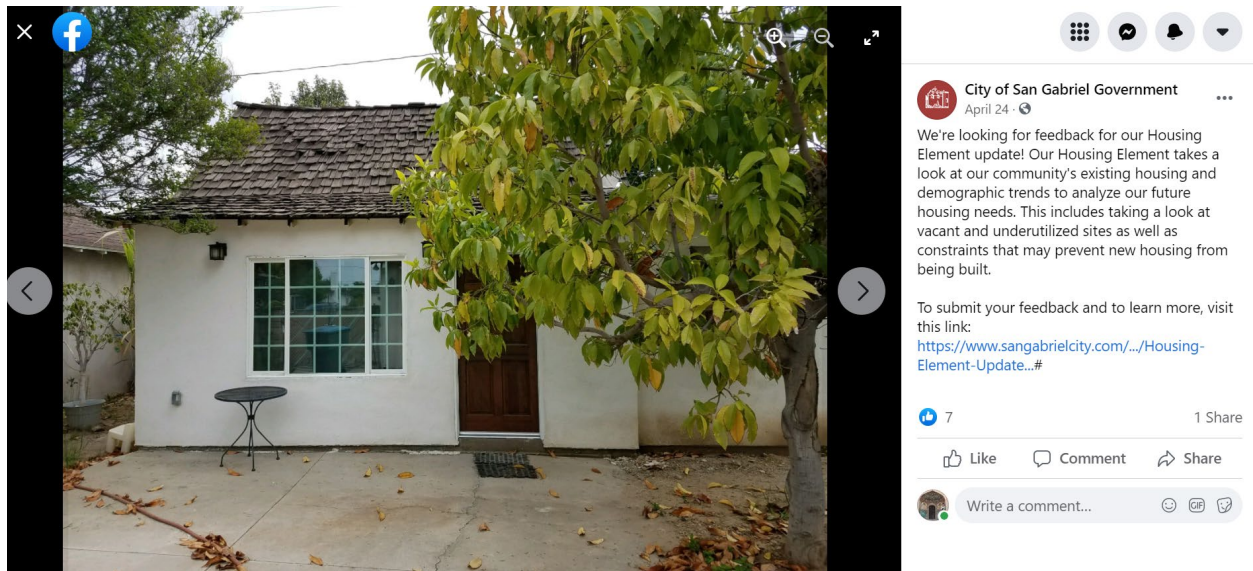
[City Council Meeting - April 20, 2021](#)

Watch a replay of the April 20 City Council meeting on our YouTube channel.

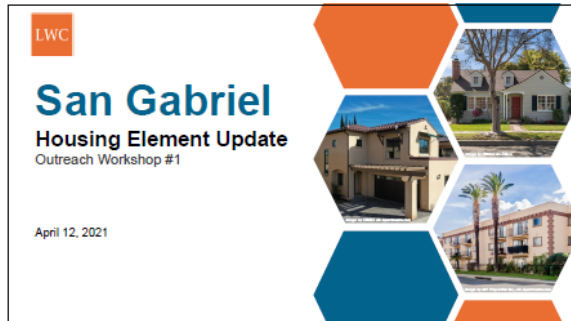
[Planning Commission - April 12, 2021](#)

Watch a replay of the April 12 Planning Commission meeting on our YouTube channel.

E.5.2 Social Media Notifications



E.5.3 Presentations



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Agenda

- 1 Introductions
- 2 Housing Element Basics
- 3 New State Legislation
- 4 Housing Element Update Process
- 5 What is Affordable Housing?
- 6 Housing in San Gabriel
- 7 Regional Housing Needs Allocation (RHNA)
- 8 Wrap Up & Discussion

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Lisa Wise Consulting, Inc.



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LWC Housing Element Experience

6th Cycle	5th Cycle	4th Cycle
Beaumont Coachella Long Beach Pleasanton San Gabriel Santa Maria Temple City Woodland	Arroyo Grande Atascadero Benito Livermore Loomis Richmond Tehachapi Vallejo	Arroyo Grande Atascadero Benito El Dorado County Grover Beach King City Loomis Monte Sereno Pacific Grove Pismo Beach Placer County Richmond Tehachapi Tulare

30 - Housing Elements
8 - 6th Cycle Housing Elements

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2 Housing Element Basics

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Purpose of the Housing Element

State Housing Element Law

- Intended to require jurisdictions to do their "fair share" around planning for adequate affordable housing
- Recognizes that housing is a critical need, and the government and private sector must work together to address it
- Cities are not required to build or initiate housing projects, but rather ensure zoning capacity exists to build housing

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What is the Housing Element?

The Housing Element is a required section of the City's General Plan. It must:

- Assess the residents' housing needs and conditions of housing stock
- Establish a roadmap for accommodating projected housing unit demand over the next eight years
- Set citywide housing-related goals, objectives, policies, and programs
- Show how the City will meet demand for housing at all income levels

Other General Plan Elements

- Land Use
- Mobility
- Conservation
- Open Space
- Safety
- Noise

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Housing Element Components

- Policy and Programs Review:** A performance evaluation of policies and programs from the current (5th Cycle) housing element
- Housing Needs Assessment:** A review of the existing and projected housing needs, with particular consideration for special needs populations
- Adequate Sites Inventory:** List of land suitable suitably zoned to accommodate the City's share of regional housing need
- Housing Resources Assessment:** Resources identified to support the development, preservation, and rehabilitation of housing
- Housing Constraints Assessment:** An assessment of governmental and non-governmental (market, environmental, etc.) constraints to housing development
- Implementation Plan:** Goals, policies, and programs for addressing the City's housing need

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3 New State Legislation

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New Legislation

The State continues to pass new housing legislation, including:

- AB 1397:** Adequate Housing Element Sites
- SB 166:** No Net Loss
- AB 686:** Affirmatively Furthering Fair Housing
- AB 72:** Housing Element Enforcement
- AB 671:** ADU plan
- AB 879:** Reporting Requirements
- AB 1763:** Enhanced Density Bonus
- AB 2162:** Supportive Housing Streamlined Approval
- SB 6:** Design and Development of the Site Inventory
- AB 1851:** Religious Institutions Affiliated Housing (Yes in God's Back Yard, YIGBY)

The following slides provide a high-level overview of a select few.

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AB 1397 & SB 166

AB 1397 Adequate Housing Element Sites (2017): Strengthens local governments' obligation to identify a supply of adequate sites available to meet their share of regional housing needs at all income levels.

- Non-vacant sites must have a realistic development potential.
- Currently identified (5th Cycle) sites must be re-zoned by-right and include 20% affordable units.
- Requires history of affordable housing development on < ½ acre and >10-acre sites.

SB 166 No Net Loss (2017): Requires jurisdictions to maintain adequate sites to always accommodate its remaining regional housing needs allocation throughout the housing element planning period.

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AB 686 & AB 72

AB 686 Affirmatively Furthering Fair Housing (AFFH) (2018): Requires housing elements to demonstrate the local jurisdiction is affirmatively furthering fair housing. Jurisdictions need to demonstrate compliance with the statute by:

- Analyzing existing fair housing and segregation issues;
- Identifying fair housing goals;
- Developing strategies to implement these goals; and
- Ensuring sites in the inventory are identified in such a way that promotes AFFH.

AB 72 Housing Element Enforcement (2017): Allows HCD to review any action or lack of action by a jurisdiction that is inconsistent with its housing element. HCD can revoke housing element compliance and notify the Attorney General.

AFFH is the taking of meaningful actions that "overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity" for communities of color, persons with disabilities, and others protected by California law

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4 Housing Element Update Process

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Update Process



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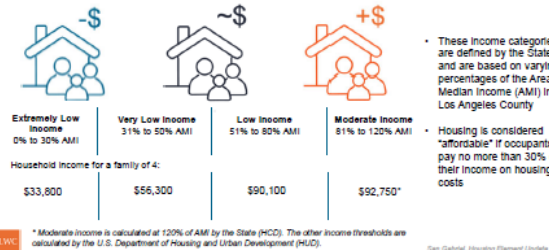
5 What is Affordable Housing?

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What is Affordable Housing?



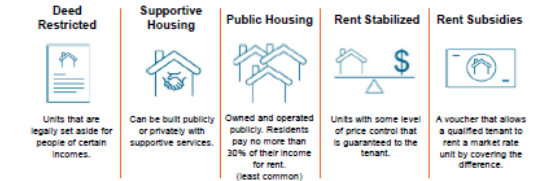
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Types of Affordable Housing

Affordable Housing is provided in a variety of ways, by both the public and private sector.



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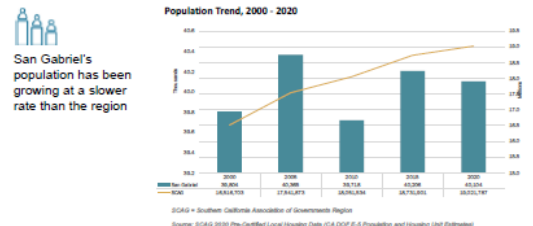
6 Housing in San Gabriel

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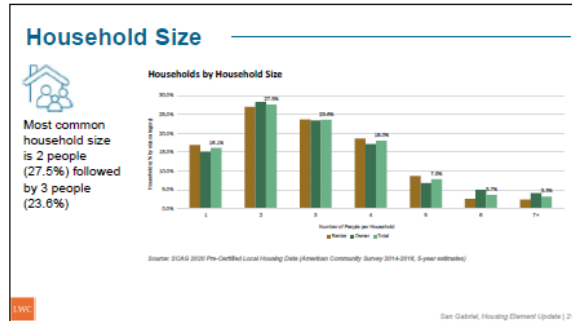
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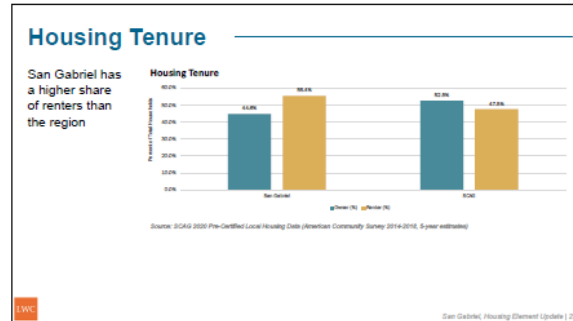
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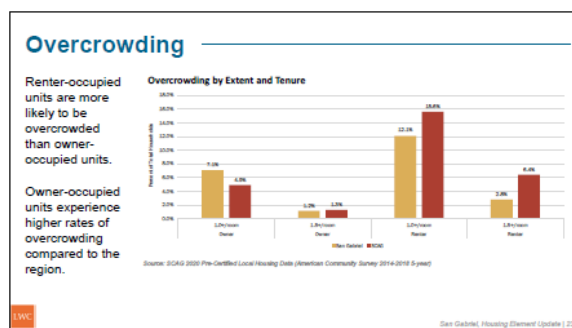
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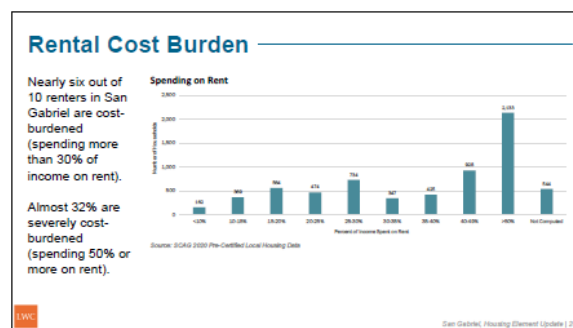
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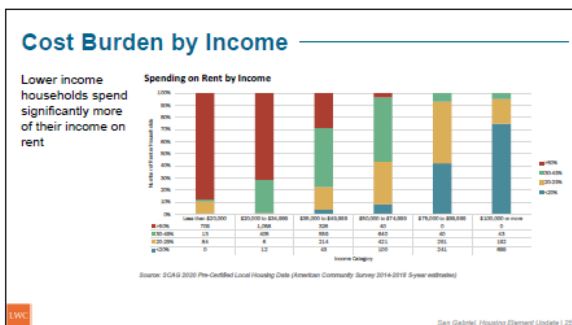
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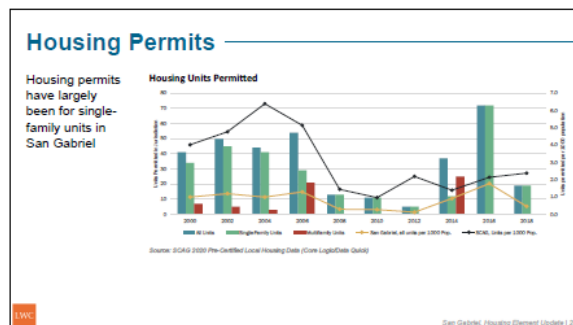
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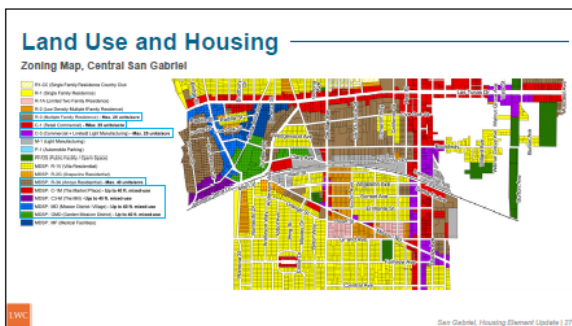
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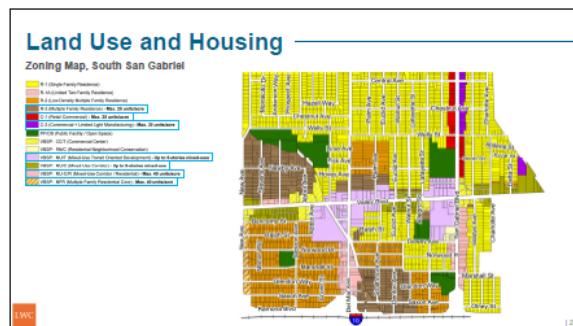
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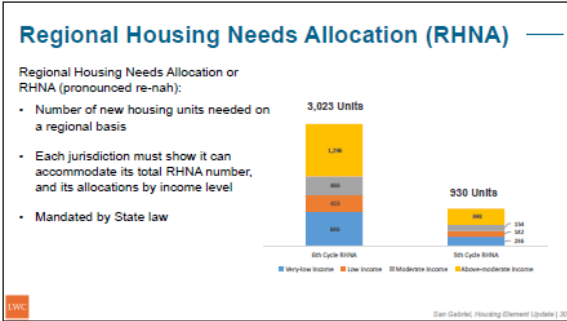
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7 Regional Housing Needs Allocation (RHNA)

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RHNA & the Housing Element Update

How Does the Housing Element Update Help the City Meet its Goals?

- Develop an inventory of sites sufficient to meet San Gabriel's RHNA allocation
- Establish additional policies and programs to incentivize both market-rate and affordable housing development and expand housing production

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8 Wrap Up & Discussion

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Stay Informed and Involved!

San Gabriel Housing Element Webpage:
<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029>

San Gabriel Project Contact:

Samantha Tewasart
 Planning Manager
 (626) 308-2806 ext. 4623
stewasart@sogch.org

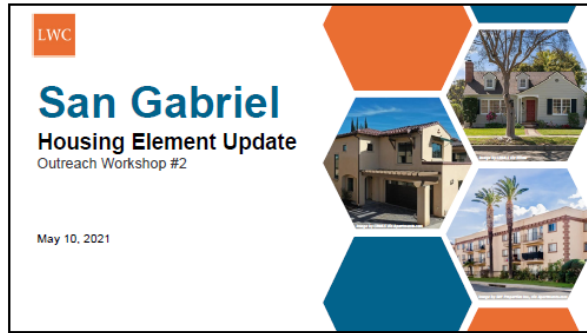
Future Items:

- Preliminary Report available for public review – May
- Next Public Meeting – May (to discuss Preliminary Report)

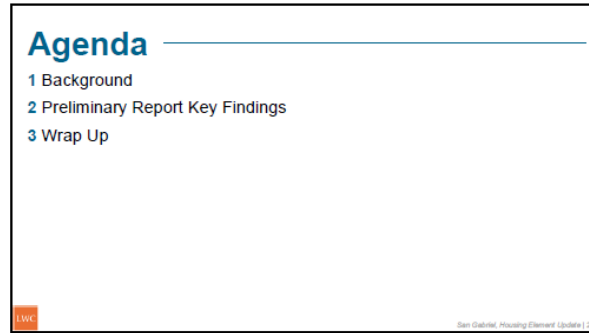
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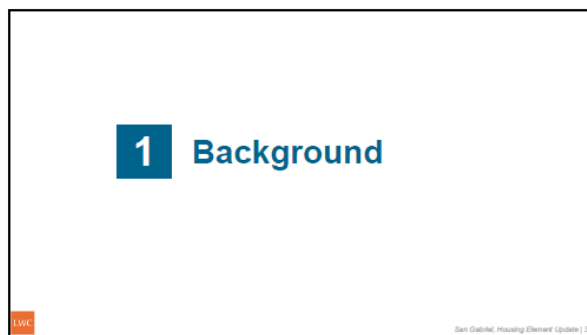
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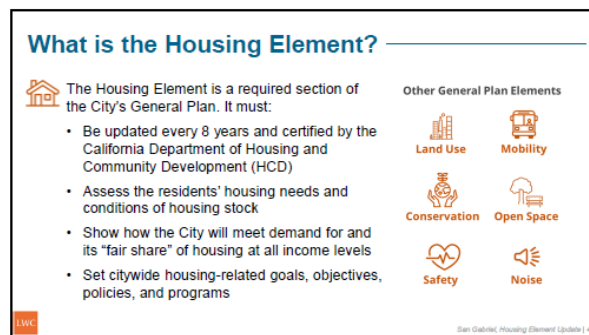
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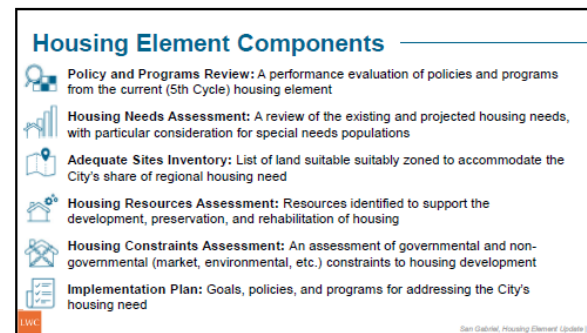
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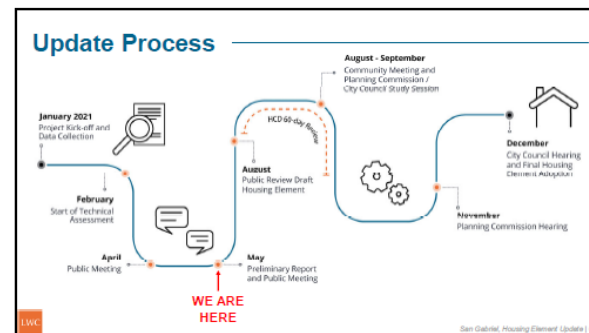
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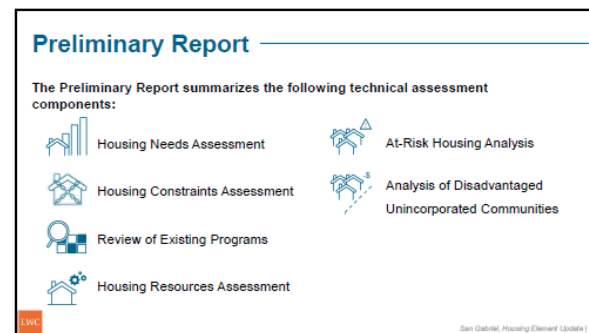
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Preliminary Report

The Preliminary Report will inform the development of the following, which will be prepared and included in the Draft Housing Element (available in August):

- Adequate Sites Inventory
- Implementation Plan

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Housing Needs Assessment

- San Gabriel has a lower-income population than the County
 - Median household income is 10% lower than the County
 - 58% of households are low-income households; 18.4% are extremely low-income
- San Gabriel has an older population
 - Median age is 41.3 years; County is 36.2 years
 - Approximately two-thirds of the senior population is low-income

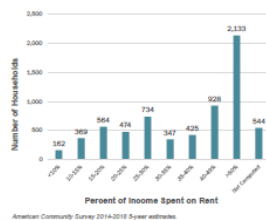
Household Income		
	San Gabriel	Los Angeles County
Median Income	\$57,863	\$64,251
Mean Income	\$83,228	\$94,484

Source: ACS 5-year estimates (2016, 2018)

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Housing Needs Assessment

- 55.4% of households are renter occupied
- Rents are slightly higher than in the county
- Nearly 6 of 10 renters are housing cost-burdened (>30% of income on housing costs)
 - Almost 32% are severely cost-burdened (>50% of income on housing costs)
- Renter-occupied households are more likely to be overcrowded than owner-occupied households

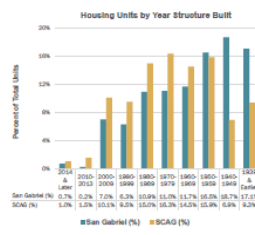


American Community Survey 2014-2018 5-year estimates

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Housing Needs Assessment

- 15% of households are large (5+ people); 16% are 1-person households
- San Gabriel's housing stock is 48% 3+ bedrooms and 15% 1-bedroom or studio. This is adequate for larger households, but fewer options are available for smaller households
- San Gabriel's housing stock is older - 52.3% of units >60 years old, compared to 32.1% of units in the region
- Compared to the region, San Gabriel permits fewer units on a per population basis



American Community Survey 2014-2018 5-year estimates

12

Housing Constraints Assessment

Governmental:

- Minimum dwelling unit size precludes smaller units, which can be more affordable
- Mixed-use projects in commercial zones (C-1 and C-3) may only be 3 stories / 45 feet, while commercial projects may be up to 5 stories / 70 feet
- Per unit open space requirements are relatively high and may reduce the area that can be dedicated to housing

Zone	Mins. Dwelling Unit Size (sq. ft.)	Mins. Open Space
Low Density Multiple-Family Residential Zone	10-2	500 sq. ft. for each bedroom
Multiple-Family Residential Zone	10-3	1-bed & den or 2-bed: 1,100 2-bed & den or 3-bed: 1,300 Bedroom (not double): 125
Neighborhood Commercial Zone	C-1	1-bed: 900 2-bed: 1,100 3-bed: 1,300
General Commercial Zone	C-3	100 sq. ft. per each residential unit plus community garden or other open space area required for mixed-use developments > 75 acres

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Housing Constraints Assessment

Governmental (continued):

- Parking standards, including rates and configuration (e.g., garage required for multi-family) could result in higher priced housing units
- Subjective design guidelines, while not currently applicable to multi-family projects due to State law (SB 330), could result in uncertainty for developers and a longer permit review process in the future

Non-Governmental:

- Competitive housing market that favors construction of for-sale over rental housing
- San Gabriel is generally built out – often there are increased costs with redevelopment compared to vacant land development

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Existing Programs Review

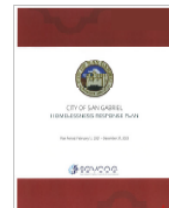
- Many of the current Housing Element programs were successfully completed or are ongoing efforts
- Almost all programs are recommended to be continued with some being modified. For example:
 - Senior Housing Units and Second Units – **Modify**
 - Density Bonus Ordinance – **Modify**
 - Incentives for Lot Consolidation – **Continue**
- The only program recommended to be deleted is the Housing Summit Program - replace with more cost-effective stakeholder and developer outreach

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Housing Resources Assessment

- Local
 - Permanent Local Housing Allocation (PLHA) Grant – \$187,992 1st year allocation for pre-development
 - Homelessness Response Plan – Strategies and actions that can leverage local resources aligned with County Homeless Initiative Strategies
 - Affordable Housing Fees – developer paid via negotiated development agreement with the City
- SVG (e.g., SGVCOG, SGVRHT, etc.)
- Regional (e.g., LADCA programs, etc.)
- State & Federal



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At-Risk Housing Analysis

- "At-risk" assisted housing units are multi-family rental units that receive government assistance and are eligible to convert to market-rate in the next 10 years
- The City has two units (in Las Casas Apartments) that are considered low-risk of conversion to market-rate - the deed restrictions do not expire until 2046



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Analysis of Disadvantaged Unincorporated Communities

- State law (SB 244) requires jurisdictions to analyze the infrastructure needs of disadvantaged unincorporated communities (DUCs) within the jurisdiction's sphere of influence (SOI)
- A DUC is a community with an annual median household income that is less than 80% of the statewide annual median household income
- There are no DUCs in the City of San Gabriel's SOI; there are no infrastructure deficiencies that need to be analyzed

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3 Wrap Up

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Stay Informed and Involved!

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<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029>

San Gabriel Project Contact:

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Future Items:

- Draft Housing Element available for public review – August
- Next Public Meeting – August (to discuss Draft Housing Element)

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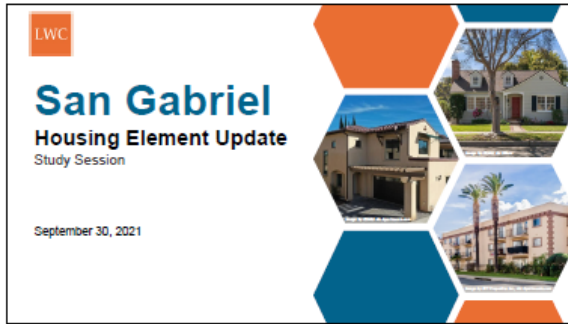
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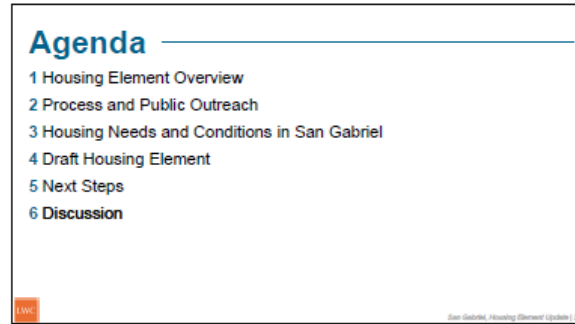
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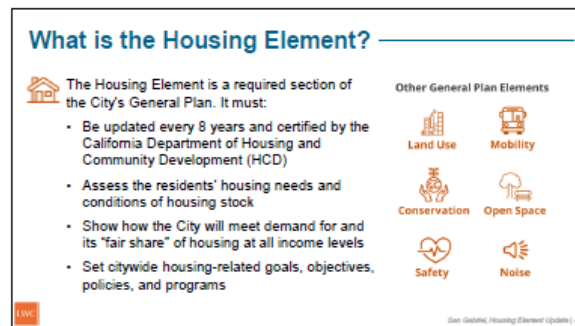
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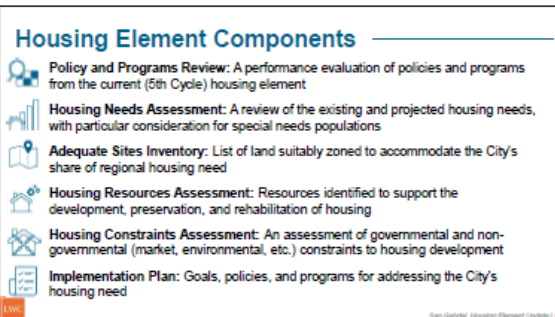
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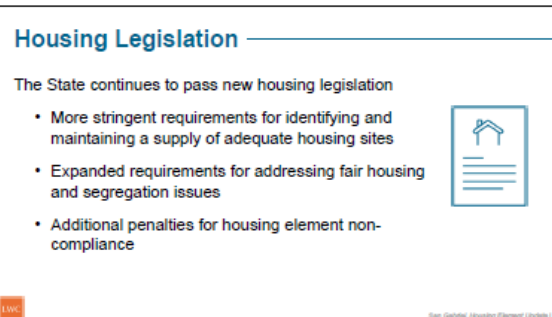
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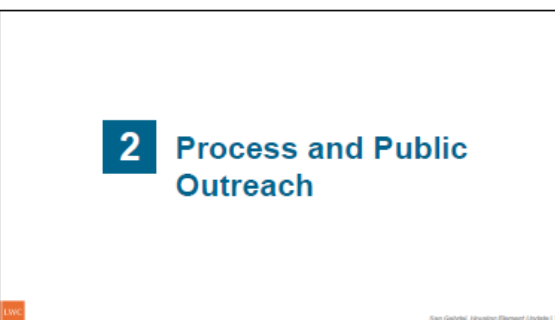
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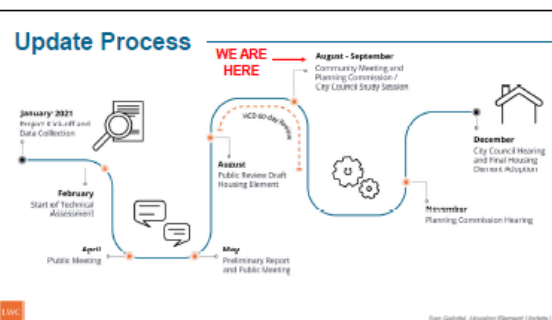
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Public Outreach

- Housing Element Update webpage
- Public meetings
 - Introduction – April 12, 2021
 - Preliminary Report – May 10, 2021
- Direct outreach to housing stakeholders and organizations
- Email notifications (e.g., City Beat)
- Development Quarterly newsletter
- Social media posts



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3 Housing Needs and Conditions in San Gabriel

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Household Income Distribution

- Over half (58%) of San Gabriel households are lower income (earning less than 80% of Area Median Income (AMI))
- Lower median income than county
- San Gabriel is a majority renter city (55.4% renter households)



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Households by Poverty Status

- 7.4% of households in San Gabriel (894 households) are experiencing poverty
- LA County experiences a similar rate
- Female-headed households are more likely to be in poverty



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Senior Households by Income and Tenure

- 2/3 of the senior households is considered low income (1,855 households)
- 25% of senior households are extremely low-income (earning less than 30% of Area Median Income (AMI))

	Owner	Renter	Total	Percent of Total Elderly Households
Income category, relative to surrounding area:				
< 30% HAMFI	305	405	710	25.4%
30-50% HAMFI	220	325	545	19.5%
50-80% HAMFI	350	250	600	21.5%
80-100% HAMFI	135	80	215	7.7%
> 100% HAMFI	625	100	725	25.9%
Total	1,635	1,160	2,795	-

Note: HAMFI refers to Housing Urban Development Area Median Family Income.
Source: SCAQ 2020 Pre-Certified Local Housing Data (PLHD CHAS, 2012-2016)

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Housing Cost Burden / Overpayment

- Lower-income households are much more likely to be housing cost burdened
- Nearly six out of 10 renters spend >30% of income on rent
- Over 30% of renters are severely cost burdened (spend >50% of income on housing)

Households by Share of Income Spent on Housing Costs			
Income	Not Cost Burdened (<30% of Income)	Cost Burdened (30-50% of Income)	Severely Cost Burdened (>50% of Income)
< 30% HAMFI	11%	17%	71%
30-50% HAMFI	24%	32%	44%
50-80% HAMFI	52%	38%	11%
80-100% HAMFI	81%	15%	4%
>100% HAMFI	89%	10%	1%

Note: HAMFI refers to Housing Urban Development Area Median Family Income.

Source: SCAQ 2020 Pre-Certified Local Housing Data (PLHD CHAS, 2012-2016)

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Regional Housing Needs Allocation

Regional Housing Needs Allocation or RHNA (pronounced re-nah):

- Projected number of new housing units needed
- Each jurisdiction must show it can accommodate its total RHNA number, and its allocations by income level
- Mandated by state law

	Region (SCAQ)	San Gabriel
	6th Cycle RHNA	6th Cycle RHNA Share
Very Low (30-50% AMI)	351,795	845
Low (50-80% AMI)	208,807	415
Moderate (80-120% AMI)	223,957	466
Above Moderate (>120% AMI)	550,267	1,296
Total	1,341,827	3,023

Median Income 4-person household: \$77,300

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4 Draft Housing Element

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- Section I Introduction
- Section II Projected Housing Need
- Section III Housing Resources
- Section IV Housing Plan

- Appendix A: Housing Needs Assessment
- Appendix B: Sites Inventory and Methodology
- Appendix C: Housing Constraints
- Appendix D: Existing Programs Review
- Appendix E: Public Participation Summaries
- Appendix F: Affirmatively Furthering Fair Housing Assessment (underway)

- Goal A: Facilitate Housing and a Range of Housing Types
- Goal B: Promote Housing for Lower- and Moderate-Income Households
- Goal C: Remove Government Constraints to Housing
- Goal D: Conserve and Maintain Existing Affordable Housing Stock
- Goal E: Promote Fair Housing Opportunities

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Sites Inventory

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	848	416	488	1,298	3,023
ADUs	63	36	188	9	126	422
Entitled/Proposed Projects ¹	-	-	56	12	1,188	1,256
Remaining RHNA	See Very Low	747	171	446	(18)	1,346
Sites Inventory	See Very Low/Low	583		1,170	57	1,810
Surplus / (Shortfall)	See Very Low/Low	(336)		726	76	466

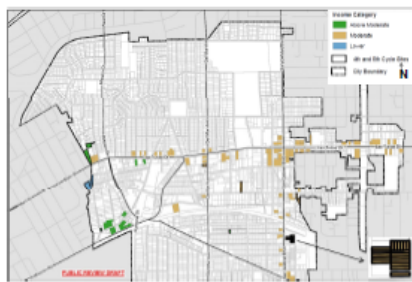
¹ Considers net new units only.

Source: City of San Gabriel, LWC

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Sites Inventory: Northern San Gabriel

Sites identified on the map are under no obligation to construct affordable housing.



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Sites Inventory: Southern San Gabriel

Sites identified on the map are under no obligation to construct affordable housing.



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Key Programs

RHNA Housing Sites Implementation; Rezone Program (Program 1)
To accommodate the lower-income RHNA shortfall, rezone a minimum of 16.8 acres of vacant or underutilized land to a min. of 20 and max. of 30 units per acre by January 2025. Rezoned sites must allow 100% residential and require at least 50% of a mixed-use project to be residential.

Accessory Dwelling Units (ADUs) (Program 3)
Given the scarcity of developable land remaining in San Gabriel, integrating ADUs helps accommodate additional affordable rental housing. Publicize and promote ADU Guidebook.

Housing Developer Outreach (Program 7)
Conduct targeted engagement with local housing developers, both private and nonprofit, to promote housing development on available sites.



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Key Programs

Infrastructure Grants (Program 8)
Pursue grants for infrastructure that supports infill development across the city.

Objective Design Standards (Program 10)
Consistent with state law, adopt objective design standards for multi-family and mixed-use projects to expedite the approval process.

Enhanced Density Bonus Ordinance (Program 12)
Evaluate increasing density bonus provisions for projects that include affordable housing above that required by state law (e.g., more than the 50% density bonus).



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Key Programs

Inclusionary Housing (Program 13)
Evaluate an inclusionary housing program for requiring on-site affordable housing and adopt an ordinance based on the analysis.

Safe Parking Program (Program 18)
A safe parking program is operated on a property outside of the public right-of-way and managed by a social service provider that provides individuals and families with vehicles a safe place to park overnight while working toward a transition to permanent housing. Allow safe parking in appropriate zones.

Standardize Maximum Heights (Program 19)
Allow mixed-use buildings to have the same maximum height commercial buildings (five stories/70 feet) instead of three stories/45 feet to provide more housing opportunities.



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Key Programs

Residential Code Enforcement (Program 28)
Code enforcement efforts for bringing substandard housing units into compliance with building and property maintenance codes.

Encourage Preservation of Existing Rental Housing Stock (Program 27)
San Gabriel is a majority renter city, and condominium conversions can raise the cost of housing and take affordable multi-family rental housing off the market. Adopt an ordinance identifying requirements for condominium conversions.

Anti-Displacement Information Dissemination (Program 34)
Create and distribute user-friendly materials that communicate local and regional tenants' rights and other relevant resources.



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Review Period

Overview of the Review Period:

- Submitted to HCD on August 26, 2021 (60-day HCD review period)
- Available for public review from 8/26/2021 to 10/26/2021 on the City's website:

<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029#>

- Hard copies at the Community Development Department and the San Gabriel Public Library

How to Provide Input:

- Write-in to Samantha Tewart, Planning Manager, via stewart@sqch.org
- Speak up at today's meeting
- Speak up at future meetings, including public hearings (*timing pending HCD review and comments*)
- HCD directly

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5 Next Steps

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Next Steps

Complete and Publish Affirmatively Furthering Fair Housing (AFFH) Analysis Per Recent State Law

- Guidelines released late April 2021

End of Review Period

- Submit all comments by October 26, 2021
- City will review and update the Housing Element, as appropriate

HCD Review

- City will make any necessary modifications to meet requirements to be certified by the State

Target Adoption Hearing Date (*timing pending HCD review and comments*)

- Planning Commission – November (TBD)
- City Council – December (TBD)

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Stay Informed and Involved!

San Gabriel Housing Element Webpage:

<https://www.sangabrielcity.com/1525/Housing-Element-Update-2021-2029>

San Gabriel Project Contact:

Samantha Tewart
Planning Manager
(626) 308-2806 ext. 4623
stewart@sqch.org

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Thank you!

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Appendix F: Affirmatively Furthering Fair Housing (AFFH)

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Section F.1 Introduction

Assembly Bill 686, signed in 2018, establishes a statewide framework to affirmatively further fair housing (AFFH) with the goal of achieving better economic and health outcomes for all Californians through equitable housing policies. AB 686 requires cities and counties to take deliberate actions to foster inclusive communities, advance fair and equal housing choice, and address racial and economic disparities through local policies and programs. Housing elements are now required to address the following five components:

- **Inclusive and Equitable Outreach:** A summary of fair housing outreach and capacity that includes all economic segments of the community.
- **Assessment of Fair Housing:** An assessment of fair housing issues, including integration and segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, and disproportionate housing needs.
- **Analysis of Sites Inventory:** An evaluation of whether the sites inventory improve or exacerbate conditions for fair housing.
- **Identification of Contributing Factors:** The identification and prioritization of contributing factors related to fair housing issue.
- **Priorities, Goals, and Actions to AFFH:** The identification of fair housing goals and actions that directly address the contributing factors outlined above. The housing element should include metrics and milestones for evaluating progress and fair housing results.

This section documents four of the five components of the AFFH components. The summary of AFFH-related outreach is included in Appendix E.

F.1.1 Notes on Figures and Analysis

This Appendix contains geospatial data downloaded from HCD's AFFH Data and Mapping Resources Hub. Additional analysis is sourced from the Census American Community Survey and HCD's pre-certified data, where appropriate.

Section F.2 Assessment of Fair Housing

F.2.1 Fair Housing Outreach and Enforcement

Fair housing complaints can be an indicator of housing discrimination in San Gabriel. Fair housing issues can arise through discrimination against an individual based on disability, race, national origin, familial status, disability, religion, or sex when renting or selling a dwelling unit.

The U.S. Department of Housing and Urban Development's (HUD) Office of Fair Housing and Equal Opportunity (FHEO) is the federal agency responsible for eliminating housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO services and

activities include investigating fair housing complaints, conducting compliance reviews, ensuring civil rights in HUD programs, and managing fair housing grants.

Locally, the City partners with the Housing Rights Center (HRC) to investigate fair housing complaints. HRC is a non-profit, approved by HUD, that works with local government offices to ensure Fair Housing laws are upheld. HRC provides various services to Los Angeles County stakeholders, including tenant/landlord mediation, credit counseling, and fair housing training and workshops.

During the 2020-2021 fiscal year, the HRC and Fair Housing Council reported five discrimination inquiries filed by residents of San Gabriel. The discrimination breakdown provided by HRC reported only inquiries. Table F-1 provides the classifications of these five inquiries. The HRC disposition summary for these inquiries indicated that four were counseled and one was pending at the time of the report. No other information on these inquiries, such as geographical distribution, was included in their reporting.

Table F-1: Breakdown of Fair Housing Issues

Discrimination Inquiries Fiscal Year 2020/2021	
Protected Classification	Number of Inquiries
Mental Disability	1
Physical Disability	3
Racial	1
Total	5
<i>Source: HRC and Fair Housing Council</i>	

The City does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights. The City does not currently have any local fair housing laws. However, the City did adopt an Urgency Ordinance related to evictions and COVID-19 that is known as the “Covid-19 Eviction Moratorium Ordinance”. This ordinance established a temporary moratorium on evictions for non-payment of rent due to the ongoing COVID-19 pandemic.

The City provides residents with fair housing information primarily by posting links to a variety of fair housing resources on the City’s website at www.sangabrielcity.com/426/Links. These resources include the Fair Housing Council/Housing Rights Center and a free mediation service to help resolve landlord tenant disputes. Programs are included to expand fair housing links and resources available through the City’s website, as well as the City’s promotion and distribution of fair housing and anti-displacement resources to residents, especially those at-risk of displacement.

F.2.2 Integration and Segregation

This section analyzes integration and segregation, including patterns and trends, related to people with protected characteristics.

Race and Ethnicity

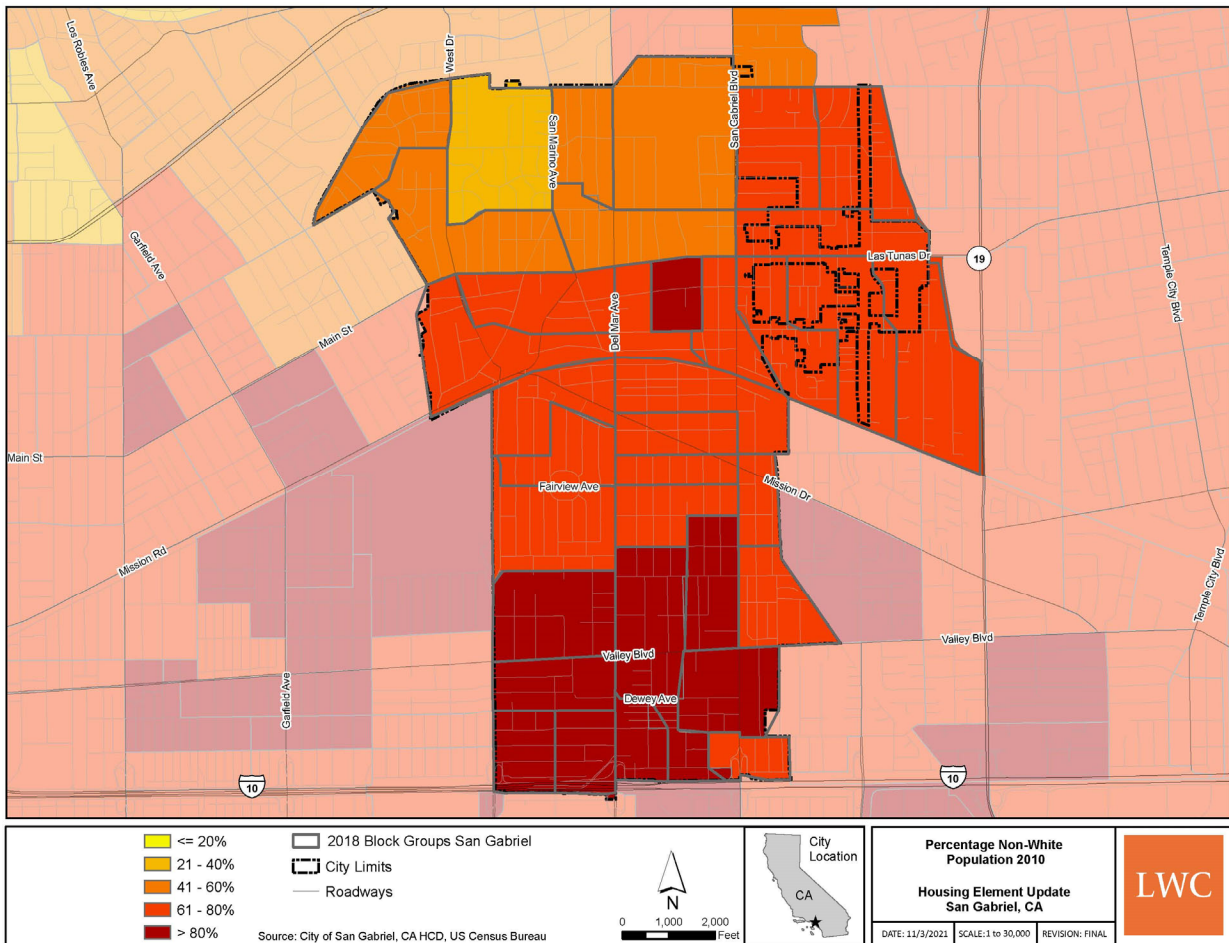
According to the American Community Survey (ACS), approximately 80.9 percent of the San Gabriel population belonged to a racial minority group in 2019. San Gabriel had a higher proportion of racial and ethnic groups than Los Angeles County overall (48.7 percent) at this time. The largest racial group is Asian (60 percent of the population), and the city has a lower proportion of Hispanic or Latino (of any race) compared to the county (see Appendix A, Housing Needs Assessment, Section A.2.3).

Figure F-1 provides historical non-white population percentages by block group from 2010 ACS data. At this time, the northern portion of the city had the lowest non-white percentages with the lowest value of 39 percent in one northern block group (gold color in Figure F-1) and the surrounding area in the 41 to 60 percent range. The middle and eastern sections had non-white percentages mostly in the 61 to 80 percent range. In 2010, block groups mostly in the southern portion of the city had non-white percentages above 80 percent.

Figure F-2 shows the non-white population percentage by census block group for 2018. Most block groups in the city had a non-white population greater than 80 percent at this time. Relatively lower non-white population percentages are in the northwestern portion of the city, with the lowest value in the same block group as 2010 data at 60 percent.

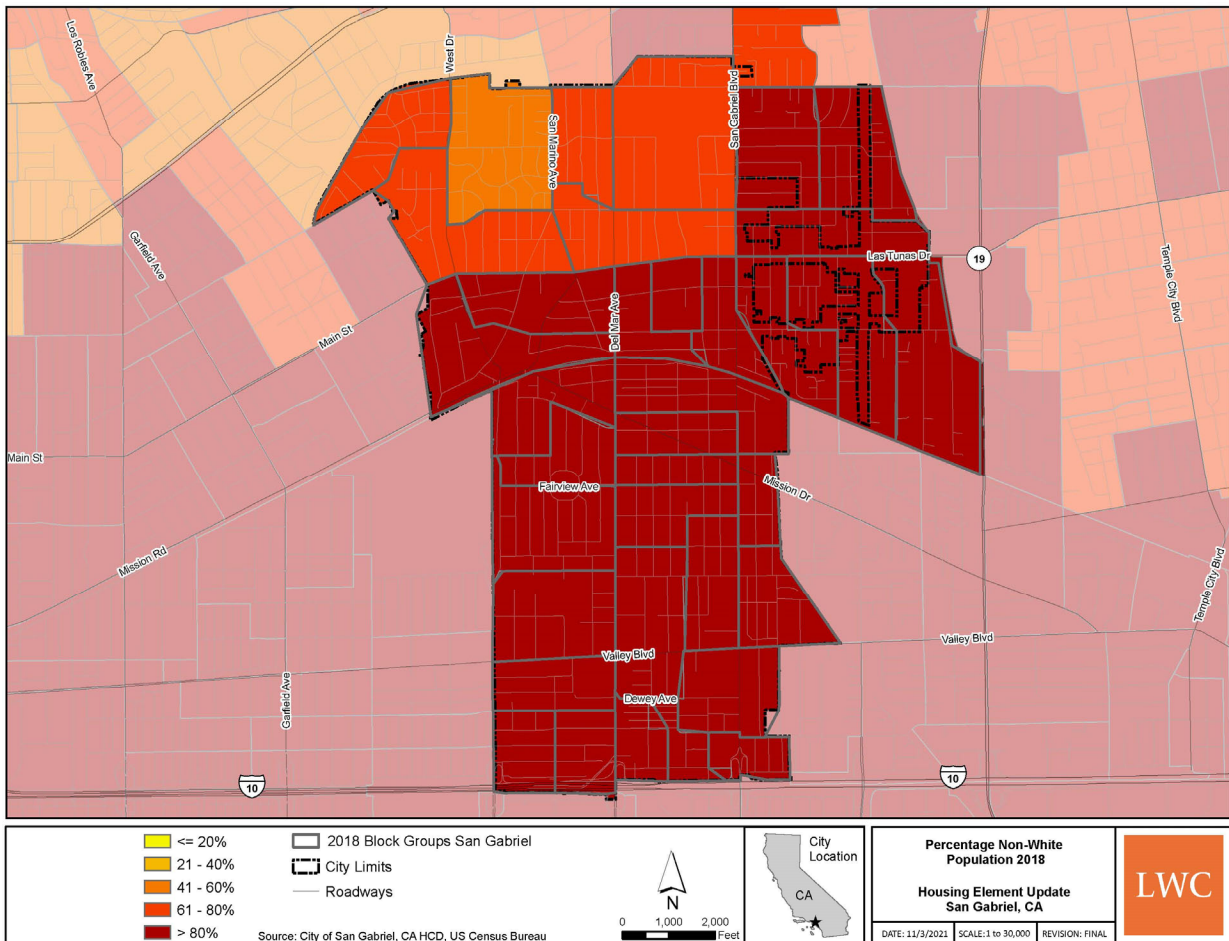
The city had higher percentages of non-white population overall in 2018 as compared to 2010 according to ACS data. The 2018 ACS data showed an increase in non-white population percentage in every block group in the city over 2010 data. The northwestern portion of the city bordered by San Gabriel Boulevard and Las Tunas Drive exhibited the lowest non-white percentages in both years. From a regional perspective, San Gabriel has a higher proportion of non-white population than Los Angeles County but the community has a similar racial and ethnic composition to the block groups adjacent to the City.

Figure F-1: Non-White Population (2010)



Source: HCD AFFH Spatial Data

Figure F-2: Non-White Population (2018)



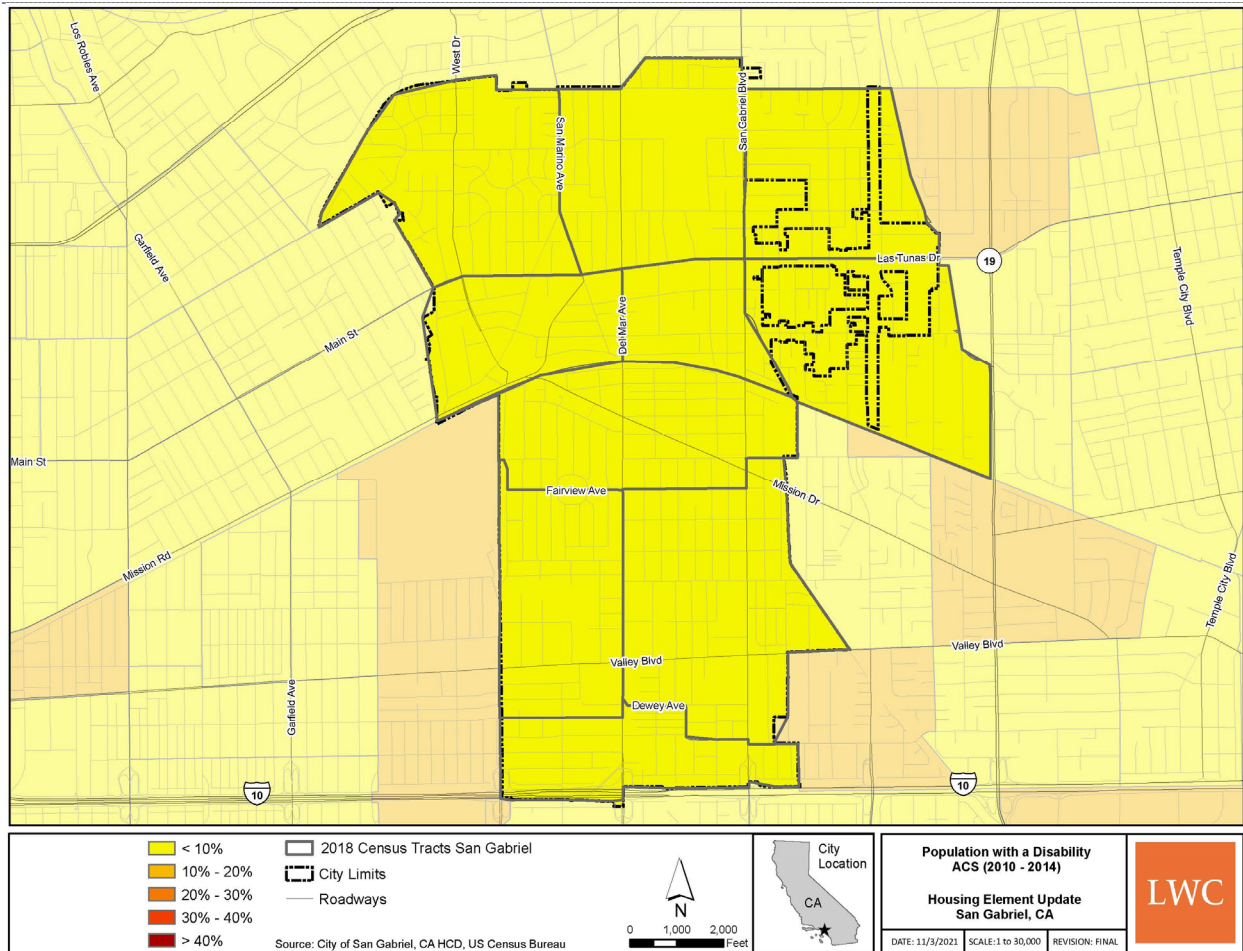
Source: HCD AFFH Spatial Data

Disability

People are considered to have a disability if they have one or more of the following: hearing difficulty, vision difficulty, cognitive difficulty, ambulatory difficulty, self-care difficulty, and independent living difficulty.

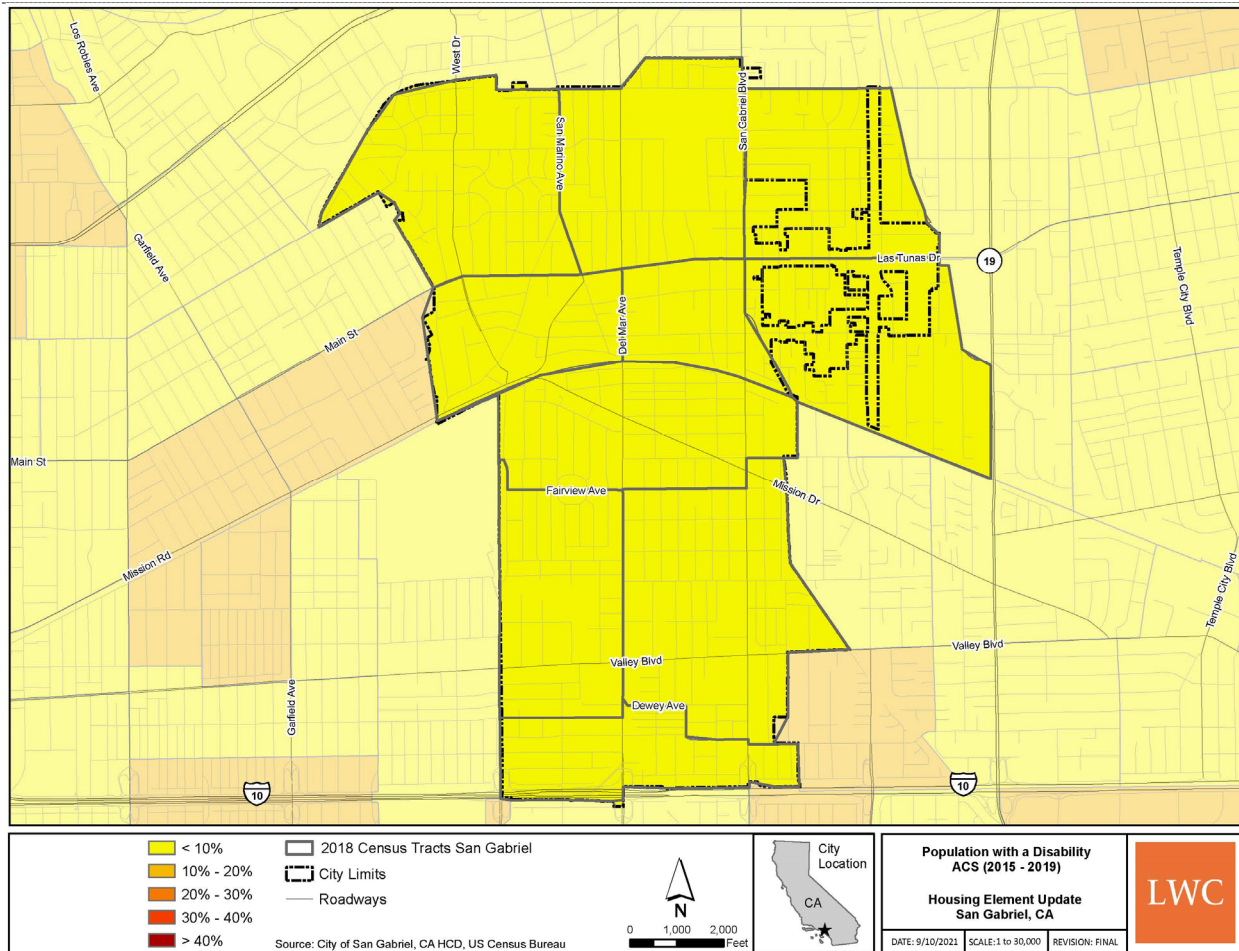
Figure F-3 presents the ACS 2010 to 2014 data for percentage of population with a disability and Figure F-4 shows the ACS 2015 to 2019 data for percentage of population with a disability. According to the 2015 to 2019 ACS, approximately 6.9 percent of San Gabriel residents have a disability, compared to 9.4 percent countywide. All census tracts in San Gabriel consisted of less than 10 percent of residents experiencing disability during both five-year time periods. The distribution of this population is not appreciably different than in the block groups adjacent to the City of San Gabriel

Figure F-3: Percent of Population with a Disability (2010 - 2014)



Source: HCD AFFH Spatial Data

Figure F-4: Percent of Population with a Disability (2015 - 2019)



Source: HCD AFFH Spatial Data

Familial Status

Familial status refers to the presence of at least one child under 18 years old. Examples of familial status discrimination include refusal to rent to families with children, eviction of families once a child joins, confinement of families to specific floors of a building, and overly restrictive rules regarding children's use of common areas.

According to the 2015 to 2019 ACS, 30.8 percent of households in San Gabriel have one or more children under the age of 18. The city's share of households is lower than that of the county overall at 33.0 percent. It is also lower than the surrounding neighboring jurisdictions of East San Gabriel (36.0 percent), Temple City (36.6 percent), and Rosemead (38.5 percent).

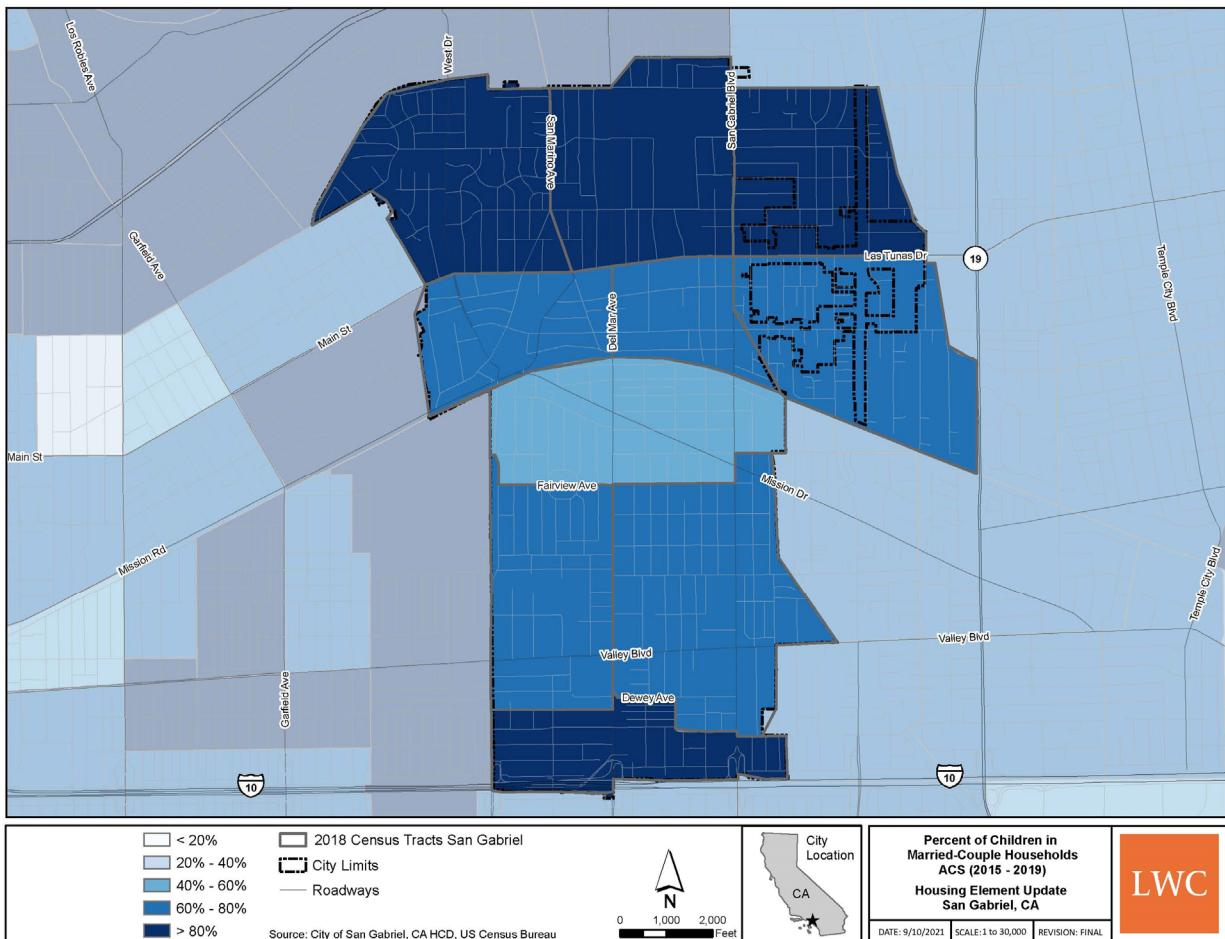
Figure F-5 shows the distribution of children in married couple households in San Gabriel. The percentage of married couple households with children is highest in the northern and southern portions of the city where it exceeds 80 percent. Census tracts adjacent to these areas also have

high levels at 60 to 80 percent. The lowest percentage of children in married couple households within San Gabriel is 58.3 percent in the central portion of the city.

Single parent households are also a fair housing protected class. San Gabriel has 4.8 percent of households consisting of single-parent households. Of particular consideration are female-headed households, who may experience greater housing affordability challenges due to typically lower household incomes compared to two-parent households. A total of 4.1 percent of households in San Gabriel are single female-headed households with children. San Gabriel has had a lower proportion of female-headed households with children compared to the SCAG region (see Appendix A, Housing Needs Assessment, Section A.3.5).

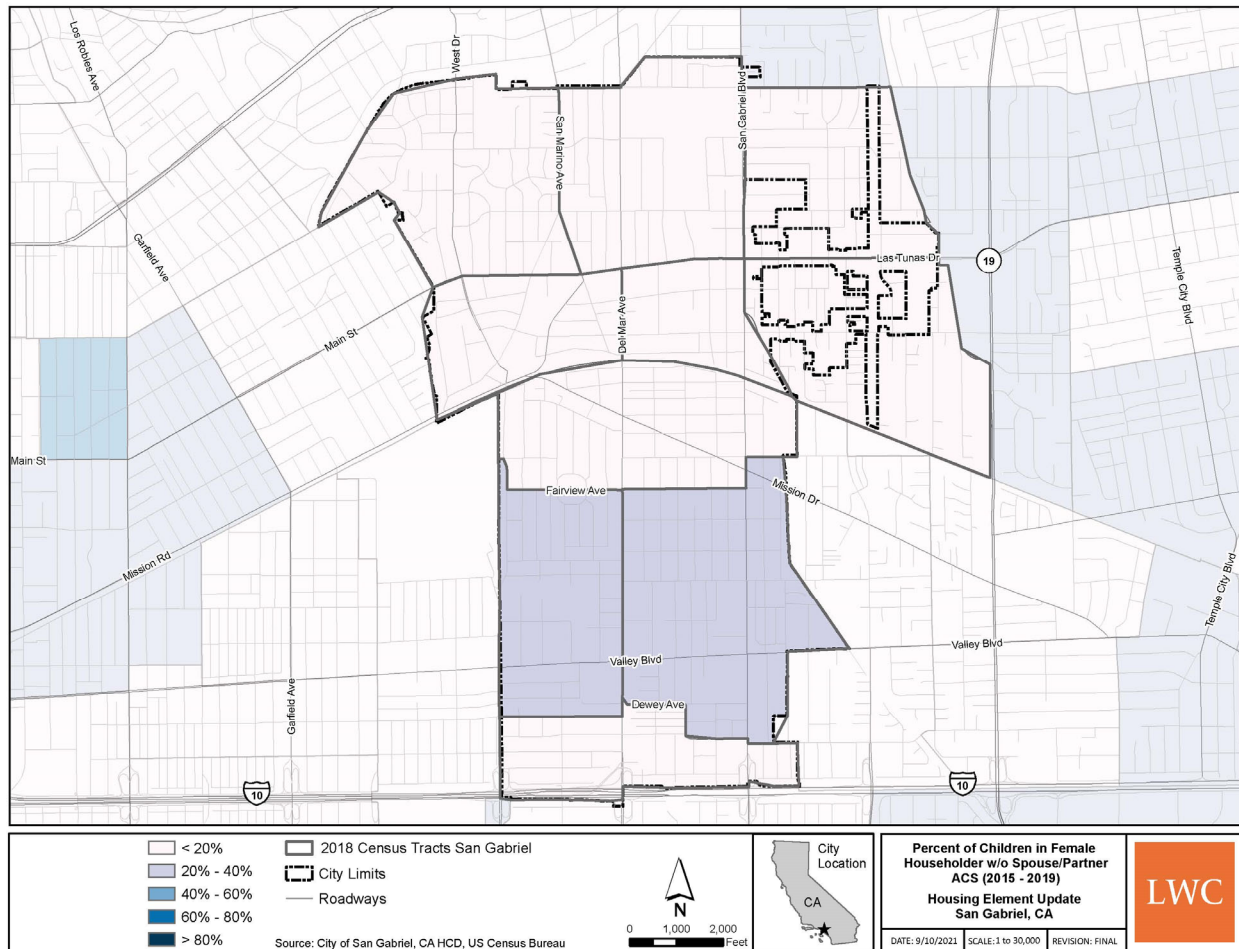
As shown in Figure F-6, San Gabriel has some variability in the percentages of children in single female-headed households. These households are more concentrated in tracts in the south-central portion of the city at levels of 20 to 40 percent.

Figure F-5: Children in Married-Couple Households (2015 - 2019)



Source: HCD AFFH Spatial Data

Figure F-6: Children in Female-Headed Households with No Partner Present (2015-2019)



Source: HCD AFFH Spatial Data

Income

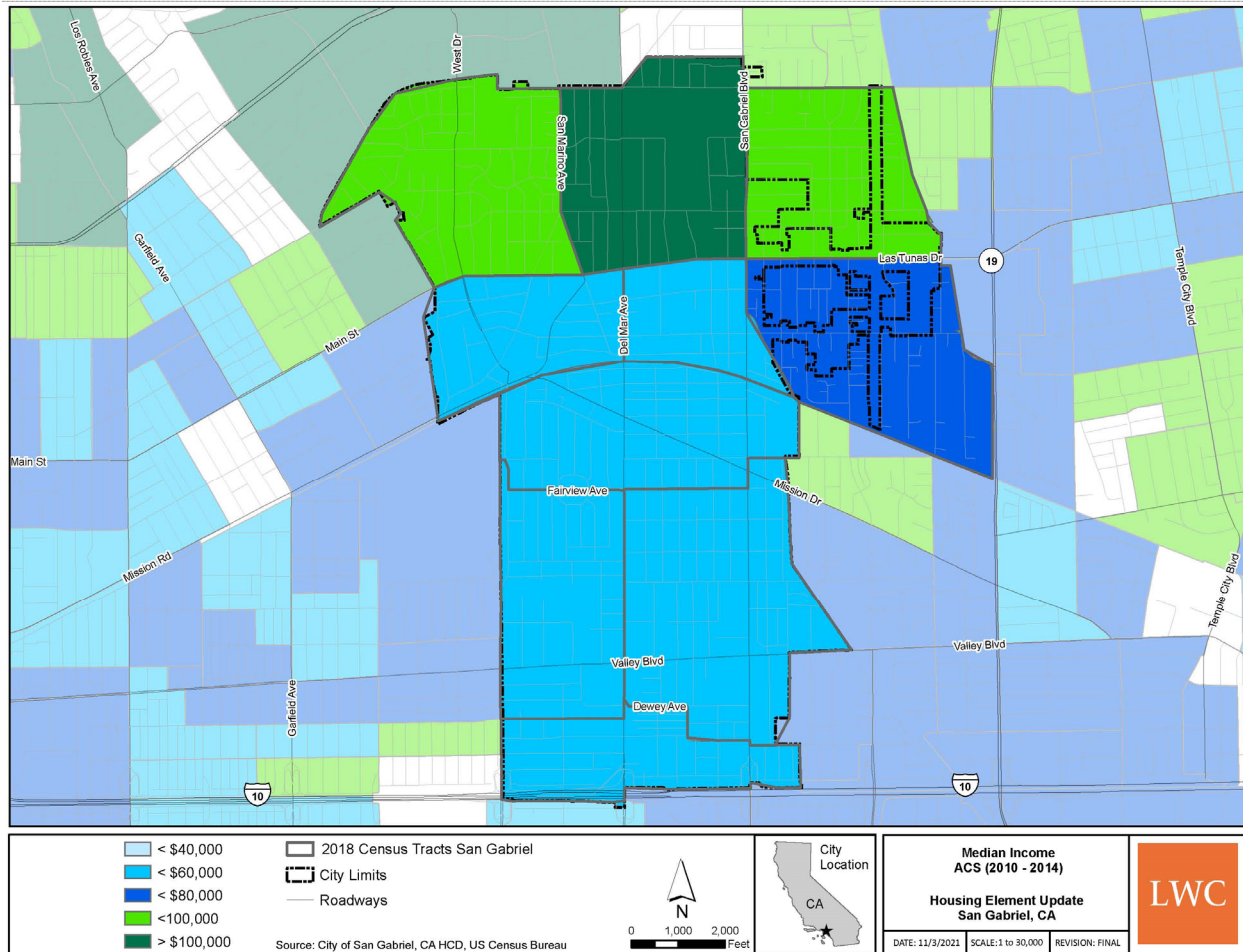
According to the 2015 to 2019 ACS, the median household income in San Gabriel is \$62,541, which is less than Los Angeles County at \$68,044 over the same period.

Figure F-7 displays the distribution of median household income by census tract in San Gabriel for 2010 to 2014. Household income was highest in the northern area of the city during this time period at \$100,000 or above. The other tracts had incomes at less than \$60,000 for this period except for one in the eastern portion.

Figure F-8 presents median household income by block group for 2015 to 2019. Some variation in household income is evident in Figure F-8 in adjacent tracts in certain areas of the city. Several block groups have lower median household incomes at under \$55,000 than surrounding areas. Most of the northern portion of the city has higher incomes overall with two tracts exceeding \$125,000. The majority of tracts within the city are at approximately the same level as the 2020 State Median Income (\$87,000).

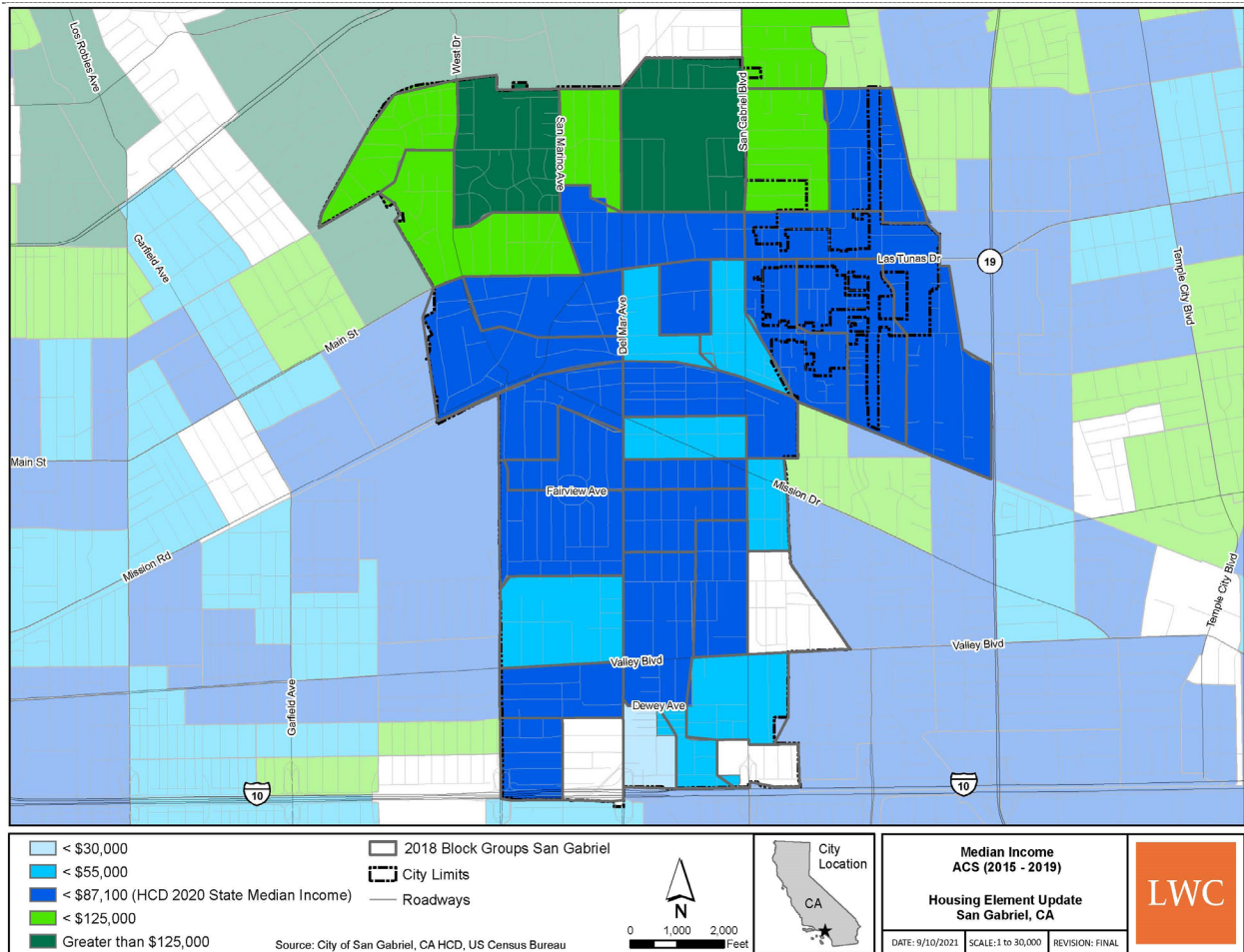
Three block groups within the city have no income data in the 2015 to 2019 ACS data. The patterns of median household income distribution between the two time periods of 2010 to 2014 and 2015 to 2019 are similar. Household income was highest in the northern portions of the city during both periods and lower elsewhere. Household income increased for the latter period in most areas south of Las Tunas Drive.

Figure F-7: Median Household Income (2010 - 2014)



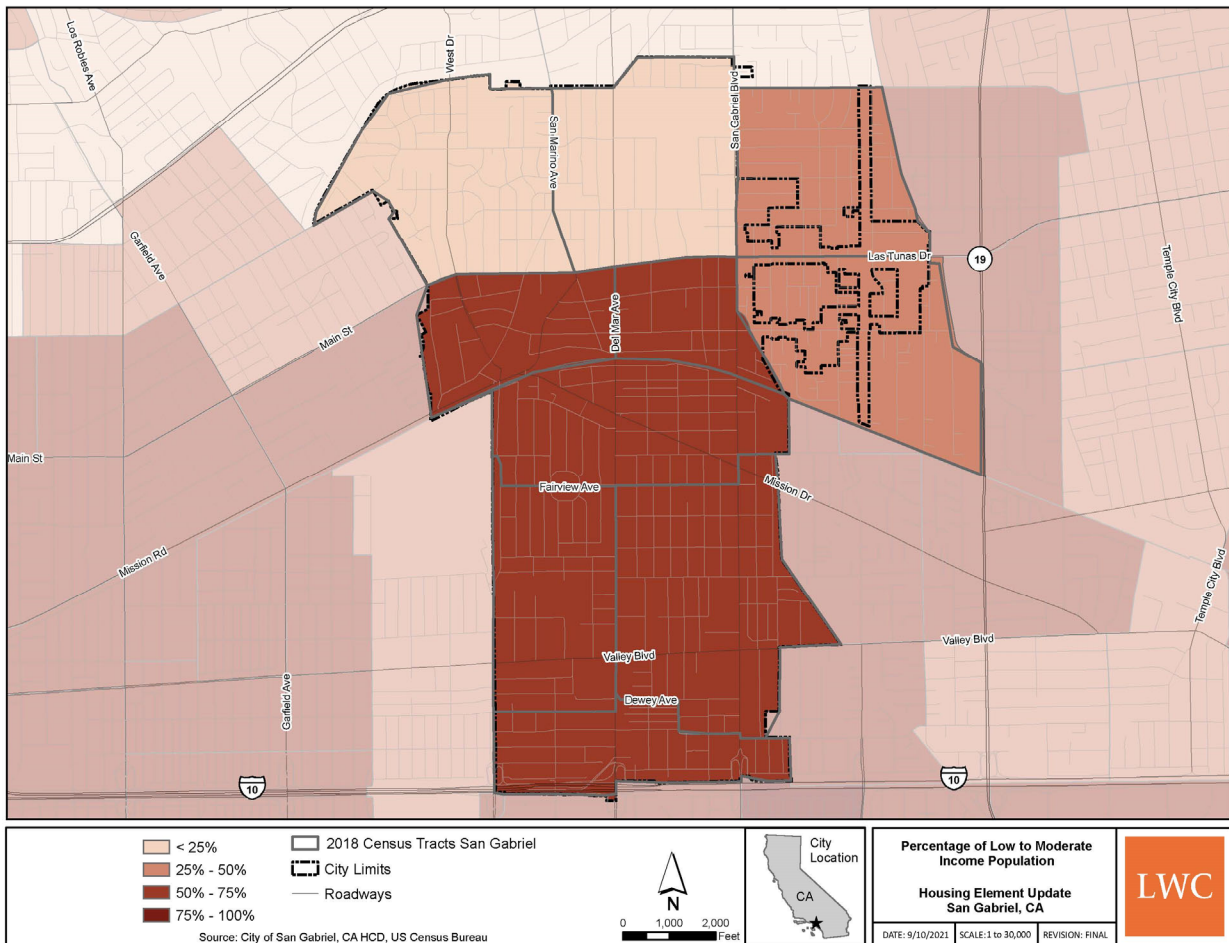
Source: HCD AFFH Spatial Data

Figure F-8: Median Household Income (2015 - 2019)



Source: HCD AFFH Spatial Data

Figure F-9: Low to Moderate Income Population



Source: HCD AFFH Spatial Data

Income should also be disaggregated by race and ethnicity to further understand local patterns of segregation and integration. Although the citywide poverty rate was 12.8 percent in 2019, not all racial and ethnic groups in San Gabriel have the same likelihood of experiencing poverty¹. As shown in Table F-2, a higher percentage of Black or African American individuals experience poverty than other racial or ethnic groups at a rate of about one in five. This rate is especially pronounced because this group represents only 0.6 percent of the total population according to the ACS data. The poverty rate was also acute for Asian alone and residents who identified as two or more races; those individuals also disproportionately experienced poverty at rates of 15.6 percent and 8.7 percent, respectively.

¹ In San Gabriel, 7.4 percent of total households are experiencing poverty, compared to 7.9 percent of households in the SCAG region (see Appendix A, Housing Needs Assessment, Section A.3.5).

Figure F-9 presents the distribution of LMI households in the city. The amount of LMI households is lowest in the northern section of the city at less than 25 percent and intermediate in the eastern portion at 25 to 50 percent. Higher levels of LMI households are located south of Las Tunas Drive at 50 to 75 percent. The city does not contain any neighborhoods in the highest quartile. Overall, the city has higher proportion of lower income households than the county at 58 to 54 percent, respectively.

Table F-2: Poverty by Race/Ethnicity (2019)

San Gabriel	Poverty Rate	% Of Population
Total Population	12.8%	-
White alone	7.9%	19.1%
Black or African American alone	22.2%	0.7%
American Indian and Alaska Native alone	0.8%	0.3%
Asian alone	15.6%	61.5%
Native Hawaiian/Other Pacific Islander alone	0.0%	0.2%
Some other race alone	8.5%	15.4%
Two or more races	8.7%	2.8%
Hispanic or Latino origin (of any race)	8.3%	25.5%
<i>Source: ACS 2019 5-Year Estimates, Table S1701</i>		

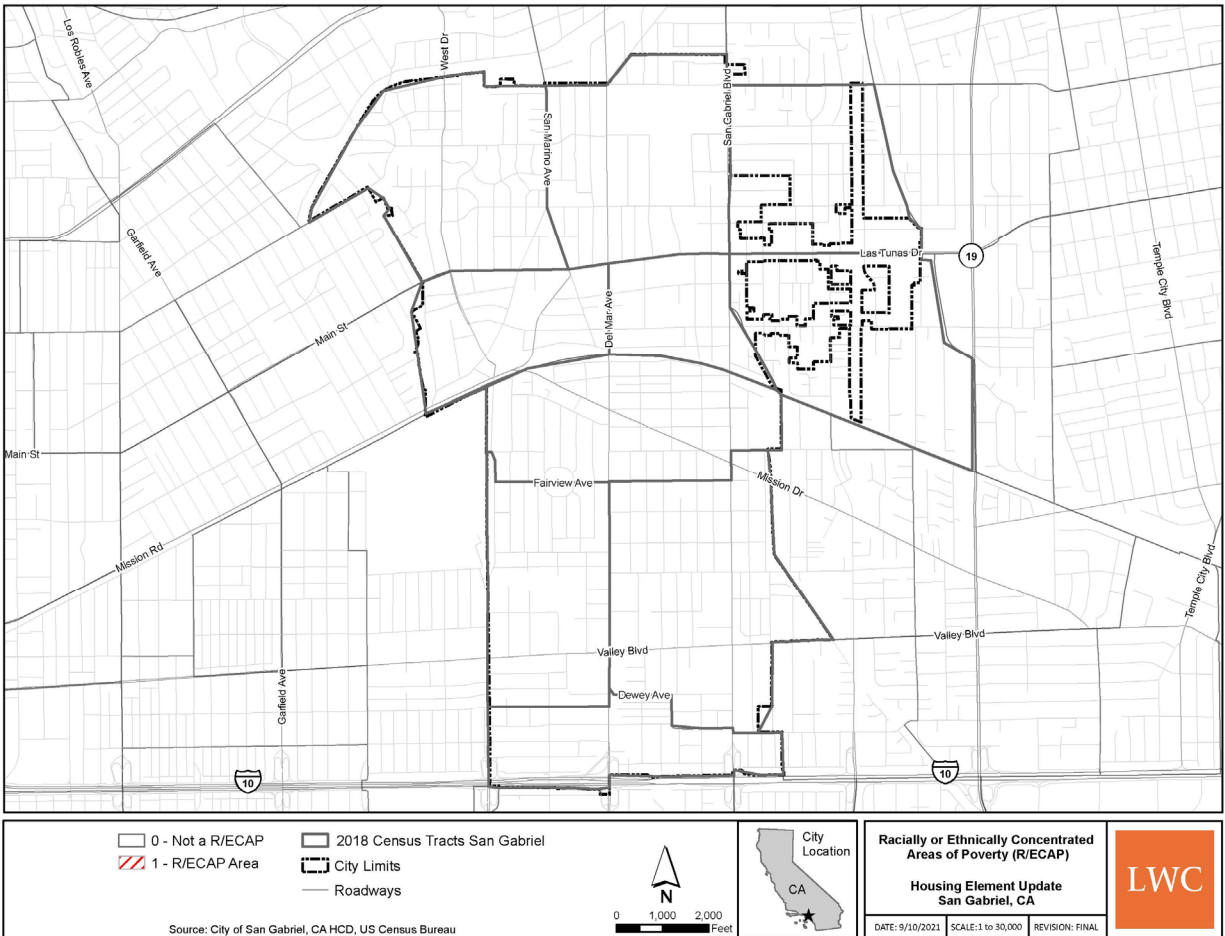
F.2.3 Racially or Ethnically Concentrated Areas of Poverty

Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs)

Racially or Ethnically Concentrated Areas of Poverty (R/ECAP) are areas that exhibit both high racial/ethnic concentrations and high poverty rates. HUD defines R/ECAPs as census tracts with a majority non-white population (50 percent or more) and a poverty rate that exceeds 40 percent or is three times the average poverty rate for the county, whichever is lower.

R/ECAPs may indicate the presence of disadvantaged households facing housing insecurity and need. They identify areas whose residents may have faced historical discrimination and who continue to experience economic hardship, furthering entrenched inequities in these communities. According to Figure F-10, there are no R/ECAPs in San Gabriel or in the surrounding area.

Figure F-10: Racially/Ethnically Concentrated Areas of Poverty (2009-2013)



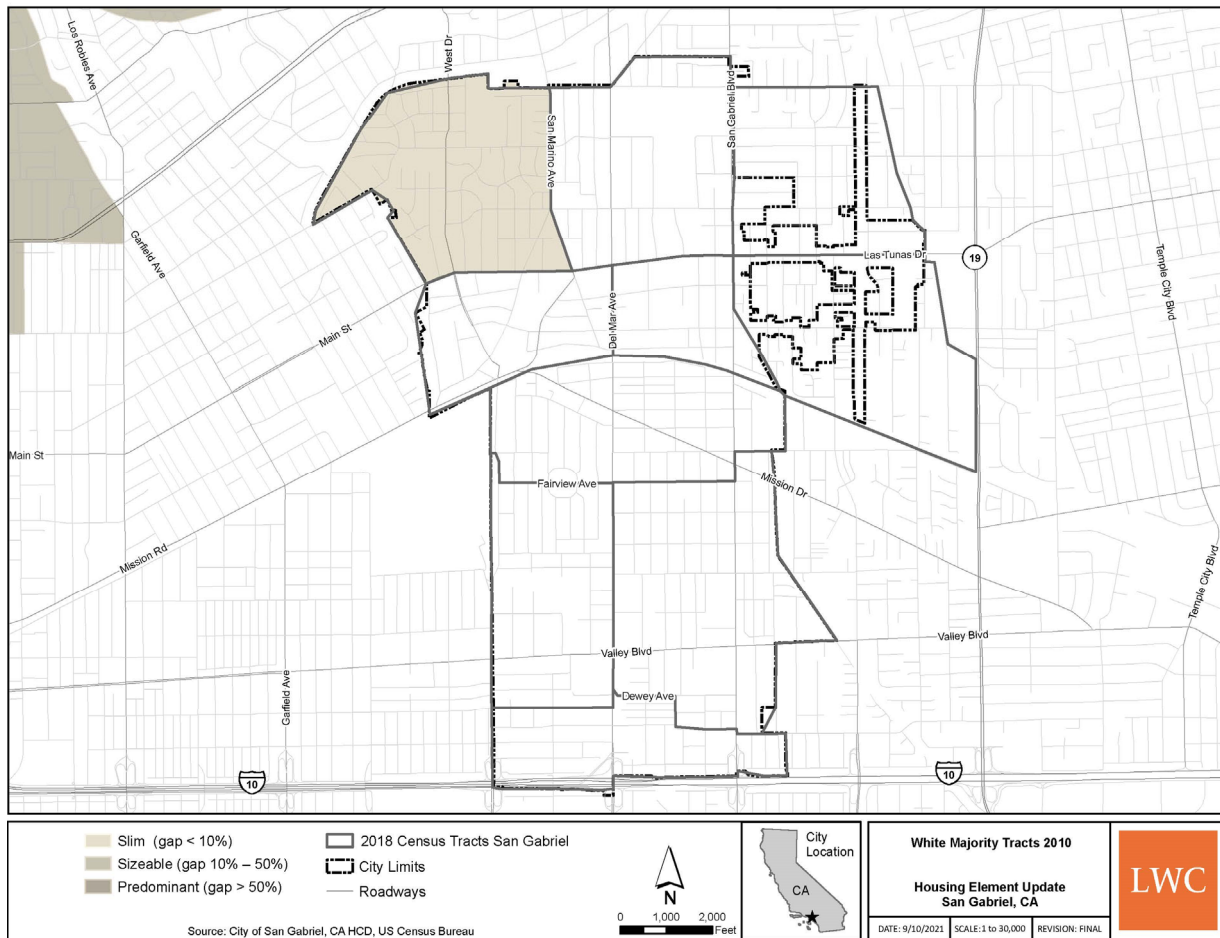
Source: HCD AFFH Spatial Data

Racially or Ethnically Concentrated Areas of Affluence (RCAAs)

Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates. Based on research from the University of Minnesota Humphrey School of Public Affairs, RCAAs are defined as census tracts where 80 percent or more of the population is white, and the median household income is \$125,000 or greater (which is slightly more than double the national median household income in 2016).

However, HCD has adjusted the RCAA methodology to more appropriately consider California's higher levels of diversity. According to 2010 data available from HCD (as shown in Figure F-11), San Gabriel had one white majority block group in 2010, but that is no longer true as shown in Figure F-2. Therefore, no tracts within the city meet the thresholds to be considered RCAAs.

Figure F-11: White Majority Tracts (2010)



Source: HCD AFFH Spatial Data

F.2.4 Access to Opportunity

One important component of fair housing is a neighborhood's access to opportunity, which correlates relative place-based characteristics of an area, such as education, employment, safety, and the environment, with critical life outcomes, such as health, wealth, and life expectancy. Ensuring access to opportunity means both investing in existing low-income and underserved communities, as well as supporting residents' mobility and access to 'high resource' neighborhoods.

In February 2017, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (TCAC) convened the California Fair Housing Task Force to provide research and evidence-based policy recommendations to further HCD's fair housing goals of (1) avoiding further segregation and concentration of poverty and (2) encouraging access to opportunity through land use policy and affordable housing, program design, and implementation.

HCD and TCAC prepared opportunity maps to identify census tracts with the highest and lowest resources. High resource areas are areas with high index scores for a variety of opportunity indicators. Examples of indicators of high resources areas include high employment rates, low poverty rates, proximity to jobs, high educational proficiency, and limited exposure to environmental health hazards. High resources tracts are areas that offer low-income residents the best chance of a high quality of life, whether through economic advancement, high educational attainment, or clean environmental health. Census tracts in the city that are categorized as moderate resource areas have access to many of the same resources as the high resource areas but may have fewer job opportunities, lower performing schools, lower median home values, or other factors that lower their indexes across the various economic, educational, and environmental indicators.

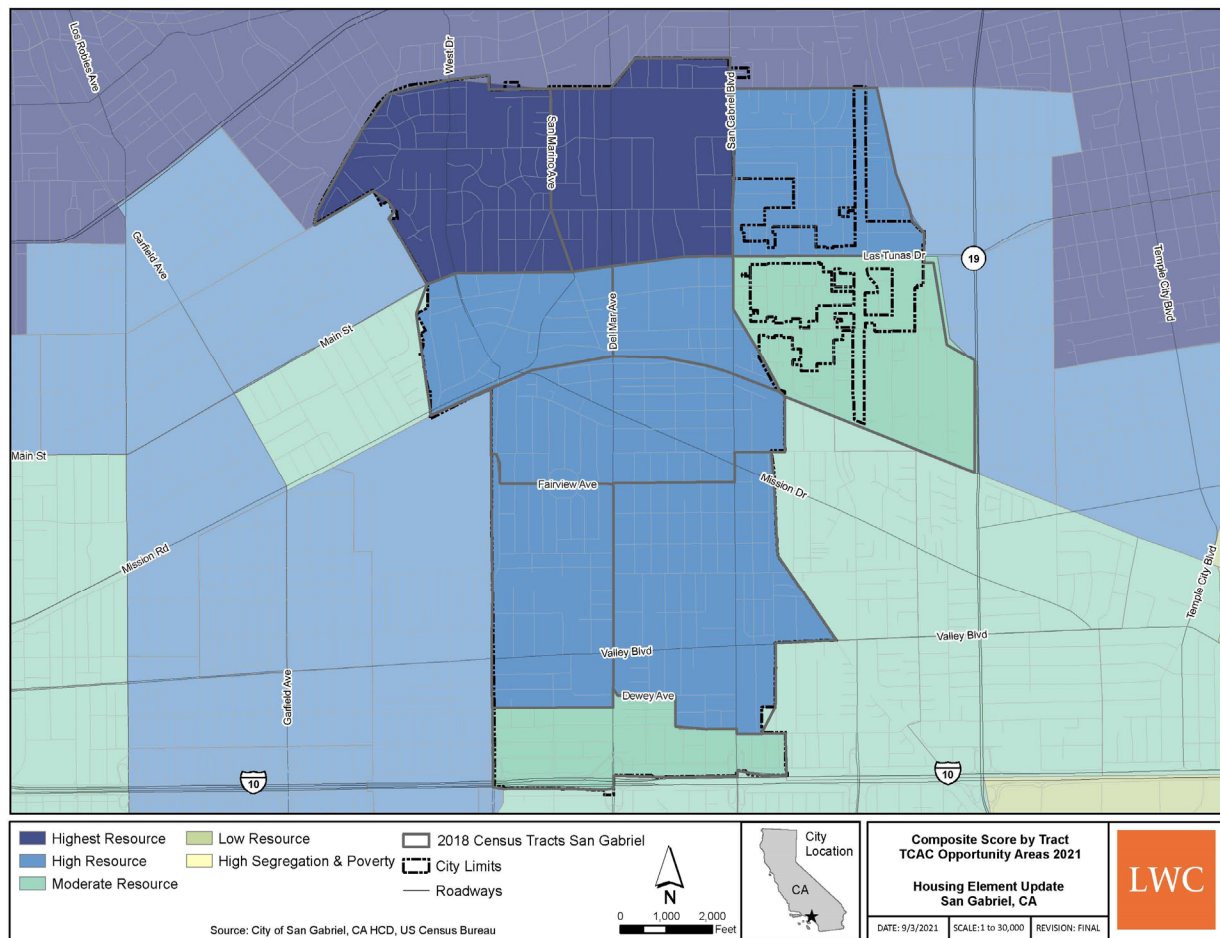
Low resources areas are characterized as having fewer opportunities to employment and education, or a lower index for other economic, environmental, and educational indicators. These areas have greater quality of life needs and should be prioritized for future investment to improve opportunities for current and future residents.

The opportunity maps inform TCAC, which oversees the Low-Income Housing Tax Credit (LIHTC) Program, to more equitably distribute funding for affordable housing in areas with the highest opportunity. The analysis evaluates total access to opportunity (e.g., high, moderate, low), but also individually assesses opportunity access across more specific indicators, such as education, transportation, economic development, and environment.

TCAC Opportunity Areas – Composite Score

The 2021 TCAC Opportunity Areas Composite Score provides an aggregate index of three domains: economic, education, and environmental. Census tracts with higher composite scores indicate higher resource areas overall. As shown in Figure F-12, San Gabriel has three different levels of resource areas: highest, high, and moderate. Highest resource neighborhoods are in two tracts north of Las Tunas Drive and west of San Gabriel Boulevard. Most of the city is within the high resource category. Two tracts are characterized as moderate resource areas and are in the eastern and southern portions of the city.

Figure F-12: TCAC Opportunity Areas 2021 - Composite Score



Source: HCD AFFH Spatial Data

Economic Score

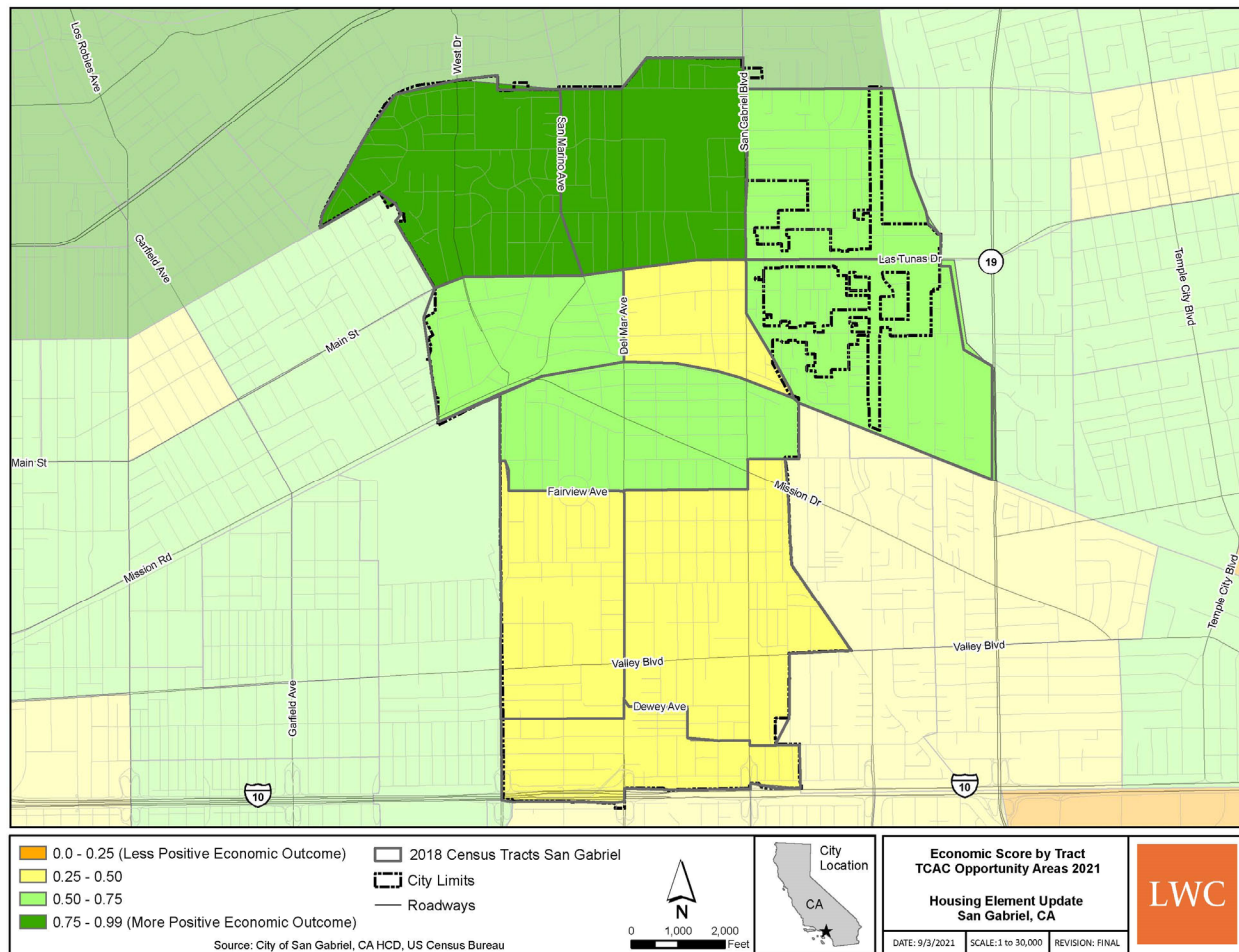
The 2021 TCAC Opportunity Areas Economic Score for a census tract is based on poverty, adult education, employment, job proximity, and median home value indicators. The score is broken up by quartiles, with the highest quartile indicating more positive economic outcomes and the lowest score indicating least positive outcomes.

The city has four tracts with economic scores of 0.25 to 0.50 and 0.50 to 0.75 as shown in Figure F-13. The city has two tracts in the higher score range (0.75 to 0.99) located in northern portions of the city; these tracts also have higher median household income.

The City has taken steps to help revitalize declining commercial areas and thus improve economic conditions for residents. Consistent with San Gabriel's General Plan, which identifies that the City will utilize Community Development Block Grant (CDBG) funding to help improve commercial areas (Action 4.1.1.3), CDBG funds have been used to fund code enforcement services related to qualified property maintenance cases, street improvement projects, and community services

programs. Also, the City encourages public and private investment through the Valley Boulevard Specific Plan, which allows for higher intensity residential and mixed-use development, and was adopted in 2006. Valley Boulevard is within areas of lower economic scores in San Gabriel. LA Metro and City of Montebello bus lines serve San Gabriel, including bus lines along San Gabriel Boulevard that connect to the greater transit system.

Figure F-13: TCAC Opportunity Areas 2021 - Economic Score



Source: HCD AFFH Spatial Data

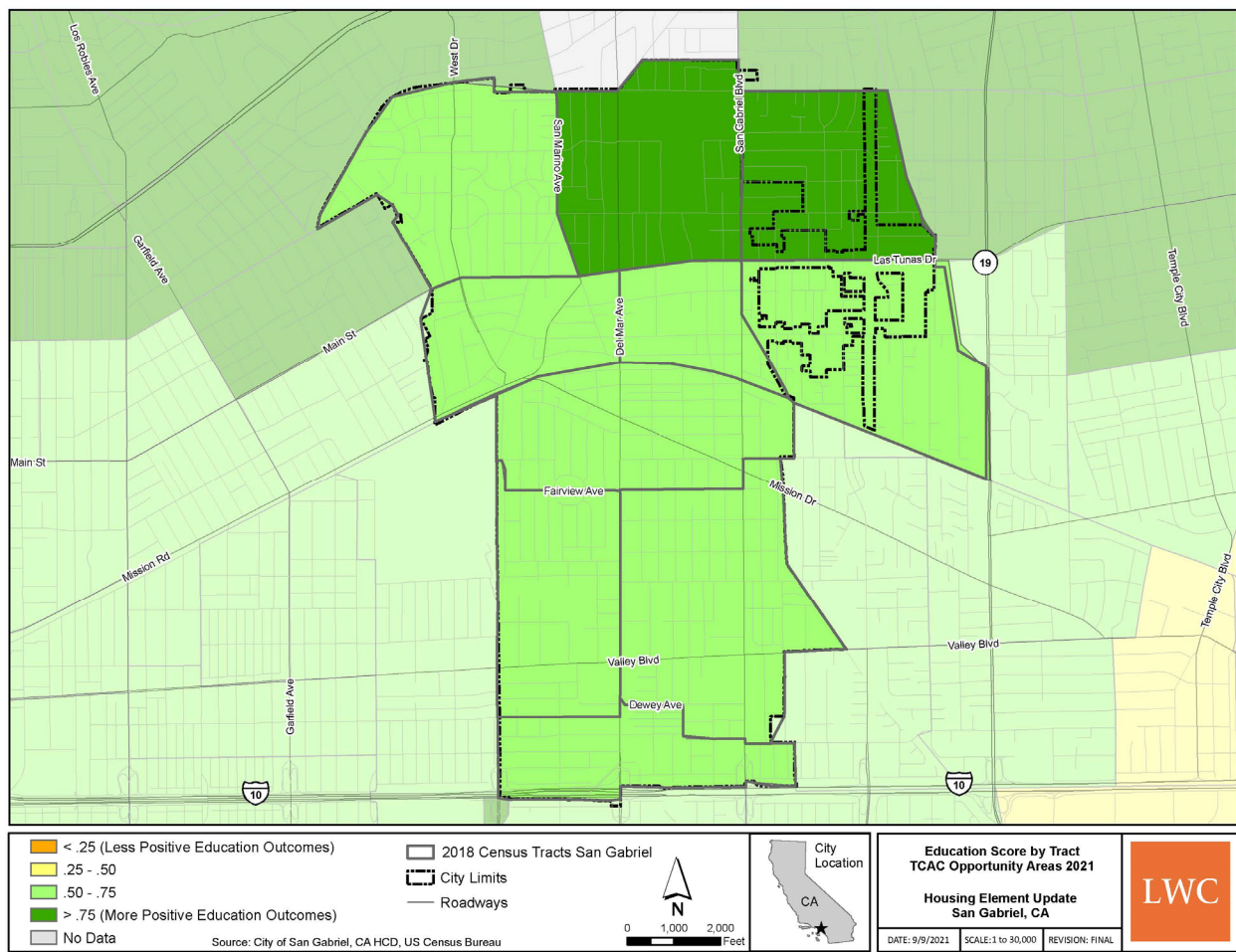
Education Score

The 2021 TCAC Opportunity Areas Education Score for a census tract is based on math and reading proficiency, high school graduation rate, and student poverty rate indicators. The score is broken up by quartiles, with the highest quartile indicating more positive education outcomes and the lowest quartile signifying less positive outcomes.

As shown in Figure F-14, most census tracts in the city have a good education score between 0.50 and 0.75. Two tracts have scores greater than 0.75. These scores suggest that the city generally has positive educational outcomes for students.

The San Gabriel Unified School District (SGUSD) has five elementary schools within its boundaries. While two of the elementary school attendance areas are within or partially within census tracts with the highest education scores (Wilson Elementary School and Washington Elementary School), the school attendance areas do not appear to correlate or modify the education score. The SGUSD has a long-standing record of excellence with a 95 percent graduation rate.

Figure F-14: TCAC Opportunity Areas 2021 - Education Score



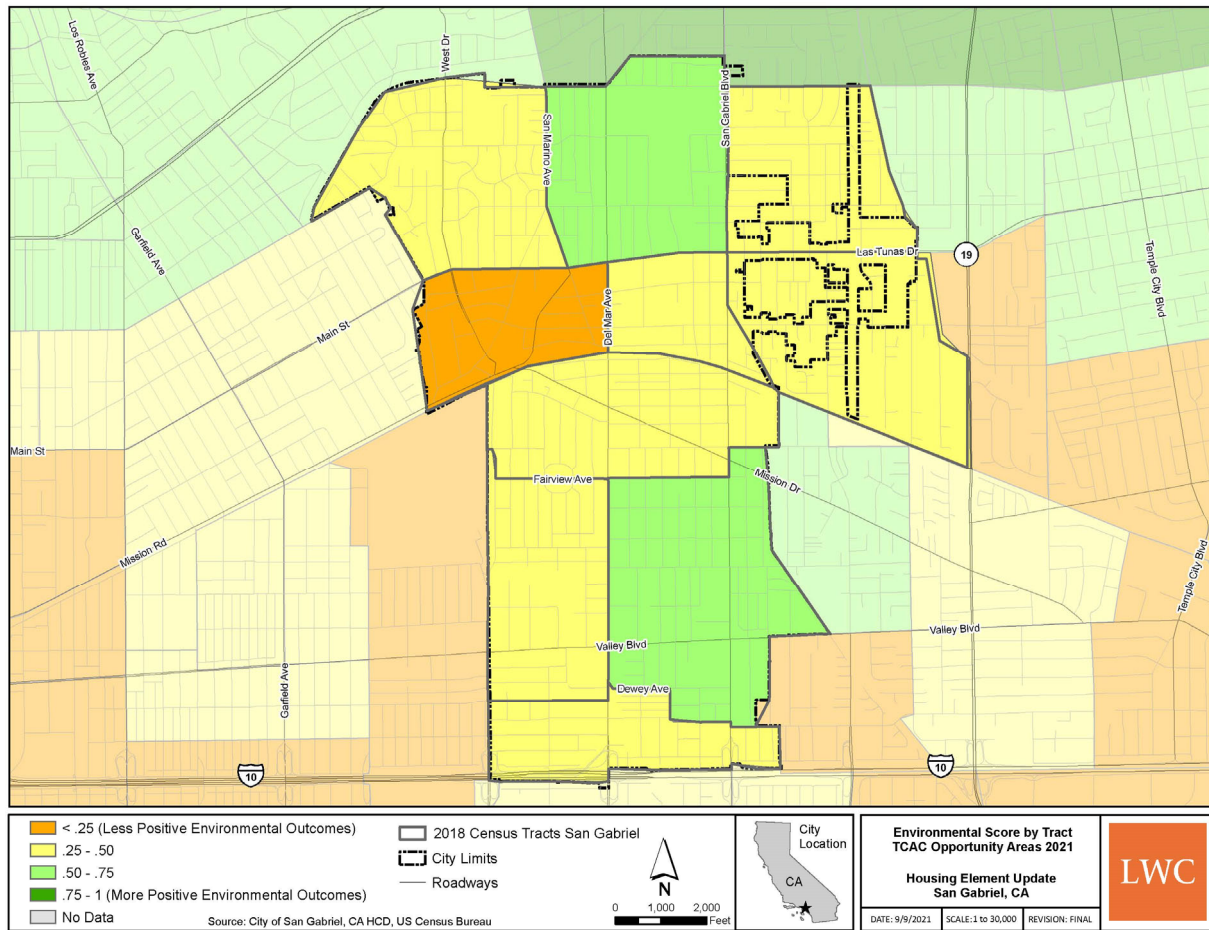
Source: HCD AFFH Spatial Data

Environmental Score

Environmental scores for census tracts presented in Figure F-15 are based on 2021 TCAC Opportunity Areas Environmental Scores that reflect environmental risk. The scores are divided into quartiles with higher scores representing more positive environmental outcomes and lower scores indicating least positive environmental outcomes for residents living there.

The city contains a range of environmental scores that indicate residents in different areas of the city experience different levels of environmental outcomes. As shown in Figure F-15, the lowest environmental score is in the census tract located between Las Tunas Drive and Mission Road and west of Del Mar Avenue. A large portion of this area is within the Mission District Specific Plan, and there are some groundwater cleanup sites located in this area (none of which are located on identified housing sites). However, during public review of the Housing Element comments included that new development has not occurred in the Mission District Specific Plan area, demonstrating an overall lack of investment in an area where residential and mixed uses are allowed. Most of the tracts within the city have environmental scores in the relatively lower range of 0.25 to 0.50 and only two have scores above 0.50.

Figure F-15: TCAC Opportunity Areas 2021 - Environmental Score



Source: HCD AFFH Spatial Data

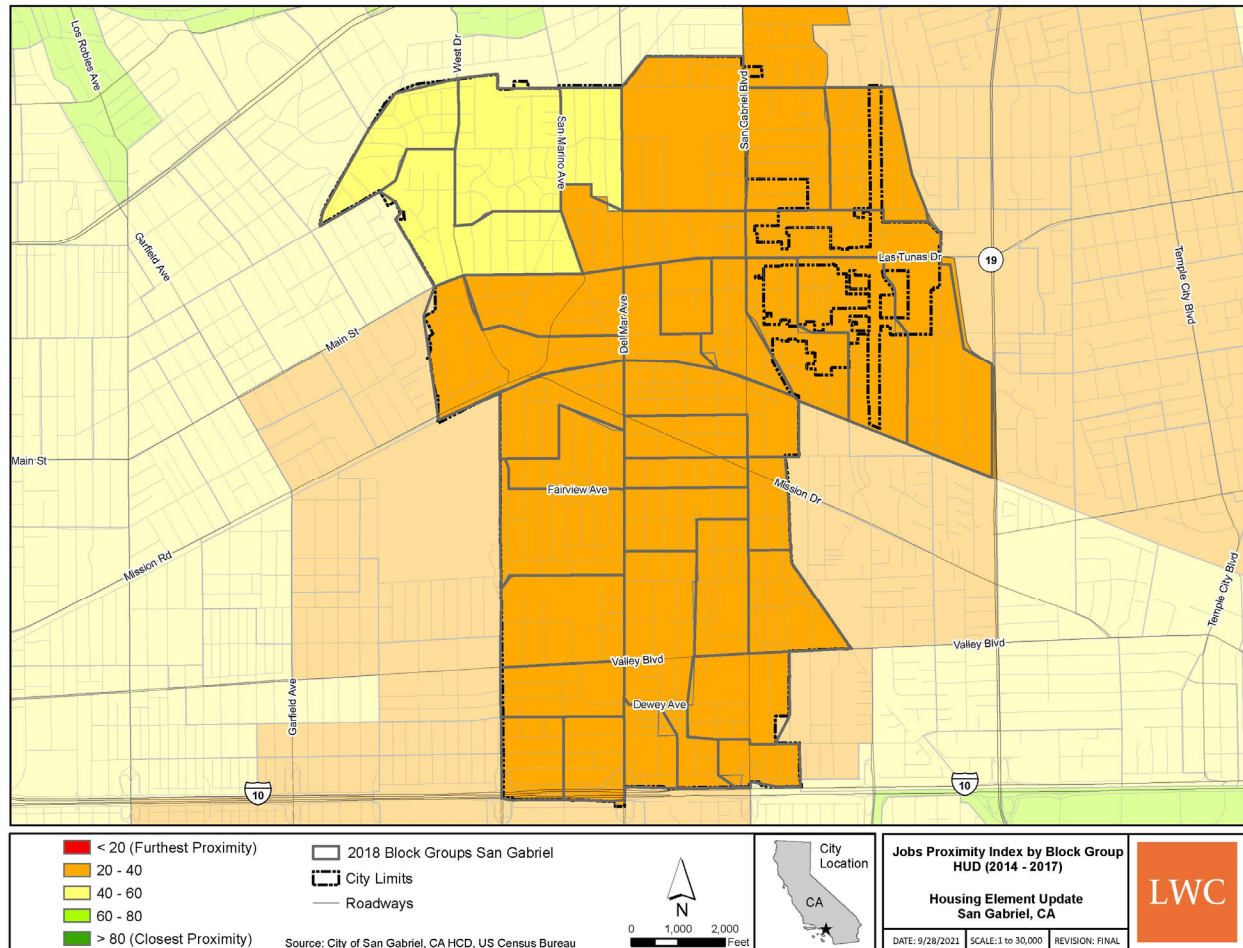
Jobs Proximity Index

HUD's Jobs Proximity Index for a census tract measures the area's distance from employment. This index can be used as a proxy to indicate relative transportation needs in a community. The score is broken up by quintiles, with the highest quintile representing areas closest to job centers. The Jobs Proximity Index score is relatively low across San Gabriel, with the exception of the northwest portion, and most of the entire city is located in a 20 to 40 quintile indicating relatively further distance to job centers as shown in Figure F-16. Approximately 1,200 people are both employed and live in San Gabriel, which is 9.0 percent of employed San Gabriel residents². The largest proportion of employed San Gabriel residents (17.5 percent) work in the City of Los

² Longitudinal Employer-Household Dynamics (LEHD), OnTheMap, 2018.

Angeles, followed by the City of San Gabriel (9.0 percent), the City of Pasadena (5.9 percent), and the City of Alhambra (4.8 percent).

Figure F-16: Jobs Proximity Index (HUD, 2014-2017)



Source: HCD AFFH Spatial Data

Disparities in Access to Opportunity for Persons with Disabilities

People with disabilities often experience challenges with accessibility, discrimination, and housing choice that make it difficult to find suitable housing to meet their needs. This section analyzes such disparities to ensure the City is able to adequately serve its residents with disabilities.

According to the Needs Assessment (Appendix A, Figures A-11 and A-12), the most common types of disabilities in San Gabriel in 2018 were ambulatory disabilities followed by independent living disabilities. Of the total senior population in San Gabriel, the most common types of disabilities in 2018 were ambulatory disabilities (17.0 percent of the total senior population) and independent living disabilities (14.5 percent of the total senior population).

The California Department of Developmental Services (DDS) currently provides community-based services to approximately 350,000 persons with developmental disabilities and their families through a statewide system of regional centers, developmental centers, and community-based facilities. DDS also provides data on developmental disabilities by age and type of residence. According to DDS and as shown in the Needs Assessment (Appendix A, Table A-8), there are about 300 residents with a development disability in San Gabriel, most of whom are able to live in their own home with their parent or guardian.

There are a variety of housing types appropriate for people with disabilities, such as licensed and unlicensed single-family homes, group homes, and transitional and supportive housing. The design of housing-accessibility modifications, proximity to services and transit, and the availability of group living opportunities represent some of the types of considerations that are important in serving this need group. The Housing Constraints Appendix (Appendix C) discusses how the City permits various housing types, including the allowance for reasonable accommodations. A program is included to amend the required findings for a reasonable accommodation to facilitate approval of reasonable accommodation requests.

As identified in the Housing Needs Assessment (Appendix A), several facilities located in San Gabriel can provide care and housing for people with disabilities. These are the San Marino Manor, Vista Cove Care Center, and Live Oak Rehab Center. Also, the Eastern Los Angeles Regional Center located in Alhambra provides services for people with developmental disabilities in San Gabriel. It is one of seven regional centers in Los Angeles County operated by private nonprofit corporations that contract with DDS to coordinate services for people with developmental disabilities³.

Additionally, the Los Angeles County Department of Public Social Services operates the In-Home Supportive Services (IHSS) program for low-income seniors or people with disabilities. This program provides support for individuals such as meal preparation, laundry, house cleaning, and personal care to enable them to live at home.

Disparities in Access to Transportation Opportunities

The HUD Low Transportation Cost Index is based on estimates of transportation costs for a family that meets the following description: a three-person single-parent family with income at 50 percent of the median income for renters for the region. These estimates originate from the Location Affordability Index (LAI). Transportation costs are modeled for census tracts as a percent of income for renters in these households. Index values are inverted, and percentile ranked nationally, with values ranging from 0 to 100. Higher index values indicate lower transportation costs in that neighborhood. Transportation costs may be low within a tract for a range of reasons,

³ <https://www.sgprc.org/>

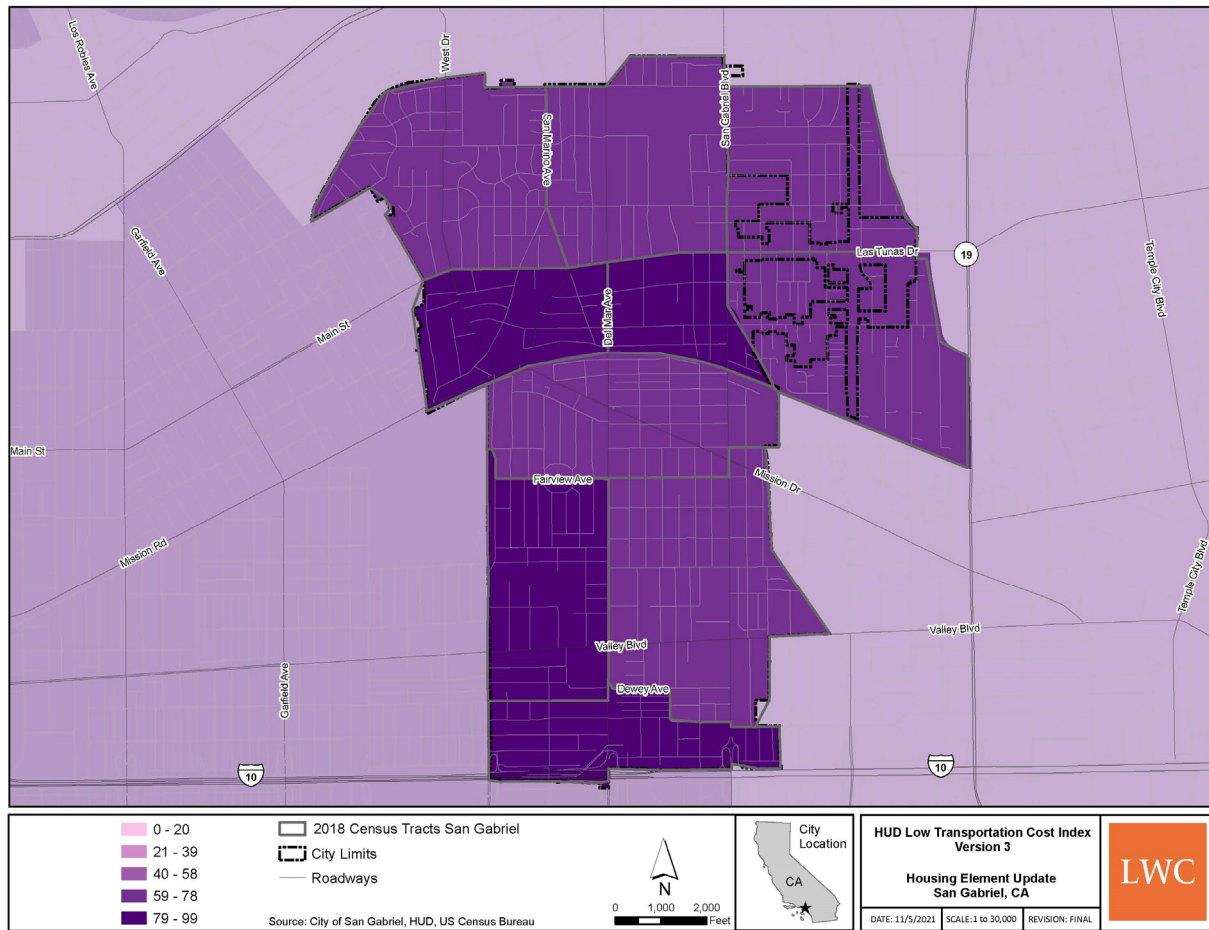
including greater access to public transportation and the density of homes, services, and jobs in that area.

Figure F-17 displays the Transportation Cost Index ranges in San Gabriel. The city contains two levels for the index, 59 to 78 and 79 to 99. The index values range from 66 to 78 and 79 to 88, respectively, and they indicate that San Gabriel has lower transportation costs than that percentage of the nation. Transportation costs are therefore relatively low across the city and access to transportation opportunities are relatively even.

The City does not have a citywide transit map but does offer multiple links to information about transit services on the City's website. Some of the transit services offered by the City include access services which is an on-demand, curb-to-curb ride program for certified individuals with disabilities that prevent them from using other public transportation options and low cost on-call transportation for residents with disabilities and those 62 years or older (Senior Dial-a-Ride). Public transit options are one City of Montebello bus line serving and several Metro Route lines.

San Gabriel also has two bikeways. One is located on Las Tunas Drive from San Gabriel Boulevard to the eastern boundary and is designated as Class II. The other bikeway located on Juniper Sierra Drive is designated as Class III. City sidewalks and bicycle facilities help connect residents to transit.

Figure F-17: HUD Low Transportation Cost Index



Source: HUD Spatial Data

F.2.5 Disproportionate Housing Needs

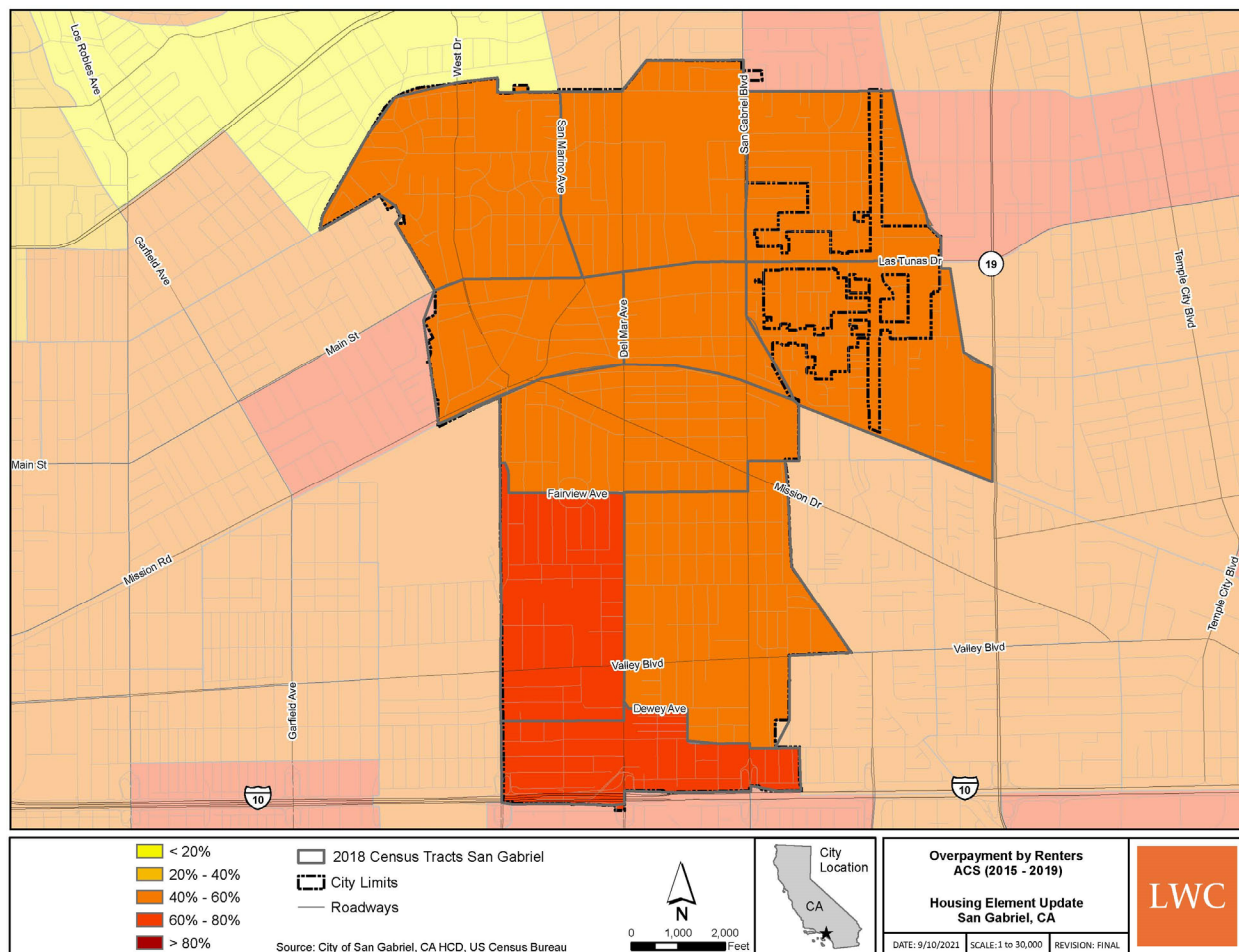
Overpayment

HUD defines overpayment, or “housing cost burden”, as households paying 30 percent or more of their gross income on housing expenses, including rent or mortgage payments and utilities. Housing cost burden is considered a housing need because households that overpay for housing costs may have difficulty affording other necessary expenses, such as childcare, transportation, and medical costs.

Renters are more likely to overpay for housing costs than homeowners. According to the Needs Assessment (Appendix A), 57.4 percent of renters in San Gabriel is cost burdened, which is higher than the overpayment rate in the SCAG region at 55.3 percent. The percentage of renter households exhibiting cost burden was high across the city at 40 to 80 percent (see Figure F-18). However, the highest burden is in the census tracts at the southwest of the city, along Interstate 10 and south of Fairway Avenue and west of Del Mar Avenue. These areas consist of a mixed of

housing types in varying condition, including a portion located in the Valley Boulevard Specific Plan.

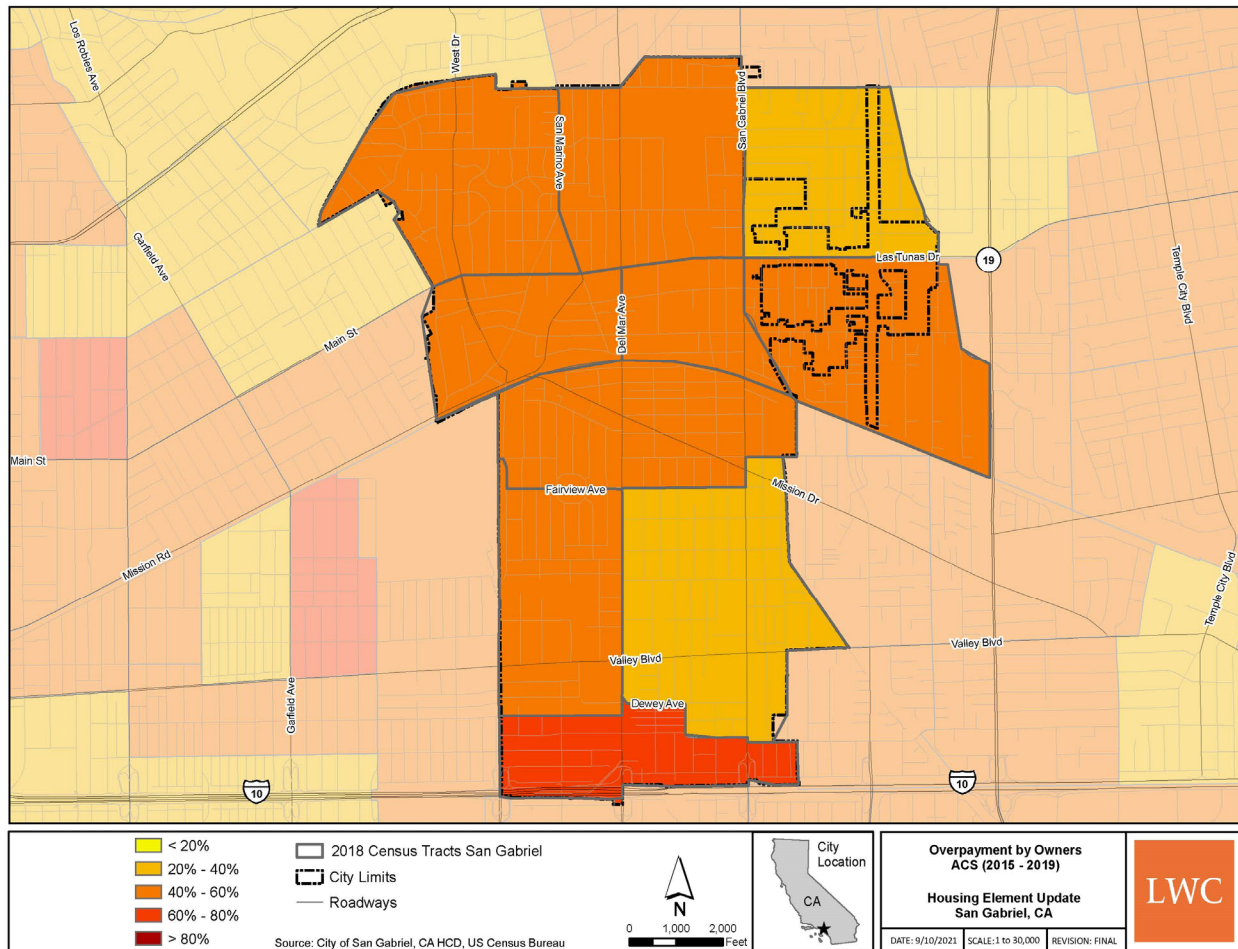
Figure F-18: Overpayment by Renters (2015 - 2019)



Source: HCD AFFH Spatial Data

Homeowners generally experience a lower rate of cost burden than renters. Figures F-19 shows the percentages of homeowners experiencing overpayment for the 2015 to 2019 time period. Percentages of homeowners with overpayment range from approximately 20 percent to 80 percent across the city. The census tract south of Dewey Avenue to Interstate 10 in the southern portion of the city contains similar levels of renters and homeowners who are housing cost burdened at 70 percent and 64 percent, respectively. These may be areas where both renters and homebuyers are over-extending financially to live in San Gabriel to gain access to higher quality school districts and other opportunities. This is evidenced by community members comments, including those describing difficulties with being able to buy a home in San Gabriel after renting in the city for an extended period (in some cases decades) and having dual incomes.

Figure F-19: Overpayment by Owners (2015 - 2019)



Source: HCD AFFH Spatial Data

Overcrowding

Overcrowding is defined by the Census as a unit in which more than one person occupies a room (excluding bathrooms and kitchens) while severe overcrowding occurs when more than 1.5 people occupy a room. Overcrowded households are an indicator of housing needs, as lower income families or individuals may choose to live together in smaller spaces to save money on housing costs.

Community members voiced concern about overcrowded housing conditions and the impact it has on children, youth, and seniors – both mentally and physically. In addition to the strain on residents' mental and physical health, overcrowding can also lead to more rapid deterioration of the property due to increased usage. According to the 2015 to 2019 ACS data, 6.8 percent of households in San Gabriel experienced overcrowding and 3.0 percent experienced severe overcrowding. The city's overcrowded rate is similar to that of Los Angeles County at 6.6 percent, while the city's severely overcrowded rate is lower than Los Angeles County's at 4.7 percent

(Table F-3). This is similar to the comparison to the SCAG region, where the San Gabriel's severely overcrowded rate is lower than the region, but the owner-occupied overcrowded rate is higher (see Appendix A, Housing Needs Assessment Section A.3.3).

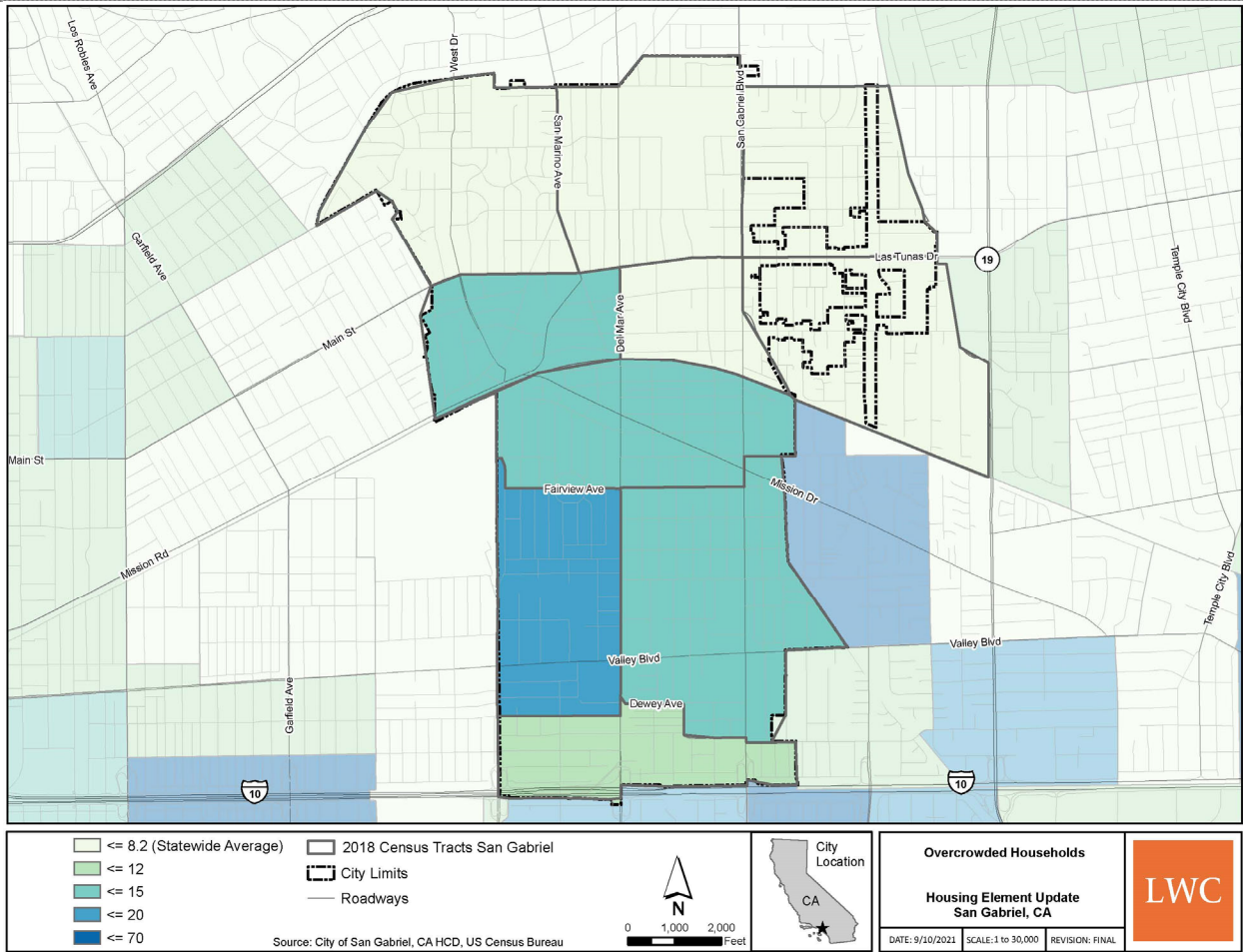
Table F-3: Overcrowding and Severe Overcrowding Rates

	San Gabriel	Los Angeles County
Occupants Per Room	Percent of Occupied Housing Units	
1.01 to 1.5	6.8%	6.6%
1.51 or more	3.0%	4.7%
<i>Source: ACS 5-Year Estimates, Table DP04</i>		

The percentages of overcrowded households in San Gabriel are shown by census tract in Figure F-20. Half of the tracts within the city have similar levels of overcrowding as the state average at equal to or less than 8.2 percent. The other half of census tracts have higher levels of overcrowding rates with those mostly located in the southern portions of the city. The highest level of overcrowding in the city is 17.2 percent in the tract located between Fairview and Dewey avenues and west of Del Mar Avenue. This tract also contains higher proportions of female-headed households with children.

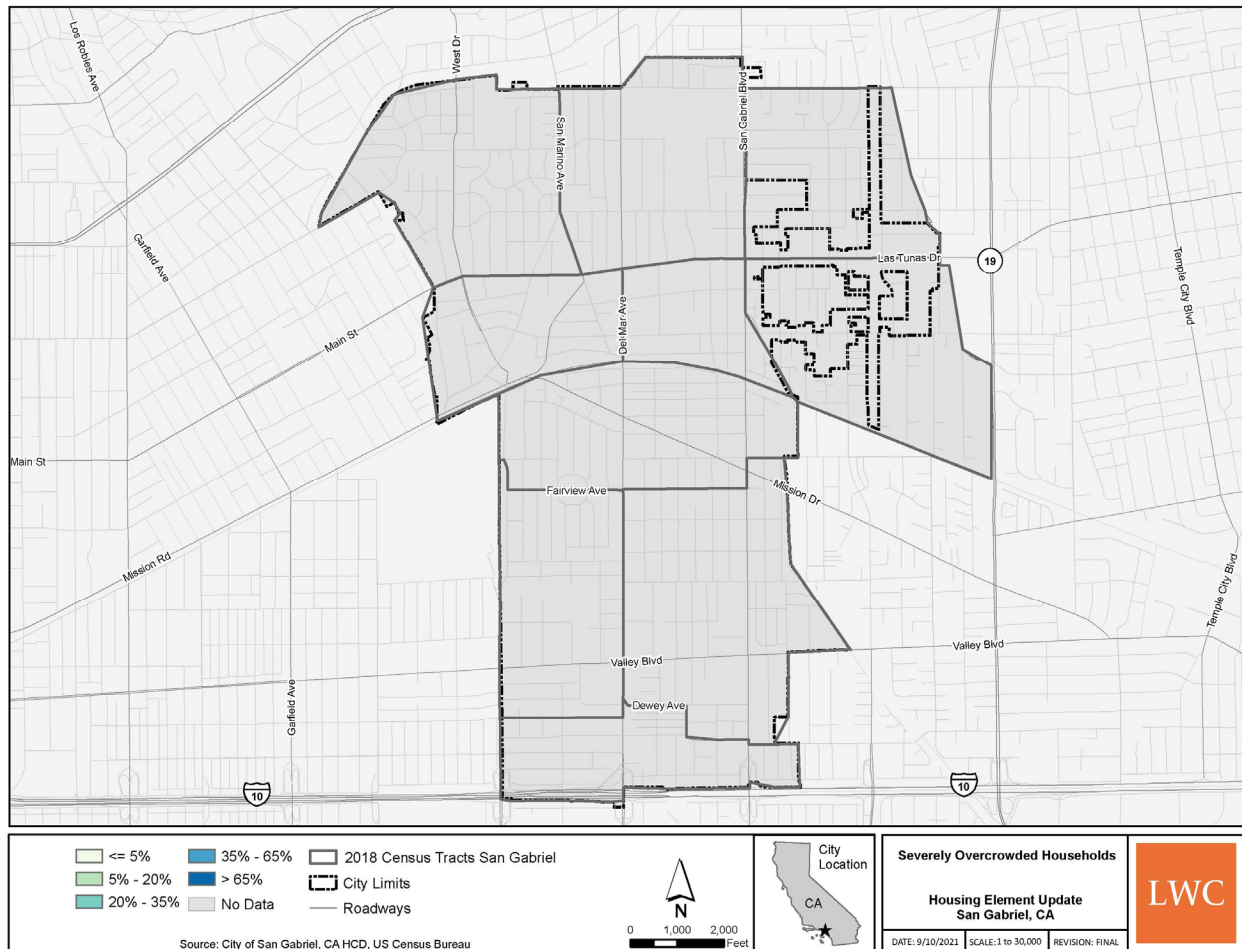
The statewide spatial data for severe overcrowding did not contain any values in the vicinity of San Gabriel as shown in Figure F-21.

Figure F-20: Overcrowded Households



Source: HCD AFFH Spatial Data

Figure F-21: Severely Overcrowded Households



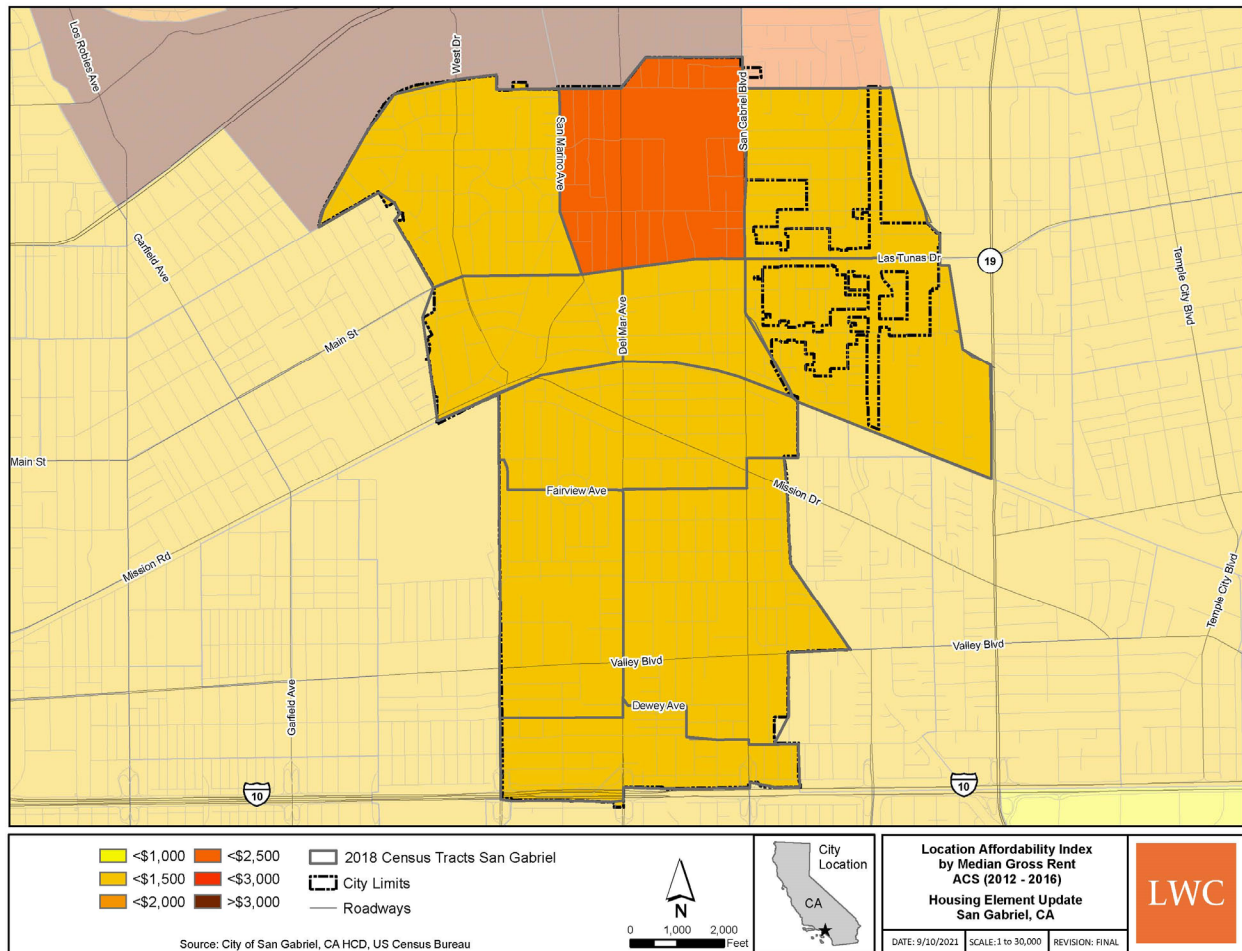
Source: HCD AFFH Spatial Data

Location Affordability Index

Figure F-22 shows the median gross rent across San Gabriel per HUD's Location Affordability Index for the years 2012 to 2016. This index estimates household housing and transportation cost on a neighborhood-scale. As shown in this Figure, the index ratings show that the majority of the city has median gross rents in the middle range of less than \$2,000 a month. San Gabriel has relatively higher median rents (less than \$2,500) in one census tract in a northern portion of the city bounded by San Gabriel Boulevard and San Marino Avenue to the east and the west, respectively.

This range is aligned with the Needs Assessment (Appendix A), which shows the median monthly rent paid in San Gabriel in 2018 was \$1,425. These rents are primarily affordable to moderate-income households but would be considered a cost-burden for many lower-income households.

Figure F-22: Location Affordability



Source: HCD AFFH Spatial Data

Substandard Housing

Incomplete plumbing or kitchen facilities can be used as a proxy to indicate substandard housing conditions. According to the 2015 to 2019 ACS, 0.4 percent of San Gabriel households lacked complete plumbing installations, which is about the same as Los Angeles County overall at 0.5 percent. The level of San Gabriel households without complete kitchen facilities is 2.2 percent, which is higher than the County at 1.5 percent.

Table F-4: Substandard Housing Rates

	San Gabriel	Los Angeles County
Substandard Condition	Percent of Occupied Housing Units	
Lacking complete plumbing facilities	0.4%	0.5%
Lacking complete kitchen facilities	2.2%	1.5%
<i>Source: ACS 5-year estimates 2015-2019, Table DP04</i>		

The age of housing stock can also be an indicator of substandard housing. As homes get older, there is a greater need for maintenance and repair. If not properly addressed, an aging housing stock can result in poorer living standards, incur more expensive repair costs and, under certain conditions, lower overall property values.

San Gabriel's housing stock is generally older than that of the Southern California Association of Governments (SCAG) region. According to the Needs Assessment (Appendix A), 52.3 percent of all units in San Gabriel are older than 60 years old, compared to 32.1 percent of units in the SCAG region. The greatest share of San Gabriel's housing units was built between 1940 to 1949, while in the SCAG region more units were built between 1970 to 1979 than any other time.

Displacement Risk

The University of California Berkeley's Urban Displacement Project (UDP) uses data-driven research to produce maps identifying sensitive communities that are at-risk of displacement. UDP defines sensitive communities as currently having "populations vulnerable to displacement in the event of increased redevelopment and drastic shifts in housing cost". Vulnerability was determined based on the following characteristics:

- The share of very low-income residents is above 20 percent;
AND
- The tract meets two of the following criteria:
 - Share of renters is above 40 percent
 - Share of people of color is above 50 percent
 - Share of very low-income households that are severely rent burdened households is above the county median
 - Percent change in rent is above county median rent increase
 - Rent gap, which is the difference between tract median rent and median rent for surrounding areas

UDP has identified vulnerable communities in seven census tracts across the city (Figure F-23). Four of these tracts are more likely to experience overcrowding, and the tracts in southern portions of the city also have higher concentrations of LMI households. Interstate 10 runs along the southern boundary of the city that is mostly zoned R-2 (Low Density Multiple Family), but also includes R-3 and R-1-zoned properties. Additionally, the Valley Boulevard Specific Plan (VBSP)

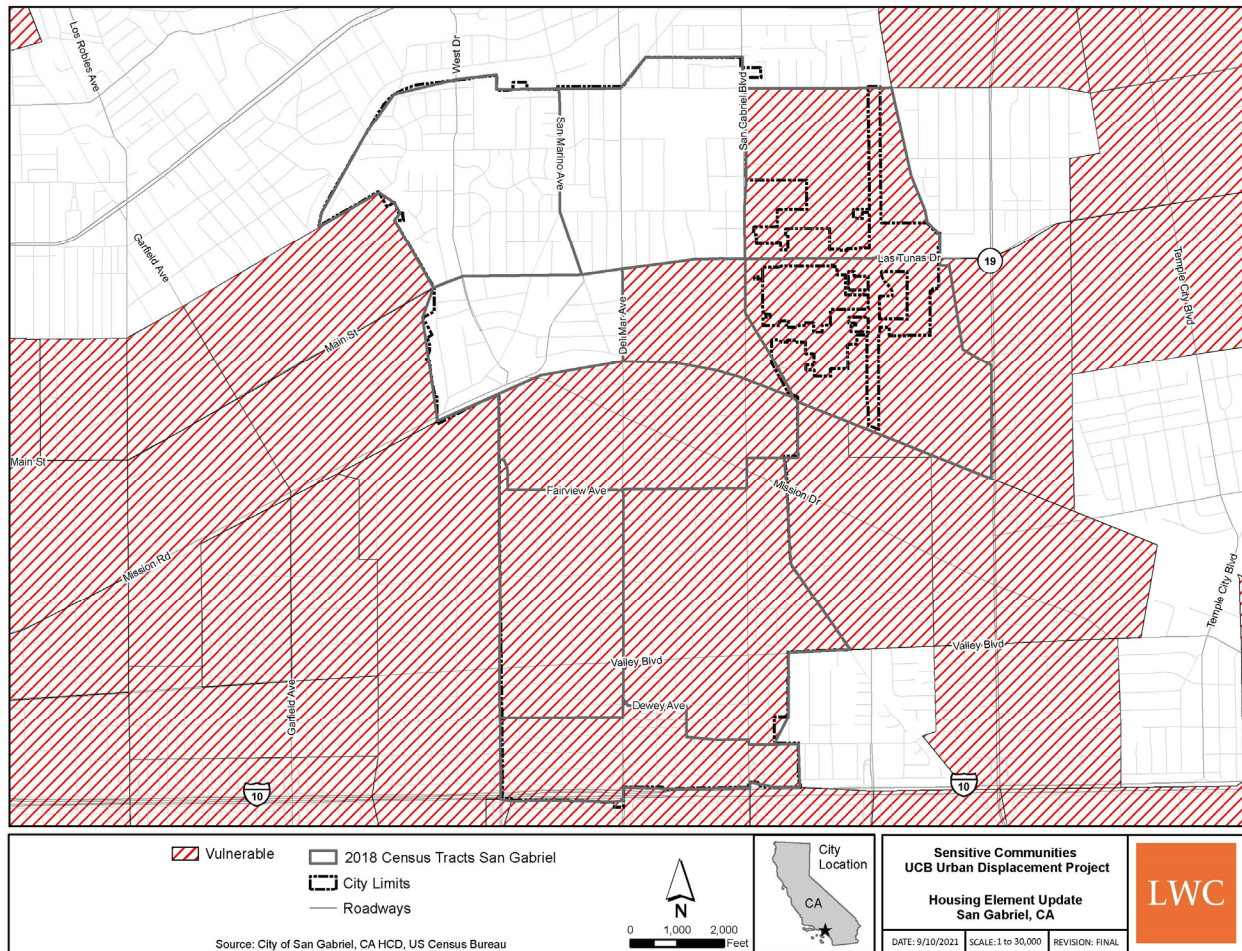
is within the area identified as vulnerable communities. Neighborhoods within the VBSP consist of a mix of units including detached single-family homes, townhomes, and apartments. The maintenance or condition of these units varies considerably, and some exhibit important historic and cultural values for the community⁴. These values were emphasized during conversations with community members who highlighted the desire to protect historic neighborhoods. The VBSP provides for the conservation of the neighborhoods based on where infill is allowed; however, it recognizes *“that policies for land use and development will in and of themselves not necessarily sustain or improve neighborhood quality and character. A broader program of interventions including code enforcement, public safety, resident education and involvement, and property maintenance and improvement are essential”*⁵. This demonstrates the importance of balancing the need for investment in these neighborhoods with preserving existing neighborhoods and avoiding displacement of residents.

The most vulnerable areas are predominately non-white, where most female-headed households with children reside, and have higher concentrations of renters overpaying and overcrowded households. These areas have a greater need for more affordable housing to alleviate demand and provide increased stability for residents that need it most. Furthermore, community members raised concerns that as higher priced housing cannot be afforded by current residents, properties may remain unoccupied and create other challenges.

⁴ Valley Boulevard Sustainability (Specific) Plan, 2013.

⁵ Ibid.

Figure F-23: Vulnerable Communities



Source: HCD AFFH Spatial Data

Homelessness

According to data from the Los Angeles Homeless Services Authority (LHSA), there were a total of 66,436 persons experiencing homelessness at some point in time in 2020 in Los Angeles County. This number represents a 13 percent increase over 2019 due to a higher estimated inflow into homelessness even though the share of those sheltered increased over the same period according to LHSA. LHSA demographic data on homelessness indicate that the unhoused population in Los Angeles County is mostly Hispanic/Latino at 36.1 percent, then Black or African American at 33.7 percent, followed by White at 25.5 percent. These racial groups share of the total county population are 48.5, 7.9, and 26.3 percent, respectively.

San Gabriel is part of the Los Angeles Continuum of Care (CoC), which is a regional planning body funded by HUD that coordinates housing and services funding across its partner jurisdictions. As a member of the Los Angeles CoC, LAHSA can provide homeless services to all individuals requiring support within San Gabriel's jurisdiction. According to the Point-in-Time count HUD

requires each CoC to conduct on an annual or biannual basis, there were an estimated 11 persons experiencing homelessness in San Gabriel in 2020.

In January 2021, the City adopted a two-year Homelessness Response Plan, which identifies goals and supporting actions that are in alignment with Los Angeles County Homeless Initiative to maximize regional effectiveness in reducing homelessness. Additional information on City resources for homeless persons is provided in Section A.3.5, Special Housing Needs, of the Needs Assessment (Appendix A).

F.2.6 Other Relevant Factors

Rates of Homeownership by Race and Ethnicity

The homeownership rate is about 44 percent in San Gabriel compared to about 46 percent for Los Angeles County. However, not all racial and ethnic groups have a similar probability of owning a home. The 2019 ACS data for percentages of occupied housing units by race is presented in Table F-5.

The rates of homeownership are lower than renting for every race except Whites. Whites are almost three times more likely to own their housing unit than rent. The ownership rate for Asians is essentially the same as renting (at 0.2 percent difference), and most disparate for those of “Some other race alone” (at a 12 percent difference). Ownership levels are about 11 percent lower than renting for Hispanic/Latinos. The ownership levels for Black and American Indians and Native Alaskans in San Gabriel are zero according to the ACS data. Racial and ethnic groups that have much lower rates of homeownership are more at risk of being displaced due to rising home prices.

Table F-5: Housing Tenure by Race/Ethnicity in San Gabriel (2019)

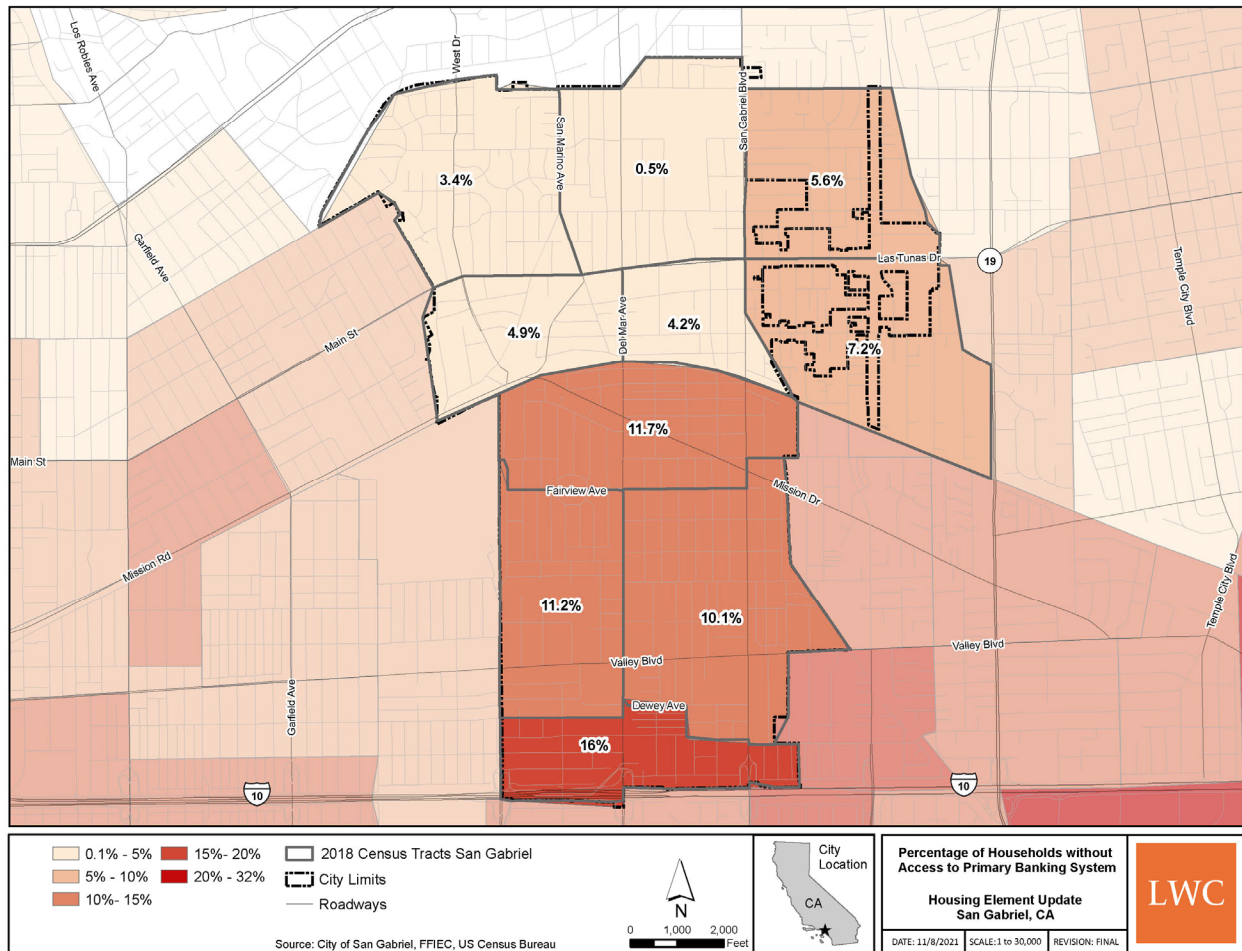
San Gabriel	Renter Occupied Units		Owner Occupied Units		Total Occupied Units
	Number	% of Total	Number	% of Total	
White alone, not Latino	532	7.7%	1,158	21.2%	1,690
Black or African American alone	121	1.7%	0	0%	121
American Indian and Alaska Native alone	39	0.6%	0	0%	39
Asian alone	4,189	60.5%	3,304	60.3%	7,493
Native Hawaiian/Other Pacific Islander alone	50	0.7%	14	0.3%	64
Some other race alone	1,204	17.4%	299	5.5%	1,503
Two or more races	162	2.3%	114	2.1%	276
Hispanic or Latino origin	1,917	27.7%	922	16.8%	2,839
TOTAL	6,926	55%	5,475	45%	12,401
<i>Source: ACS 2019 5-Year Estimates, Table S2502</i>					

One obstacle to home ownership is lack of access to the first tier of the financial system to obtain banking services and loans. The Federal Financial Institutions Examination Council (FFIEC) provides the Community Reinvestment Act (CRA) July 2021 census tract spatial data known as CRAMap 2021 (www.ffiec.gov/cra/). Included in the CRAMap 2021 spatial data is the Unbanked index (developed by RPM Consulting) which provides an estimate of households lacking access to the primary banking system. This index estimates the likelihood of a household will lack both a savings and checking account with a bank, thrift, or credit union.

Figure F-24 presents the estimates for the percentages of households that lack access to banking and credit from the CRAMap 2021 Unbanked index. Identifying areas with relatively higher levels of residents without access to the primary banking system can facilitate the process of providing them first-tier financial services. This may aid lower income residents in avoiding a dependency on second-tier services, particularly predatory lenders.

As displayed in Figure F-24 the percentage of households without access to primary banking and credit varies substantially by census tract. The lowest levels of households without access to banking services are in the northern portion of the city with percentages below five percent. Intermediate levels between 5 and 10 percent are observed in the easternmost portions. The highest levels of households without banking services in on the southern half of the city where the rate varies from 10.1 to 16 percent. Areas with higher levels of unbanked households correlate with higher concentrations of non-White residents which suggests that communities of color lack access to the primary banking system at higher rates.

Figure F-24: Percentage of Households without Access to Banking or Credit



Source: FFIEC CRAMap 2021 Spatial Data

F.2.7 Summary of Fair Housing Issues

Access to opportunity in San Gabriel is not equally distributed across the city. Northern portions of the city located north of Las Tunas Drive are higher resource areas than the rest of the city (based on TCAC Composite Scores) characterized by higher median incomes, higher TCAC Economic Scores, and closer proximity to employment centers.

Conversely, areas of the city located south of Las Tunas Drive have higher concentrations of LMI households in lower resource areas (based on TCAC Composite Scores), lower TCAC Economic Scores, lower environmental scores, more single-parent female-headed households with children, and experience levels of overcrowding above the state average.

A citywide fair housing issue is high rates of overpayment by renters and homeowners, but the issue is more acute for renters with almost 6 in 10 renters housing burdened. Also, over half of the city contains vulnerable communities that may be at greater risk of displacement.

The primary fair housing issue in San Gabriel is disproportionate housing needs because it is likely to affect the most residents. The main contributing factor that influences this issue is displacement of residents due to economic pressures, especially in the census tracts located south of Las Tunas Drive. This is identified as the main contributing factor due to the correlation of low-income vulnerable communities with high levels of overpayment by renters placing them at risk of displacement due to rising rent costs; more single-parent female-headed households with children that may experience greater housing affordability challenges which also put them at risk of displacement in these same areas; and higher rates of overcrowding within some of the same census tracts which may suggest that residents are struggling to afford housing costs.

An additional contributing factor under disproportionate housing needs is a lack of availability of affordable units in a range of sizes. This contributing factor is evident due to the levels of overpayment by homeowners and renters across the city within both higher and lower income areas and the levels of overcrowding that are present. These indicators suggest that both higher and lower income households, encompassing various household sizes, would choose more affordable housing if available.

The secondary fair housing issue in San Gabriel is disparities in access to opportunity. The major contributing factor to this issue is identified as lack of private investments in specific neighborhoods. This determination was made partly based on the lower TCAC Economic Scores present in the three census tracts located south of Fairview Avenue, which also includes the Valley Boulevard area. The City has prioritized the Valley Boulevard area, located in the same census tracts south of Fairview Avenue that were discussed in the primary fair housing issue, as needing reinvestment to promote development. This area has experienced some lack of private investment which has likely lowered the economic opportunity for residents in this area. The lack of investment has been evident for decades, triggering the desire for the Valley Boulevard Specific Plan (adopted in 2006, amended in 2013). Finally, households in southern census tracts, particularly the southernmost one, are also more likely to lack access to basic banking services which places them at a further economic disadvantage. While investment is beginning to occur in the Valley Boulevard area, further investment is necessary to result in meaningful change.

Also, during public review of the Housing Element, comments were included that new development has not occurred in the Mission District Specific Plan area, an area where residential and mixed uses are allowed, demonstrating an overall lack of investment in another area of the city. Although households in this area generally experience less severe disparities than those in the southern portion of the city, this area has a lower TCAC score, poorer CalEnviroScreen score, and higher concentration of lower and moderate-income households than the northern portion of the city.

An additional contributing factor under disparities in access to opportunity is the location of environmental health hazards in the city. This issue is pronounced between Las Tunas Drive and Mission Road within the lowest TCAC Environmental Score range and a census tract that also experiences overcrowding.

Section F.3 Sites Inventory

AB 686 requires a jurisdiction's site inventory to be consistent with its duty to affirmatively further fair housing. This section evaluates the City's site inventory locations against various measures in the Assessment of Fair Housing that includes income level, racially and ethnically concentrated areas of poverty, access to opportunity, and environmental risk to determine any socio-economic patterns or implications.

F.3.1 Potential Effects on Patterns of Segregation

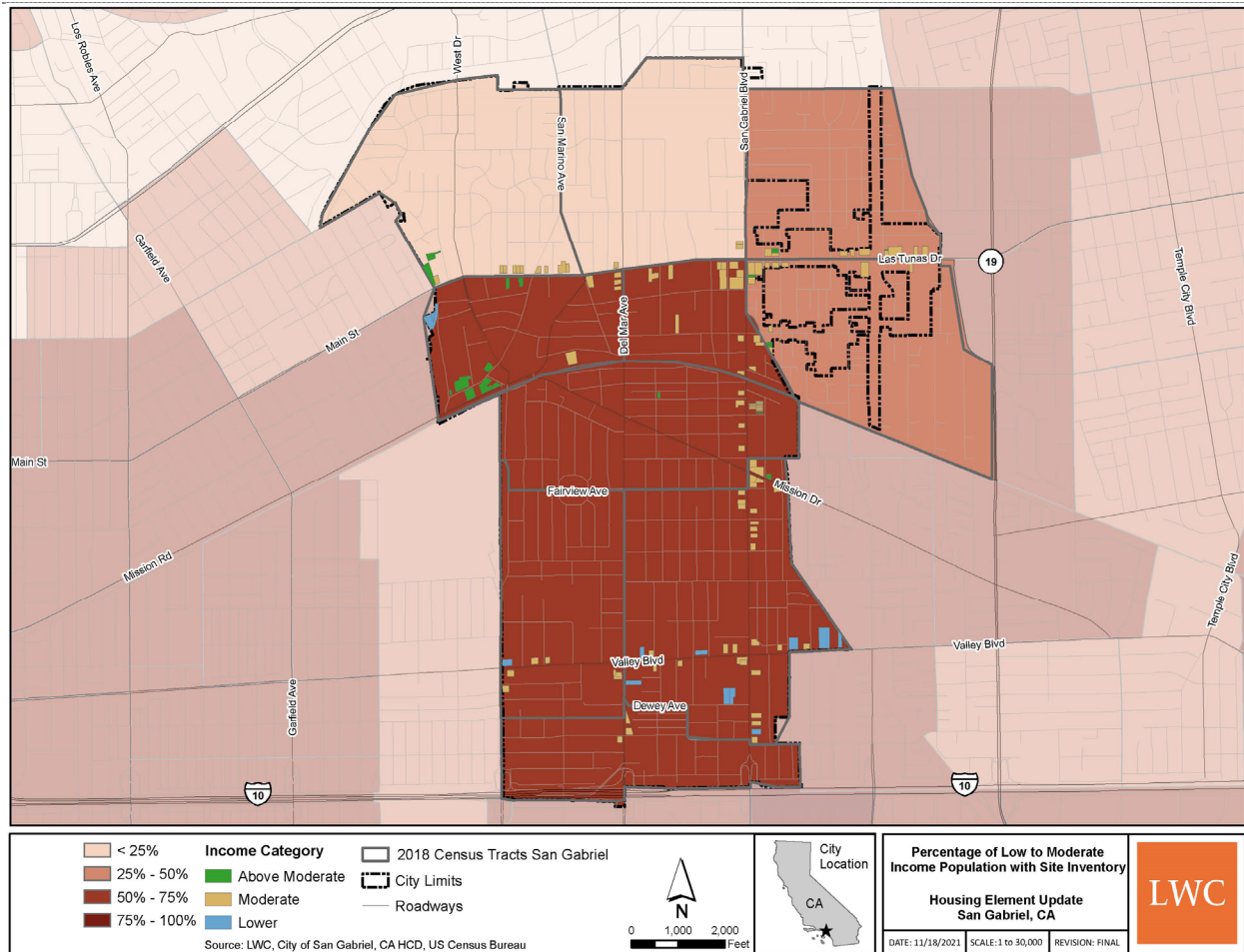
A comparison of a jurisdiction's site inventory against its LMI households and R/ECAP area can reveal if the City's accommodation of housing is exacerbating or ameliorating segregation and social inequity. Figure F-25 shows the locations of San Gabriel's sites inventory relative to LMI concentrations, and Figure F-26 shows the distribution of sites area relative to the area of LMI concentrations.

The city contains three LMI percentage quartiles, less than 25 percent, 25 to 50 percent, and 50 to 75 percent. About two-thirds of the city (64 percent) is within the higher LMI category of 50 to 75 percent. This area is located south of Las Tunas Drive and experiences higher levels of overpayment by renters than the rest of the city (see Figure F-18) as well as overcrowding rates higher than the statewide average (see Figure F-20). The portion of south of Dewey Avenue contains the highest concentrations of LMI populations at about 70 percent, and this area also has higher levels of overpayment by homeowners (see Figure F-19). Percentages of city area and site inventory area are closely aligned within this LMI category with 73 percent of sites in this area of higher concentration of LMI households. This area contains most of the above moderate-income sites, most of the moderate-income sites, and all the lower-income sites.

The city's middle LMI percentage category of 25 to 50 percent is located east of San Gabriel Boulevard and contains only moderate-income sites. The amount city area within this area is eight percent, and about 17 percent of the sites inventory area is located in this category. Various parcels identified for moderate and above moderate income in this area meet the criteria for rezoning to lower income, which will help to facilitate the distribution of housing at various income levels.

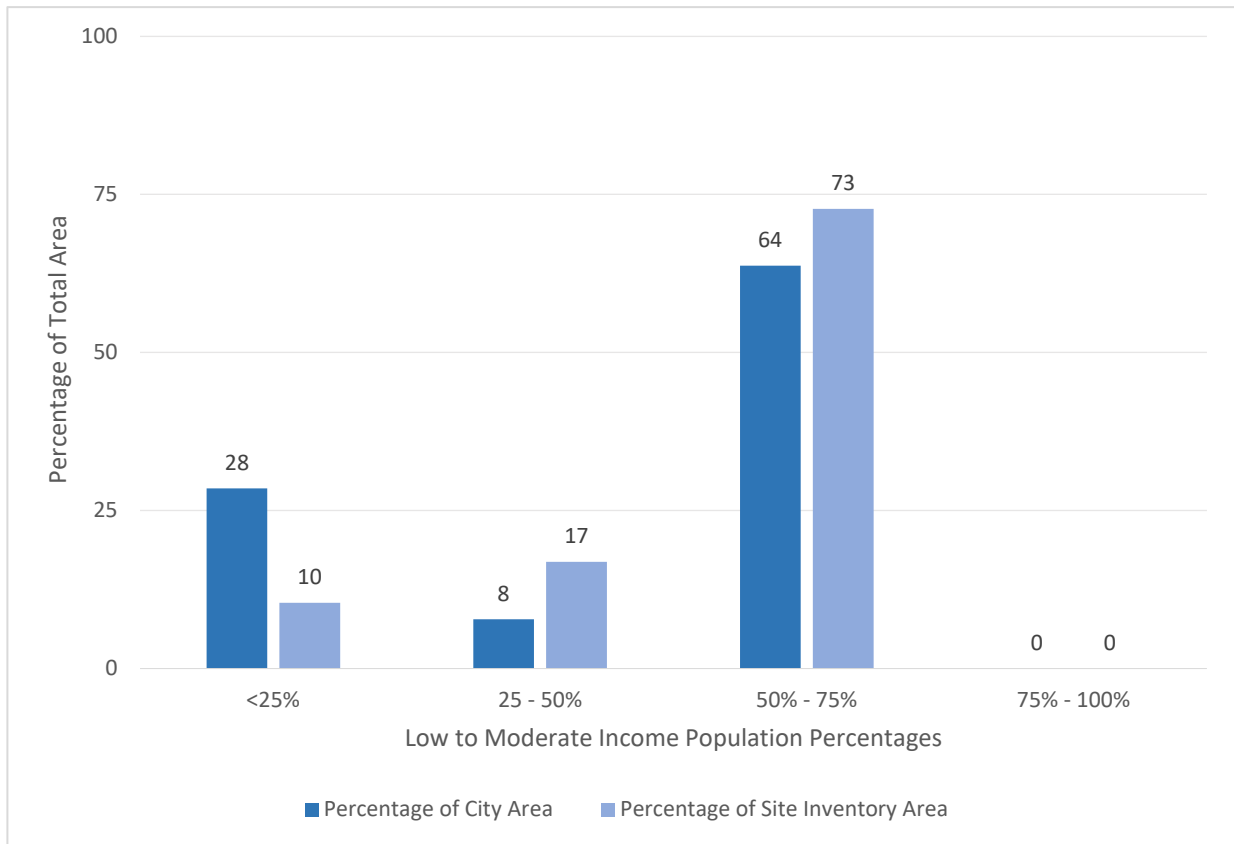
The lowest LMI category (less than 25 percent) covers 28 percent of city area and is in the northern portion of the city. This LMI category encompasses the least amount of site inventory area at 10 percent making it the largest difference from percentage of city area. The sites inventory in this category is comprised of mostly moderate income with two above moderate sites. The rezoning program (Program 1) identifies that one of these sites meets the criteria for rezoning to lower income, which will help to facilitate the distribution of housing at various income levels.

Figure F-25: Sites Inventory and LMI Households



Source: HCD AFFH Spatial Data and LWC

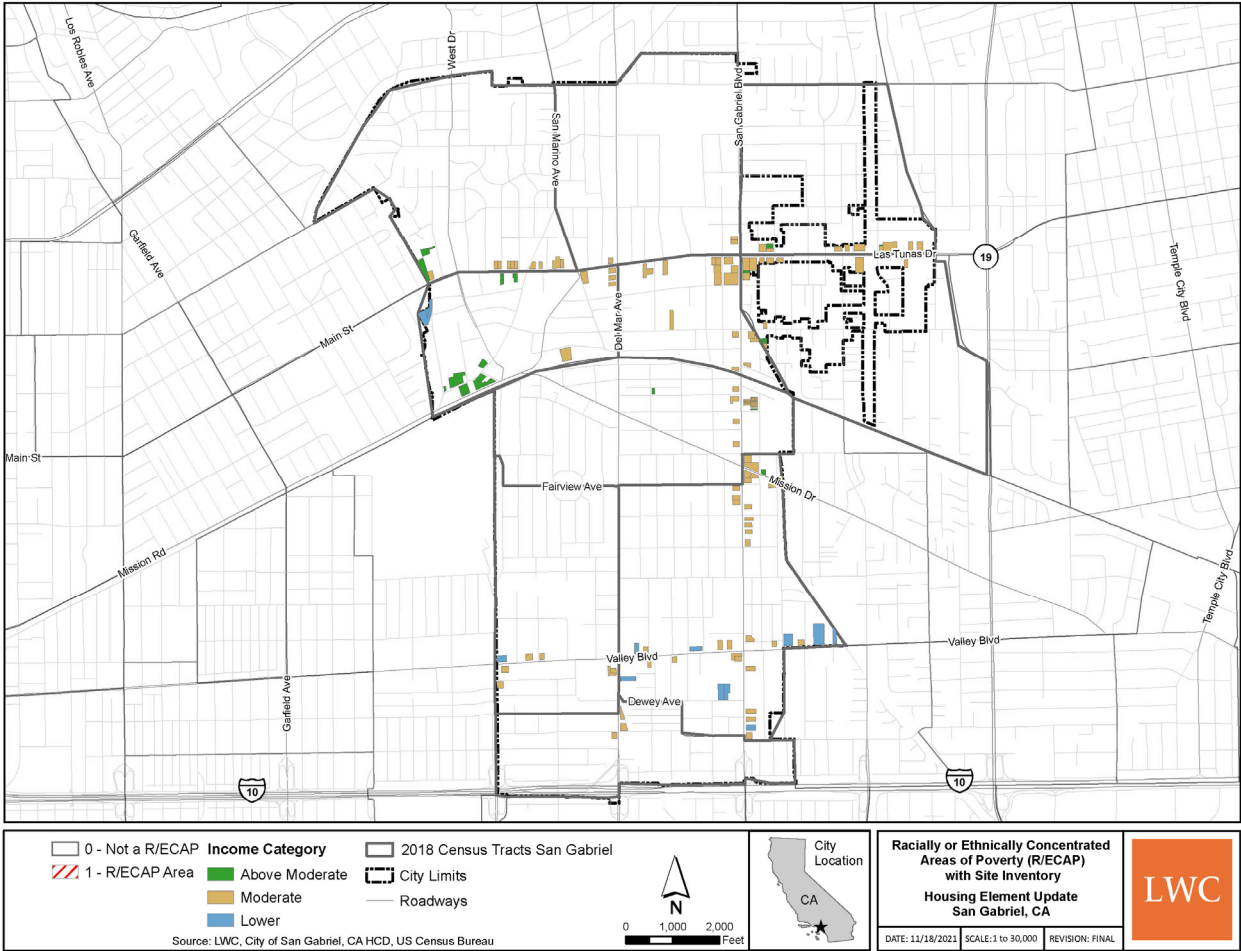
Figure F-26: Distribution of Sites Inventory across Low to Moderate Income Population Percentages



Source: HCD AFFH Spatial Data and LWC

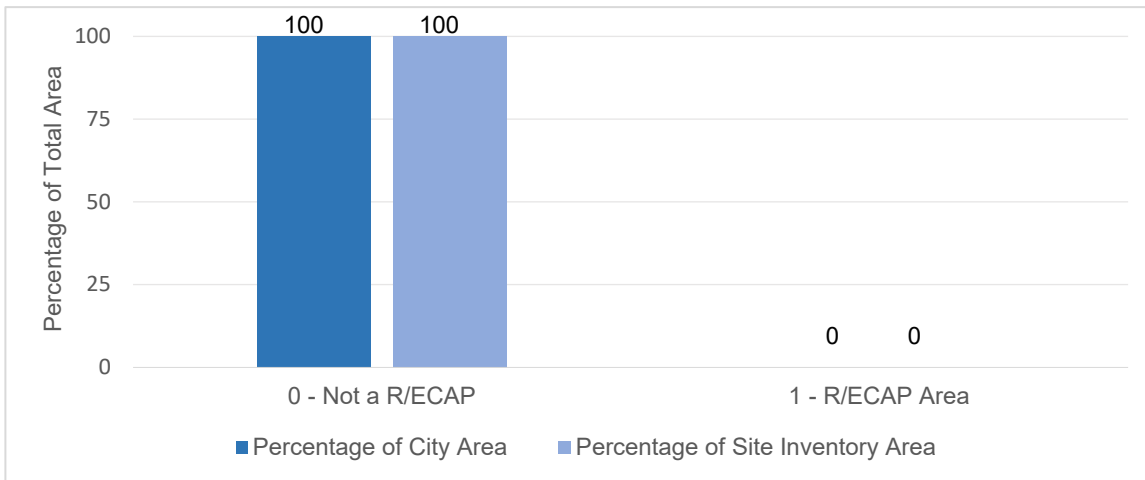
Figures F-27 and F-28 display the site inventory area associated with R/ECAP. As previously noted, San Gabriel does not have any R/ECAPs within its boundaries. The amount of site inventory area not within a R/ECAP is therefore 100 percent.

Figure F-27: Sites Inventory and R/ECAPs



Source: HCD AFFH Spatial Data and LWC

Figure F-28: Distribution of Sites Inventory across R/ECAP



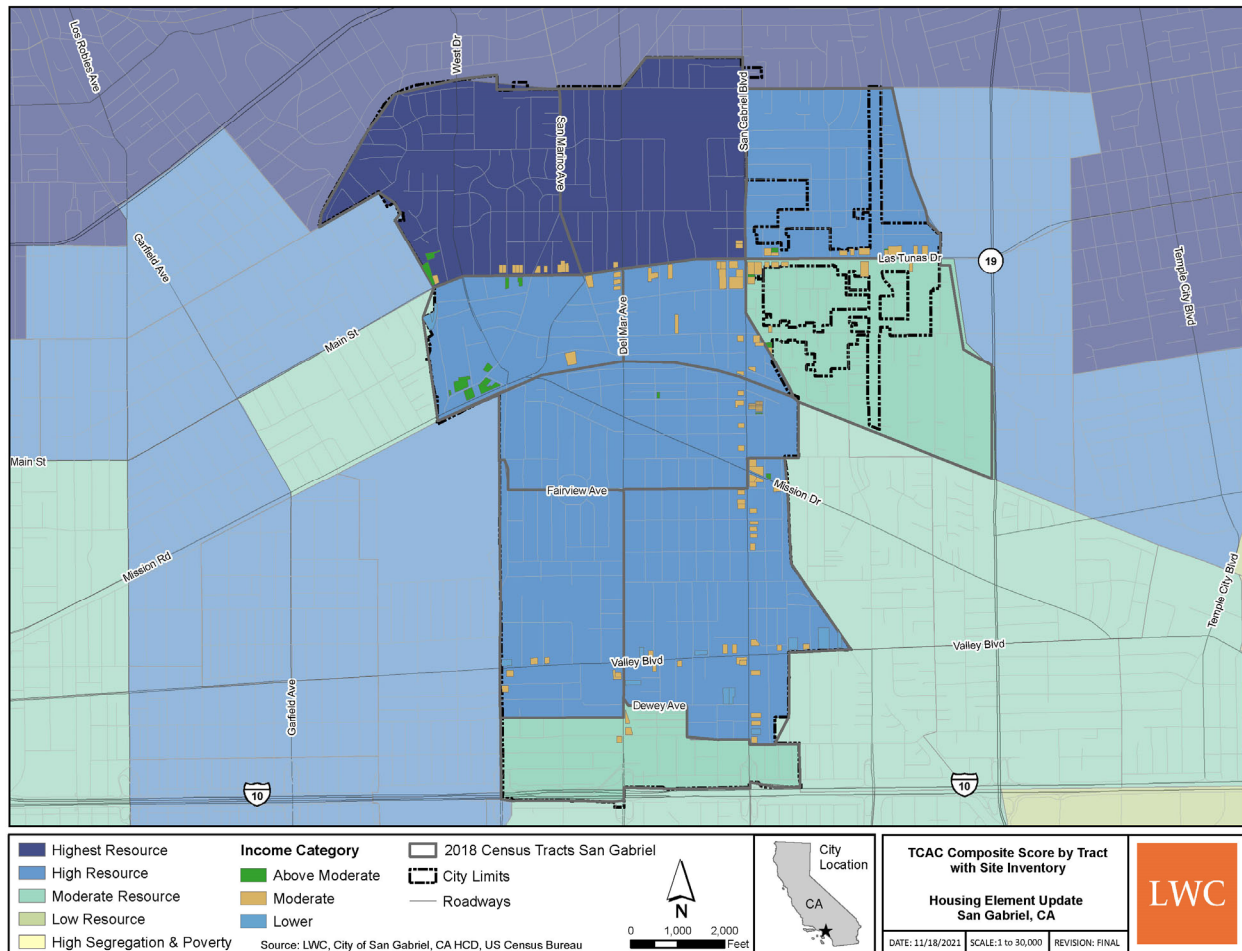
Source: HCD AFFH Spatial Data and LWC

F.3.2 Potential Effects on Access to Opportunity

Figure F-29 shows sites inventory locations across TCAC Opportunity Areas. As mentioned previously, the city is categorized as either highest, high, or moderate resource areas based on the TCAC Composite Score. These areas have been scored based on very good access to high quality schools and economic opportunities.

Sites identified to satisfy the lower-income RHNA are located in a high resource area. Although lower income sites are in high resource areas, a portion of the city is a highest resource area, in which no lower income sites are identified. The rezoning program (Program 1) includes one site in the highest resource area (i.e., north of Las Tunas Drive and west of San Gabriel Boulevard) that meets the criteria for rezoning to lower income. Additionally, Program 42 targets housing development in the highest resource areas through outreach to property owners of housing sites to encourage housing of all income levels in these areas. With these programs, the sites inventory is anticipated to improve conditions related to access to opportunities.

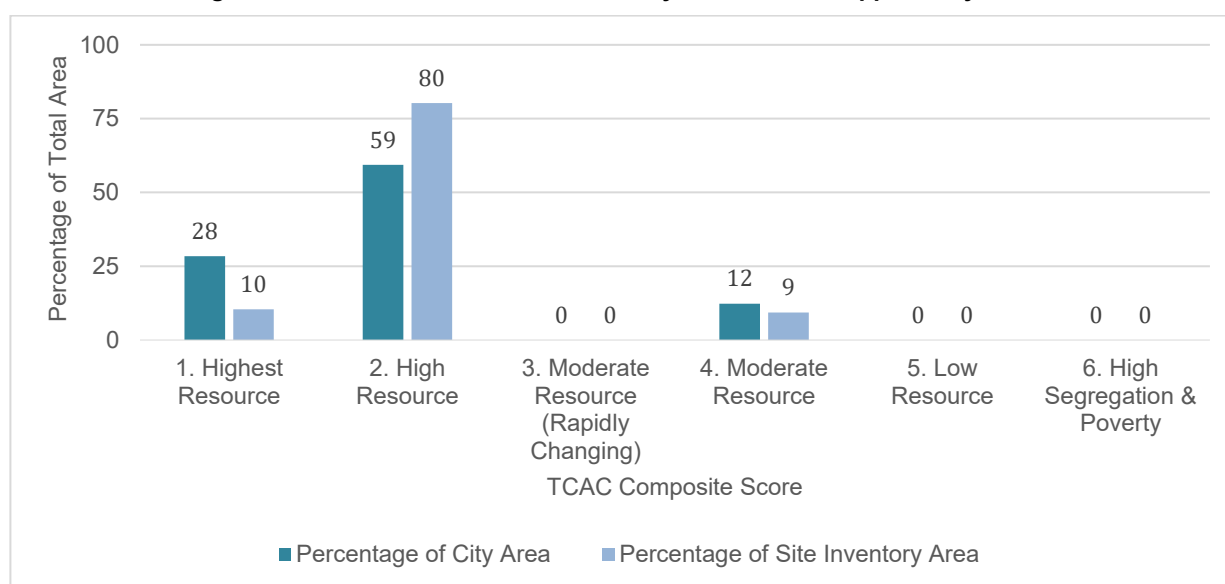
Figure F-29: Sites Inventory and TCAC Composite Score



Source: HCD AFFH Spatial Data and LWC

Figure F-30 shows the distribution of San Gabriel sites across the TCAC Opportunity Area Composite Score categories. The city is comprised of three categories: highest resource (28 percent of the city), high resource (59 percent of the city), and moderate resource (12 percent of the city). The sites inventory area distribution is generally aligned with the city's Opportunity Areas. In this respect, the sites inventory is considered to mitigate fair housing concerns regarding access to opportunity because housing development potential in the city is equitably located in high resource neighborhoods overall. Furthermore, programs are included to rezoning sites for lower income and target housing in the highest resource area (i.e., north of Las Tunas Drive and west of San Gabriel Boulevard) (Programs 1 and 42), prioritize parks and open space improvements in lower opportunity areas (Program 41), and address environmental issues in lower opportunity areas (Programs 43 and 44) (discuss further below).

Figure F-30: Distribution of Sites Inventory across TCAC Opportunity Areas



Source: HCD AFFH Spatial Data and LWC

Figure F-31 shows the sites inventory across CalEnviroScreen scores. The city has six CalEnviroScreen scores ranging from 21 to 30 percent (third decile, lower risk) to 81 to 90 percent (ninth decile, higher risk). Most lower income sites are in the higher risk area of 71 to 80 percent. Moderate income sites are spread across all six scores while the above moderate-income sites are in two scores, 61 to 70 (seventh decile) percent and 21 to 30 percent.

Figure F-32 shows the distribution of sites across the range of CalEnviroScreen scores presented as deciles in San Gabriel. The city contains six decile scores: 3, 4, 6, 7, 8, and 9. The highest environmental risk to residents (score nine) accounts for eight percent of city area and makes up two percent of the sites inventory area.

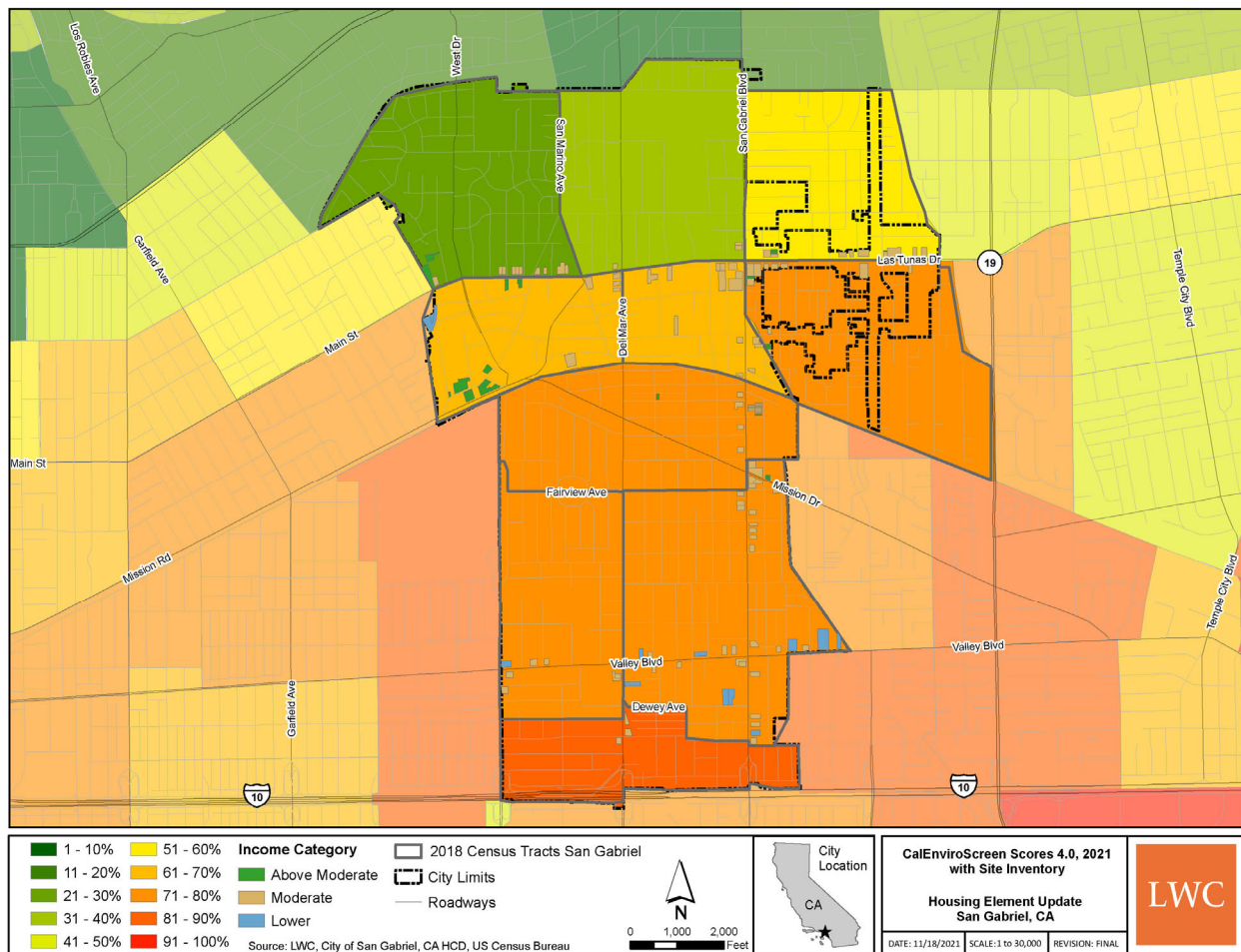
A majority of the city has a similar amount of land area categorized with a score of eight as it does land area in the sites inventory (46 and 50 percent, respectively). The next lowest CalEnviroScreen score of seven covers 14 percent of city area and 30 percent of the sites inventory area. Thus, about 80 percent of the site inventory area is within the scores of seven and eight.

The next lowest CalEnviroScreen score of six accounts for only four percent of city area and eight percent of site inventory area. The portions of the city with the lowest amount of environmental risk (decile scores three and four) are located north of Las Tunas Drive and represent a total of 28 percent and 10 percent of city area and site inventory area, respectively.

As sites are generally located in areas of relatively higher environmental risk, programs have been included to mitigate those potential impacts. Program 43 specifically targets the highest risk area along Interstate 10 with the City coordinating with Caltrans to address air quality impacts. Through

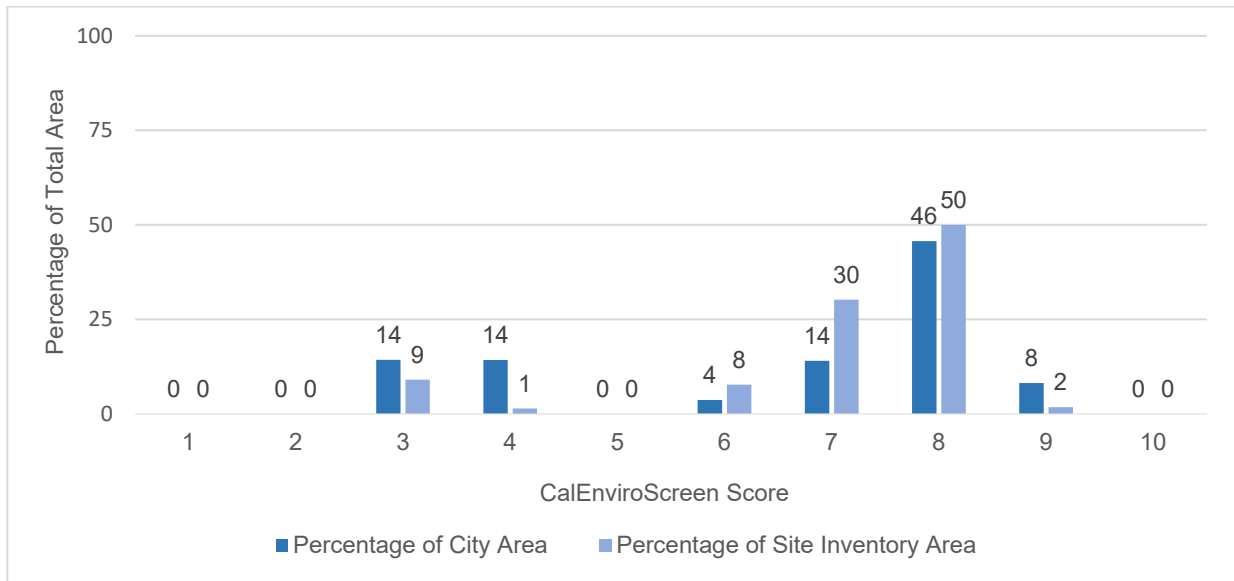
Program 44, the City will work with the Human Equity, Access and Relations (HEAR) Commission to conduct outreach and gather information on environmental and health factors most acutely impacting residents in the southern portion of the city. Then the City will prepare an action plan to address those issues, including prioritization, timeframe for implementation, responsible party(ies), and funding. Additionally, one site to be rezoned to lower income is in the area with the best CalEnviroScreen score. With these programs, the sites inventory is anticipated to improve conditions related to environmental risk.

Figure F-31: Sites Inventory and CalEnviroScreen Score



Source: HCD AFFH Spatial Data and LWC

Figure F-32: Distribution of Sites Inventory across CalEnviroScreen Scores



Source: HCD AFFH Spatial Data and LWC

Section F.4 Contributing Factors and Meaningful Actions

Table F-6 lists the most prevalent fair housing issues and its corresponding contributing factors for the City of San Gabriel, as prioritized through the findings from this AFFH assessment. As outlined in Section F.2.7, a summary of the findings is also presented here.

The primary fair housing issue in San Gabriel is disproportionate housing needs because it is likely to affect the most residents. The two contributing factors, in order of priority, that influence this issue are:

- Displacement of residents due to economic pressures
- Lack of availability of affordable units in a range of sizes

These contributing factors are acutely impacting residents' housing security, especially low-income vulnerable communities and special needs populations that are struggling to afford housing costs. However, lack of available and affordable units in a range of sizes is impacting a variety of residents and households.

The secondary fair housing issue in San Gabriel is disparities in access to opportunity as this affects specific areas of the city, including areas where housing sites are identified. The two contributing factors, in order of priority, that influence this issue are:

- Lack of private investments in specific neighborhoods
- Location of environmental health hazards

These contributing factors are impacting the quality of life and opportunities for those living in certain areas of San Gabriel, particularly the southern portion of the city, which have lower economic and environmental scores.

Table F-6: Contributing Factors

Priority	Contributing Factor	Fair Housing Issue
1	Displacement of residents due to economic pressures	Disproportionate Housing Needs
2	Lack of private investments in specific neighborhoods	Disparities in Access to Opportunity
3	Availability of affordable units in a range of sizes	Disproportionate Housing Needs
4	Location of environmental health hazards	Disparities in Access to Opportunity

Table F-7 lists the housing programs the City will pursue to specifically overcome identified patterns and trends from the above assessment and proactively affirmatively further fair housing in San Gabriel. The programs are detailed in the Housing Plan, Section IV.

Table F-7: Meaningful Actions

Contributing Factor	AFFH Strategy	Housing Implementation Programs
Displacement of residents due to economic pressures	Protecting Existing Residents from Displacement	33. Encourage Preservation of Existing Rental Housing Stock 34. Preservation of Assisted Housing Developments 38. Fair Housing 40. Anti-Displacement Information Dissemination
Lack of private investments in specific neighborhoods	Place-based Strategies to Encourage Community Conservation and Revitalization	9. Infrastructure Grants 12. Valley Boulevard Specific Plan Minimum Densities 13. Mission District Specific Plan Evaluation and Update 23. Standardize Maximum Heights 24. Eliminate Residential Floor Area Limit in C-1 and C-3 Zones 41. Prioritize Future Parks and Open Space in Lower Opportunity Areas
Availability of affordable units in a range of sizes	New Housing Choices and Affordability in Areas of Opportunity	3. Accessory Dwelling Units (ADUs) 11. Religious Institutions Outreach 16. Inclusionary Housing 27. Assess Single-Room Occupancy Requirements 42. Target Housing Development in Highest Resource Areas
	Housing Mobility Strategies	20. Low-Income Household Ownership Opportunities 25. Eliminate Minimum Floor Area Standard
Location of environmental health hazards	New Housing Choices and Affordability in Areas of Opportunity	1. RHNA Housing Sites Implementation; Rezone Program
	Place-based Strategies to Encourage Community Conservation and Revitalization	43. Intergovernmental Environmental Impacts Reduction 44. Lower Opportunity Area Environmental Issue Identification and Action