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City Planning Division
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July 8, 2022

Paul McDougall, Senior Program Manager
State Department of Housing and Community Development
c/o Land Use and Planning Unit
2020 W. El Camino Ave, Suite 500
Sacramento, CA 95833

Re: Transmittal of Draft Redline Revisions to City of Santa Monica's 6th Cycle (2021-2029) Housing Element

Dear Paul,

Please find enclosed the draft redline revisions to the 6th Cycle Housing Element, which has been prepared consistent with our phone consultations over the past few months and in response to HCD's February 8, 2022 comments. Your guidance has been immensely helpful in preparation of these draft redline revisions, which are being submitted for review.

The Santa Monica City Council and Planning Commission have reviewed the draft redline revisions and provided input. On June 21, 2022, the City Council directed staff to transmit the draft redline revisions to HCD for review and comment. In accordance with Government Code Section 65585(b)(1), on June 24, 2022, the City posted the draft redline revisions on the City's website and emailed a link to the draft revisions to all individuals and organizations that have previously requested notices related to the City's 6th Cycle Housing Element.

If you have any questions, please feel free to contact me at (310) 458-8203 or jing.yeo@santamonica.gov. We have appreciated your assistance throughout this process and look forward to HCD's concurrence that these draft redline revisions result in a Housing Element that is in compliance with Housing Element law.

Sincerely,

Jing Yeo

Jing Yeo, AICP
Planning Manager



City of
**Santa
Monica**

2021 - 2029

HOUSING ELEMENT

Draft Redline Revisions, June 21, 2022



Acknowledgements

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1: Introduction

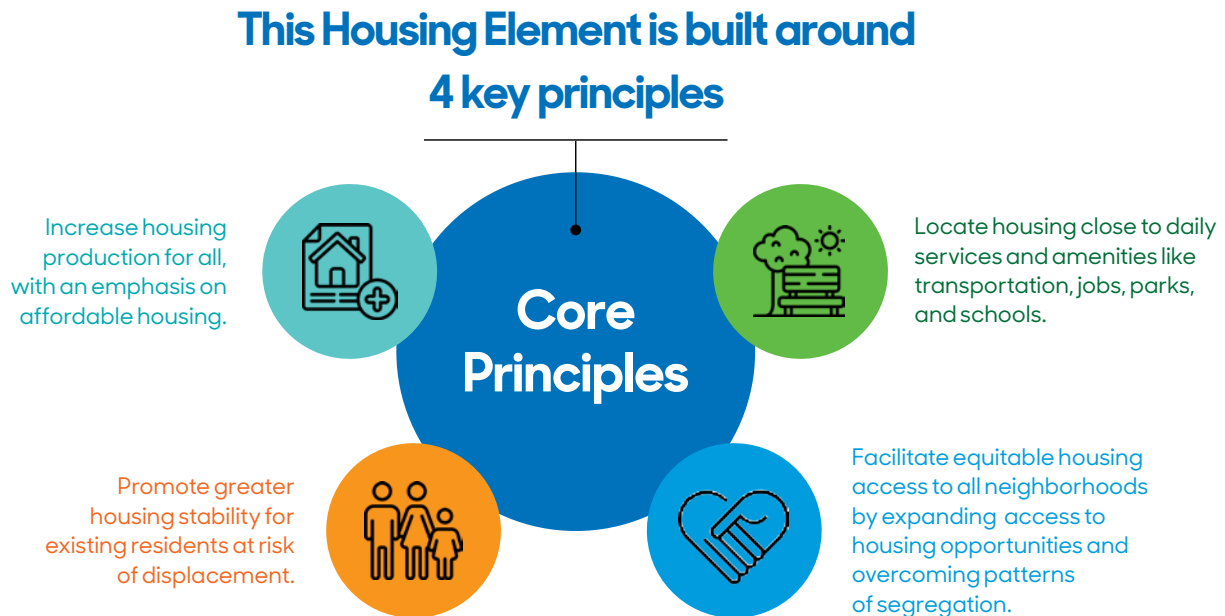


Chapter 1: Introduction

A. Santa Monica’s Housing Strategy

Santa Monica’s 2021–2029 Housing Element represents the City’s longstanding commitment to affordable housing, tenant protection, housing and services for special needs groups, homeless services, sustainable development, and fair housing. With a renewed emphasis on equity and the mandate to Affirmatively Further Fair Housing, the housing plan augments the adopted Land Use and Circulation Element (LUCE) by enhancing housing mobility and expanding housing choice in high opportunity areas that have historically excluded diverse populations, which may be areas that are not immediately adjacent to major transportation systems.

The Housing Element also reflects the City’s emergence from the COVID-19 pandemic and the socioeconomic inequities that have manifested in the lack of housing stability that disproportionately affected Black, Indigenous, and people of color (BIPOC) and lower-income households. This is an opportunity for the City to reflect and assess the City’s approach to housing and to take a leadership role in creating solutions to address affordable housing production and housing stability in line with Santa Monica’s values to secure livable and affordable housing opportunities for all.



This Housing Plan continues to reinforce Santa Monica’s core values of supporting housing production, particularly affordable housing, but includes departures from the 2013–2021 Housing Element particularly with respect to where housing is incentivized in the City. While the LUCE established a strategy to encourage housing production around major transportation systems, it does not account for the state’s new Affirmatively Furthering Fair Housing mandate. Key LUCE policies to develop complete neighborhoods in mixed-use areas within easy access to transit opportunities and daily services remain but the updated Housing Plan is driven largely through an equity and inclusion lens. Ensuring equitable housing access and housing choice to all of Santa Monica’s neighborhoods and ensuring that affordable housing production is provided the highest levels of development and process incentives are the bedrock of this updated Housing Element.

The programmatic approaches in this housing plan reflect both the City’s desire to continue to reinforce LUCE policies to develop complete neighborhoods in transit-adjacent mixed-use areas and significant changes in State of California Housing laws and events that have affected funding streams for affordable housing, including:

- Changes in State housing laws (AB686) that mandate Affirmative Furthering Fair Housing, which requires that the cities...“take meaningful actions in addition to combating discrimination that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protective characteristics.”
- Changes to the California Department of Housing and Community Development’s (HCD) Regional Housing Needs Allocation (RHNA) methodology that resulted in a significantly higher new housing unit allocation for Santa Monica due to accounting for existing unmet need.
- The devastating economic impact from the COVID-19 pandemic which affected Santa Monica’s budget and funding that would otherwise have been allocated for affordable housing. Further, as the City continues on the road to economic recovery, the funding sources for affordable housing depend heavily on the sales tax revenue that will not recover quickly and likely will affect affordable housing production in the first half of this Housing Element cycle.

LUCE Goals for Housing

The 2010 LUCE set forth numerous goals and policies in support of conserving and developing appropriate housing in the City and providing services and amenities to support a walkable, accessible community for residents. For convenient reference, these goals have been gathered in Appendix C of this Housing Element. As the housing strategy has been updated to account for changes in State law, LUCE policies will be updated to support this strategy.

B. Community Context

Santa Monica had simple beginnings in 1875 as an aspiring commercial port. Growth was slow until the City re-imagined itself as a seaside coastal resort and incorporated in 1886. A regional population surge spurred on by the arrival of the Santa Fe Railroad in 1887, resulted in the City's population increasing to approximately 2,000 people by 1892 when the Santa Fe completed its line to Santa Monica. The arrival of the first electric street car in 1896 and the completion of major regional roadways in the early 1910s led to the further growth of primarily single family homes.¹ During the 1920s, the City witnessed a substantial population and building boom, transforming the City from a recreational destination to a sought-after residential community, that also included significant brick and aircraft industries. During World War II, demand for housing was further spurred on by the rapid growth of Douglas Aircraft resulting in both single and multi-unit development. By the mid-1960s, most land in Santa Monica was developed. Since that time,



growth has resulted principally from recycling lower-intensity land uses to higher-density uses. In recent years, the City experienced its most significant residential development in its commercial, mixed-use areas. This trend has been reinforced by the LUCE and Downtown Community Plan policies that incentivize increasing housing around the Metro E (Exposition) Light Rail transit stations.

Today, the City's existing housing stock of 52,269 units consists of a wide range of housing types, from single-unit dwellings on large lots, to small scale bungalows, courtyard apartments, condominiums and larger mixed-use apartments. This housing stock is located within distinct residential neighborhoods and commercial mixed-use districts.

With its seaside location and mild, pleasant temperatures year-round, the City has become one of the most highly desirable places to live in the country. However, the opportunity to live in the City comes at a hefty cost. While it is generally recognized that Californians pay more for housing than the average American, Santa Monica's housing costs are among the highest in the nation (see Appendix B). The lack of housing, particularly affordable housing, is consistently a top concern for many Santa Monica residents and workers.

¹ Santa Monica Historic Context Statement, Architectural Resources Group and Historic Resources Group, March 2018.

There are a variety of negative effects caused by a lack of housing. With a greater share of household incomes spent on housing, households are left with less money available to spend on discretionary purchases, or even basic necessities. Having less money available for non-housing costs often means that low-income households will have less savings in the bank, putting those households at risk for poverty, or preventing them from rising out of it. Low-income residents also face extra pressure of displacement due to rising housing costs. With a lack of affordable housing, more and more people are crowding into existing housing units. In addition to public safety issues, there are quality of life impacts associated with overcrowding. High housing costs also impact wider economic growth and are becoming a major consideration for employers. With approximately 80,000 non-resident workers commuting into Santa Monica, employee retention for Santa Monica companies is an issue especially if workers can't afford to live near their job and have to commute long distances to work.

C. Creating an Equitable and Inclusive Community

Santa Monica has a record of supporting social equity, housing affordability, and an inclusive community. For the past forty years, the City has enacted numerous policies to prevent resident displacement, including rent control, just-cause eviction, anti-tenant harassment, source of income protections, and anti-discrimination laws that afford protections beyond the federal Fair Housing Act and the California Fair Employment and Housing Act. The City has consistently prioritized the diversity of housing opportunities available to all household types and income levels. Santa Monica's commitment to affirmatively furthering fair housing is evidenced by specific actions that the City has taken (see Chapter 2 for further discussion).

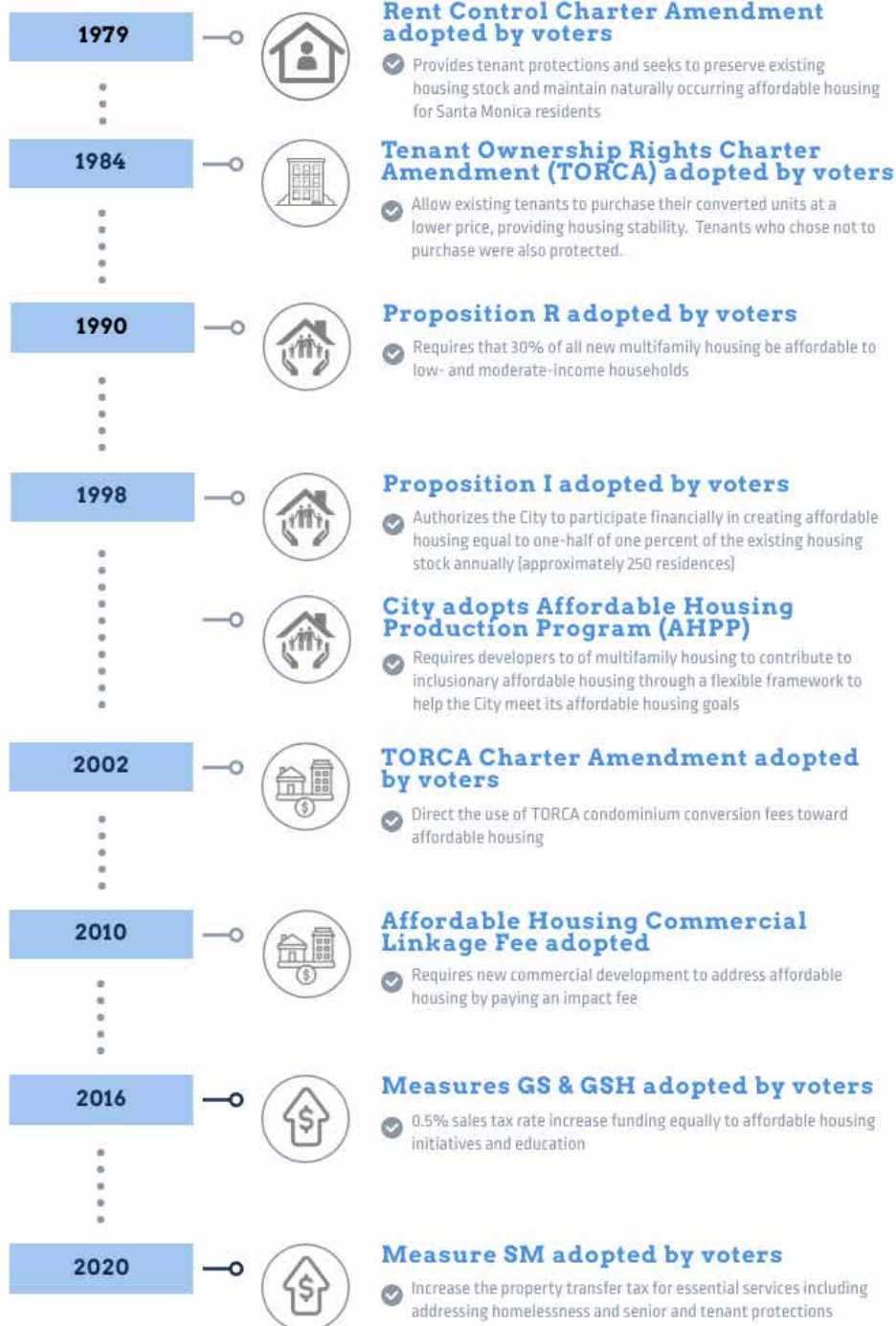
In addition, for several decades, the City has implemented policies and programs to increase the supply of deed-restricted residences that are affordable to low- and moderate-income households. The strategy primarily involves three components:

1. Public financing to support the acquisition, rehabilitation, and deed restriction of existing housing;
2. Public financing to support the construction of new deed-restricted housing;
3. Deed-restricted housing developed by private, for-profit organizations pursuant to the AHPP or development agreements.

These actions have resulted in a drastically expanded housing stock in the City. The City has preserved and produced a larger and more diverse supply of low- and moderate-income housing than otherwise would be possible if the City pursued a single strategy.

Santa Monica has also facilitated affordable housing through the adoption of land use plans and administrative funding guidelines to support affordable housing preservation and production. In 2010, the Land Use and Circulation Element (LUCE) of the General Plan was adopted, and identifies affordable housing as a primary community benefit associated with new development. Additionally, the City has a Housing Trust Fund. These actions have resulted in a drastically expanded housing stock in the City.

40 YEARS OF SANTA MONICA'S ACTIONS FOR AN EQUITABLE AND INCLUSIVE COMMUNITY





The City continues to promote and enforce programs to address its fair housing issues, including a Fair Housing Program that is implemented by the City Attorney’s Office Public Rights Division (see Chapter 2 for further discussion).

To foster an inclusive and diverse community, it will be essential to continue to put greater emphasis on providing housing that meets the needs of everyone, including low-income households, seniors, BIPOC, multi-generational families, and households with children.

The effects of the COVID-19 pandemic have highlighted the complex housing challenges that the City faces, including addressing barriers to housing opportunities, housing insecurity for existing residents, and homelessness. The pandemic has particularly highlighted equity issues in terms of how lack of housing affordability disproportionately affects BIPOC and the need to reexamine land use and zoning decisions to ensure that they do not perpetuate these inequities.

This Housing Element presents an opportunity to reflect on, refine, and broaden the City’s approach to housing production – particularly affordable housing – to meet the needs of our most vulnerable community members. It is also an opportunity for the City to take a leadership role in creating solutions to increase affordable housing production and stability in line with Santa Monica’s values to provide secure, livable, and affordable housing opportunities for all.

D. Purpose and Statutory Authority

The Housing Element is mandated by Sections 65580 to 65589 of the California Government Code. State Housing Element law requires that each City and County identify and analyze existing and projected housing needs within its jurisdiction every eight years. To that end, State law requires that the Housing Element:

- Provide an analysis of existing and projected housing needs, including any special housing needs
- Assess affordable units at risk of conversion to market rate
- Analyze actual and potential constraints to housing
- Assess and describe fair housing issues, including actions to affirmatively further fair housing
- Identify adequately zoned sites suitable for housing
- Analyze zoning for a variety of housing types
- Identify goals and policies to meet housing needs
- Identify a schedule of programs and actions to be undertaken to achieve the goals and policies
- Identify a quantified objective that estimates the number of units likely to be constructed, rehabilitated, or conserved/preserved
- Analyze performance of prior goals, policies, and programs from the last Housing Element cycle
- Identify opportunities for energy conservation

The 2021-2029 Housing Element updates Santa Monica's 2013-2021 Element, adopted by the City Council on December 10, 2013 and certified by the State Department of Housing and Community Development (HCD) on January 29, 2014.

~~In compliance with State law, the City of Santa Monica has prepared this Housing Element to be certified by HCD after adoption by the City Council by October 15, 2021. In compliance with State law, the City of Santa Monica has prepared this Housing Element to be certified by HCD after adoption by the City Council.~~

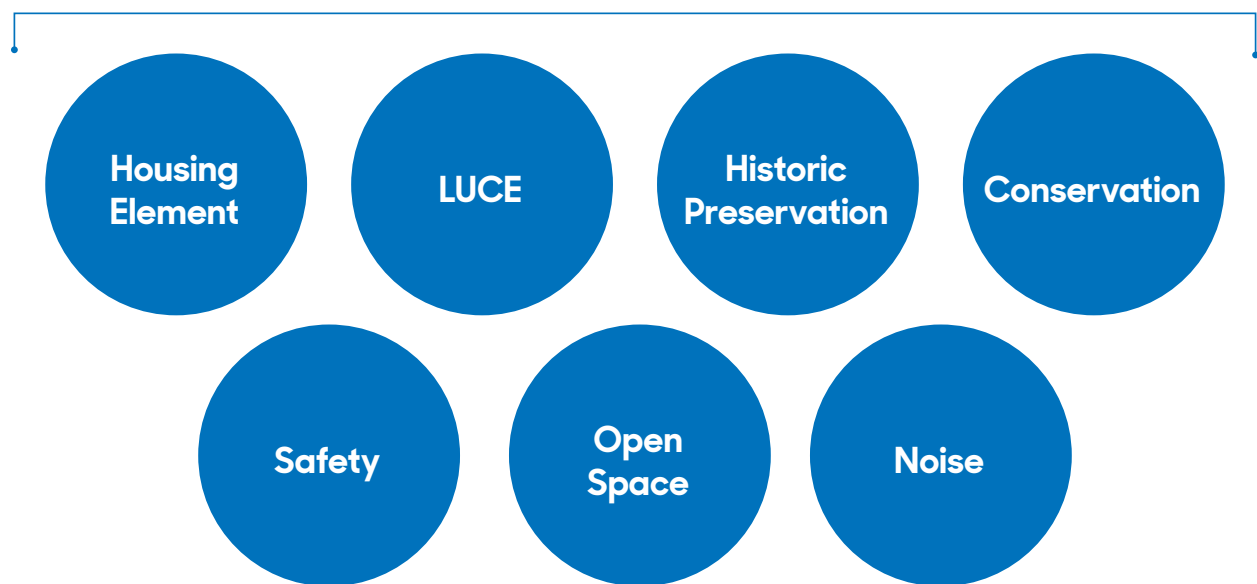
E. Relationship to Other General Plan Elements

State law mandates the adoption of a general plan (Government Code Section 65300), which serves as the blueprint for how a particular city or county (e.g., the City of Santa Monica) will develop. A general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. Zoning ordinances, specific plans, development projects, capital improvements, and development agreements are required to conform to the general plan. Preparing, adopting, implementing, and maintaining the general plan serves to identify the community's land use, circulation, environmental, economic, and social goals and policies

as they relate to future growth and development. A general plan consists of individual sections —or elements--that address a specific area of concern, but collectively, they make up an integrated planning approach for the jurisdiction. State Law requires that general plans include seven elements: land use, transportation, conservation, noise, open space, safety, and housing. A city or county may choose to have additional elements as part of their general plan.

Santa Monica’s General Plan consists of the 7 state-mandated elements: (1 & 2) Land Use and Circulation, (3) Conservation, (4) Housing, (5) Open Space, (6) Noise, (7) Safety, as well as a (8) Historic Preservation element. The City’s Land Use and Circulation Element (LUCE) was adopted in July 2010, and last amended in 2020. The LUCE provides guidance for the City’s overall development strategy, including where and how new land uses will be located in relation to the circulation system in the City through 2030. The LUCE established overarching policies and standards for new development based on land use designations for every property in the City. These policies and standards were further refined in the City’s Zoning Ordinance Update in 2015 and by the adoption of various area and specific plans, including the 2013 Bergamot Area Plan and the 2017 Downtown Community Plan.

General Plan



To meet the City’s RHNA allocation of 8,895 new units over the next 8 years and to affirmatively further fair housing, the Housing Element includes actions and programs to amend adopted development standards and policies. As required by State law, elements of the General Plan should form an integrated, internally consistent plan, and inconsistencies cannot be remedied by a statement giving one element precedence over the others (Gov. Code § 65300.5; *Sierra Club v. Board of Supervisors of Kern County* (1981) 126 Cal.App.3d 698). Therefore, adoption of the Housing Element will require amendments to the LUCE and the City’s Zoning Ordinance, Bergamot Area Plan, and Downtown Community Plan to ensure internal consistency.

Adoption of this Housing Element will also trigger revision of the City's Safety Element. The Safety Element was last updated and adopted in February 1995. Over 25 years have passed and since that time, and the State has established new requirements pertaining to Safety Element updates. Specifically, Senate Bill 1030 which was passed in 2018 establishes the following:

- Requires the safety element to be revised to identify new information on fire hazards, flood hazards, and climate adaptation and resiliency strategies applicable to the eCity or county that was not available during the previous revision of the safety element
- Requires this revision to occur upon each revision of the housing element or Local Hazard Mitigation Plan (LHMP), but not less than every eight years.

F. Housing Element Organization

Santa Monica's Housing Element is organized into the following chapters:

1. **Introduction:** This chapter discusses the City of Santa Monica's housing strategy, statutory requirements of the Housing Element and relationship to other General Plan elements, changes to the Land Use and Circulation Element, and a summary of the outreach efforts.
2. **Affirmatively Furthering Fair Housing:** This chapter provides an assessment of fair housing including a description of segregation patterns, racially or ethnically concentrated areas of poverty, disparities in access to opportunity, disproportionate housing needs, and a summary of actions to affirmatively further fair housing in the City.
3. **Goals and Policies:** This chapter provides the background for the City's housing needs, and then establishes the goals and policies to address the housing issues identified. This section forms the framework of the programs in the Housing Element.
4. **Land Available for Housing:** This chapter summarizes the City's State mandated RHNA and provides an analysis of suitable land available for residential development to meet the RHNA.
5. **Programs and Schedule of Implementation:** This chapter lays out the programs that the City will implement to achieve the goals and objectives. Each program includes specific actions to be undertaken by the City, a timeframe for implementation, the City departments/divisions responsible for implementation, and desired outcomes (where appropriate).



G. Community Engagement

The City encourages and solicits the participation of the community and other local agencies in the process of identifying housing and community needs, and prioritizing expenditure of funds. Throughout the preparation of the Housing Element, the City conducted numerous outreach efforts to engage all segments of the community.

Public Process Adapts to the COVID-19 Pandemic

Due to the COVID-19 Pandemic and the resulting safer at home orders, the public outreach process was adapted to accommodate virtual participation. Staff held online roundtable discussions, workshops, questionnaires, and study sessions. The global pandemic not only shifted the way that public participation was performed, but also the way that Staff noticed outreach events.

A project website was created and launched in August 2020 to document project progress with information on public outreach events, draft documents, the RHNA, and relevant links. (www.santamonica.gov/housing-element-update). In order to communicate upcoming engagement opportunities during a safer at home order, additional engagement strategies were needed, aside from the typical social media posts, newspaper notices, and email blasts. Two large-scale surveys were conducted at the launch of the project and when the draft concepts were released in order to gather input (see Appendix A). Non-digital communication strategies were employed, like the Rent Control Board newsletter and Seascope, a quarterly City publication mailed to every household in Santa Monica. Materials and notices were also distributed through stakeholders and community partners such as housing providers. While most materials were posted to the project website, printed versions and alternate language versions were available upon request.

Community Input

The two phases of public outreach conducted to get community input for the Plan included public outreach meetings and inter-department collaboration with other City divisions and departments.

Outreach Meetings

Figure 1-1 lists the meetings at which opportunities for public, City Council, and City commission input on the Housing Element were provided. As indicated, the City held public webinars, met with stakeholders virtually, and held numerous public hearings with the Planning Commission, City Council, Housing Commission, and Rent Control Board. City staff attended over 35 meetings and hearings throughout the course of the Housing Element preparation.

Figure 1-1: City Boards and Commissions

Meeting	Date	Description
Housing Element Update Public Webinar	11/12/20 (Morning) 11/12/20 (Evening) 11/14/20	Public webinars on the project launch
Planning Commission	11/18/20 12/9/20 1/20/21 2/17/21 3/16/21 3/17/21 5/12/21 6/2/21 6/3/21 8/18/21 9/8/21 9/14/21	"Gathering Input for the Plan" presentations to City boards, commissions, and the City Council took place between November 2020 and April 2021. An initial study session with the City Council took place in December 2020.
City Council	12/10/19 12/15/20 3/9/21 3/30/21 6/15/21	Presentations of the May 2021 Draft, which took place between May and June 2021, highlighted the proposed updates to the Housing Element for Commissions, Boards and neighborhood groups as requested. The meetings yielded direction on concepts to include in the draft Housing Element.
Housing Commission	1/7/21 4/1/21 4/15/21	
Rent Control Board	12/10/20 4/8/21	
Housing Production Technical Working Group	12/3/20 12/17/20 1/22/21 2/19/21	Two technical working groups on Housing Production and Housing Stability were formed in November 2020. The groups were comprised of practitioners and interested community members. The two groups met four times each between December 2020 and February 2021.
Housing Stability Technical Working Group	12/11/20 1/8/21 1/28/21 2/18/21	
Affordable Housing Developer Round-table	2/25/21	The affordable housing stakeholders' roundtable brought together affordable housing producers and advocates with particular knowledge and experience in housing issues. Participants included: Linc Housing, Community Corporation of Santa Monica (CCSM), Abode Communities, EAH Housing, Southern California Association of Nonprofit Housing - SCANPH, Step Up, and Amcal Multi-Housing
Interfaith Council	4/28/21	Staff met with representatives of a variety of religious congregations through the Santa Monica Area Interfaith Council. The intent was to provide information regarding the possibility of increasing housing potential on parking lots of religious congregations.

The first public draft of the Housing Element was released in May 2021 and posted on the department and project website. The Planning Commission held a public hearing on June 2 and 3, 2021, followed by City Council on June 15, 2021. All City meetings are open to the public. The City provides the public with advance notice of the public hearing, on-line links and digital copies of all related materials with print and translated materials available upon request. Comments and direction provided at these meetings were incorporated into the May 2021 draft, which was posted on the website and submitted to the State of California Department of Housing and Community Development (HCD).

The City also made use of its internal and external partners to maximize the noticing of hearings, events and the release of draft materials and concepts. This included working with affordable housing providers in the City, the rent control board, and the City's communications team to reach affordable housing and rent control residents, and the City at large through the SaMo News email blast and City social media accounts.

Community outreach for the Housing Element update started with three identical virtual workshops outlining the update process, objectives, and future engagement opportunities. Following the staff presentation, participants were given time to ask staff questions. A summary of each workshop, including the question and answer portion, was then posted to the project website. These workshops were held across several days and times, including the weekend, to allow for broad participation. In addition, an online survey was sent out to all neighborhood groups, stakeholders, and the City's list of interested parties/groups.

Additionally, two Technical Working Groups were established, one focused on housing production and the other on housing stability. The goal of these two groups was to bring together community members, practitioners, and experts to garner more specific feedback on the barriers to housing development and issues surrounding displacement. Attendees came from a broad range of stakeholder groups, including Abundant Housing LA, Community Corp of Santa Monica, NRDC, EAH Housing, various boards and commissions, several private architecture firms, and other various community groups. For a full list of member organization/affiliation, see the Figure 1-2 below. The working

groups met four times each and discussed the past and future goals, policies, and programs of the Housing Element. The comments received were then used to develop draft concepts around housing production, location, stability, and equity. These concepts were posted to the website, in both English and Spanish, along with surveys to petition additional feedback from the community at large.

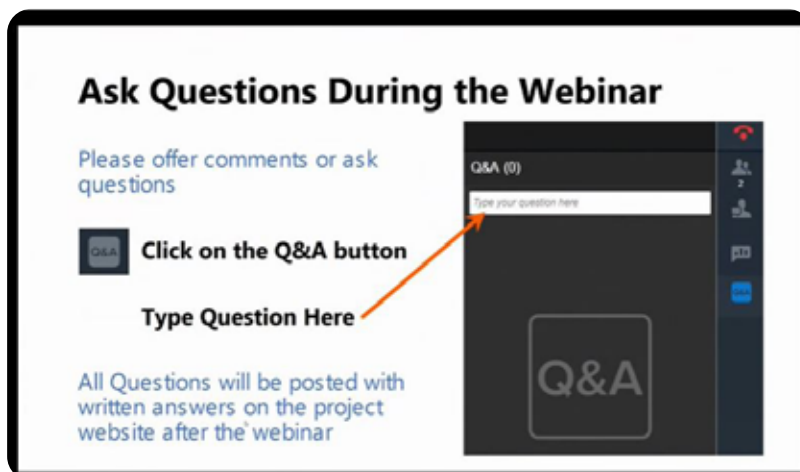


Figure 1-2: Technical Working Group Member Organization/Affiliation

Stability TWG	Production TWG
NOMA	KoningEizenberg Architecture
Santa Monica Housing Commission	RLB Architecture
Pico Neighborhood Association	KEA
Black Agenda	SREG
Committee for Racial Justice	Abundant Housing LA
League of Women Voters	L.A. Realty Partners
NRDC	Armbruster Goldsmith & Delvac LLP
Community Corp of Santa Monica	Community Corp of Santa Monica
Harding Larmore Kutcher & Kozal	Abundant Housing LA
Disability Community Resource Center	Moore Ruble Yudell Architects and Planners
MAPS Realty	Housing Commission
PCG	Santa Monicans for Renters' Rights
Cypress Equity Investments	DFH Architects
Morley Builders	Architectural Review Board
Santa Monica Architects for a Responsible Tomorrow	Michael W. Folonis, Architects
Housing Commission	Yuguchi Architecture
Planning Commission	NRDC
Interested Community Members	Harding Larmore Kutcher & Kozal
	Santa Monica Housing Council
	Planning Commission
	Zinner Consultants
	EAH Inc.
	MAPS Realty
	Sustainable Homes of the Future, LLC
	Cypress Equity Investments
	Goldman Firth Rossi Architects
	Morley Builders
	Architect, member Building and Fire Life-Safety Commission
	Santa Monica Architects for a Responsible Tomorrow
	Housing Commission
	Interested Community Members

In an effort to gather more specific feedback around the barriers to affordable housing development, staff held a roundtable with affordable housing developers from across the Los Angeles area. Involved organizations included Linc Housing, Community Corporation of Santa Monica (CCSM), Abode Communities, EAH Housing, Southern California Association of Nonprofit Housing – SCANPH, Step Up, and Amcal Multi-Housing.

Once draft concepts for the Housing Element were developed, they were posted online, in both English and Spanish, for a period of review by the community. The public were provided the opportunity to comment on the draft concepts via an on-line interactive survey. The comments received were then presented back to the Housing Commission, Rent Control Board, Planning Commission, and City Council. City Boards and Commissions

Following each meeting held during the initial phase of the community outreach effort, comments were summarized and posted on the project webpage. These materials were made available in English and Spanish, upon request.

Figure 1-3 summarizes comments by topics that were received from the community and indicates where issues have been addressed in this document. Individual meeting summaries can be found in Appendix D.



Figure 1-3: Comments Received During Phase I Community Outreach, by Topic

General Comment	Where Addressed
<p>Affordable Housing: There were many discussions that concurred that the cost of housing in Santa Monica is too high. To alleviate the demand for lower-cost housing, the Housing Element should encourage both 100% affordable developments and inclusionary units in market rate housing projects. Some concepts proposed to encourage additional affordable housing are:</p> <ul style="list-style-type: none"> • Increasing the inclusionary requirements of the AHPP; • Building in additional flexibility for the off-site affordable housing requirement; • Changes to certain development standards to encourage housing production; • Further streamline the process for housing project approval; • Incorporate the SB1763 changes to the state density bonus law; • Increase the maximum allowable density and height to ensure housing feasibility and to support increased affordable housing production; • Right of first offer for non-profit housing developers 	<p>Programs: 1.A, 1.B, 1.E, 1.F, 1.J, 2.A, 2.B, 2.C, 2.D, 2.E, 2.F, 4.A, 4.B</p>
<p>Protect Existing Tenants: Concern was expressed that meeting the higher RHNA allocation would lead to the displacement of existing tenants. Community members advocated for additional protections for existing tenants to make sure that they can remain in place while also allowing additional housing units to be built. Some concepts proposed to protect existing residents are:</p> <ul style="list-style-type: none"> • Expanding upon and adding to the existing programs that provide rental assistance, tenant protections, resident support services, and maintenance/ rehabilitation of housing units; • Protect existing rental units and require that protected units are replaced; • Maintain housing repair and rehabilitation programs; • Expand upon outreach and information for property owners and tenants regarding tenant rights and rehabilitation programs; • Protect low-income units at-risk of converting to market-rate units, as well as the naturally occurring affordable housing units. 	<p>Programs: 2.G, 3.A, 3.B, 3.C, 3.D, 3.E, 3.H, 5.A, 6.A, 6.B, 6.C, 6.D, 6.G, 6.H</p>
<p>Additional Incentives for Accessory Dwelling Unit (ADU) Production: Ideas were proposed to explore ways to increase the development of ADUs. Since ADUs are typically additions to existing structures, the new units would help to contribute to the RHNA while maintaining neighborhood character and protecting existing residents. Some ideas proposed are:</p> <ul style="list-style-type: none"> • Allow additional ADUs on single-dwelling unit parcels if they are deed restricted for affordable housing; • Develop an ADU accelerator program to simplify the ADU process and create pre-approved plan sets for ADUs. 	<p>Programs: 1.G, 4.C, 4.E</p>

Inter-Agency Review

City Departments: An Interdepartmental Taskforce representing all City departments related to housing including the Community Development Department (encompassing City Planning, Housing, and Economic Development), Community Services Department, City Attorney's Office and Rent Control Board met regularly over the past year to contribute to the development of the Housing Element, review draft documents, and keep the City's relevant Boards and Commissions informed about the planning process and key policy issues.

Water and Sewer Priority (Section 65589.7): As required by State Law, the Housing Element was shared with the City's Water Resources Division (WRD), which has responsibility for water and sewer maintenance and development. Appendix F provides a summary of potential water and sewer infrastructure constraints for housing projects. As indicated, while increases in infrastructure capacity will be necessary to accommodate the sewer and water demands of future housing development, the City will be increasing the Capital Facilities Fee to implement improvements as necessary to serve future housing development.



The stormwater and sewer treatment facility at the Civic Center Lot, part of the City's Sustainable Water Infrastructure Project (SWIP).

H. Summary Of Housing Programs For The 2021-2029 Housing Element

This summary table is provided for convenient reference. More details regarding the programs, including program background can be found in Chapter 5.

Program No	Program	Objective	Timing
<p>GOAL 1 PROGRAMS Production of new housing that is sustainable, innovative, safe and resilient, appropriate with the surrounding neighborhood, offers opportunities for active and healthy living, including walking and biking, and increases equitable housing opportunities.</p>			
<p>1.A</p>	<p>By-Right Approvals For Housing Projects The City shall make permanent amendments to the Zoning Ordinance that are currently interim and make amendments to the Land Use and Circulation Element (LUCE), Downtown Community Plan (DCP), Bergamot Area Plan (BAP) and Zoning Ordinance, as necessary, to allow, at a minimum: 1) 100% affordable housing projects; 2) non-Downtown housing projects that are code-compliant or are granted specified modifications/waivers to be established in the Zoning Ordinance; 3) Downtown housing projects that do not exceed Tier 2 maximums and are code-compliant or are granted specified modifications and waivers to be established in the Zoning Ordinance; and 4) housing projects that include at least 20% of units on-site as affordable to lower-income households [Government Code Section 65583.2(c)], to be reviewed through a by-right process. <u>The by-right process for housing projects is intended to achieve the RHNA target and at minimum, the Quantified Objectives established in this Housing Element.</u> Such by-right projects shall still be subject to design review, provided that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.</p> <p>The City shall extend interim zoning amendments for process thresholds pending the full implementation of this program.</p> <p>The City shall also develop written procedures to implement the streamlined review process for eligible projects under SB35.</p> <p><u>The City shall also continue to facilitate consolidation of sites for housing projects by processing administrative lot tie agreements as part of the plan check process.</u></p>	<p>Provide certainty for housing providers by allowing a ministerial approval process based on objective standards for 100% affordable housing projects, housing projects that are code compliant or granted specified modifications, code-compliant Downtown housing projects that do not exceed Tier 2 maximums or are granted specified modifications, and housing projects eligible for by-right processing in accordance with State law.</p>	<p><u>March 31, 2022</u></p> <p><u>October 15, 2022</u></p>

Program No	Program	Objective	Timing
1.B	<p>Streamline The Architectural Review Process and Ensure Design Review Objectivity For Housing Projects</p> <p>The City shall adopt new streamlining procedures to allow staff level design review for smaller housing projects and expedited design review of larger housing projects by shifting the design review process to before or concurrently with entitlement issuance. This will reduce processing timelines and increase certainty for housing providers. These procedural changes would involve amending the Municipal Code to assure that design review cannot unreasonably delay a housing project approval by, for example, placing limits on number of hearings and maximum time limits for design review. <i>The City shall review approval findings for design review and establish procedures or other mechanisms to promote approval certainty. The amendments shall also be clear that design review cannot be used to reduce density or deny a housing project.</i> Additionally, the City shall develop objective design standards <i>for applicable housing projects, which will also be used to ensure consistency anticipating compliance</i> with SB35 <i>for applicable housing projects.</i></p>	Streamlined housing approvals.	September 30, 2022-Objective Design Standards by June 30, 2023; Process streamlining by October 15, 2022
1.C	<p>Incentivize Housing Development On Surface Parking Lots in Residential Zones</p> <p>In order to provide new housing choices and affordability in high opportunity areas, the City shall adopt standards that incentivize housing production on surface parking lots in residential zones associated with existing commercial uses, including, but not limited to, removing density caps and commercial parking replacement restrictions, lot consolidation, street access to the project, and restoring underlying maximum allowable density.</p> <p>The City shall also adopt standards that incentivize housing production on surface parking lots associated with existing residential uses as long as the existing residential use is not removed.</p>	Incentivize housing production on underutilized sites that would not displace existing tenants.	August 1, 2023
1.D	<p>Reduce Minimum Parking Requirements for Housing Projects</p> <p>The City shall reduce minimum parking requirements for all housing projects by applying Parking Overlay 1 rates.</p>	Lower the cost of housing production	August 1, 2022, October 15, 2022
1.E	<p>Revise The Design Standards In The Bergamot Area Plan (BAP) For Easier Understanding And To Support Housing Production</p> <p>The City shall modify the design guidelines in the BAP to establish objective standards to support housing production by increasing certainty for housing providers. The revisions to design standards will address at minimum: building modulation, ground floor uses, street frontages/pedestrian orientation, open space, reduction in parking minimums, live/work artist and commercial living situations, etc. The standards shall be user-friendly with improved clarity to support housing production. The BAP should also consider the special housing needs of artists, such as live-work units, to promote artist residents in the Bergamot area.</p>	Provide clarity in the regulatory environment for housing and incentivize housing production in the Bergamot area.	By June 30, 2023

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1.F	<p>Revise the Downtown Community Plan Development Standards To Support Housing Projects</p> <p>The City shall modify the development standards in the DCP to ensure they are set at levels that can support the minimum AHPP requirements and to support feasible housing projects. The City shall also amend the development standards and AHPP requirements to ensure Tier 2 and Tier 3 Downtown housing projects are feasible.</p> <p>The City's assumptions of feasibility and the City's SSI are based on the results of a feasibility analysis prepared by HR&A dated June 9, 2021 and February 2, 2022. Based on the results of the feasibility analysis, the feasible FARs for housing projects range from a minimum 2.75 to 4.0 with heights ranging from 55 feet to 84 feet. The City reserves the right to adjust these heights and FARs up or down. Any changes will promote housing and ensure feasibility and that overall unit capacity assumed in the site inventory is met, including income category, and will be no lower than the minimum FAR and height shown in the table below, existing allowable height and FAR as of October 13, 2021. The off-site affordability requirement will be greater than the on-site requirement.</p> <p>The City shall consider opportunities, including rezoning or the creation of new zoning districts, as necessary, to facilitate advancement of housing goals and/or historic preservation.</p> <p>In addition to FAR and height, the City shall review and modify as appropriate all standards and regulations that may be considered a constraint to housing production including but not limited to development impact fees, unit mix, and design standards such as restrictions on ground floor residential use, minimum/maximum ground floor height, and daylight plane adjacent to existing residential neighborhoods.</p> <table border="1"> <thead> <tr> <th>Zone</th> <th>Approx. Acres to be Rezoned</th> <th>Current Tier 1 FAR/Height</th> <th>Minimum Tier 1 FAR/Height with Rezoning</th> <th>Current Tier 2 FAR/Height</th> <th>Minimum Tier 2 FAR/Height with Rezoning</th> <th>Current Tier 3 FAR/Height</th> <th>Minimum Tier 3 FAR/Height with Rezoning</th> </tr> </thead> <tbody> <tr> <td>LT (East)</td> <td>12</td> <td>1.50/39 ft</td> <td>2.75/60 ft</td> <td>2.25/50 ft</td> <td>3.0/65 ft</td> <td>=</td> <td>=</td> </tr> <tr> <td>LT (West)</td> <td>11</td> <td>1.50/39 ft</td> <td>2.75/60 ft</td> <td>2.75/60 ft</td> <td>3.0/65 ft</td> <td>=</td> <td>=</td> </tr> <tr> <td>NV</td> <td>31</td> <td>2.25/39 ft</td> <td>2.75/60 ft</td> <td>3.50/60 ft</td> <td>3.50/70 ft</td> <td>=</td> <td>4.0/84 ft</td> </tr> <tr> <td>BC (Promenade)</td> <td>12</td> <td>2.25/39 ft</td> <td>2.75/60 ft</td> <td>2.75/60 ft</td> <td>3.0/65 ft</td> <td>=</td> <td>=</td> </tr> <tr> <td>BC (2nd/4th)</td> <td>25</td> <td>2.25/39 ft</td> <td>2.75/60 ft</td> <td>3.50/60 ft</td> <td>3.50/70 ft</td> <td>=</td> <td>=</td> </tr> <tr> <td>IA</td> <td>52</td> <td>2.25/39 ft</td> <td>2.75/60 ft</td> <td>3.50/60 ft</td> <td>3.50/70 ft</td> <td>4.0/84 ft</td> <td>4.0/84 ft</td> </tr> <tr> <td>OT</td> <td>15</td> <td>2.25/39 ft</td> <td>2.75/60 ft</td> <td>2.75/60 ft</td> <td>3.0/65 ft</td> <td>=</td> <td>=</td> </tr> <tr> <td>WT</td> <td>6</td> <td>1.50/39 ft</td> <td>2.75/60 ft</td> <td>2.25/50 ft</td> <td>3.0/65 ft</td> <td>=</td> <td>=</td> </tr> </tbody> </table>	Zone	Approx. Acres to be Rezoned	Current Tier 1 FAR/Height	Minimum Tier 1 FAR/Height with Rezoning	Current Tier 2 FAR/Height	Minimum Tier 2 FAR/Height with Rezoning	Current Tier 3 FAR/Height	Minimum Tier 3 FAR/Height with Rezoning	LT (East)	12	1.50/39 ft	2.75/60 ft	2.25/50 ft	3.0/65 ft	=	=	LT (West)	11	1.50/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=	NV	31	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	=	4.0/84 ft	BC (Promenade)	12	2.25/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=	BC (2nd/4th)	25	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	=	=	IA	52	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	4.0/84 ft	4.0/84 ft	OT	15	2.25/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=	WT	6	1.50/39 ft	2.75/60 ft	2.25/50 ft	3.0/65 ft	=	=	Continue to encourage housing production in Downtown area.	March 31, 2022 <u>October 15, 2022</u>
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1.G	<p>Incentivize and Facilitate the Development Of Accessory Dwelling Units Through An ADU Accelerator Program The City shall develop an Accessory Dwelling Unit (ADU) Accelerator Program that will simplify the ADU process by providing prospective ADU developers property owners interested in constructing ADUs throughout all neighborhoods with a handbook detailing all ADU standards and review procedures, and pre-approved ADU plans that can be selected to reduce time and costs associated with ADU development. The program will further streamline the City's ADU permitting review process with the aim of issuing building permits for an average of 47 ADUs/year. Additionally, the City will review and update its locally adopted ADU Ordinance for consistency with State law.</p>	Streamline approvals and facilitate development of ADUs.	December 31, 2022 June 30, 2023
1.H	<p>Adaptive Reuse Of Existing Commercial Buildings For Permanent Residential Use As an alternative to constructing new housing, the City shall amend the Zoning Ordinance to encourage and incentivize the adaptive reuse of existing commercial tenant space Citywide, for permanent residential use and also allow an adaptive reuse of existing ground floor commercial space for artists and live-work use. The City shall also adopt policy and zoning eChanges to incentivize the conversion of existing commercial tenant space to residential use include but are not limited to, such as relaxing minimum parking requirements, unit mix, open space, and other typical zoning or building code requirements.</p>	Increase flexibility for reuse of vacant commercial space to residential use.	December 31, 202 3 4
1.I	<p>Ensure That Local Regulations Support Innovations In Construction Technology To The Extent Technically Feasible The City shall support innovative lower-cost, efficient and environmentally sustainable construction techniques for housing. Program shall implement a streamlined building permit review process for housing projects utilizing innovative construction methods and technology, and project-based outcome-oriented permitting benchmarks.</p>	Remove impediments to innovation in housing construction.	December 31, 202 3 4
1.J	<p>Rezoning by Revising Development Standards to Ensure that Housing Projects are Feasible and Incentivized Over Commercial Development The City shall amend the Zoning Ordinance, LUCE, and the Bergamot Area Plan (BAP) to increase FAR and height standards throughout the city's non-residential zoning districts (other than Downtown which is addressed in Program 1.F) to levels that can support feasible housing projects.</p> <p>The City's assumptions of feasibility and the City's SSI are based on the results of a feasibility analysis prepared by HR&A dated June 9, 2021 and February 2, 2022. Based on the results of the feasibility analysis, the feasible FARs for housing projects range from a minimum 2.750 to 3.25 with heights ranging from 55 feet to 65 feet. The City reserves the right to adjust these heights and FARs up or down. Any changes will ensure feasibility and that promote housing to ensure overall unit capacity assumed in the site inventory is met, including income category, and will be no lower than minimum FAR and height shown in the tables below, existing allowable height and FAR as of October 13, 2021. The off-site affordability requirement willshall be greater than the on-site requirement</p>	Support the production of affordable housing and encourage the equitable production of housing across the City.	March 31, October 15, 2022

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1.K	<p>Adequate Sites Program</p> <p>To accommodate the City's lower-income RHNA <u>shortfall</u>, the City shall make amendments to the Land Use and Circulation Element (LUCE), Downtown Community Plan (DCP), Bergamot Area Plan (BAP) and Zoning Ordinance, as necessary, to <u>create the opportunity for 1,880 lower income units and</u> establish that <u>the City-owned sites identified in the Suitable Sites Inventory meet all requirements pursuant to Government Code Section 65583.2(h) and (i) including but not limited to allowing are-allowed</u> 100 percent residential use and require <u>ing</u> residential use to occupy at least 50 percent of the floor area. Additionally, while not required to meet the shortfall of lower-income units, the Zoning Ordinance shall be amended to specify additional mixed-used zoning districts that shall be allowed 100 percent residential uses. <u>To ensure that the City comply with SB 166 (No Net Loss), the City will monitor new residential and mixed use project applications to ensure an adequate inventory is available to meet the City's RHNA obligations.</u></p>	Create opportunity to accommodate the City's lower-income RHNA targets	<u>August 1, 2022</u> <u>June 30, 2023</u>
<p>GOAL 2 PROGRAMS</p> <p>Housing production for all income categories including for the community's workforce and most vulnerable communities.</p>			
2.A	<p>Establish A Moderate-Income Affordable Housing Overlay</p> <p>The City shall amend the Zoning Ordinance to establish a 100% affordable housing overlay for moderate-income (up to 120% AMI) housing projects in <u>targeted at least three</u> areas of the City such as Downtown area, Bergamot area, and the immediate area around the 17th St station. The moderate-income affordable housing overlay would allow a height increase of up to three additional stories or 33 feet, 50% density bonus, up to four incentives and concessions, no minimum parking requirements, and flexibility in unit size/unit mix in exchange for additional common area amenities.</p>	Provide significant incentives for 100% affordable housing.	<u>August 1, 2022</u> <u>June 30, 2023</u>
2.B	<p>Right Of First Offer Ordinance For Nonprofit Affordable Housing Providers</p> <p><u>Promote the use of SB1079 (2020) which created a new foreclosure sale process for 2-4 unit buildings that allows qualified parties a means to purchase property in foreclosure, subject to certain requirements. Building off this state law.</u> The City shall <u>consider</u> adopting a Right of First Offer Ordinance that would provide nonprofit affordable housing providers the right of first offer for a specified time period to acquire private properties <u>outside of foreclosure</u> as they become available for purchase. As part of this effort, the City shall prioritize the scope of properties that would most effectively achieve the goal of making nonprofit housing providers more competitive in the land buying market for the purpose of <u>preserving or</u> producing affordable housing. <u>Given the lack of an identified funding source to assist nonprofit affordable housing providers in purchase of multi-unit residential buildings through this program, explore funding sources, including grants and loans, that would contribute to the acquisition/rehabilitation quantified objective of 40 units. Require purchasers to preserve units as permanently affordable.</u></p>	Support 100% affordable housing by assisting nonprofit affordable housing providers to be competitive in the land acquisition market.	December 31, 202 <u>34</u>

Program No	Program	Objective	Timing
2.C	<p>Update The City's Affordable Housing Production Program to Increase the Number of Affordable Housing Units at all Income Levels</p> <p>In order to increase the number of affordable housing units at all income levels <u>such that 15% of all new multi-unit residential housing units are affordable to low and moderate income households and aim to achieve the Quantified Objective for lower income households as shown in Figure 5-1, Chapter 5</u>, the AHPP on-site and off-site option for housing projects located outside of the Downtown shall be revised to maximize the contributions of the AHPP to achieving the RHNA affordable housing allocation and advancing the City's affordable housing goals. Areas to be considered may include, but not be limited to:</p> <ul style="list-style-type: none"> • Increase the threshold (to at least 6 units) at which projects are required to provide on-site or off-site affordable units; • Eliminate the current "menu" option of affordability requirements and instead establish a new base affordability percentage; • Re-evaluate the in-lieu fee option for applicants to pay a fee instead of constructing affordable units to ensure that the fee supports the funding and construction of new affordable housing throughout the City; and • Evaluate the possibility of a mixed-compliance option that would provide applicants more flexibility in meeting AHPP requirements. • Increase the minimum percentage of required off-site affordable units to be higher than the on-site option; • Allow projects to locate off-site affordable housing anywhere in the City that is not a disadvantaged area as defined by SB535, which includes socioeconomic and environmental metrics • Allow market-rate projects to comply with AHPP off-site option through acquisition and rehabilitation of existing rental units and converting those to deed-restricted units. 	Ensure that the AHPP provides housing developers viable options for compliance.	June 30, 2022 By April 30, 2023
2.D	<p>Update Density Bonus Ordinance to Ensure Consistency With State Law And Integration Into The City's Land Use System</p> <p>The City shall update the density bonus ordinance, Santa Monica Municipal Code Chapter 9.22, to ensure consistency with State Density Bonus Law and integration with the City's land use system, including the AHPP. The ordinance will clarify how to apply State density bonus law in the City's commercial and mixed-use districts that do not have maximum density controls, including application of State density bonuses to floor area dedicated to residential uses. The amendments to the Municipal Code shall also set forth a voluntary by-right menu of incentives & concessions that do not require following the process under Government Code Section 65915(d) for approval. Requests for "off-menu" incentives and concessions may be requested pursuant to Government Code Section 65915(d).</p>	Ensure consistency with State Law.	March 31 October 15, 2022

Program No	Program	Objective	Timing
2.E	<p>Commit To The Production Of Affordable Housing On City-Owned/Publicly- Owned Land</p> <p>The City shall commit City-owned sites for the production of 100% affordable housing, with consideration of other community-serving purposes, including, but not limited to, green space, place making, and/or community-serving commercial and revenue generating uses.</p> <p>The City shall plan for a minimum of 1,884 affordable housing units across available City-owned sites, <u>which are located throughout the City, as shown in Figure F-6, Appendix F,</u> which may include, but shall not be limited to, rezoning actions in the LUCE, Specific Plans, and/or Zoning Ordinance amendments. Amendments to maximize affordable housing development potential on City-owned sites, and any subsequent development of those sites will be guided through a public process, including engagement of community stakeholders. <u>At least three RFPs shall be issued for city-owned sites identified on the Suitable Sites Inventory to accommodate at least 1,880 affordable units. The first RFP for at least one a city-owned site shall be issued by June 30, 2023. Subsequently, the City shall issue an RFP by June 30, 2025, and June 30, 2027 accounting for existing constraints on city-owned sites such as existing leases as shown in Figure F-6, Appendix F. Following the regular process for production of affordable housing on city-owned land, at the conclusion of the RFP process, the City will select a developer partner for each city-owned site with the intent to develop each site for 100% affordable housing. The developer would negotiate a ground lease with the City, process any necessary loans through the City's local Housing Trust Fund, and concurrently process the Planning entitlements for the project through a ministerial process. The timeframe from selection of a developer to issuance of building permits typically takes approximately 24-30 months. Future RFPs shall be staggered based on availability of resources.</u></p> <p><u>As has been done in the past, the City will use a variety of tools to facilitate 100% affordable housing development, including but not limited to:</u></p> <ul style="list-style-type: none"> <u>• Facilitate appropriate zoning and process to support 100% affordable housing</u> <u>• Substantially reduced or free ground rent, the City will</u> <u>• Providing funding through local housing trust fund</u> <u>• Support applications for other funding sources for affordable housing (e.g. low-income-housing tax credits, grants, State funding, Federal funding)</u> <u>• Support measures that are not housing constraints to generate and allocate tax revenue for the acquisition and development of deed-restricted affordable housing</u> <p><u>Further,</u> the City will continue to assess appropriate City-owned properties for the development of affordable housing, or in some cases may consider the most appropriate disposition of City properties to nonprofit developers for the development of affordable housing.</p>	Prioritize affordable housing production on city-owned land.	December 31, 2023 and Annual Ongoing

Program No	Program	Objective	Timing
2.F	<p>New Affordable Housing Finance Programs To Enable Continued Provision Of Technical And Financial Assistance For Housing Production</p> <p>The City shall leverage its commitment to use of City-owned land for affordable housing with advocacy for new sources of state, federal, and philanthropic funding that may be used for housing. Once appropriate funding sources are identified, the City will take the necessary steps to move forward.</p> <p>The City has adopted policy on prioritizing our local funding through a Housing Trust Fund plan that includes spending commitments for affordable housing production and preservation for special needs and ELI households including exploring new funding for conversion to deed-restricted, multi-unit developments in areas of affluence. The plan outlines funding strategy for ELI households including seniors and persons living with disabilities. The City will continue to implement the policy and execute funding commitments to produce housing targeted to persons experiencing homelessness or at-risk of homelessness. Local funding through the Housing Trust Fund will also help support the production of at least 1,880 affordable housing production units on City-owned/publicly owned land in accordance with Program 2E. On an ongoing basis, the City will continue to communicate with local affordable housing providers on potential housing projects based on funding availability.</p> <p>Financial and technical assistance shall be provided when resources are available and committed to nonprofit housing providers to the greatest extent possible to support the development of affordable housing, including special needs housing and arts housing. The City will research creative financing tools like a regional housing trust fund and infrastructure financing plans to learn how they are used elsewhere and how the City might best leverage these tools to support the construction of affordable housing. Support measures that are not housing constraints to generate and allocate tax revenue for the acquisition and development of deed-restricted affordable housing</p>	Seek innovative affordable housing financing tools to increase production.	Annual ongoing
2.G	<p>Expand Housing Choice by Facilitating The Development And Maintenance Of Special Needs Housing</p> <p>The City shall continue to utilize available financial resources and partnerships with service providers to create and retrofit existing housing for special needs households throughout the city with a target of 20 minor home repairs over the Housing Element cycle. This includes the provision of new programs, services, infrastructure and amenities that can help seniors who choose to live independently remain in their homes as long as possible.</p> <p>Within legal constraints, encourage or require housing providers to assign affordable housing units designed for persons with disabilities, including physical or developmental disabilities, for use by those who require those features. The City shall encourage barrier-free construction and adaptation.</p> <p>Through the 5-year Consolidated Plan process, the City shall continue to identify housing and supportive service gaps for various special needs groups and propose policy and priorities based on the analysis.</p>	Housing for individuals with special needs.	Annual ongoing
2.H	<p>Maintain Proposition I Monitoring</p> <p>The City shall monitor utilization of Proposition I authority through annual reporting of new "low rent-housing projects."</p>	Ensure the City continues to report on compliance with Proposition I.	Annual ongoing

Program No	Program	Objective	Timing
2.I	<p>Zoning For A Variety Of Housing Types Including Special Needs Housing And Housing Acces For Persons With Disabilities</p> <p>The City shall review and update the Zoning Ordinance and BAP, as applicable, to ensure consistency with State law as needed regarding special needs housing types and residential land use classifications as needed. <u>Review and expected revisions will include, but are not limited to, updating parking requirements for Emergency Shelters pursuant to AB139, the city’s definition of “household”, and land use requirements for Residential Care Facilities for seven or more persons to promote objectivity and approval certainty.</u></p>	Ensure the City is compliant with all State laws for special needs housing types and residential land uses.	December 31, 202 2 ³ and Annual Ongoing
2.J	<p>Program 2.J Prioritize Water And Sewer Service To Housing Projects With On-Site Affordable Units</p> <p>The City shall establish written procedures to grant priority to developments with on-site units affordable to lower-income households if availability of service is limited.</p>	Prioritize infrastructure service to developments with lower income units to support the production of affordable housing throughout the City	December 31 2022
<p>GOAL 3 PROGRAMS Preservation of the existing supply of housing and prevent displacement of existing tenants.</p>			
3.A	<p>Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced</p> <p>The City shall amend the Municipal Code to adopt local requirements that make permanent and potentially expand upon the anti-displacement requirements of SB 330 to ensure that <u>100% of all</u> protected units proposed to be demolished in order to construct a new housing development project are replaced.</p> <p>As required by Government Code Section 65583.2(g)(3), the City shall amend the Zoning Ordinance to require that sites that currently have residential use, or within the past five years have had residential uses that have been vacated or demolished, that (1) are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income <u>(approximately 1,150 deed-restricted affordable units within market-rate housing projects on private property)</u>, or (2) subject to any other form of rent or price control through a public entity’s valid exercise of its police power <u>(approximately 27,484 units)</u>, or (3) within the past five years were occupied by low or very low income households, shall be required to replace all of those units as affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth Government Code Section 65915(c)(3).</p>	Protect existing residents by preserving existing rental housing stock; no net loss of units.	August 1, 2022 <u>June 30, 2023</u>

Program No	Program	Objective	Timing
3.B	<p>Develop Tenant and Landlord Programs To Address State And Federal Legislative Mandates Regarding Anti-Discrimination</p> <p>The City shall continue to implement programs throughout the City, including tenant and landlord education/outreach through workshops that are held twice as well as regular noticing of fair housing issues, that strive to protect tenants against landlord discrimination and cancellation of existing Section 8 contracts (including City and/or private foundation-funded subsidy) to enable tenants to remain and pay the maximum allowable rent (MAR). The City will continue to fund the acquisition and rehabilitation of existing rental units and continue to investigate new, innovative ways to increase the affordability of housing in light of the loss of formerly affordable units due to vacancy de-control and Ellis withdrawals. The City will also continue to work with community partners to keep the public aware of fair housing rights and obligations (along with the now much-needed rental assistance programs), and to use enforcement of our laws to help stop housing discrimination in Santa Monica whenever it appears, such as the Legal Aid Foundation of Los Angeles</p>	Develop programs to address State and Federal housing mandates.	Annual ongoing
3.C	<p>Facilitate The Conservation Of Restricted And Non-Restricted At-Risk Housing.</p> <p>There are approximately 770 affordable, deed-restricted units that are at-risk of conversion to market rate in the next 10 years. The City will continue to monitor over this Housing Element Cycle the status of of the approximately 770 affordable, deed-restricted at-risk projects units within throughout the City, ensure that required notice is given to tenants, and advise property owners and tenants in advance of potential conversion dates, and assist in answering questions from residents of at-risk housing. As a part of the ongoing monitoring, the City will continue to provide information on maintaining long-term affordability and assist federally-funded housing properties with seeking funding assistance in applying for allocations of housing vouchers from the federal government to maintain housing affordability. On an ongoing basis, the City will continue to communicate with local affordable housing providers on conserving housing projects.</p> <p>The City will exercise its right of first refusal to purchase properties if necessary and financially feasible to ensure the continued availability of affordable housing units. Additionally, the City shall continue to report annually on research and implement strategies on conserving non-covenant residential units such as the approximately 27,484 rent-controlled units and naturally occurring affordable units.</p>	The City proactively monitors units at risk of conversion due to expiring covenants and takes actions to ensure their long-term affordability.	Annual ongoing
3.D	<p>Maintain An Acquisition And Rehabilitation Program</p> <p>As resources are available, the City shall continue to provide loan assistance to nonprofit affordable housing providers and work with providers to identify new funding sources for acquisition and rehabilitation throughout the city. As outlined in Program 2.B, the City shall adopt a Right of First Offer Ordinance that would provide nonprofit affordable housing providers the right of first offer to acquire existing private properties as they become available for purchase.</p>	Protect existing residents by acquiring and rehabilitating existing housing.	Annual ongoing
3.E	<p>Maintain A Low Income Residential Repair Program</p> <p>The City shall support and fund the rehabilitation of 38 multi-family units and provide 20 minor home repairs throughout the City.</p>	Rehabilitate 38 multi-unit dwellings and provide 20 minor home repairs.	2024

Program No	Program	Objective	Timing
3.F	<p>Enhance Code Enforcement Response To Housing-Related Violations</p> <p>The City shall continue to respond to residential building code violation complaints <u>throughout the City</u>. Code Enforcement and Building and Safety Divisions will coordinate with the Housing and Human Services Division to provide information on available rehabilitation assistance to correct code deficiencies. <u>The City shall continue to respond to residential substandard housing complaints that affect habitability (which are a Priority 1 complaint) within 1 day.</u></p>	Require property owners to respond to Building Code violations and complete routine maintenance on their residential buildings.	Annual ongoing
3.G	<p>Maintain A Mandatory Seismic Retrofit Program</p> <p>The City shall continue to implement the Seismic Retrofit Program pursuant to the City's Seismic Retrofit Ordinance. <u>The City shall aim to issue building permits for seismic retrofit throughout the city of at least 900 buildings by the end of this Housing Element Cycle.</u></p>	Protect existing residents by ensuring the safety and structural integrity of existing residential buildings.	Annual ongoing
3.H	<p>Information And Outreach For Property Owners Regarding Rehabilitation And Maintenance Of Housing Units</p> <p>The City shall provide additional education and outreach to multi-unit property owners on available City programs and support continued rehabilitation, maintenance, repairs, and upgrades of their housing units. <u>Outreach will continue to include at least one annual seminar dedicated to providing information to rental property owners on rehabilitation and maintenance of properties.</u></p>	Inform property owners regarding proper maintenance of residential units.	Annual ongoing
3.I	<p>Right To Counsel Program</p> <p>The City shall continue to implement a Right to Counsel pilot program and evaluate its overall effectiveness, program capacity, and long-term feasibility.</p>	Prevent the displacement of tenants by providing access to legal assistance and support for tenants facing eviction.	Ongoing
3.J	<p>Restrict Conversion Of Existing Rental Housing To Condominiums</p> <p>The City shall continue to regulate condominium conversions pursuant to SMMC Section 9.24.040. <u>The City will continue to track the City's vacancy factor of rental units, and restrict conversions if vacancy factor is 5 percent or less of the total rental housing inventory. Furthermore, the City will monitor removal of rental housing units from the rental housing market and provide annual data.</u></p>	Restrict loss of rental housing units to condominium conversions	Ongoing

Program No	Program	Objective	Timing
GOAL 4 PROGRAMS A community that provides equitable housing access to all neighborhoods.			
4.A	<p>Zoning Ordinance Amendment To Permit Multiple-Unit Housing In Non-Residential Zones Where Not Currently Permitted</p> <p>The City shall amend the Zoning Ordinance, LUCE, and associated specific and area plans to add multi-unit housing as a permitted use in non-residential zones where housing is currently prohibited. To promote the fair and equitable distribution of new housing opportunities across the City, land use regulations shall be amended to add multi-unit housing as a permitted use in areas where it is currently prohibited. Land use regulations, FAR, and Height (as indicated in Program 1.I) will be revised to allow housing in the three areas that currently do not allow housing such as the Office Campus, Industrial Conservation, and Creative Conservation Sector zones.</p> <p>To promote fair and equitable housing opportunities throughout the City, the City shall amend the Zoning Ordinance, LUCE, and the Bergamot Area Plan (BAP) including in areas that have historically not permitted or accommodated housing, to allow for higher maximum allowable FAR and height in the NC, IC, and OC zoning districts.</p> <p>For the purposes of addressing environmental health considerations, the City shall amend the Zoning Ordinance to specify locations in the City where housing projects are required to conduct an air quality assessment and implement recommendations from the assessment.</p>	Support the production of affordable housing and encourage the equitable production of housing across the City.	August 1, 2022 October 15, 2022
4.B	<p>Facilitate The Development Of Housing On Surface Parking Lots Owned By Community Assembly Uses</p> <p>In order to Affirmatively Further Fair Housing, the City shall adopt standards that support the production of affordable housing on surface parking lots owned by community assembly uses, including religious congregations including allowing not more than 50% market-rate units to support the affordable housing, unlimited density, no minimum parking requirements, an additional 33 feet of building height and allowance for the primary community assembly use and related ancillary use, for the support or expansion thereof, on or above the ground floor.</p>	Increase equitable access to all residential neighborhoods and not incentivize affordable housing in areas that have historically excluded diverse housing opportunities.	August 1, 2022 June 30, 2023
4.C	<p>Provide New Housing Choices and Affordability in High Opportunity Areas Through Incentives for Additional ADUs in R1-Zone Neighborhoods</p> <p>The City shall establish programs to address historically exclusionary single-unit dwelling zones by encouraging and incentivizing the production of ADUs in single-unit residential districts in accordance with program 4.F. This would include allowing an additional ADU to be constructed if the ADU is deed restricted as a rental unit. As ADUs are naturally more affordable by design given their size, the program would help affirmatively further fair housing by helping to provide new housing choices and affordability in high opportunity areas of the City that are largely unaffordable to many people.</p>	Increase equitable access to all neighborhoods through nominal density increases that may lower the barrier to housing access in areas that have historically excluded diverse housing opportunities.	August 1, 2022 June 30, 2023

Program No	Program	Objective	Timing
4.D	<p>Right to Return Program</p> <p>The City shall continue to implement a Right to Return Pilot Program and evaluate outreach strategies, applicant demand, the availability of historical documentation, verification processes, compliance with government legislation, and the administrative resources required to implement a broader long-term program. <u>The program will provide priority in City-funded affordable housing and inclusionary housing for up to 100 households or descendants of households.</u></p>	<p>Address the historical displacement of Santa Monica households resulting from the development of the Civic Auditorium and I-10 freeway through the Pico neighborhood during the 1950s and 1960s that disproportionately impacted low-income communities and communities of color.</p>	<p>Annual Ongoing</p>
4.E	<p>Provide New Housing Choices and Affordability in High Opportunity Areas Through Incentives for SB9 Units in R1-Zone Neighborhoods</p> <p><u>The City shall adopt a local ordinance implementing SB9, which shall establish an administrative process without any discretionary action, and shall include strong incentives to densify larger parcels in R1-Zone neighborhoods by allowing property owners on parcels of at least 10,000 sf to add ADUs as allowed under State Law in addition to SB9 projects. This will open up the possibility for property owners to construct up to 6 units through a multi-step process and create more housing choices and affordability in some of the most affluent areas of the city in accordance with Program 4E.</u></p>	<p><u>Increase equitable access to all neighborhoods through small increases that may lower the barriers to housing access in high opportunity neighborhoods.</u></p>	<p><u>By June 30, 2023</u></p>
4.F	<p>Establish Target to Increase Housing Production in R1 Zones and Include Mid-Cycle Monitoring</p> <p><u>The City shall aim to issue at least 47 building permits per year for additional housing units and types in R1 zones. Review progress towards targets by December 31, 2025 and if targets are not being met, adjust land use strategies as necessary and appropriate within one year.</u></p>	<p><u>Increase the number of net new housing units in R1 zones</u></p>	<p><u>Assess progress by December 31, 2025</u></p>

Program No	Program	Objective	Timing
GOAL 5 PROGRAMS			
Housing for persons experiencing homelessness			
5.A	<p>Reduce The Number Of Homeless Individuals Living On The Streets Of Santa Monica Through The Provision Of A Range Of Housing Options, With An Emphasis On Affordable, Permanent, Supportive Housing.</p> <p>The City shall continue to seek and leverage funds that contribute to the development of a range of permanent, supportive housing options, within and outside of Santa Monica. Focus case management and housing resources on the most chronic and vulnerable homeless individuals that have been identified on the City's Homeless Service Registry. Continue to serve other priority homeless populations through City- funded programs. Continue strategies to reunite those not first-homeless in Santa Monica with family and friends in their home communities. Review City policies and practices that may contribute to homelessness.</p>	Continue to invest in and implement housing and supportive services to prevent and address the impacts of homelessness.	Annual ongoing
5.B	<p>Low Barrier Navigation Centers As By-Right Use</p> <p>The City shall amend the Zoning Ordinance to allow Low Barrier Navigation Centers as a by-right permitted use in all non-residential zones permitting multi-unit uses.</p>	Ensure the City's regulations and procedures are in conformance with State Law.	December 31, 2023
GOAL 6 PROGRAMS			
Provision of housing assistance and supportive programs and services to extremely low-, very low-, low-, and moderate-income households and households with special needs, families, seniors, and the homeless.			
6.A	<p>Enhance Housing Mobility By Maintaining Rental Housing Voucher Programs Throughout the City And Expand To Assist All Persons With Disabilities</p> <p>The City shall continue to operate strong rental housing voucher programs throughout the City and advocate for funding guidelines for Section 8 that are competitive for Santa Monica; and shall pursue additional funding to maintain and expand voucher programs, if possible. Review and update the Housing Authority Administrative Plan annually to ensure compliance with the latest HUD regulations and to provide flexibility to respond to tenants' needs consistent with legal requirements. Utilize vouchers as a tool to prevent senior homelessness where eligible. When available funding opportunities are available, expand the rental housing voucher programs to fill the gap between income levels and the cost of housing for persons with permanent disabilities, including persons with Developmental Disabilities.</p>	Maintain voucher programs to ensure availability and choice of housing for households at all income levels.	Annual ongoing
6.B	<p>Seek Funding Sources To Support Rental Assistance For Vulnerable Individuals And Households At-Risk Of Displacement</p> <p>The City shall continue to pursue and identify new funding sources that support rental assistance programs, including emergency rental assistance to for individuals and households at risk of displacement throughout the city with a goal to provide emergency rental assistance to at least 100 households throughout the City over the Housing Element cycle the extent feasible.</p>	Maintain housing stability for vulnerable individuals and households.	Annual ongoing

Program No	Program	Objective	Timing
6.C	<p>Maintain And Expand The Preserving Our Diversity (POD) Program</p> <p>The City shall continue to operate the POD program and pursue additional funding to maintain assistance to seniors and evaluate expanding program assistance to other rent burdened residents vulnerable to displacement, if possible. The program shall ensure that POD subsidies do not result in an increase in rents. <i>The City intends the POD Program to serve at least 150 participants within this Housing Element cycle. Support measures that are not housing constraints to generate and allocate tax revenue for income assistance.</i></p>	Assist POD beneficiaries in achieving a basic needs budget.	Annual ongoing
6.D	<p>Information And Outreach Coordination For Tenants And Landlords On Housing Programs And Resources</p> <p>The City shall prioritize additional education and outreach to tenants and landlords <i>throughout the City</i> to increase awareness of federal and local housing programs and their rights and legal obligations, including Section 8 housing voucher program and anti-discrimination regarding income source. The City shall strengthen outreach and connect vulnerable residents with housing assistance and resources, including, but not limited to, credit counseling and support services addressing resident needs in securing adequate housing <i>and hosting two educational events per year.</i></p>	Raise awareness of housing assistance programs and tenant and landlord rights and responsibilities.	Annual ongoing subject to available staffing resources
6.E	<p>Maintain A Community Development Grant Program</p> <p>The City shall continue to fund supportive services that serve the priority homeless populations, striking a balance between existing programs that have demonstrated effectiveness and national best practices that are consistent with the City's adopted Action Plan to Address Homelessness in Santa Monica.</p>	Maintain funding for programs that service priority homeless populations, lower-income households, and special needs populations.	Annual ongoing
6.F	<p>Provide Tenant Relocation Assistance</p> <p>The City shall continue to implement the Tenant Relocation Assistance program; periodically review existing City policies and ordinances and recommend modifications if deemed necessary, including but not limited to, additional support in locating new housing for displaced residents upon relocation. <i>The City shall continue to prioritize displaced residents on the City's Below Market Housing waiting list in order to provide opportunities to identify comparable replacement housing within Santa Monica.</i></p>	Provide displaced tenants with cash-based relocation assistance.	Annual ongoing
6.G	<p>Maintain A Temporary Relocation Program</p> <p>The City shall continue the Temporary Relocation Program, including program oversight and enforcement, and coordination in providing accommodations to minimize impacts to residents including emergency hotel vouchers for tenants who have been ordered to vacate their units by the City for code violations, safety improvements, or maintenance. <i>The City shall continue to require that all temporarily displaced tenants are relocated to comparable housing within Santa Monica, or close proximity, and that temporary relocation is for the amount of time necessary to restore habitability to the dwelling unit or if the landlord demonstrates that tenancy was legally terminated.</i></p>	Provide temporary housing for tenants displaced from their units due to required maintenance.	Annual ongoing

Program No	Program	Objective	Timing
6.H	<p>Maintain Reasonable Accommodations To Ensure Equal Opportunity For Housing</p> <p>The City shall maintain and continue to support reasonable accommodations to ensure equal housing opportunities, consistent with fair housing laws.</p>	Provide regulatory relief to enable housing access for disabled persons.	Annual ongoing
<p>GOAL 7 PROGRAMS</p> <p>Eliminate housing discrimination on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, age, marital status, national origin, ancestry, familial status, income level, source of income, disability, veteran or military status, genetic information, or other such characteristics.</p>			
7.A	<p>Maintain Fair Housing Enforcement and Outreach Program</p> <p>The City shall continue to implement fair housing programs. The City shall educate landlords about discrimination and educate the real estate community on the necessity of ensuring that their practices meet the objectives of the fair housing laws. The City shall also conduct targeted outreach <u>by hosting a Fair Housing Workshop to the general public twice a year that covers fair housing. The City shall also continue to provide and</u> tenant application assistance and support to special needs populations including seniors, persons with disabilities, and individuals transitioning from institutional settings and individuals who are at risk of institutionalization.</p>	Education of tenants and landlords of their rights and responsibilities under fair housing laws.	Annual ongoing
7.B	<p>Provide Tenant/Landlord Mediation And Legal Services</p> <p>The City shall continue to support tenant/landlord mediation and legal services assistance.</p>	Provide tenant/landlord dispute resolution services.	Annual ongoing
7.C	<p>Maintain The Anti-Discrimination Tenant Protection Program</p> <p>The City shall continue to prevent discrimination, tenant harassment, and unlawful evictions through monitoring and enforcing of "just cause" eviction protections, and continue to provide fair housing services through the Public Rights Division of the Santa Monica City Attorney's Office. The City shall review current laws and recommend any needed modifications to ensure protection of tenants to the maximum extent possible.</p>	Protect existing tenants from harassment and unlawful eviction.	Annual ongoing



2.

Assessment of Fair Housing in the City



Chapter 2: Assessment of Fair Housing in the City

Housing is a human right – unfortunately though, many segments of our population do not have access to safe and affordable housing. Even when such housing is available, these units may not be located in areas that are in proximity to good jobs, easily accessible public transit, and other fundamental community features such as schools and open space. In recognition of the housing inequalities that endure to this day, the State legislature passed AB 636 (2018) to require cities and counties to advance social equity through meaningful actions that affirmatively further fair housing (AFFH). This chapter of the Housing Element provides an assessment of fair housing in the City as well as programs and policies to combat “discrimination, overcome patterns of segregation, and foster inclusive communities free from barriers that restrict access to opportunity based on protective characteristics.” The information provided in this chapter references and supplements the analysis in the [City of Santa Monica’s Assessment of Fair Housing \(AFH\)](#) that was prepared in accordance with U.S. Department of Housing and Urban Development requirements and adopted in April 2020. The Assessment of Fair Housing (AFH) which is attached as Appendix I is a thorough examination of structural barriers to fair housing choice and access to opportunity for members of historically marginalized groups protected from discrimination by the federal Fair Housing Act (FHA).

Redlining

The term “redlining” refers to the discriminatory policy instituted by the federal government to create color-coded maps of every metropolitan area in the country to indicate where it was safe to insure mortgage. These maps were based on racial composition, quality of housing stock, access to amenities, etc. and were color coded to identify best (green “A” grade), still desirable (blue “B” grade), definitely declining (yellow “C” grade), and hazardous (red “D” grade) neighborhoods. Areas of the City that were predominantly commercial/ industrial were not color coded.



A. Historical Practices and Policies Leading to Segregation

The established neighborhoods of the City today are largely the result of decades of structural racism deeply rooted in Federal, State, and local housing policies. In the early days of Santa Monica, the City had a sizeable population of Blacks/African Americans, who had moved into the City from the 1890s to the early 20th century, as part of larger westward migration patterns based in part on the prospect of new economic opportunities and community available in California. Additionally, beginning in 1904, the job opportunities at the City's clay pit operations in the eastern portion of the City drew new Mexican immigrants. However, Blacks/African Americans, Mexicans, and other racial and ethnic groups, were met with racism from White residents in the City. In 1922, homeowners formed the Santa Monica Bay Protective League with an agenda of "eliminating all objectionable features or anything that now is or will prove a menace to the bay district ... or prove detrimental to our property values." One of the ways that this was achieved was through racial covenants on deeds.

Local government also contributed to the patterns of segregation through the adoption of exclusionary zoning. When Blacks/African Americans tried to build a Jazz Club in the Belmar area in the 1920s, City officials used zoning laws to block the project. Single-unit zoning was also seen as a way tool to economically separate the wealthier Whites from Blacks/African Americans and other racial and ethnic groups, including Italians, Japanese, Mexicans, Portuguese and, later Jews. Since many people of color could not afford or were unable to receive mortgages for owning homes, they were excluded from single-family zoned neighborhoods. Today approximately, 35% of all the land in the City is zoned for single-family homes, and very few people of color live in these zones (see Appendix B).

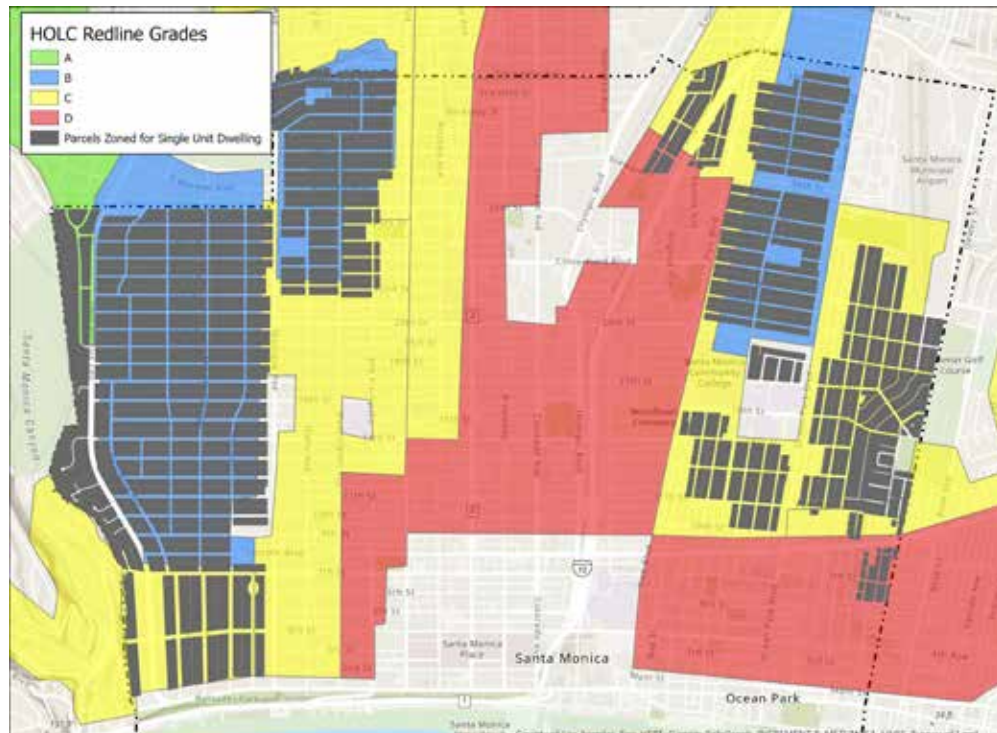
This type of discrimination at the local level was bolstered by the federal policy of "redlining" that arose during the New Deal era (1930s). The color-coded maps were first used by the Home Owners' Loan Corporation (HOLC) and then the Federal Housing Administration (FHA) and then adopted by the Veterans Administration (VA). This discriminatory practice of determining who could qualify for home mortgages based on race, ethnicity, religion, or immigrant status led to widespread segregated communities across the country, and prohibited



*Burning a derelict house on Belmar Place on July 1, 1953
Source: Santa Monica Public Library*

people of color from buying homes. In Santa Monica, areas that were redlined included the Pico Neighborhood, portions of the Mid City neighborhood south of Santa Monica Boulevard, and Ocean Park. Areas that were color-coded green or blue generally consisted of the single-family zoned neighborhoods such as the North of Montana and Northeast neighborhoods (Map 2-1).

Map 2-1: Formerly “Redlined” Areas and Single Family Zoning in the City of Santa Monica



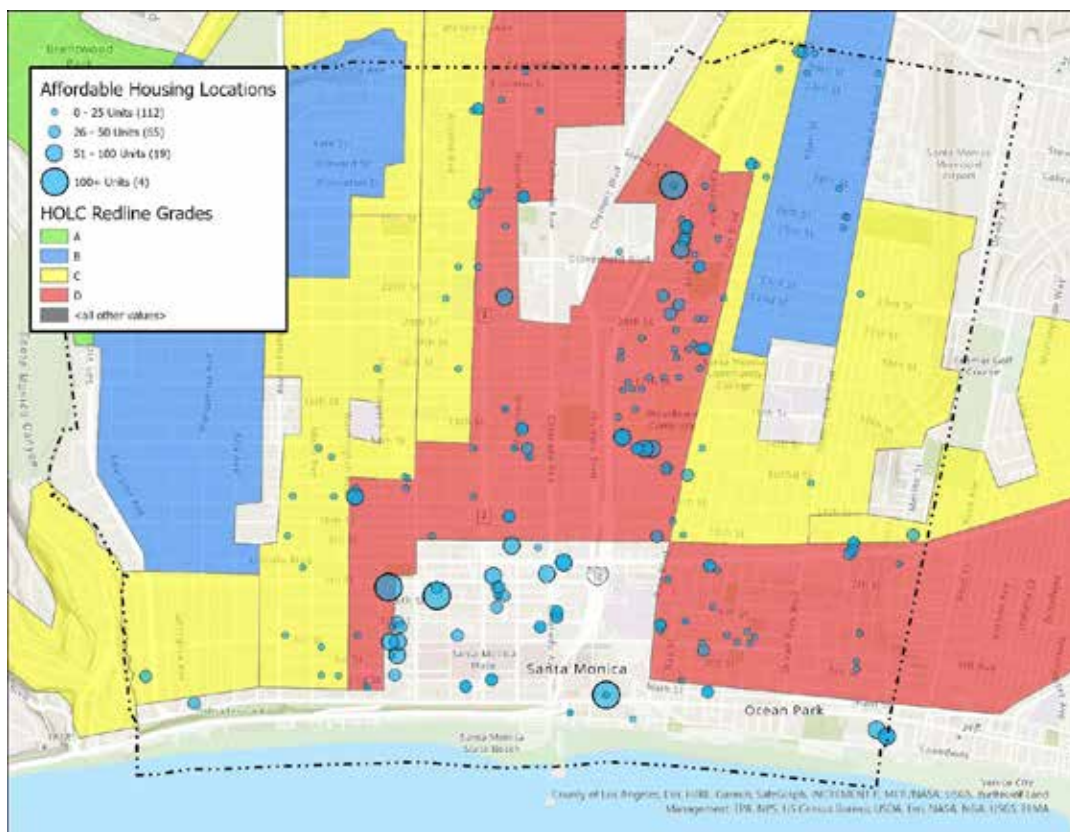
In the post-World War II era, the local and Federal government further intensified segregation through the systematic construction of government buildings and highways/freeways that began in the 1950s. Freeways were purposely routed through communities of color or to create physical barriers to separate White and Black neighborhoods. The Interstate 10 freeway in Santa Monica was purposely constructed through the middle of the Pico Neighborhood where most people of color lived instead of using mostly undeveloped land or land with abandoned uses less than two blocks away. The construction of the I-10 freeway in the early 1960s demolished hundreds of homes in the Pico neighborhood, resulting in a loss of family wealth through home ownership. With other Santa Monica neighborhoods still not open to the displaced, many more single-unit homes in the Pico Neighborhood were replaced by apartment buildings.

Santa Monica government officials in the 1950s to 1960s also targeted multiethnic neighborhoods in their plans to modernize the City. The City’s Civic Center today sits atop the historic Belmar Triangle, (which encompassed the area bound by the former trolley line on the north and west [southern part of Main Street today], Fourth Street on the east, and Pico Boulevard on the south). Historically,

the Belmar Triangle was home to many African American families and other families of color who migrated to Santa Monica.¹ Through eminent domain proceedings, the Belmar Triangle was razed to build the Santa Monica Civic Auditorium and part of the Los Angeles County Courthouse grounds. The City's annual reports claimed that the Belmar area was "blighted" and that only substandard and dilapidated structures and dwellings were burned down and removed for health and safety reasons.²

Over the years, the development of lower-cost affordable housing has largely followed historic patterns of segregation. Map 2-2 shows the redlining boundaries overlaid with affordable housing that has been constructed or acquired/rehabilitated over the years. Of the affordable units that have been constructed over the years, 49% are in the City's former redlined areas (which make up 24% of the City).

Map 2-2: Affordable Housing and Formerly "Redlined" Areas in the City of Santa Monica



1 Alison Rose Jefferson, PH.D., The Erased African American Experience in Santa Monica's History; https://alisonrosejefferson.com/wp-content/uploads/2021/02/Jefferson.ReconstructionAndReclamation.FINAL_12.22.2020.pdf
 2 Ibid

B. Integration and Segregation Patterns and Trends

Defining Integration and Segregation

Integration generally means a condition in which there is not a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a particular type of disability when compared to a broader geographic area.

Segregation generally means a condition in which there is a high concentration of persons of a particular race, color, religion, sex, familial status, national origin, or having a disability or a type of disability in a particular geographic area when compared to a broader geographic area.

1. Race and Ethnicity

The greater Los Angeles metropolitan area is a melting pot of different cultures, races, and backgrounds. Unlike the our larger, neighboring City of Los Angeles, Whites still make up the majority of the City of Santa Monica's population. ESRI (an international supplier of geographic information system (GIS) software) tracks the shifting demographics of race and ethnicity of communities through its Diversity Index. The index shows the likelihood that two people, chosen at random from the same area, belong to different race or ethnic groups. The index ranges from 0 (no diversity) to 100 (complete diversity). For example, a diversity index of 59 means there is a 59 percent probability that two people randomly chosen would belong to different race or ethnic groups. As shown in Map 2-3, the City's census tracts have lower diversity indices than most of the surrounding Los Angeles region.

While the City is generally less diverse than the region as a whole, census data shows that the City's racial makeup is becoming more diverse. As shown in Figure 2-1, Hispanics/Latinos make up the second largest racial group in the City, followed by Asians.

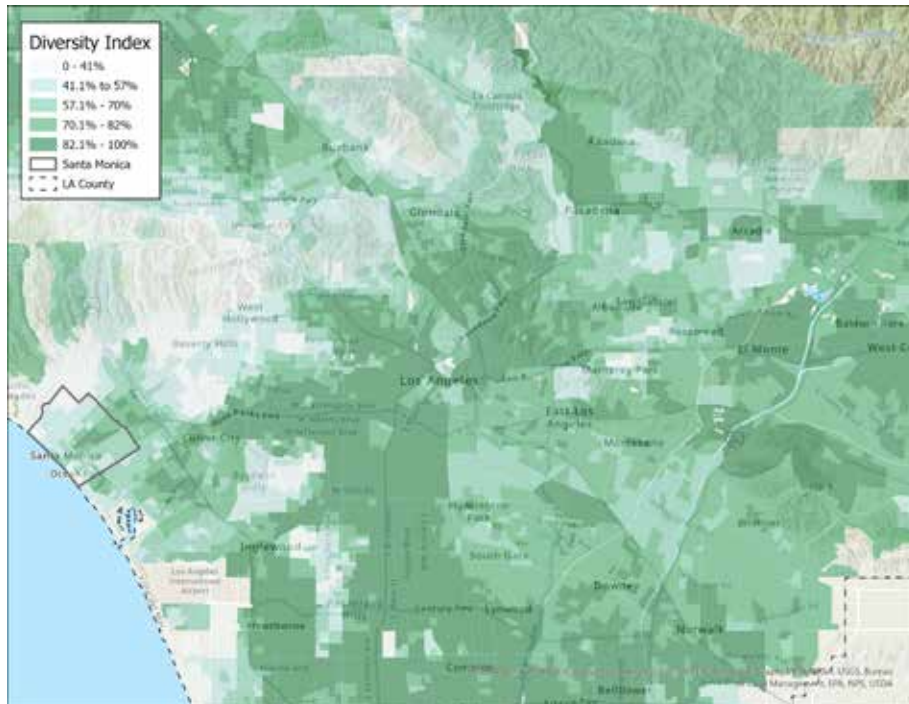
In terms of the racial/ethnic makeup by census tract, there are more predominant populations of Hispanic/Latino residents in the Pico Neighborhood while the remaining areas of the City are predominantly White, Map 2-4 and Map 2-5.



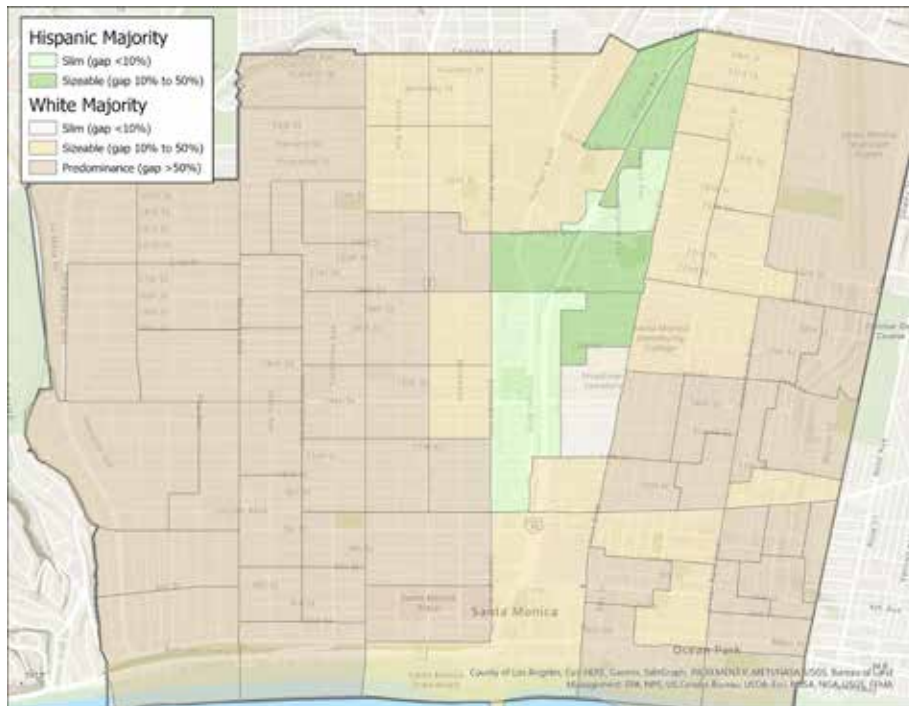
Figure 2-1: Santa Monica Population by Race and Ethnicity

Category	2000	%	2010	%	2018	%	2019	%
White	60,482	71.9%	62,917	70.1%	59,197	64.3%	59,200	64.3%
Hispanic or Latino	11,304	13.4%	11,716	13.1%	14,613	15.9%	14,097	15.3%
Black or African American	3,081	3.7%	3,364	3.7%	3,950	4.3%	3,995	4.3%
Asian	6,043	7.2%	7,960	8.9%	9,004	9.8%	9,018	9.8%
Two or more races	2,584	3.1%	3,174	3.5%	4,782	5.2%	4,571	5.0%
Other	590	0.7%	605	0.7%	532	0.6%	696	0.8%
TOTAL	84,084		89,736		92,078		91,577	

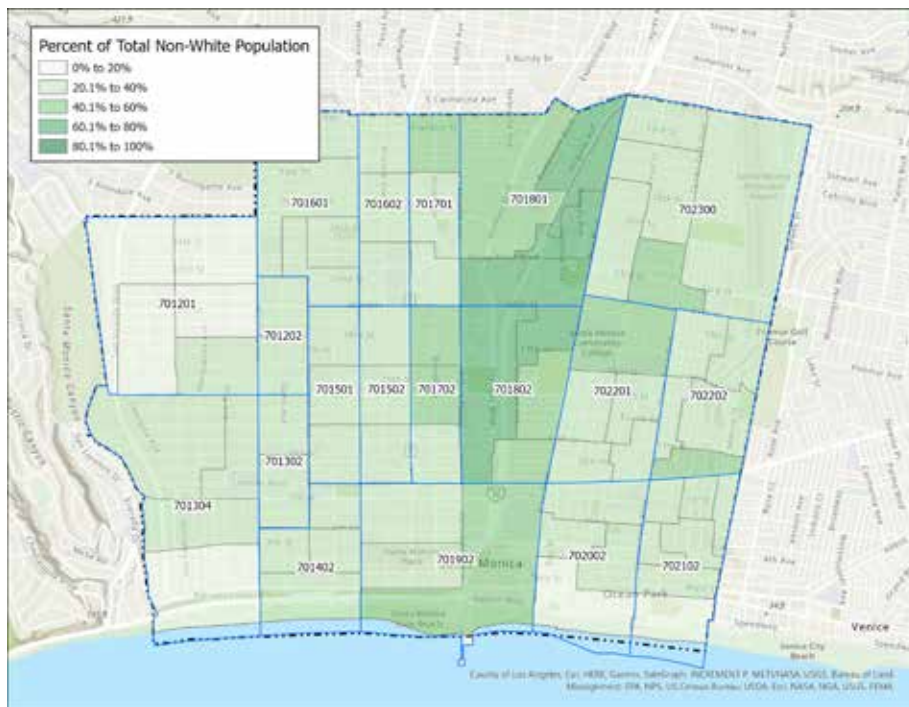
Map 2-3: Diversity Index



Map 2-4: Racial and Ethnic Majority by Census Tract



Map 2-5: Population Distribution of Non-Whites

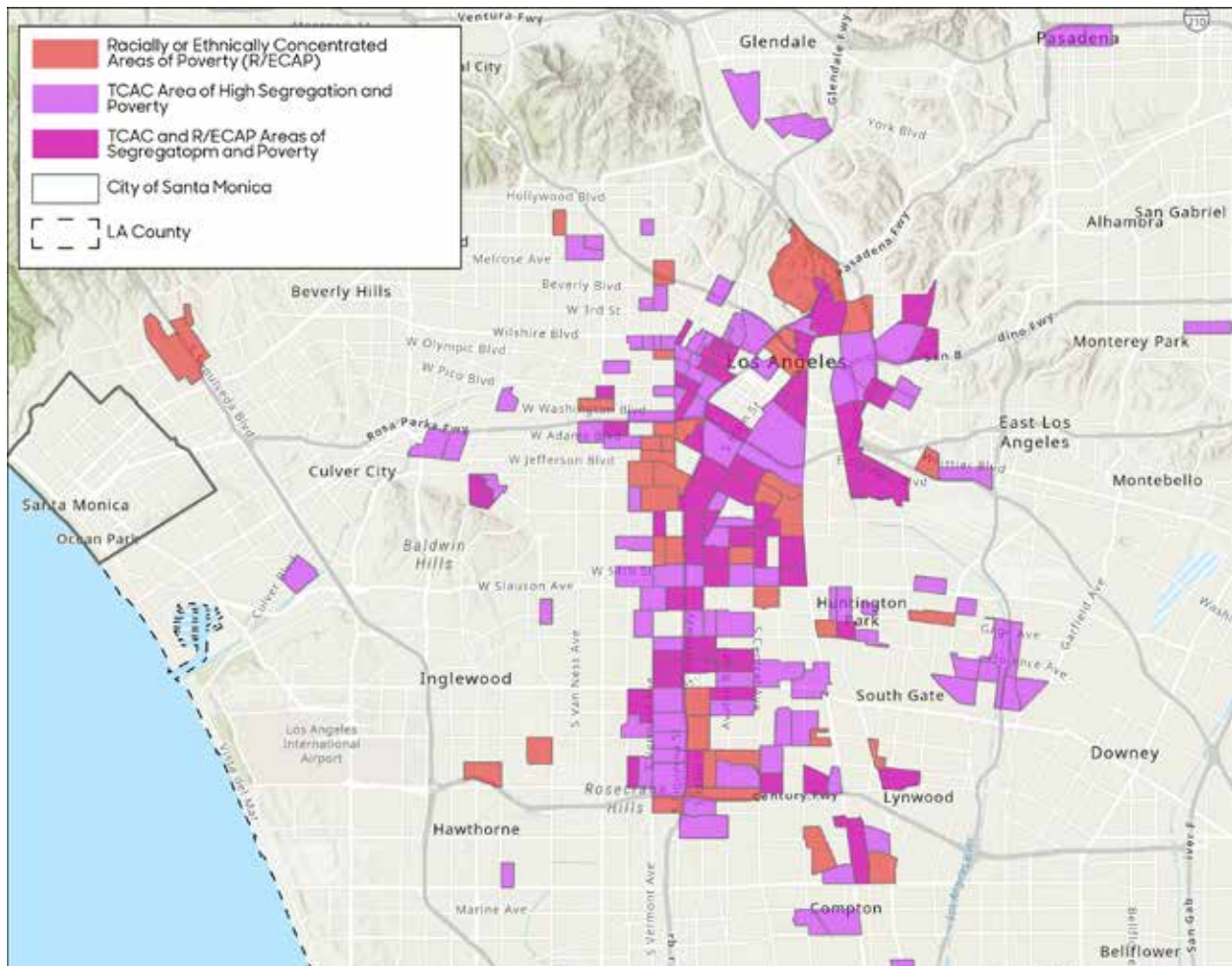


2. Racially or Ethnically Concentrated Areas of Poverty (R/ECAPs) and Affluence (RCAA)

R/ECAPs

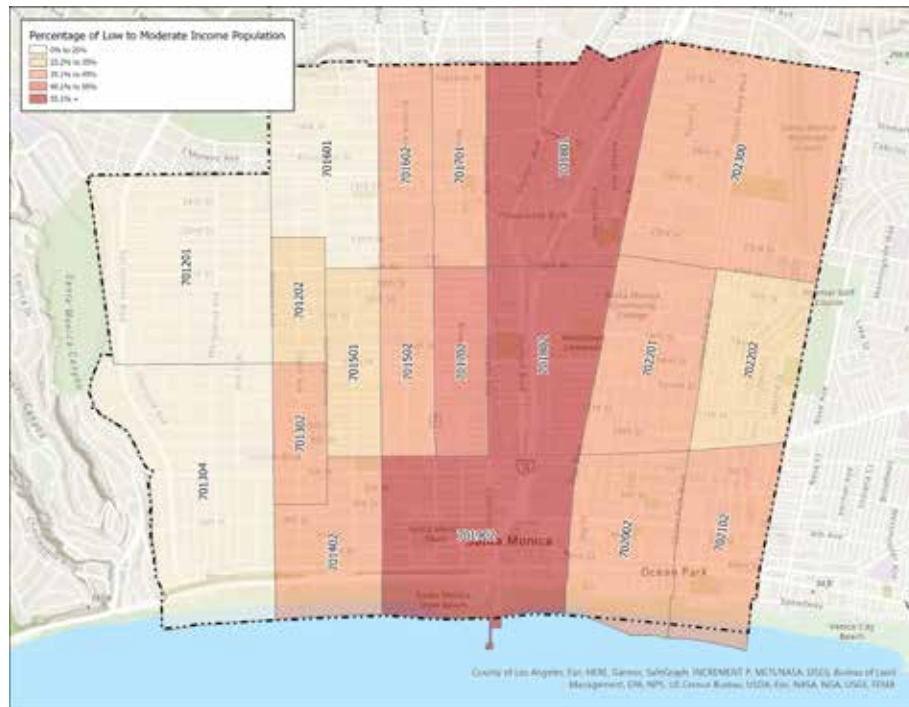
R/ECAPs are geographic areas with significant concentrations of poverty and minority populations. HUD has developed a census-tract based definition of R/ECAPs. In terms of racial or ethnic concentration, R/ECAPs are areas with a non-White population of 50 percent or more. With regards to poverty, R/ECAPs are census tracts in which 40 percent or more of individuals are living at or below the poverty limit or that have a poverty rate three times the average poverty rate for the metropolitan area, whichever threshold is lower. Households within R/ECAP tracts frequently represent the most disadvantaged households within a community and often face a multitude of housing challenges. R/ECAPs are meant to identify where residents may have historically faced discrimination and continue to be challenged by limited economic opportunity.

Map 2-6: Racially or Ethnically Concentrated Areas of Poverty and Areas of High Segregation & Poverty



While there are no R/ECAPs within the City of Santa Monica (Map 2-6), the legacy of past racist planning and housing policies have shaped land use patterns in the City that we see today. There are census tracts in the City that have higher concentrations of non-Whites as well as higher concentrations of low income and moderate income population. In general, the patterns of non-White and lower income households continue to mirror the redline maps with more affluent Whites on the northern and southern ends of the City (Map 2-4) and non-Whites and lower income populations concentrated in the central city near the main transportation corridors (Map 2-7).

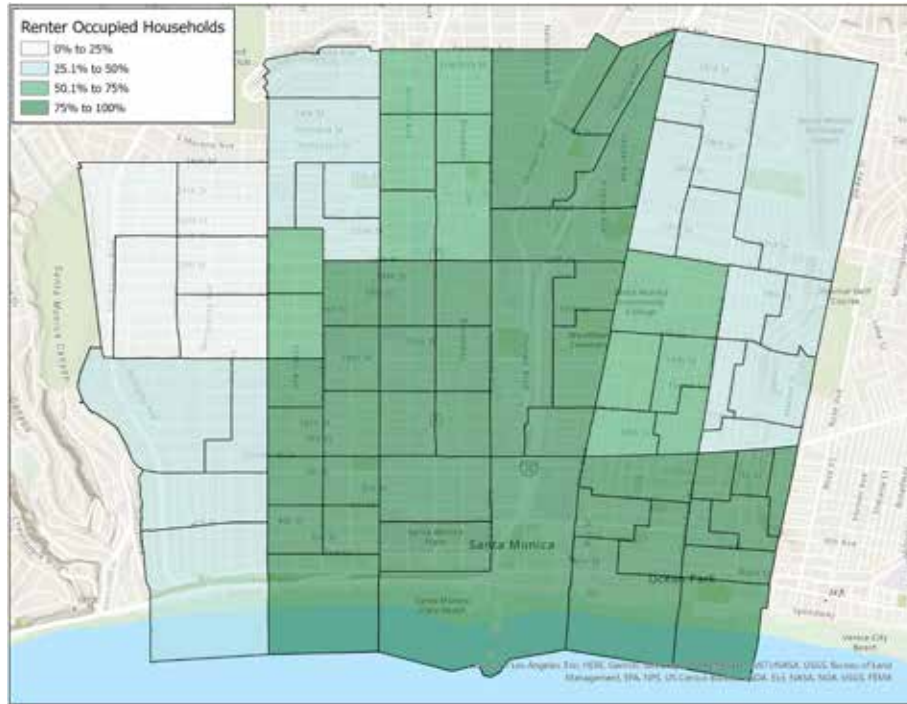
Map 2-7: Low to Moderate Income Population by Census Tract



This pattern of segregation is also true for renter versus ownership households. The 2020 AFH found that the location of renters and owners in Santa Monica very highly correlates with patterns of residential racial and ethnic segregation. The areas with the highest concentrations of homeownership, such as north of Montana, Ocean Park, and Sunset Park are also the areas that are predominantly White. The areas with the highest concentrations of renters, such as the Pico neighborhood and Downtown, are areas that contain high concentrations of minorities and/or those with Limited English Proficiency.

The AFH also found that a major contributor to continued racial and ethnic segregation is the economics of high housing and land costs created by zoning, which particularly limits the feasibility of developing of affordable housing in certain areas of the City.

Map 2-8: Renter Households by Census Tract

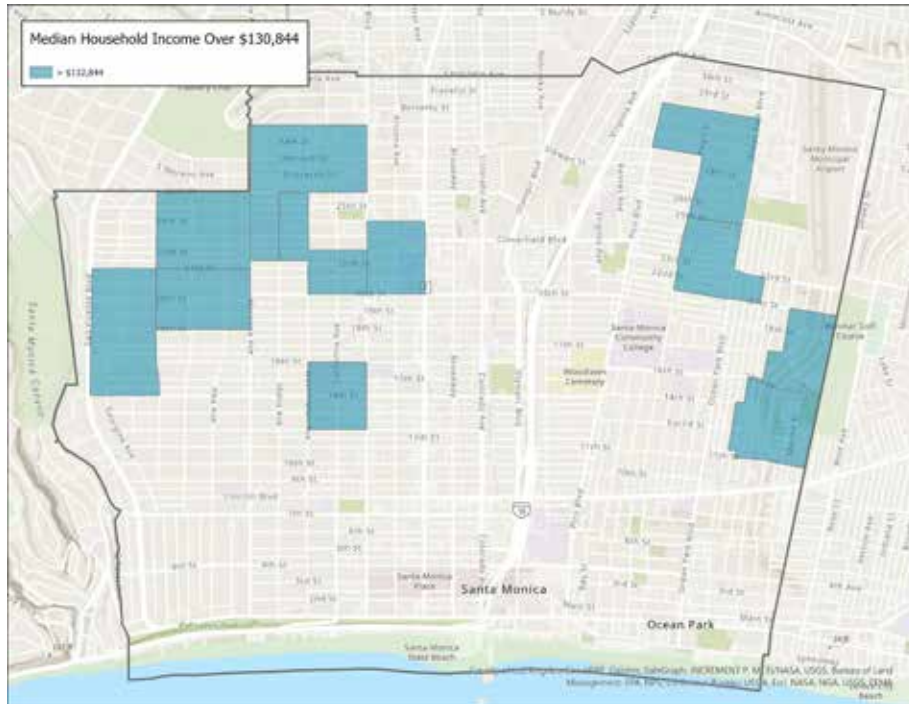


RCAA

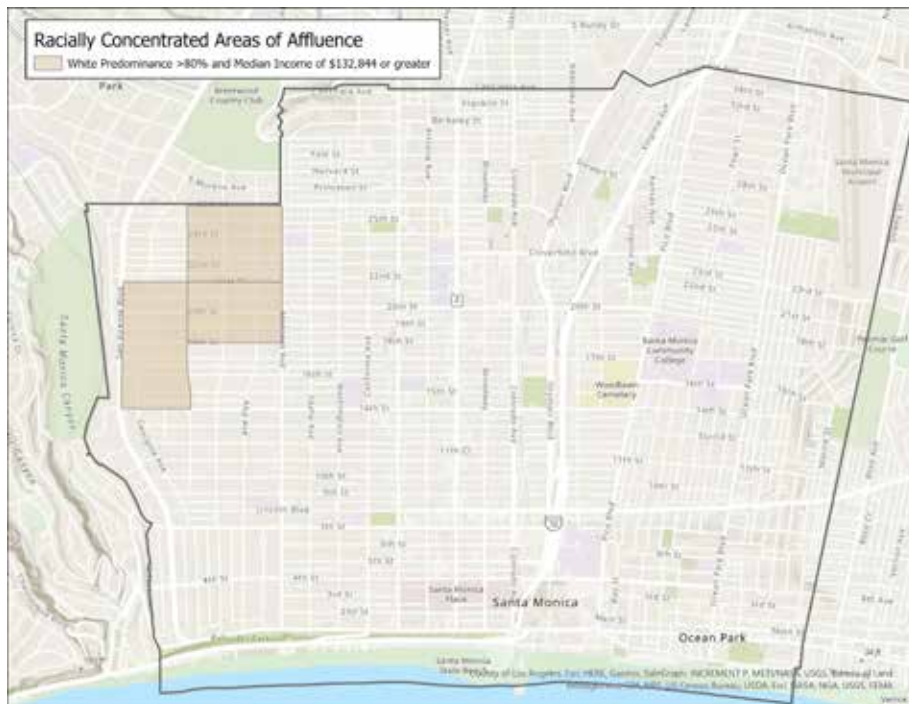
Racially or Ethnically Concentrated Areas of Affluence (RCAAs) are neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates.³ Census tracts that have median income over \$132,844 and have 80% of its households as non-Hispanic white are considered RCAAs. As discussed previously, non-Hispanic Whites are the predominant racial/ethnic group in the City, with more predominance in the northern and southern ends of the City. Additionally, the median household income in most census tracts throughout the City is lower than the RCAA income threshold. However, several census tracts have a median household income above \$132,844 (Map 2-9). The three census tracts with median household income above \$132,844 and have at least 80% of its households characterized by non-Hispanic Whites are located in Northeast area of the City, as shown in Map 2-10.

³ In response to the R/ECAPs utilized by HUD in its 2015 AFFH rule, scholars at the University of Minnesota Humphrey School of Public Affairs have created the Racially Concentrated Areas of Affluence (RCAAs) metric to more fully tell the story of segregation in the United States.⁶⁴ Based on their research, RCAAs are defined as census tracts where 1) 80 percent or more of the population is white, and 2) the median household income is \$125,000 or greater (slightly more than double the national the median household income in 2016). While this is a useful measure nationwide, HCD has adjusted the RCAA methodology to better reflect California's relative diversity.

Map 2-9: Median Household Income Over \$130,844



Map 2-10: Racially or Ethnically Concentrated Areas of Affluence

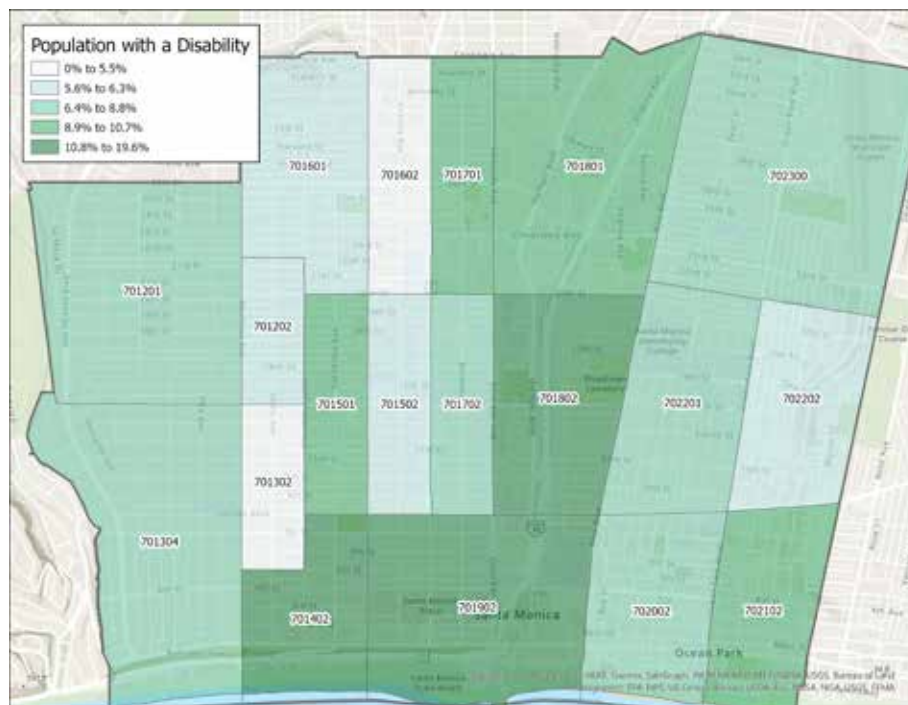


3. Disability Status

A "disability" is defined as a long-lasting physical, mental, or emotional condition. This can include those with vision, hearing, ambulatory, cognitive, self-care, and independent living disabilities. As further detailed in Appendix B, there are 8,841 Santa Monica residents with at least one disability in 2019. Map 2-11 shows the population of persons with a disability by census tract in the City. The map reveals a slightly higher concentration of residents with disabilities in Downtown and the census tracts to the north and east. This may indicate that persons with a disability have a slight preference for areas nearer to the beach – likely due to a combination of elderly housing sites, concentration of amenities including public transportation, and population density near the coast.

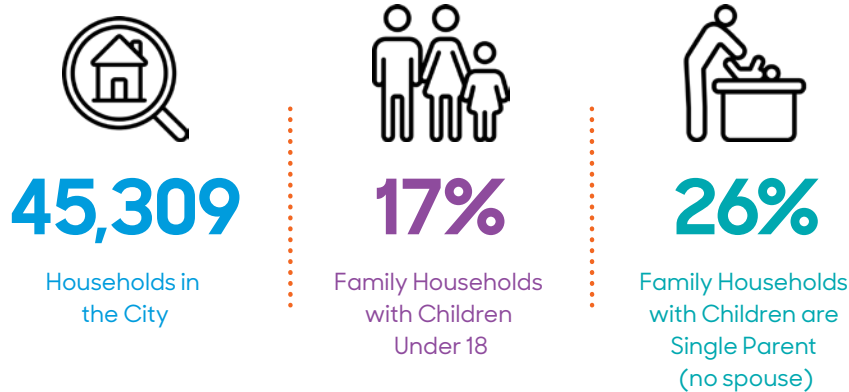
As described in the 2020 AFH report, the primary option for affordable housing for people with disabilities is Housing Choice Vouchers, of which people with disabilities make up more than 50% of residents. In 2020, five hundred twenty-two (522) people with disabilities reside in units assisted with Housing Choice Vouchers in Santa Monica, but this does not represent a proxy for actual affordable, accessible units. Rather, Housing Choice Vouchers are a mechanism for bringing otherwise unaffordable housing, which may or may not be accessible, within reach of low-income people with disabilities.

Map 2-11: Persons with a Disability

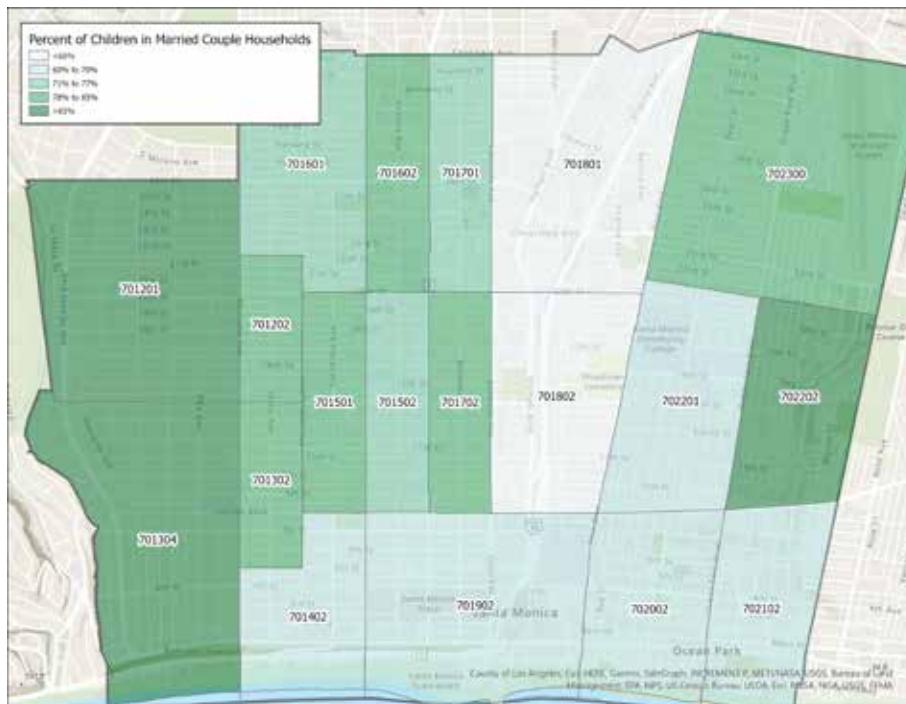


4. Familial Status

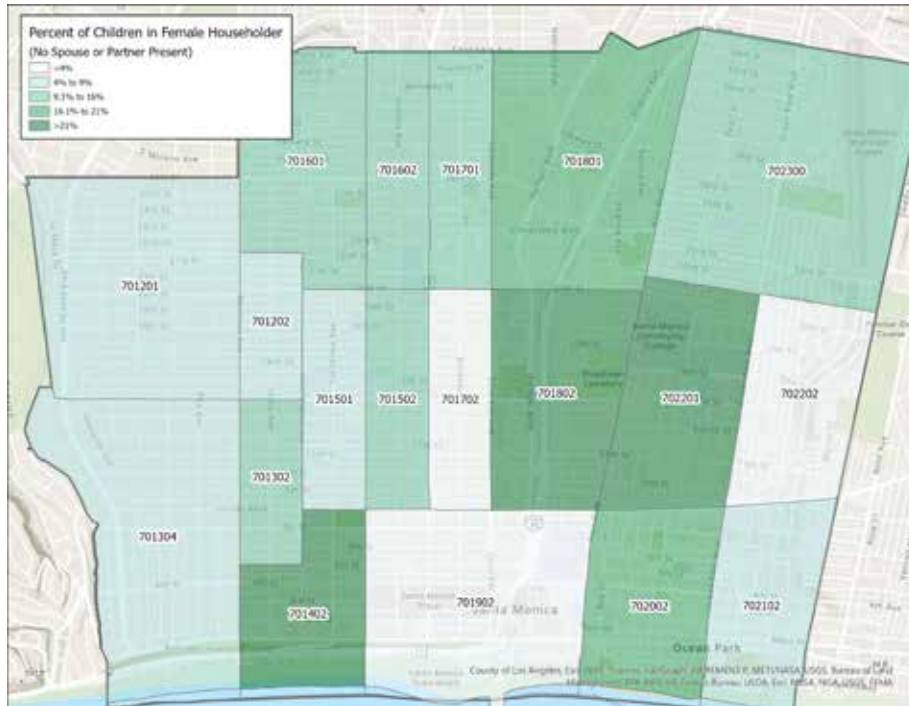
The Fair Housing Act (FHA) bans discrimination based on certain protected classes, including "familial status" which refers to households with at least one child under 18 years old. Appendix B indicates that in 2019, there were 7,750 family households with children under 18 years of age representing 17% of the City's total households. Of this number, 5,716 are married couple family households, 1,381 are Female-Headed Households (no spouse), and 653 are Male-headed households (no spouse). Married couple families predominantly reside in the R-1 neighborhoods of the City as compared to single female headed families who are located in R-2 and R-3 neighborhoods.



Map 2-12: Married Couple Family Households with Children Under 18



Map 2-13: Female Headed Households with Children Under 18



C. Disparities In Access To Opportunity

Where a person lives greatly influences their life outcomes. Housing and neighborhood choice are cornerstones of measuring fair housing and resident stability. A person's educational attainment, economic mobility, health and well-being, to name a few, are directly impacted by exposure to poverty, neighborhood condition, and access to key opportunities such as high quality schools, jobs, transportation, economic development, and a healthy physical environment. Several agencies, including HUD and HCD in coordination with the California Tax Credit Allocation Committee (TCAC), have developed methodologies to assess and measure geographic disparities in access to opportunity (including education, poverty, transportation, and employment, and environmentally healthy neighborhoods) for areas throughout California.

HUD's opportunity indices compare data indicators by race and ethnicity, for households below the poverty line, between jurisdictions and for the region overall. Figure 2-2 provides the City's opportunity indices by census tracts or census block groups and Figure 2-3 provides indices by race.

Figure 2-2: Santa Monica Access to Opportunity Indices

Census Tract	Block Group	School Proficiency	Jobs Proficiency	Labor Market Index	Low Transportation Cost	Environmental Health	Low Poverty Index
701201	1	98	87	81	86	19	86
	2	96	91				
	3	96	91				
	4	98	87				
	5	98	91				
701202	1	96	92	97	74	7	74
	2	98	93				
701302	1	97	94	98	69	6	69
	2	97	93				
701304	1	99	88	97	70	0	70
	2	98	91				
	3	99	92				
	4	97	93				
701402	1	98	94	90	61	0	61
	2	98	93				
	3	98	93				
	4	97	94				
701501	1	96	94	96	77	4	77
	2	98	95				
	3	97	94				
701502	1	85	94	87	57	3	57
	2	85	95				
	3	97	94				
701601	1	66	93	95	93	8	93
	2	96	93				
	3	96	93				
	4	96	93				
701602	1	85	94	98	54	3	54
	2	85	93				
	3	85	94				
701701	1	85	94	73	64	3	64
	2	85	94				
	3	85	94				
701702	1	85	94	91	31	3	31
	2	85	95				
	3	97	94				

Census Tract	Block Group	School Proficiency	Jobs Proficiency	Labor Market Index	Low Transportation Cost	Environmental Health	Low Poverty Index
701801	1	84	95	50	46	4	46
	2	87	94				
	3	87	94				
	4	87	94				
	5	85	94				
701802	1	84	94	44	40	5	40
	2	84	94				
	3	71	94				
	4	73	95				
701902	1	95	93	61	39	0	39
	2	95	93				
	3	89	93				
702002	1	48	93	87	55	0	55
	2	76	92				
	3	76	93				
	4	76	93				
702102	1	48	88	89	59	0	59
	2	76	85				
	3	76	87				
	4	48	88				
	5	76	89				
	6	76	89				
	7	76	87				
702201	1	90	92	92	71	8	71
	2	85	91				
	3	85	93				
	4	71	93				
	5	71	91				
702202	1	85	87	94	70	7	70
	2	90	89				
	3	90	86				
	4	90	87				
	5	85	89				
702300	1	93	93	84	65	4	65
	2	70	89				
	3	93	92				
	4	93	93				
	5	93	93				

Figure 2-3: Summary of the Opportunity Indicators by Race

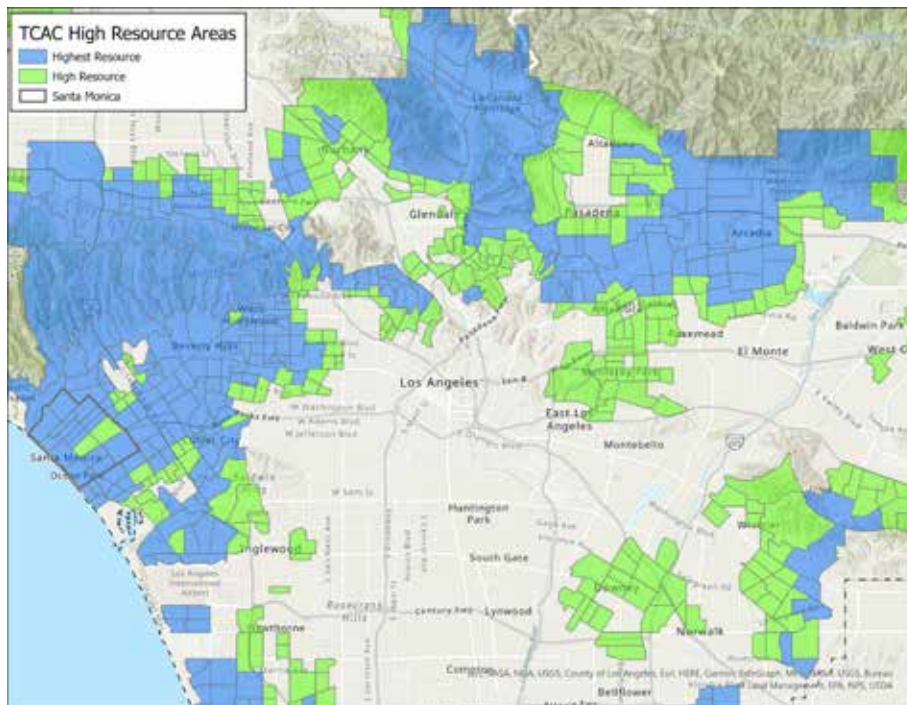
(Santa Monica, CA CDBG) Jurisdiction	School Proficiency Index	Labor Market Index	Jobs Proximity Index	Transit Index	Low Transportation Cost Index	Low Poverty Index	Environmental Health Index
Total Population							
White, Non-Hispanic	86.33	87.43	92.18	87.66	93.17	64.91	13.74
Black, Non-Hispanic	84.72	75.22	93.11	87.29	94.69	54.14	11.93
Hispanic	84.48	76.93	92.79	87.25	94.17	58.25	11.62
Asian or Pacific Islander, Non-Hispanic	86.66	83.66	92.59	87.15	93.36	63.72	12.73
Native American, Non-Hispanic	83.10	81.09	92.34	87.47	94.50	57.87	11.69
Population below federal poverty line							
White, Non-Hispanic	85.69	84.64	92.66	87.88	94.52	59.57	13.05
Black, Non-Hispanic	84.21	64.98	93.53	86.65	95.30	47.35	11.71
Hispanic	82.94	65.98	93.39	86.56	94.37	52.04	10.14
Asian or Pacific Islander, Non-Hispanic	84.85	83.21	92.67	86.81	93.67	57.06	10.83
Native American, Non-Hispanic	80.85	81.52	92.92	88.49	95.84	47.65	12.84
(Los Angeles Long Beach Anaheim, CA) Region							
Total Population							
White, Non-Hispanic	67.87	67.43	54.59	76.59	79.87	65.19	21.35
Black, Non-Hispanic	31.89	35.34	40.72	81.34	83.42	36.07	11.92
Hispanic	37.09	35.73	43.70	80.65	83.98	35.53	12.36
Asian or Pacific Islander, Non-Hispanic	62.18	57.64	51.11	78.82	82.35	55.03	13.13
Native American, Non-Hispanic	49.49	48.58	45.88	78.04	81.53	48.40	17.68
Population below federal poverty line							
White, Non-Hispanic	59.42	59.62	56.98	80.43	84.23	53.66	18.46
Black, Non-Hispanic	24.68	26.41	36.90	83.34	85.48	24.12	11.74
Hispanic	30.68	29.50	44.63	83.28	86.96	25.05	10.63
Asian or Pacific Islander, Non-Hispanic	57.18	51.41	52.88	82.27	86.69	45.45	11.05
Native American, Non-Hispanic	37.54	36.05	47.65	80.82	84.18	33.63	16.22

Note 1: Data Sources: Decennial Census; ACS; Great Schools; Common Core of Data; SABINS; LAI; LEHD; NATA

Note 2: To generate this table, index values were calculated for each census tract. These tract values were averaged and then weighted based on the distribution of people of different races and ethnicities within the CDBG jurisdiction, HOME jurisdiction, or CBSA to generate composite index values for each race and ethnicity. A similar process was applied to weight the data based on the distribution of people of different races and ethnicities who are living below the federal poverty line within the CDBG or HOME jurisdiction and CBSA. The population estimates are based on the 2010 Decennial Census at the census tract or block-group level, depending on the geographic level at which the index was originally calculated. Released June 2020

TCAC has also prepared opportunity maps to identify areas with the highest and lowest resources. The high resource areas are those areas, according to research, that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. As shown in Map 2-14 below, the City is generally considered a high resource, with census tract 701802 and 701801 having slightly less resource than the remaining areas of the City.

Map 2-14: High Resource Areas



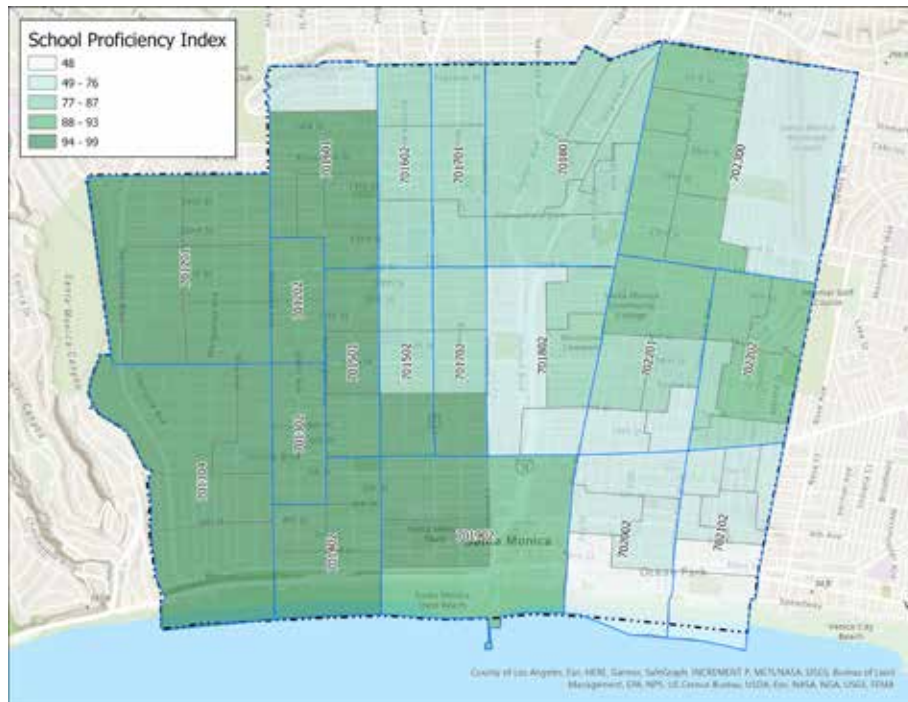
The City's designation as a high resource area is largely attributed to the availability of high performing schools, numerous employment opportunities, easy access to low cost transportation, and environmentally healthy neighborhoods. The analysis of Access to Opportunity summarized below is based on the AFH:

1. Access to Schools

Since there are only three middle/high schools in Santa Monica, disparities in school proficiency are most relevant to elementary school education. This is especially true because elementary school education builds the foundation for success in secondary and post-secondary education, and those without a strong foundation often struggle to catch up to their peers as they mature. As illustrated by Map 2-15, the northern half of the City has significantly higher school proficiency index numbers than the southern half, with a notable dip in proficiency in the Pico, Mid-City, and Ocean Park neighborhoods. This closely correlates with wealthier households, single-unit zoning, and concentrations of White

households. Despite these internal disparities, children in the City regardless of race generally have very high access to proficient schools, with most school proficiency index numbers above the 70s. With such proficient schools, Santa Monica generally far outperforms the region as a whole.

Map 2-15: School Proficiency Index Map



2. Access to Employment

In the City of Santa Monica, disparities in job proximity are generally modest with Black residents experiencing greater slightly greater job proximity followed by Hispanic and Asian American and Pacific Islander residents, with White residents having the lowest job proximity. This indicates that people of color in the City are more likely to live closer to their jobs, within the commercial areas.

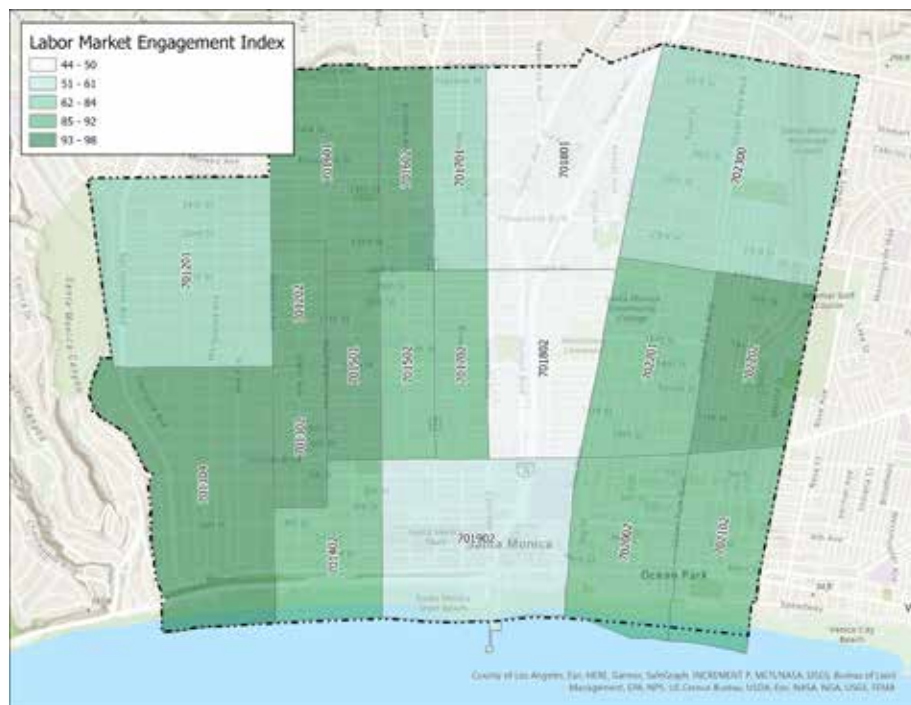
With respect to labor market engagement, disparities are somewhat larger. The order in which groups live in neighborhoods with high labor market engagement is, for the most part, reversed (meaning that Whites tend to live in areas with higher labor market engagement while population of color tend to live in areas with lower labor market engagement). One qualification to that overall trend is that Asian Americans and Pacific Islanders live in areas with significantly higher labor market engagement than do Hispanics.

In the City of Santa Monica, disparities in labor market engagement, but not in job proximity, are driven by residential patterns. Black and Hispanic residents, including residents of Mexican national origin, are disproportionately likely to live in the Pico neighborhood while areas such as North of Montana,

North of Wilshire, and Sunset Park are more heavily White. As shown in Map 2-16, two Census Tracts that include parts of the Pico neighborhood have Labor Market Indices of 44 and 50, respectively. Of the nine Block Groups in those two Census Tracts, seven are majority non-White. At the same time, the vast majority of Block Groups in Census Tracts with Labor Market Indices of 90 or above have White population concentrations of 70% or more. White residents live in areas that, by far, have the highest labor market engagement. Asian American and Pacific Islander residents live in areas with significantly lower labor market engagement, but the difference is most dramatic for Black and Hispanic residents.

In the region, there are virtually no differences in job proximity by race and ethnicity. Hispanic residents have slightly lower job proximity than other groups, but the disparity is minute. With respect to labor market engagement, however, there are significant disparities. In the region, areas with high labor market engagement are areas with disproportionately high White populations including the City of Santa Monica, westside neighborhoods within Los Angeles such as West Los Angeles, and adjacent cities like West Hollywood and Beverly Hills; neighborhoods of Los Angeles within communities in the southern or western portion of the San Fernando Valley including like Sherman Oaks, Encino, Tarzana, and Woodland Hills; the cities of Pasadena; Manhattan Beach, Hermosa Beach, Redondo Beach, and Palos Verdes in southern Los Angeles County; and most of Orange County outside of the diverse communities of Anaheim, Garden Grove, Santa Ana, and Westminster.

Map 2-16: Labor Market Engagement Index Map



3. Access to Transportation

The City of Santa Monica has very high levels of utilization of transit. Overall, as shown in Map 2-17, there is very good access to low-cost public transportation, with high transportation indices (i.e., high access to transportation) for the census tracts located along the City's major boulevards (Wilshire Boulevard, Santa Monica Boulevard, Colorado Avenue). The areas with the lowest access to low-cost transportation (lowest transportation cost index), such as the northeast tract, also have the lowest levels of public transit utilization. Santa Monica is serviced by the Metro "E" (Expo) Light Rail Line, which directly connects Santa Monica to Downtown Los Angeles by rail, and provides for additional rail access to as well as Pasadena, the San Fernando Valley, the South Bay, Long Beach, and points in between. The City is also serviced by Big Blue Bus, which departs the LAX City Bus Center with two lines that run through Santa Monica. These connections to and the extensive LA Metro bus system and light rail network help to make the Region's transportation system fairly integrated. Santa Monica is fairly small and compact, and well-served by public transport. There do not seem to be any great disparities based on residential living patterns. In the Region, however, disparities in access to transportation are far more evident, and heavily dependent on residential living patterns.

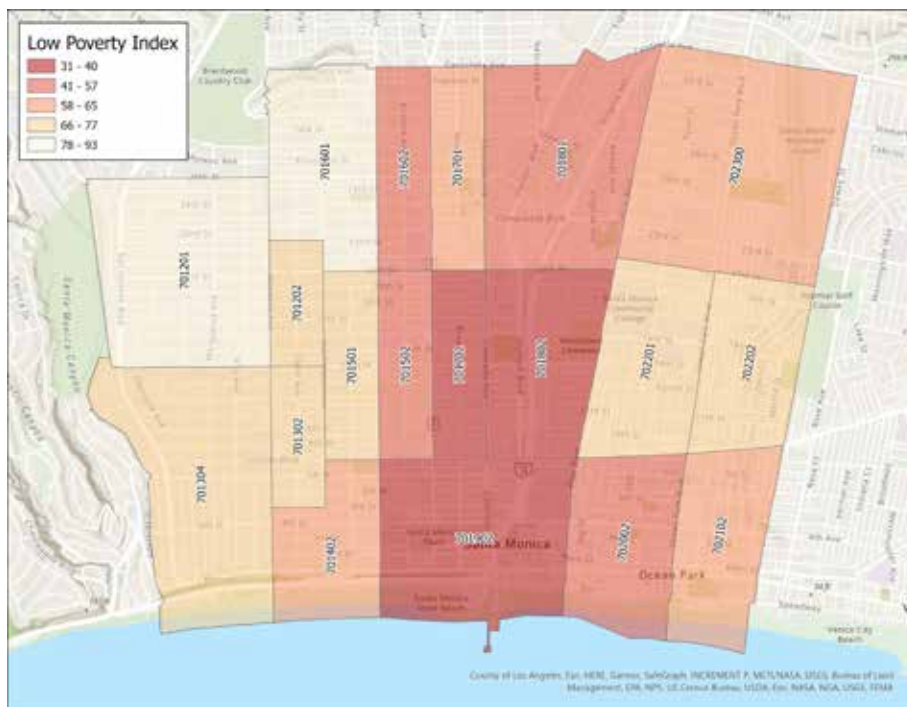
Map 2-17: Low Transportation Cost Index Map



4. Access to Low Poverty Neighborhoods

In the City of Santa Monica, access to low poverty neighborhoods is closely linked to residential patterns of racial and ethnic concentration. Map 2-18 shows the low poverty indices for the City. The areas with the lowest Low Poverty Indices and thus the highest concentrations of poverty are in the Pico neighborhood and the immediate vicinity of Downtown Santa Monica. These areas have higher concentrations of Black and Hispanic households than the city as a whole. By contrast, the North of Wilshire and North of Montana neighborhoods, with higher White populations, both have higher Low Poverty Indices and thus lower concentrations of poverty. In the City of Santa Monica, Black and Hispanic households have lower access to low poverty neighborhoods than do White and Asian American or Pacific Islander households. The disparities are significant but not extreme.

Map 2-18: Low Poverty Index

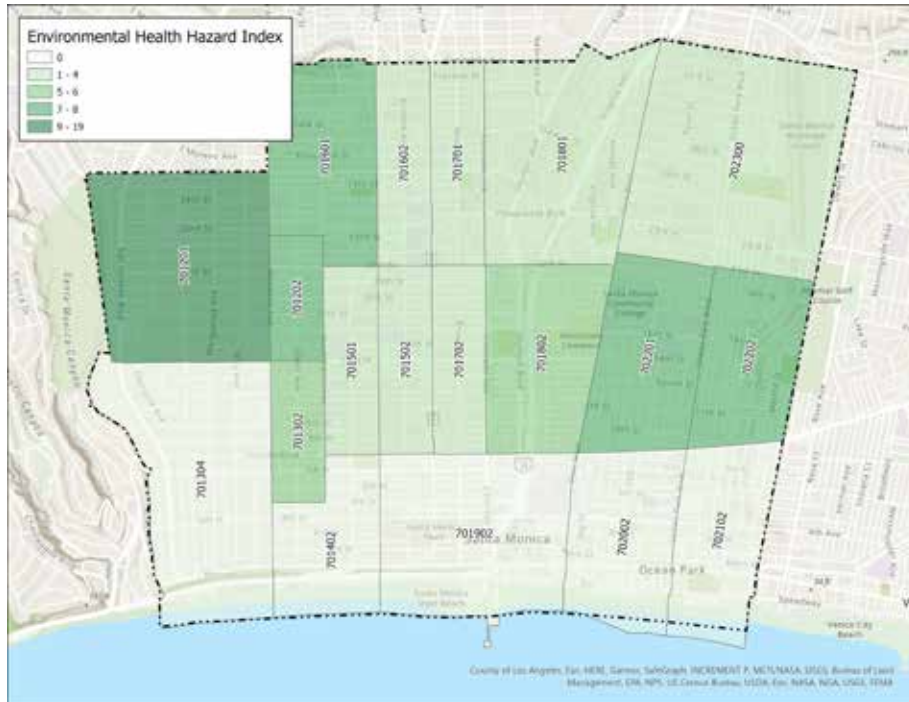


5. Access to Environmentally Healthy Neighborhoods

Map 2-19 which shows the Environmental Health Hazard indices across the City and substantiates the view that there are significant differences in environmental health between neighborhoods and that those disparities are correlated with neighborhood demographics. The eastern area of NOMA and Northeast neighborhood of the City are the most environmentally healthy than other areas in the City, and have the highest environmental health indices. The Pico neighborhood, current and former industrial areas of the Industrial Conservation zones, and Downtown Santa Monica are more heavily affected by their proximity to the I-10 freeway than are more heavily White neighborhoods

like North of Wilshire and North of Montana. The Pico neighborhood and Downtown Santa Monica have the lowest Environmental Health Hazard indices, indicating adverse environmental conditions, while the North of Montana neighborhood has the highest indices (Map 2-19).

Map 2-19: Environmental Health Index



Green spaces like Reed Park help to improve the health of a neighborhood, whereas industrial uses like the City Yards in the Pico neighborhood negatively impact the health of a neighborhood.

D. Disproportionate Housing Needs

Disproportionate Housing Needs generally refers to a condition in which there are significant disparities in the proportion of members of a protected class experiencing a category of housing need when compared to the proportion of members of any other relevant groups, or the total population experiencing that category of housing need in the applicable geographic area. According to the California Department of Housing and Community Development, categories of housing need are based on such factors as cost burden and severe cost burden, overcrowding, homelessness, and substandard housing conditions.

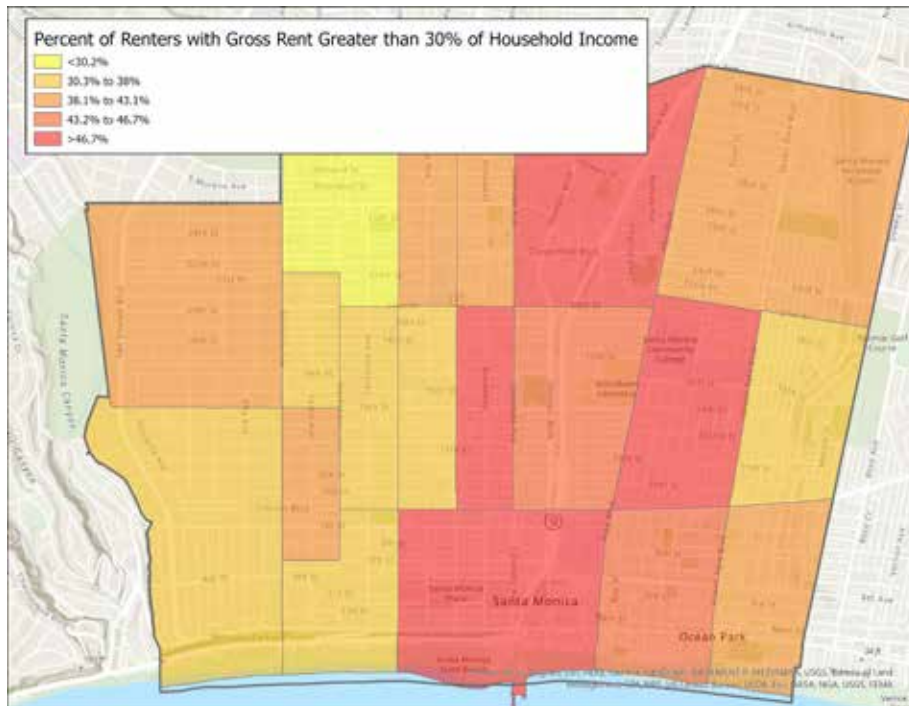
1. Cost Burden and Overpayment

The general rule is that no more than 30% of gross monthly income should be spent on housing. Households that spend more than this percentage are considered to be "housing cost burdened". Severely cost burdened households are those households spending greater than 50% of income on housing. As further detailed in Appendix B and shown below, renter households are significantly more cost-burdened compared to homeowners, with 31.6 percent of renter households burdened by housing costs compared to 9.5 percent of owner households, as shown by Figure 2-4. The areas with the most cost burdened renter households are located in Downtown, and the areas along the I-10 freeway (Map 2-20), while the areas with the most cost burdened owner households are located in the Downtown, north of Downtown, and a couple census tracts south of the I-10 freeway (Map 2-21).

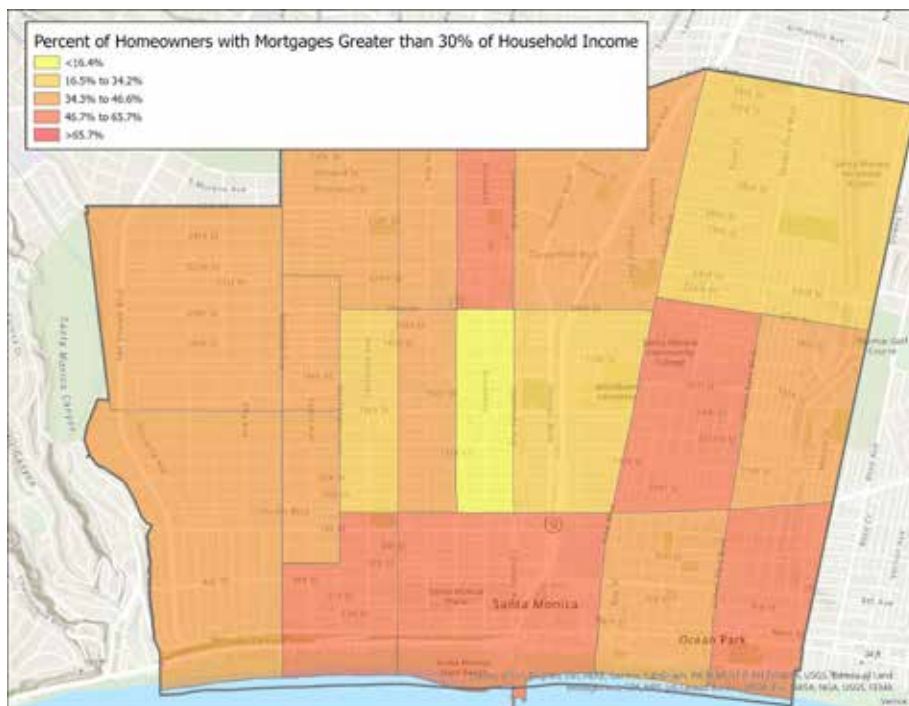
Figure 2-4: Cost Burden and Overpayment for Renters and Homeowners

Households	Renters		Owners		Total Renters and Owners	
	Cost Burdened	Total	Cost Burdened	Total	Cost Burdened	% of Citywide
Extremely Low Income (0-30% AMI)	5,055	6,145	825	975	7,120	15.4%
Very Low Income (31-50% AMI)	2,815	3,320	555	770	26,490	8.8%
Low Income (51-80% AMI)	2,880	4,220	725	1,180	5,400	11.6%
Moderate Income (80-100% AMI)	1,690	2,685	320	570	7,120	7.0%
Above 100% AMI	2,220	17,135	2,020	9,355	26,490	57.1%
Total	14,660	33,505	4,445	12,855	46,360	15.4%
% of Total Households	31.6%		9.5%			

Map 2-20: Cost Burdened Renter Households



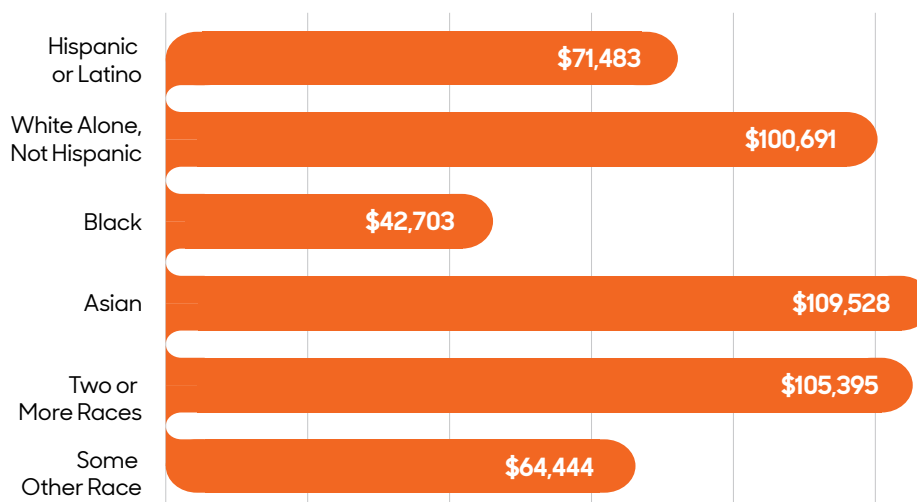
Map 2-21: Cost Burdened Owner Households



Even after the 1968 passage of the Fair Housing Act, people of color have continued to experience housing inequalities across the nation and within the City. As described in Appendix B Housing Needs Assessment, Black/African American and Hispanic/Latino households in the City have the lowest homeownership rates at 8% and 18%, respectively, far less than the 30% home ownership rate for White households.

Additionally, these households of color pay a greater share of their income towards housing costs given that they have the lowest median household incomes. In the City, Black/African American and Hispanic/Latino households have median incomes of \$42,703 and \$71,483 respectively, far below the citywide median of \$96,570 (Figure 2-5). With the high cost of housing coupled with low wages, approximately 11.7% of Black and 8.6% of Hispanic/Latino family households in the City were cost-burdened even before the COVID19 pandemic. These cost-burdened households are at greater risk of poverty and homelessness.

Figure 2-5: Median Household Income by Race

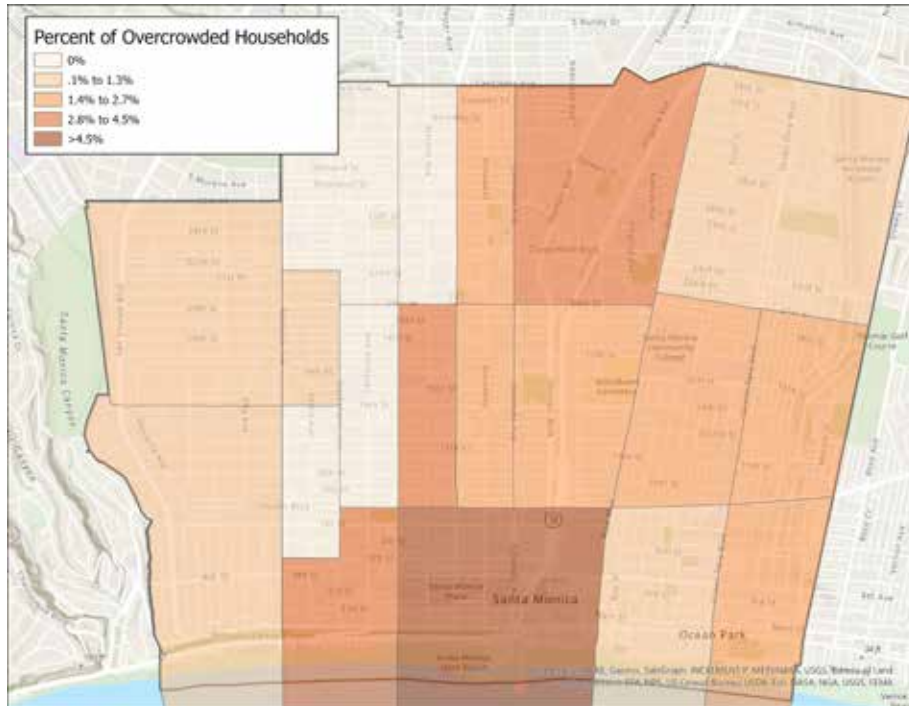


2. Overcrowding

Appendix B provides data on household size and overcrowding. The average household size in the City is 1.99. A housing unit that is occupied by more than one person per room (excluding kitchens, bathrooms, hallways and porches) is defined by U.S. Department of Housing and Urban Development (HUD) as being overcrowded. In 2019, 185 owner occupied households and 1,360 renter occupied households were determined to be overcrowded for a total of 1,545 households (3.2% of total City households).

Map 2-22 shows the trends of overcrowded households in the City by census tract. The tract with the most overcrowded households located in Downtown. The percentages of overcrowded households for all census tracts in the City are less than the statewide average of 8.2 percent.

Map 2-22: Overcrowded Households



Additionally, Black and Hispanic/Latino Households are more likely to be subject to overcrowding or substandard housing conditions (see Appendix B).

3. Homelessness

The surge of homelessness is becoming an urgent reality for many in the City. As detailed further in Appendix B, based on the most recent point in time count, there are approximately 907 homeless individuals in Santa Monica on any given night. In the greater LA region, that number is closer to 66,000. Rising rents, stagnant wages, and a decreased supply of affordable housing means that almost 7,000 people in LA County lose their housing every month. While the last count in 2020 showed positive results including an 8% decrease in Santa Monica compared to a 13% increase countywide, COVID-19 has exacerbated Los Angeles County's twin crises of housing and homelessness, and stymied interventions due to limited shelter capacity and an overburdened court system.

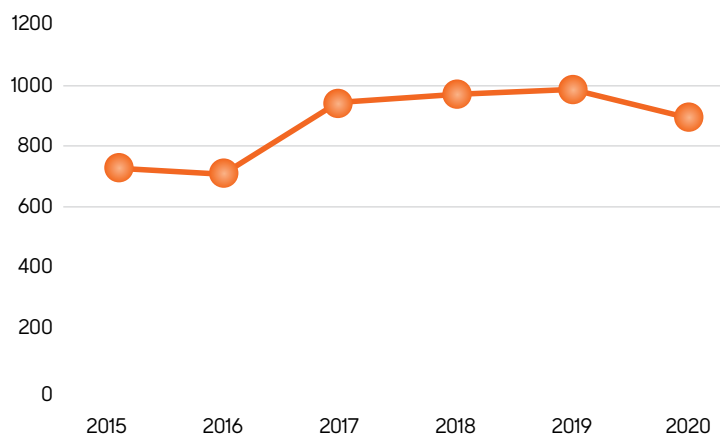
Racial inequities in housing undoubtedly has worsened due to the pandemic. While the pandemic has affected employment nationwide, its effects have been disproportionate. The job loss has been particularly dire for Blacks/African American and Latinos who experienced exceptionally high levels of unemployment and slow rates of job recovery, and therefore, are most vulnerable to losing their homes.

COVID 19 Effects on People of Color

- Almost quarter of Black and Latino renters did not pay or deferred rent in May 2020, compared with 14 percent of white renters.
- While a quarter of white renters expressed slight or no confidence in their ability to pay rent in June 2020, nearly half of Black and Latino renters expressed similar concern.

Source: US Census Bureau weekly Household Pulse Survey

Figure 2-6: Santa Monica Homeless Count, 2015 - 2020



4. Substandard Housing Conditions

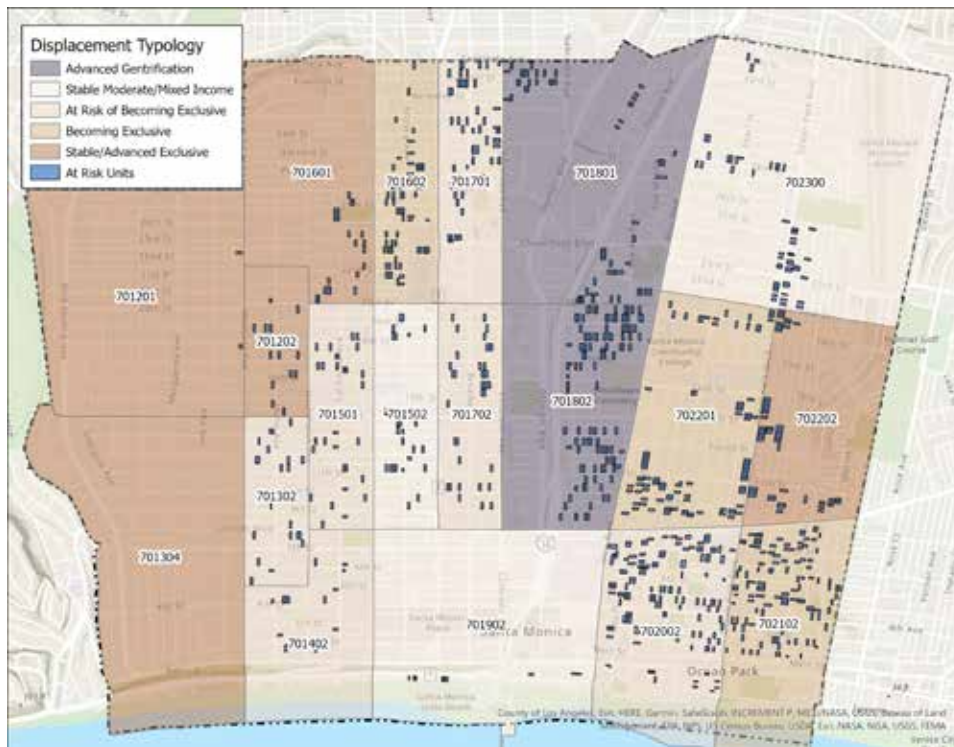
Most residential structures begin to show signs of deterioration as they approach 30 years, and often begin to require rehabilitation work to their major components, such as roofing, siding, plumbing, and electrical systems. As provided in greater detail in Appendix B, the 2019 ACS data show that almost 85% of housing in Santa Monica is more than 30 years old (i.e., built before 1990). This is much higher than the 68% measured in 2000, because Santa Monica experienced a major multi-unit construction boom in the 1970s.

The age of a structure does not necessarily equate to substandard conditions, however. Over time, building owners may have performed improvements as necessary to keep the unit in competitive market. Furthermore, many units may have been rehabilitated following the 1994 Northridge Earthquake, which resulted in many buildings being damaged. Another tool to evaluate the condition of housing is through review of Code Enforcement cases regarding violations of the City's as well as building and safety codes. Since 2015, the City has opened 222 Code violations related to substandard housing conditions.

E. Displacement Risk

The Urban Displacement Project (UDP) is a research initiative of UC Berkeley that conducts research related to potential gentrification and displacement risks in various cities, including Santa Monica and Los Angeles. Risks are based on a number of factors, such as income levels of households, diversity of neighborhoods, and changing housing costs. Map 2-23 shows the displacement assessment of census tracts in the City. As shown, Census Tract 701802 is the most vulnerable to displacement. Based on the City’s review of residential buildings that are older than 1980 (i.e. more than 40 years old) and that are underdeveloped relative to its underlying maximum allowable density, up to 274 units are considered at risk of displacement in this census tract.

Map 2-23: Displacement Risk in the City



F. Fair Housing Issues And Local Contributing Factors

During the preparation of the AFH, the City led numerous outreach efforts with various stakeholders and conducted extensive analysis to identify factors that are barriers to fair housing. These factors were prioritized as shown in Figure 2-7.

Figure 2-7: Barriers to Fair Housing

High Priority

1. Displacement of residents due to economic pressures
2. Impediments to mobility
3. Lack of access to opportunity due to high housing costs
4. Lack of affordable, accessible housing in a range of unit sizes
5. Land use and zoning laws
6. Private discrimination

Medium Priority

1. Availability of affordable units in a range of sizes
2. Community Opposition
3. Lack of affordable, integrated housing for individuals who need supportive services
4. Lack of assistance for transitioning from institutional settings to integrated housing
5. Lack of local or regional cooperation
6. Lack of meaningful language access for individuals with limited English proficiency
7. Location and type of affordable housing
8. Location of proficient schools and school assignment policies
9. Loss of affordable housing
10. Siting selection policies, practices, and decisions for publicly supported housing, including discretionary aspects of Qualified Allocation Plans and other programs
11. Source of income discrimination

Low Priority

1. Access for persons with disabilities to proficient schools
2. Access to financial services
3. Access to publicly supported housing for persons with disabilities
4. Access to transportation for persons with disabilities
5. Admissions and occupancy policies and procedures, including preferences in publicly supported housing
6. Availability, type, frequency, and reliability of public transportation
7. Deteriorated and abandoned properties
8. Displacement of and/or lack of housing support for victims of domestic violence, dating violence, sexual assault, and stalking
9. Inaccessible public or private infrastructure
10. Inaccessible government facilities or services
11. Lack of affordable in-home or community-based supportive services
12. Lack of assistance for housing accessibility modifications
13. Lack of community revitalization strategies
14. Lack of local private fair housing outreach and enforcement
15. Lack of local public fair housing enforcement
16. Lack of public investment in specific neighborhoods, including services or amenities
17. Lack of private investment in specific neighborhoods
18. Lack of resources for fair housing agencies and organizations
19. Lack of state or local fair housing laws
20. Lending discrimination
21. Location of accessible housing
22. Location of employers
23. Location of environmental health hazards
24. Occupancy codes and restrictions
25. Quality of affordable housing information programs
26. Regulatory barriers to providing housing and supportive services for persons with disabilities

The “High Priority” factors identified in the AFH are consistent with public input received during the public outreach process for the Housing Element (see Appendix A). While the City has been a leader in the production of affordable housing for the past few decades and implements a number of actions and programs to address fair housing, factors such as the high cost of housing, existing zoning, and economic pressures compounded with patterns of segregation have made it very difficult for households of color to live in the City. These factors are summarized briefly below in Figure 2-8:

Figure 2-8: Summary of Fair Housing Issues and Local Conditions

Fair Housing Issue Identified	High Priority Significant Contributing Factors
<p>Integration and Segregation; Disproportionate Housing Needs; Publicly Supported Housing</p>	<p>Displacement of residents due to economic pressures Santa Monica’s rent control law applies to most residential rental buildings constructed prior to 1979 and to certain single-family homes and condos. However, the Costa-Hawkins Rental Housing Act allows owners to raise the rents of rent-controlled units when tenants relocate or are evicted for non-payment. In addition, the Ellis Act gives property owners the right to exit the rental business, thereby evicting all of their tenants in one fell swoop (usually in the wake of a major remodel or transitioning to condo ownership). Rent-control evictions are on the rise in Santa Monica.</p>
<p>Integration and Segregation; Disparities in Access to Opportunity; Publicly Supported Housing</p>	<p>Impediments to Mobility There is not a mobility counseling program for Housing Choice Voucher holders assisted by the largest public housing authorities in the Region: the Housing Authority of the City of Los Angeles and the Housing Authority of the County of Los Angeles. As a result, there are informational gaps that impede some residents of heavily Black and Hispanic neighborhoods in the Region from utilizing their assistance to move to high opportunity areas like Santa Monica, other parts of the West Side, coastal and southern Orange County, and the southwestern portions of the San Fernando Valley. Because of the small geographic footprint of the City of Santa Monica, the lack of mobility counseling is a less significant reinforcement of segregation in that local context. Additionally, although the Santa Monica Housing Authority utilizes exception payment standards to bring more apartments in Santa Monica within reach of Housing Choice Voucher holders, housing costs are so high in the city that even higher payment standards may be appropriate.</p>
<p>Disparities in Access to Opportunity; Disproportionate Housing Needs; Publicly Supported Housing</p>	<p>High housing costs Housing prices within the city of Santa Monica are very high as indicated in Appendix B. Despite the high costs, Santa Monica has taken steps to protect housing stock. The city charter has an inclusionary zoning provision that requires not less than 30% of all newly constructed multifamily housing to be reserved for moderate or low-income families. Santa Monica has also implemented rent control since 1979. It covers all units constructed prior to passage, some units constructed after passage, and in contrast to typical rent control provisions, also covers some single family homes. In the past few Housing Element cycles, Santa Monica has exceeded its RHNA for low income units. In addition, there are approximately 1,000 LIHTC units currently in existence and earmarked for low-income households. However, these provisions largely protect those living in currently Santa Monica. Despite proximity to Los Angeles and the existence of opportunities within the city, those who don’t currently live in Santa Monica are priced out of living in the city and accessing resources or opportunity the city has to offer. Based on income and family sizes, those who are priced out will tend to be disproportionately Black, Hispanic, and with larger families.</p>

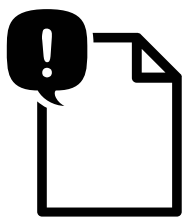
Fair Housing Issue Identified	High Priority Significant Contributing Factors
<p>Integration and Segregation; Disproportionate Housing Needs</p>	<p>Lack of affordable, accessible housing in a range of unit sizes</p> <p>Persons with disabilities in Santa Monica disproportionately have low incomes and live in poverty, thus increasing their relative need for affordable housing. In light of the broader affordable housing shortage in the city and the Region, there is a shortage for persons with disabilities. The vast majority of LIHTC units in the area were put into service from 1991–onward, thus conforming with modern accessibility standards. Publicly supported housing is also subject to the modification requirements of Section 504 of the Rehabilitation Act. Nevertheless, new affordable, multifamily units – those that are most likely to be both affordable and accessible – are too few in number to meet the total need. Supportive housing developments often consist primarily or exclusively of one–bedroom apartments. When it comes to supportive housing for persons with disabilities, although the demand likely consists primarily of a need for one–bedroom units, there are individuals at risk of institutionalization who have dependent children and persons with disabilities who need a live–in aide with their own bedroom. Including a mix of a small number of two– and even three–bedroom units in developments with a supportive housing component would foster greater community integration.</p>
<p>Segregation, R/ECAPs (in the Region), Disparities in Access to Opportunity, Disproportionate Housing Needs, Publicly Supported Housing, and Disability and Access</p>	<p>Land use and zoning laws</p> <p>Santa Monica is very compact, roughly rectangular, abutting the ocean, and just 8.3 square miles. The street layout and zoning and is very efficient, with the downtown area located along the beach and down the center of the city. Single–unit zoning is located on the northern and southern ends of the City, with denser zoning toward the center of the City and the main transportation thoroughfares. Specifically, neighborhoods like North of Montana and Sunset Park that are disproportionately White are primarily zoned for single–family homes. The problem is most severe in the North of Montana neighborhood.</p> <p>The high housing cost of single family homes and the single family home–restricted zoning on either end of the City functionally restricts racial diversity in these neighborhoods, as shown by the disproportionately White and Asian American populations of the neighborhoods. However, Santa Monica has also had an inclusionary housing program in place for 30 years within the Santa Monica Municipal Code (Affordable Housing Production Program) that requires developers to abide by affordable housing requirements, such as designating portions of their buildings for moderate–, low–, very low–, and extremely low–income rental housing. The City also has a Housing Trust Fund to finance the development, construction, and duration of affordable housing.</p>
<p>Segregation</p>	<p>Private discrimination</p> <p>Given Santa Monica’s very progressive stance and expansive state and local anti–discrimination provisions, the majority of housing discrimination in the city occurs privately, rather than at the hands of the city or state. At Santa Monica Legal Aid, most of the complaints received detail discrimination based on a tenant’s disability, particularly complaints regarding denied request for a reasonable accommodation or modification. The second largest category is Section 8 discrimination, despite Santa Monica’s explicit prohibition against source of income discrimination. The third largest category is discrimination based on familial status. Santa Monica Legal Aid coordinates with the Santa Monica City Attorney’s office to investigate and resolve these complaints, including initiating lawsuits when necessary.</p>

G. Fair Housing Enforcement And Outreach Capacity

The City of Santa Monica takes fair housing laws seriously and has enacted a number of local laws in support of fair housing including:

- Chapter 4.28 of SMMC, addressing fair housing for families with children, disability, and source of income discrimination
- Chapter 4.40 of SMMC addressing fair housing regardless of sexual orientation or domestic partnership
- Chapter 4.52 of SMMC addressing fair housing for persons living with HIV/AIDS
- Chapter 9.49 of SMMC, addressing reasonable accommodations for persons with disabilities

The City continues to promote fair housing and prevent housing discrimination. The Public Rights Division (PRD) of the City Attorney's Office enforces Fair Housing Laws, and actively accepts, investigates, and resolves fair housing complaints. The PRD does this through sending demand letters to offending parties, coordinating with the Legal Aid Foundation of Los Angeles, and suing offending parties directly. As part of its investigations and enforcement in fair housing case, the City has continued to enforce local ordinance and State law outlawing housing discrimination based on source of income, such as rental housing vouchers. In 2020, the City responded to 43 fair housing complaints, and in fiscal year 2020-2021, the program resulted in ensuring several dozen landlords will accept Section 8 vouchers, in compliance with State law. The City also funds Legal Aid Foundation of Los Angeles (LAFLA) to pursue fair housing enforcement. Additionally, the City's Code Compliance staff are available to help relocate people, if necessary. The Santa Monica Police Department is also committed to investigating and resolving hate crimes that may occur in the housing context. Unresolved fair housing violations are not a significant contributing factor to fair housing issues, as the City of Santa Monica actively pursues enforcement.



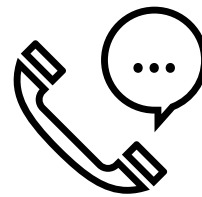
43

Fair housing complaints responded to in 2021



200+

Hours of dedicated City staff time for fair housing outreach and enforcement



13,000

Inquiries on tenant rights handled annually

The PRD also enforces the City's Tenant Harassment Ordinance, and the City's Rent Control Board monitors evictions and advises Santa Monica tenants of their rights. The Rent Control Board continues to engage the community about the protections under Rent Control Law through a number of events and seminars, as well as ongoing one-on-one consultations with tenants and property owners about their rights and responsibilities under the law. More than 13,000 inquiries are handled annually. The Board monitors owner-occupancy evictions to ensure that grounds for eviction is not abused and an inter-departmental task-force addresses issues related to withdrawals under the Ellis Act and the current use of those properties that have been withdrawn from the rental market.

Other recent actions the City has enacted to assure that tenants are not discriminated against or harassed by building owners and address fair housing issues, particularly displacement protection, include:

- In 2010, the Just Cause Eviction protections that were available only for tenants in rent-controlled units, were extended to all tenants when voters approved Measure RR.
- On December 13, 2011, the City Council adopted an ordinance which extended the protections of the Tenant Anti-Harassment Ordinance to all tenants with just cause eviction protections.
- In 2015, the City Council amended the City's fair housing ordinance to include source of income as a protected class and included a pioneering definition of "Source of Income" that included rental housing assistance such as the Section 8 Housing Voucher Program.
- On May 22, 2018, the City Council adopted an ordinance which extends specific tenant protections to households with either educators or students under the age of 18 if the notice of termination falls during the school year.
- In March of 2020, the City issued the first of a series of emergency orders that protected tenants from evictions during the pandemic and economic emergency.

In addition to enforcement, the PRD also annually conducts a campaign to improve community awareness of fair housing laws and spends over \$2,500 to undertake fair housing activities including public awareness and advertising in efforts to eliminate housing discrimination in the City. Prior to the COVID19 pandemic, the PRD hosted an annual fair housing workshop that is attended by hundreds of people. The PRD also regularly publishes articles about fair housing in the Santa Monica Daily Press and produces outreach videos on housing. In 2020-2021, the City sponsored or participated in fair housing webinars to promote community awareness and education. Approximately 200 staff hours are dedicated annually in fair housing enforcement work and community outreach.

H. Summary And Actions To Affirmatively Further Fair Housing

1. Current Actions

The City of Santa Monica has adopted numerous policies and actions to protect existing housing stock, prevent discrimination, protect tenants from displacement, and increase the supply of affordable housing, including rent control that has been in place for over 40 years. Santa Monica's anti-discrimination and strong tenant protections include just-cause evictions, anti-tenant harassment laws, and notice of tenant buyouts; prohibitions on source of income discrimination; the Preserving Our Diversity (POD) program which provides cash-based assistance to low-income seniors; and anti-discrimination laws that afford protections beyond the federal Fair Housing Act and the California Fair Employment and Housing Act. A few of Santa Monica's current actions to enhance housing mobility, provide housing choice and affordability, and prevent displacement are highlighted below:

Rent Control Law

Santa Monica Rent Control was adopted by the voters in April 1979 in response to a shortage of housing units, low vacancy rates and rapidly rising rents. The law was intended to alleviate the hardship of the housing shortage and to ensure that owners received no more than a fair return. The Regulations were adopted by the Rent Control Board to implement and enforce the Rent Control Law. The rent control provisions cover single-family homes, duplexes, triplexes, and apartment buildings. The City's rent control provides tenant protections and seeks to preserve existing housing stock and maintain naturally occurring affordable housing for its residents. Primary functions of the Rent Control Board include controlling rent amounts, maintaining amenities and services for tenants, provide for only "just cause" evictions, and limiting the removal of controlled units from the rental market, all in efforts to ensure tenant stability and preserving existing housing stock and its affordability. Under the City's rent control law, tenants may only be evicted if they are at-fault or the landlord wishes to move themselves or their family into the unit.

Proposition R (1990) and the Affordable Housing Production Program

Proposition R was passed in 1990 by the voters, and requires that 30% of all new multifamily housing in the City be affordable to low- and moderate-income households. The Affordable Housing Production Program (AHPP) implements Proposition R, making the creation of affordable housing mandatory as part of the development of market-rate apartment and condominium buildings. Developers of new multifamily buildings are required to contribute to affordable housing in Santa Monica, including:

- Constructing inclusionary affordable residences onsite in a development.
- Constructing affordable residences offsite in another development.
- Paying an affordable housing fee that is used by the City to subsidize affordable housing developments and are deposited into the Citywide Housing Trust Fund.

The City continues to comply with the Proposition R affordable housing production mandate of 30% affordability in the long-term; between fiscal year 1996-97 through FY 2018-19, 38% of all multifamily housing constructed (5,346 total), pursuant to Proposition R, is affordable. The City has exceeded the goals of Proposition R, with 40 percent of all new housing built over the past 20 years being deed-restricted for occupancy by low- and moderate-income households. The City's Affordable Housing Production Program has produced more than 800 units.

Housing Trust Fund

Additionally, the City has a Housing Trust Fund. Funds come primarily from redevelopment loan repayments and the stream of ongoing revenue provided by the voter-approved sales tax, Measures GS/GSH. The Housing Trust Funds has supported the production of over 1,200 very low and low-income affordable units over the same time period in addition to acquisition and rehabilitation of existing units and rental subsidies to help keep Santa Monicans housed.

Section 8 Housing Choice Voucher Program

Santa Monica also has made considerable investments into expanding new housing choice and opportunities for low-income households. The Santa Monica Housing Authority operates the Section 8 Housing Choice Voucher program, which provides rental housing vouchers to extremely low- and very low-income households with rent subsidies to bridge the gap between what the household can afford and market rents. Further, the City has been active in preserving affordable housing for seniors through Project-Based vouchers that fund the rehab of affordable units and prevent them from becoming market rate units.

Santa Monica's Approach to Addressing Homelessness

Santa Monica also has a long history of investing in housing and supportive services to prevent and address the impacts of homelessness. The City's homeless service system has evolved significantly over 40 years and is nationally recognized as an innovative model that addresses the complex issues that contribute to long and repeated episodes of homelessness. On March 26, 2019, the City introduced the Four "Pillars" upon which the City's homeless strategies are built:

- Preventing housed Santa Monicans from becoming homeless and increasing affordable housing opportunities;
- Addressing the behavioral health needs of vulnerable residents;
- Maintaining equitable access to safe, fun, and healthy open spaces; and
- Strengthening regional capacity to address homelessness.

These strategies have been implemented through interdepartmental and community partnerships that contributed to a sustained reduction in homelessness in the downtown and beach areas, as well as an overall 8% reduction in the City's 2020 Point-In-Time homeless count. In February 2021, in response to the economic and housing challenges brought on by the COVID19 pandemic, the City reaffirmed its commitment to addressing homelessness. In addition to continuing the multi-disciplinary street teams and the Reed Park Ambassador program through June 2023, Council prioritized the following additional strategies for consideration during the forthcoming biennial budget process.

- Extended Emergency Rental Assistance to prevent residents from falling into homelessness.
- An alternative non-congregate shelter on City property.
- A behavioral health triage center.
- Low acuity crisis response unit in the Santa Monica Fire Department.

Even with the City's residential protections, programs, and incentives at addressing fair housing issues, the lack of affordable housing to meet the housing needs of low- and moderate income residents, especially for people of color, continue to remain a challenge.

Pilot Right to Return Program

Most recently on July 13, 2021, Santa Monica City Council made changes to Santa Monica's Affordable Housing Production Program and Housing Trust Fund to address past urban renewal policies that displaced many households of color. Specifically, the City's affordable housing waitlist priority will be modified to include those former residents who were displaced by the creation of the Civic Auditorium in the Belmar Triangle neighborhood and I-10 freeway in the Pico neighborhood in the 1950s and 1960s. The pilot program is part of the City's commitment to equity and inclusion.

2. Future Actions

This Housing Element includes policies and programs further outlining the City's commitment to remedying the legacy of past housing discrimination practices, breaking down the patterns of segregation, and ensuring fair housing opportunities to all. Chapter 5 of this Housing Element includes programs that provide address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization, and displacement protection. These programs are described briefly below:

Enhancing Housing Mobility

Housing Mobility Strategies consist of removing barriers to housing in areas of opportunity and strategically enhancing access. This Housing Element sets forth the following programs that will enhance housing mobility:

- **Program 1.C** – *Incentivize Housing Development On Surface Parking Lots In Residential Zones That Are Associated With Existing Commercial Uses*

Under Program 1.C, the existing zoning barriers to housing on surface parking lots in the R1 and multiunit residential zones would be removed. Specifically, current zoning restricts the development of surface parking lots that are located in the residential zones. Current zoning limits where vehicular access can be taken on these parcels and also caps the number of residential units that could be developed (e.g, density cap of 4, 5, or 6 units), Program 1.C would remove these existing land use and zoning constraints to housing and adopt new standards to encourage housing projects on surface parking lots. This program would promote access to multifamily housing in the high opportunity areas of R1 and the multiunit residential (R2, R3, R4, OP2, OP3, and OP4) neighborhoods.

- **Program 3.B** – *Develop Tenant and Landlord Programs to Address State and Federal Legislation Mandated Regarding Anti-Discrimination*

Under program 3.B, the City shall continue to implement programs, including tenant and landlord education/outreach, that strive to protect tenants against landlord discrimination and cancellation of existing Section 8 contracts. Currently, the City has several progressive legal protection programs, such as just-cause eviction protections and a new 2-year pilot Right to Counsel program to assist tenants facing evictions.

- **Program 3.C**– *Facilitate the Conservation of Restricted and Non-Restricted At-Risk Housing*
Under Program 3.C the City will continue to provide information on maintaining long-term affordability and assist federally-funded housing properties with seeking funding assistance by applying for allocations of housing vouchers from the federal government to maintain housing affordability.

- **Program 6.A** – *Maintain Rental Housing Voucher Programs And Expand To Assist All Persons With Disabilities*

Under Program 6.A, the City will continue to:

- Maintain and operate the Section 8, Housing Choice Voucher Program
- Maintain a City-wide list of affordable rental vacancies in partnership with Community Corporation of Santa Monica

- **Program 6.D** – *Information And Outreach Coordination For Tenants And Landlords On Housing Programs And Resources*

Under Program 6.D, the City will continue to:

- Provide education and outreach to tenants and landlords to increase awareness about federal and local housing programs, including Section 8 housing voucher programs
- Provide education and outreach to tenants and landlords to increase awareness about federal and local housing rights and legal obligations, including anti-discrimination regarding source of income
- Enforce the Affirmative Marketing Policies that are required as part of HOME-assisted rental development

Programs to enhance housing mobility also address the following high priority factors identified in the City’s 2020 Assessment of Fair Housing:

- Impediments to mobility
- Lack of access to opportunity due to high housing costs
- Lack of affordable, accessible housing in a range of unit sizes
- Land use and zoning laws
- Private Discrimination

Providing New Housing Choices and Affordability in High Opportunity Areas

Housing choice strategies promote the housing supply, choices and affordability in areas of high opportunity and outside of areas of concentrated poverty. This Housing Element sets forth the following programs that will provide new housing choices and affordability in high opportunity areas:

- **Program 1.C** – *Incentivize Housing Development On Surface Parking Lots In Residential Zones That Are Associated With Existing Commercial Uses*

As discussed previously, current zoning restricts the development of surface parking lots that are located in the residential zones. Program 1.C would remove these existing land use and zoning constraints to increase housing in the high opportunity areas of R1 and the multiunit (R2, R3, R4, OP2, OP3, and OP4) neighborhoods.

- **Program 1.J** – *Revise Development Standards To Ensure Housing Projects are Feasible Incentivized Over Commercial Development.*

In some areas of the City, such as the Neighborhood Commercial districts of Main Street and Montana Avenue, housing is a permitted use. However, due to a number of factors including zoning code limitations on development, housing has not traditionally occurred in these areas. Furthermore, a financial analysis on residential development standards

prepared for the City indicate that housing projects are unlikely to occur in the remaining mixed-use areas of the City such as the boulevards, and Bergamot Area due to land use and zoning restrictions on height and floor area ratios. To incentive housing, Program 4.B would rezone and modify the development standards in all the mixed-use and commercial zoning districts to allow housing projects to have greater density and height than commercial projects. This program would incentivize housing over commercial and create new housing choice.

- **Program 4.C** - *Provide New Housing Choices And Affordability In High Opportunity Areas Through Incentives For Additional ADUs In R1-Zone Neighborhoods*

The construction of new ADUs in recent years has increased housing opportunities in single-family zones, areas which have traditionally been out of reach for renters. The vast majority of new ADUs constructed or under development in the past 3 years have been in R1 neighborhoods, providing a valuable source of rental housing access in otherwise, high cost neighborhoods. Under State law, properties are permitted to have one ADU and one JADU. This program will further allow one more ADU on single-unit dwelling parcels with the requirement that the additional third ADU be restricted to permanent rental housing. This program will incentivize the production of ADUs thus providing new housing choice and affordability in the high opportunity areas of the R1 neighborhoods.

- **Program 2.A** - *Establish a 100% Moderate Income Housing Overlay*

Moderate Income housing projects currently have no dedicated funding source or incentives under local or State law. Since AB1763 only applies to projects up to 80% AMI and the City's Zoning Ordinance similarly defines 100% affordable housing as only including projects up to 80% AMI, there are no incentives for moderate income housing projects (serving households up to 120% AMI). In the 5th Cycle Housing Element, Santa Monica did not meet its RHNA targets for moderate income units. Moderate-income housing units serve an important segment of Santa Monica workers and residents that do not qualify for lower-income affordable units yet cannot afford market rents. Program 2.A would create a new zoning overlay to incentivize moderate income housing projects in the targeted areas of the City such as Downtown area, Bergamot area, and the immediate area around the 17th St station. 100% Moderate Income housing projects would be incentivized through special standards such as additional height (at least 33 feet additionally), density bonus, and reduced parking requirements. This program will incentivize the production of moderate-income housing thus providing new housing choice and affordability in the high opportunity areas around the Metro E transit stations.

- Program 2.C** *Update the City's Affordable Housing Production Program (AHPP) to Incentivize Housing Production at All Income Levels*

The City's long established AHPP program has produced over 800 affordable units – expanding housing choice and affordability for many Santa Monica residents. Despite the success of the AHPP, there is still a significant gap between the housing needs of low-income households and the availability of affordable units. To further incentivize the production of affordable units at various income levels, Program 2.C would establish a new base affordability percentage of 15% for with the inclusionary units provided equally among very low-, low- and moderate-income levels. Program 2.C would also establish new more flexible requirements for in-lieu fees and off-site affordable housing.
- Program 4.A** – *Zoning Ordinance Amendment To Permit Multiple-Unit Housing In Nonresidential Zones Where Not Currently Permitted*

Currently, multi-unit residential is not permitted in certain commercial areas of the City; namely, the Industrial Conservation District, Office Campus, Creative Arts Center, and Conservation Creative Sector. Residential uses are not permitted in these zones, even though there may be existing residential uses that were developed in the past. Furthermore, areas within some of these zoning districts have significant housing potential with access to residential amenities, such as transit, commercial uses, parks, schools, and infrastructure. Program 4.A would add housing as a permitted use in these zones, creating new housing choices and affordability.
- Program 4.B** – *Facilitate The Development Of Housing On Surface Parking Lots Owned By Community Assembly Uses*

Parking lots of religious congregations are largely located in multi-unit residential zones presenting a unique opportunity to expand housing choice in these areas. During the Housing Element outreach process, the City met with a variety of religious congregations through the Westside Interfaith Council. A handful of congregations have expressed strong interest in developing affordable housing on the parking lots of their sites. This program would adopt special standards in the Zoning Ordinance to support the production of affordable housing on surface parking lots owned by community assembly uses, which include religious congregations, including allowing some, but not more than 50%, market-rate units to support the affordable housing. With this program, properties associated with religious congregations and other community assembly uses in the multi-unit residential zones would be opened to new housing opportunities.
- Program 6.H** – *Maintain Reasonable Accommodations To Ensure Equal Opportunity For Housing*

In the 2015 Zoning Ordinance update, Santa Monica adapted reasonable accommodation procedures (SMMC Chapter 9.49) that specify the applicability of eligible applicants and

requests, application requirements, reviewing authority and procedures, findings and decisions, appeal process, and the duration limits of the accommodation. The City will maintain and continue to support reasonable accommodations to ensure equal housing opportunities, consistent with fair housing laws.

Programs to enhance housing choice in high opportunity areas also address the following high priority factors identified in the City's 2020 Assessment of Fair Housing:

- Impediments to mobility
- High housing cost
- Lack of access to opportunity due to high housing costs
- Lack of affordable, accessible housing in a range of unit sizes
- Land use and zoning laws

Place-based Strategies to Encourage Community Conservation and Revitalization:

These strategies involve approaches that are focused on conserving and improving assets in areas of lower opportunity and concentrated poverty such as targeted investment in neighborhood revitalization, preserving or rehabilitating existing affordable housing, improving infrastructure, schools, employment, parks, transportation and other community amenities.

As a compact city of 8.3 square miles with a costly housing market, the City doesn't have the same level of distinct lower opportunity and concentrated poverty areas as other cities in the Region, such as the City of Los Angeles. This is evidenced by the fact that the entire City is considered to be a high opportunity area. Even so, some census tracts particularly adjacent to the I-10 freeway may have slightly less resources and opportunity than others. Therefore, this Housing Element sets forth the following programs that will provide promote community conservation and revitalization:

- **Program 3.C** - *Facilitate The Conservation Of Restricted And Non-Restricted At-Risk Housing.*
The City monitors the status of at-risk projects within the City, advise tenants in advance of potential conversion dates, and assist in answering questions from residents of at risk housing. The City will continue these actions and exercise its right of first refusal to purchase properties if necessary and financially feasible to ensure the continued availability of affordable housing units.
- **Program 3.D** - *Maintain An Acquisition And Rehabilitation Program*
The City provides Housing Trust Fund loans to nonprofit housing providers to assist with the purchase and rehabilitation of existing rental properties occupied primarily by low-income households. As resources are available, the City will continue to provide loan assistance to nonprofit affordable housing providers and work with providers to identify new funding sources.

- Program 3.E - Maintain A Low Income Residential Repair Program**
 The City implements the Residential Rehabilitation Program for owners of multifamily rental properties occupied by low- and moderate-income tenants; and the Owner-Occupied Rehabilitation Program for low- and moderate-income owners. Minor home modifications improve physical access for people with disabilities and seniors that assist with independent living. The City will continue to implement this program.
- Program 3.F - Enhance Code Enforcement Response To Housing-Related Violations**
 The City's Code Enforcement and Building and Safety Divisions respond to residential building code violation complaints. The City will continue this program and will coordinate with the Housing and Human Services Division to provide information on available rehabilitation assistance to correct code deficiencies.
- Program 3.H - Information And Outreach For Property Owners Regarding Rehabilitation And Maintenance Of Housing Units**
 The City will continue to provide additional education and outreach to multi-unit property owners on available City programs and support continued rehabilitation, maintenance, repairs, and upgrades of their housing units.
- Program 6.B - Seek Funding Sources To Support Rental Assistance For Vulnerable Individuals And Households At-Risk Of Displacement**
 The City will continue to pursue and identify new funding sources that support rental assistance programs, including emergency rental assistance to the extent feasible.
- Program 6.C - Maintain And Expand The Preserving Our Diversity (POD) Program**
 The City will continue to operate the POD program and pursue additional funding to maintain assistance to seniors and evaluate expanding program assistance to other rent burdened residents vulnerable to displacement, if possible.

Programs to encourage community conservation and revitalization also address the following high priority factors identified in the City's 2020 Assessment of Fair Housing:

- Displacement of Residents due to Economic Pressures
- High housing cost
- Lack of affordable, accessible housing in a range of unit sizes

Displacement Protection

As discussed previously, while the City already implements a number of programs and actions aimed at keeping residents housed, the inevitable economic pressures of the housing market have resulted in the displacement of residents. A fundamental guiding principle of the Housing Element is the preservation of existing housing stock. The primary reason why the existing multi-unit zones (R2, R3, R4, OP2, OP3, and OP4) are not being proposed for rezoning is due to the fact that most of the City's rent control housing stock are located in these areas.

Map 2-24: Zoning and Rent Control Units



These rent control units play an important role in keeping housing affordable to existing residents and helping to ensure their long-term tenancy. Any proposed increase to density in the multi-unit residential zones would make these units vulnerable to redevelopment, potentially forcing Santa Monica renters out of their homes. Therefore, this Housing Element does not propose any zone changes in the multi-unit residential zones. In addition to this community preservation approach, this Housing Element also sets forth the following programs to further provide displacement protection for existing residents:

- **Program 2.B – Right of First Offer Ordinance for Nonprofit Affordable Housing Providers**
The City will adopt a Right of First Offer Ordinance that would require that qualified nonprofit organizations would be offered the right of first offer/refusal to purchase private properties

offered for sale in the City. This program would provide existing residents the opportunity to maintain their housing at an affordable level and minimize overall tenant displacement.

- **Program 3.A** – *Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced*

The City will amend the Municipal Code to adopt local requirements that require housing projects replace existing and former residential units in the past 5 years consistent with the requirements set forth in Government Code Section 65915(c)(3).

- **Program 3.B** – *Develop Programs To Address State And Federal Legislative Mandates*

The City will continue to implement programs, including tenant and landlord education/ outreach, that strive to protect tenants against landlord discrimination and cancellation of existing Section 8 contracts (including City and/or private foundation-funded subsidy) to enable tenants to remain and pay the maximum allowable rent (MAR). The City will continue to fund the acquisition and rehabilitation of existing rental units and continue to investigate new, innovative ways to increase the affordability of housing.

- **Program 3.G** – *Maintain A Mandatory Seismic Retrofit Program*

In March 2017, the City Council adopted a Seismic Retrofit Ordinance and the City implemented the Seismic Retrofit Program that proactively seeks to strengthen existing earthquake-vulnerable buildings and enhance the safety and security of their occupants. The City will continue to implement this seismic retrofit program to minimize potential displacement of residents due to seismic risks.

- **Program 3.I** – *Right To Counsel Program*

The City in April 2021 began a two-year pilot Right to Counsel program to provide legal assistance and support for tenants facing eviction, particularly amid the COVID-19 pandemic. This program is available to Santa Monica tenant households whose income is at or below 80% of the County’s Area Medium Income (“AMI”), and facing eviction attempts by their landlord. Program 7.C will continue this program to support tenants facing eviction.

- **Program 4.E** – *Right to Return Program*

The City will implement a Right to Return Pilot Program for households that were historically

Programs to protect tenants from displacement also address the following high priority factors identified in the City’s 2020 Assessment of Fair Housing:

- Displacement of Residents due to Economic Pressures
- High housing cost
- Lack of affordable, accessible housing in a range of unit sizes
- Private Discrimination

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3:

Goals and Policies



Chapter 3: Goals and Policies

The Housing Element includes seven goals that create the framework for how the City of Santa Monica will address the community’s housing needs over the next eight years. These goals were reviewed as part of the community process for this Housing Element update. The policy goals of this Housing Element focus on:



Affordable Housing Production: Prioritize affordable housing on City-owned sites and remove barriers to affordable housing production in all areas of the City.



Market-Rate Housing Production: Continue to support the production of new market-rate housing around major transit stops and along major corridors.



Affirmatively Furthering Fair Housing: Decisions regarding distribution of new development are viewed through the lens of providing equitable housing access to all neighborhoods.



Housing Assistance: Continue to prevent displacement of existing households by providing financial and technical assistance for the provision of housing for all income groups and household types including families with children, seniors, persons with disabilities, and others with special needs.



Address Homelessness: Prevent housed Santa Monicans from becoming homeless and continue to address the special need to provide housing and supportive services for the homeless in the community with an emphasis on the most chronic and vulnerable individuals.



Balancing Housing with Other City Goals: Incorporate other community goals related to economic sustainability and environmental objectives with the production, conservation, and protection of housing. These include encouraging a balance between housing and economic development, sustainable development, providing supportive services, and increasing walkability and non-motorized forms of transportation.



Assuring Equal Housing Opportunities: Continue to assure equal access to housing for all.



▶ GOAL 1

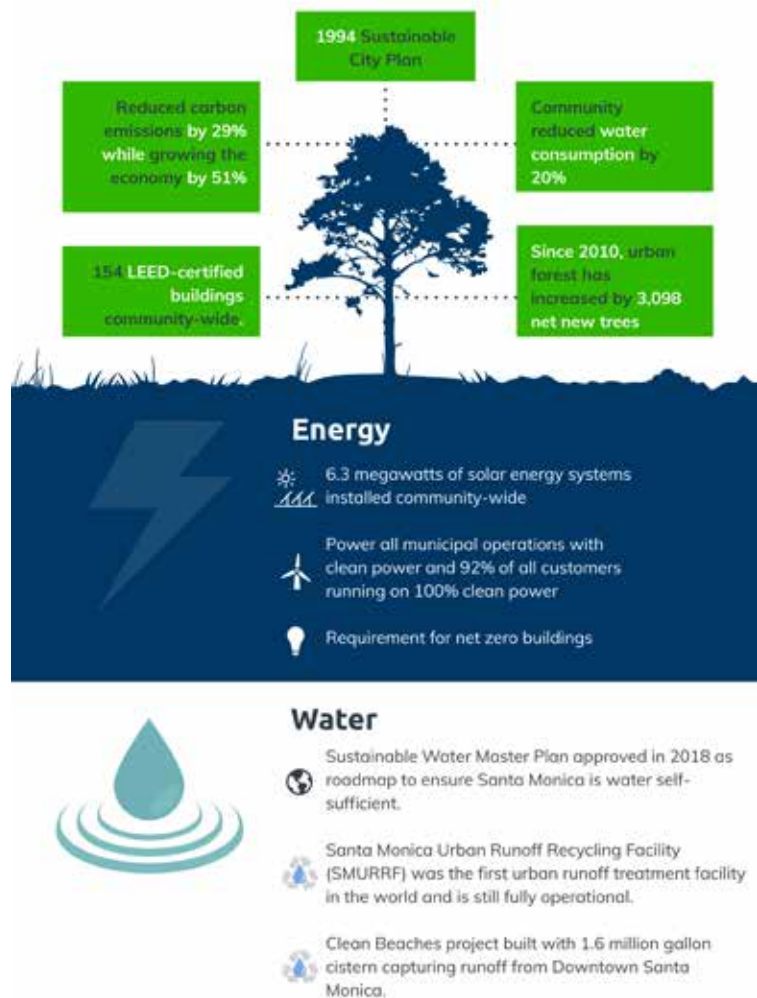
Production of new housing that is sustainable, innovative, safe and resilient, appropriate with the surrounding neighborhood, offers opportunities for active and healthy living, including walking and biking, and increases equitable housing opportunities.

.....

In Santa Monica, the demand for housing greatly exceeds the supply. This has resulted in Santa Monica being one of the most expensive places to live in the country. The City is required by the State to address this housing shortage by planning for its Regional Housing Needs Allocation (RHNA). In the past eight years, the City produced 3,643 units, well exceeding its established 5th Cycle RHNA of 1,674 units. The City’s target for this 6th cycle Housing Element is 8,895 units, an average of about 1,100 housing units annually. This number is more than 5 times larger than the allocation required in the prior Housing Element cycle. Meeting this housing target will be challenging and will require the enactment of new policies and programs to bolster housing production.

Since then, the City adopted the Land Use and Circulation Element in 2010, updated the Sustainable City Plan in 2014, updated the Urban Forest Master Plan in 2017, and adopted a Climate Action and Adaptation Plan in 2019. All of these plans provide the foundation for the creation of sustainable and healthy communities. New housing plays an important role in achieving the City’s goals to reduce vehicle miles traveled, reduce greenhouse gas emissions, expand the tree canopy, and promote environmental justice.

Santa Monica: Sustainability Leader



POLICIES

- Policy 1.1 Adequate Land for Housing.** Provide adequately zoned sites for all types of housing, particularly multi-unit housing in locations near major transportation hubs and services that promote active living in addition to areas that have historically excluded diverse housing opportunities.
- Policy 1.2 Housing Production Incentives.** Encourage and provide adequate development standards and incentives for the production of housing, particularly affordable housing.
- Policy 1.3 Adaptive Reuse.** Encourage and provide incentives for adaptive reuse of existing commercial buildings for housing.
- Policy 1.4 Design of Housing.** Ensure that the design of new housing development is responsive to the surrounding context.
- Policy 1.5 Innovative and Sustainable Housing Design.** Ensure that local regulations support: sustainable construction techniques and materials to the extent technically feasible, environmental justice that protects public health, open space, and expansion of the tree canopy.
- Policy 1.6 Housing for Special Needs.** Maintain development standards that promote the development of special needs housing, such as affordable senior, accessible, and family housing.
- Policy 1.7 Review of Housing Constraints.** Periodically review City taxes, fees, and regulations to ensure that they do not constrain housing development.
- Policy 1.8 Streamlined Housing Process.** Continue to evaluate and provide an expedited and coordinated permitting process and design review, particularly for housing projects, including those using innovative and sustainable construction techniques and materials.
- Policy 1.9 Partner with School District and Community College District for Housing.** The City shall seek opportunities to work with the School District and Community College District to facilitate housing development.
- Policy 1.10 Funding for Affordable Housing on City-Owned Sites.** Pursue grant funding opportunities to facilitate affordable housing on City-owned sites

GOAL 2

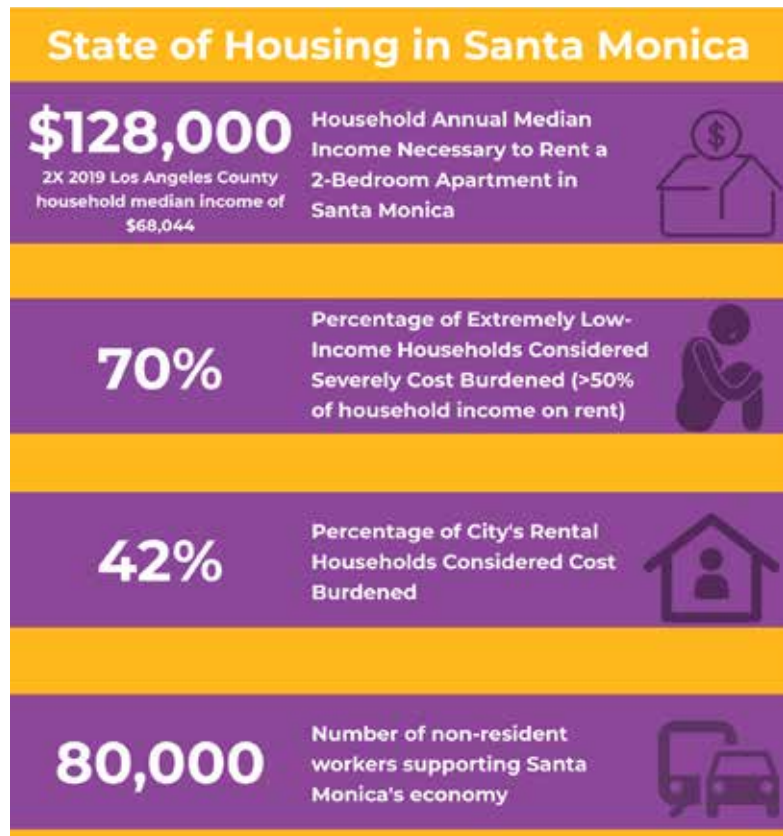
Housing production for all income categories including for the community's workforce and most vulnerable communities.

While it is generally recognized that Californians pay more for housing than the average American, Santa Monica's housing costs are among the highest in the nation. There are a variety of negative effects caused by a lack of affordable housing. With a greater share of household incomes spent on housing costs, households are left with less money available to spend on basic necessities. Having less money available for non-housing costs often means that low income households will have less savings in the bank, putting them at risk for poverty or preventing them from rising out of it.

The City's economy is supported by a diverse variety of industry sectors but remains heavily dependent on the food/accommodation and retail trade sectors. This sector employs approximately 25% of the workforce but has generally lower wages than other sectors. With lower income jobs also in other major employment sectors such as education and healthcare, 91% of workers cannot afford to live in Santa Monica. Additionally, the artist community of Santa Monica is a unique sector that should be preserved and uplifted through housing opportunities. Artist special housing needs, like live-work units, should also be considered.

Affordable housing in Santa Monica has been produced from two sources: market-rate housing and public assistance such as the City's Housing Trust Fund. Market-rate housing is required to provide affordable housing or pay an in-lieu fee through the Affordable Housing Production Program (AHPP).

In the last eight years, the City has constructed 982 affordable housing units, which represents 27% of the total units produced. As part of this Housing Element update, the City of Santa Monica must



adequately plan for and accommodate a total of 6,168 new affordable housing units, which represents 69% of the City's overall RHNA.

While the City generally provides several process and development incentives in support of 100% affordable housing projects, the major barriers to the production of affordable housing include:

- Lack of funding
- Land costs
- Insufficient height and density standards necessary to produce units
- Commercial prevailing wage requirements for buildings 5 stories and above.
- Neighborhood opposition

The City has worked to overcome these barriers over the past 40 years by supporting 100% affordable housing on city-owned land resulting in the production of 770 units of affordable housing. The long-term affordability of these units has been guaranteed through recorded deed restrictions or in the case of property sale, the City has negotiated for right of first option to purchase for a low, fixed amount in the event of future sale. As such the City has a demonstrated history of continuously leveraged public land to produce affordable housing for the benefit of the community.

POLICIES

Policy 2.1 Affordable Housing Financing. Encourage innovative private sector and governmental programs to promote the financing and development of housing for extremely low-, very low-, and low-income persons and for moderate income families.

Policy 2.2 Local Assistance for Affordable Housing. Focus available resources (including City-owned land and Housing Trust Funds) to assist for-profit and nonprofit housing providers to develop housing for extremely low-, very low-, and low-income households.

Policy 2.3 Advocacy for Legislative Changes. Support the enactment of federal, state, and local legislation to provide funding and incentives for the preservation and development of housing that is affordable to very low-, low-, and moderate-income households, and to accommodate special needs.

Policy 2.4 Local Incentives and Streamlining for Affordable Housing. Continue to encourage and provide development opportunities and incentives, expedited permit review, and reduced planning fees to increase the production of affordable housing including extremely low-, low-, very-low, and moderate-income households.

Policy 2.5 Homeownership Opportunities. Explore ways to encourage the development of ownership housing for affordable to moderate-income households and the City's workforce, including opportunities for employer-provided permanent housing.

- Policy 2.6 New Funding Sources.** Work with local nonprofit community organizations to tap into new funding sources and support local capacity to develop affordable housing on an ongoing basis. Explore private arts funding for artist housing.
- Policy 2.7 Support for Senior Housing.** Encourage and support development of senior housing and facilities to meet the needs of seniors, particularly for the oldest senior cohort, including consideration of a preference for “aging in place” along with the need for more congregate housing and residential care facilities.
- Policy 2.8 Support for Special Needs Housing.** Consider incentives and requirements to ensure that new residential development accommodates a mix of household types and sizes that include a person(s) with special needs.
- Policy 2.9 New Housing Models.** Encourage proposals for new housing types, such as co-housing, and assess their feasibility and benefits on a case-by-case basis.
- Policy 2.6 Maintenance, Improvement and Development of Housing for Persons with Disabilities.** Explore alignment with the Voluntary Compliance Agreement (VCA) between the City of Los Angeles and HUD for, Santa Monica to potentially require at least 15% of total units in all newly constructed multi-family developments receiving public funds where City funds are leveraged with Low-Income Housing Tax Credits to be accessible to persons with mobility disabilities and at least 4% of total units to be accessible for persons with hearing and/or vision disabilities.



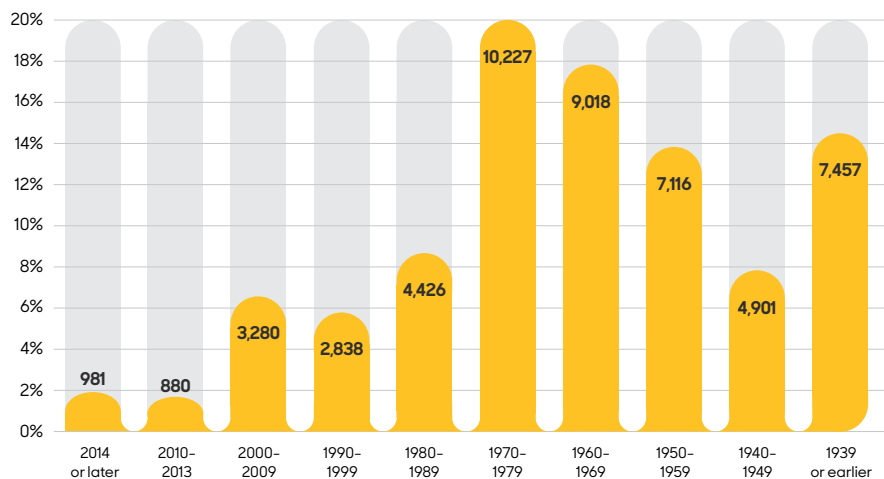
GOAL 3

Preservation of the existing supply of housing and prevent displacement of existing tenants.

In 2020, Santa Monica’s total housing stock consisted of approximately 52,629 total units, 11,572 of which are single-unit residences and 40,853 of which are within multi-unit residential structures. Although there are over 11,000 single-unit dwellings, there are only around 6,500 parcels zoned R1, meaning many are located within multi-unit zones. The total housing stock includes affordable housing units and rent-controlled units, which are valuable assets to the City as they provide housing opportunities to low and moderate-income households.

There are currently 3,902 publicly-assisted affordable units located within the City of Santa Monica.¹ An estimated 770 units are at-risk of converting to market rate by 2031. In addition, as of December 31, 2020, there were 27,429 rent-controlled units in the City.² Rent controlled units help ensure that rental costs do not outpace existing wages, and therefore, play a crucial role in keeping existing residents housed.

Figure 3-1: Age of Housing Stock



Deed-restricted affordable housing and rent-controlled units contribute significantly to the City’s housing affordability. Preserving and rehabilitating existing housing stock is a key anti-displacement tool that prevents existing households from becoming unhoused. The vast majority of the City’s housing stock was built before 1980, see Figure 3-1 above. As these units age, they will be at risk of being demolished due to deteriorating conditions if not properly maintained. Some of the City’s existing housing stock will be protected as a result of SB330, which prohibits a project that will demolish

¹ These include units produced with federal funding assistance, federal/state tax credits, redevelopment tax increment, City housing trust funds, City Multi-family Earthquake Repair Loan (MERL) Program Assistance and Los Angeles County Housing Authority owned units.

² City of Santa Monica, Rent Control 2020 Annual Report

existing residential units and would not replace, at a minimum, the same number of new residential units. This will address existing multi-unit housing properties of five units or less that are particularly vulnerable to redevelopment and replacement. Additionally, the new allowance for ADUs on existing multi-unit properties not only creates more housing opportunities but may also encourage property owners to retain their rental properties. However, there remains existing multi-unit housing properties in the City that have fewer units than maximum allowable density and as such, could be at risk for demolition and redevelopment by a housing project that proposes a higher number of new units.

POLICIES

- Policy 3.1 Support the City's Rent Control Law.** Ameliorate the effects of the Costa-Hawkins vacancy de-control regulation on the affordable housing stock.
- Policy 3.2 Preservation of Naturally Occurring and Deed Restricted Affordable Rental Housing.** Explore strategies to preserve naturally occurring, rent-controlled, and restricted affordable rental housing.
- Policy 3.3 Protection of Rental Units.** The City shall continue to protect rental housing by restricting the conversion of rental units to ownership units or for uses other than permanent rental housing.
- Policy 3.4 Replacement of Demolished Multi-Unit Housing.** The City shall ensure the reasonable replacement of multi-unit housing that is demolished.
- Policy 3.5 Availability of Affordable Housing.** The City shall ensure the continued availability and affordability of housing for very low-, low-, and moderate-income households.
- Policy 3.6 Rehabilitation Assistance.** Provide rehabilitation assistance to maintain, improve, and extend the use and livability of the City's aging residential buildings. Explore expansion of existing and new rehabilitation programs that may also result in short-term and long-term deed-restricted affordable units.
- Policy 3.7 Public and Private Funding for Rehabilitation and Preservation.** Encourage and promote the use of public and private funding to provide rehabilitation, home improvement, and maintenance loans and grants with priority given to affordable units at risk of conversion, and multi-unit rental housing.
- Policy 3.8 Continued Maintenance of Existing Housing.** Ensure continued maintenance of existing housing and that property owners are made aware of City programs to promote capital improvements to rental housing. Consider property owner incentives to encourage continued maintenance, repairs, and upgrades to housing that addresses the health and safety needs of the residents while respecting the character of the structure.
- Policy 3.9 Legal Support for Residents.** Continue to provide and strengthen anti-discrimination legal assistance and support for tenants facing harassment or eviction in efforts to prevent displacement of existing tenants.

GOAL 4

A community that provides equitable housing access to all neighborhoods.

The City of Santa Monica is generally more homogenous than the County as a whole. The majority of the City's residential population is White, followed by Hispanics and Asians, respectively. Blacks represent 4% of the population. One of the likely barriers to living in the City for non-Whites is the high cost of housing. Hispanics and Black households have the lowest median income in the City and County as a whole, and as a result, are often priced out of housing opportunities in the City.

For those households of color that can afford to live in Santa Monica, many of them are concentrated in neighborhood pockets of the City along the I-10 Freeway, and within the Pico, Downtown and Mid-City neighborhoods.

These patterns of segregation are largely the result of decades of structural racism deeply rooted in Federal, State, and local housing policies. This includes the adoption of exclusionary zoning, which was used primarily as a way to economically separate the wealthier Whites from Blacks/African Americans and other people of color. Since many Blacks/African Americans could not afford or were unable to receive mortgages to purchase homes, they were effectively driven out of single-family zoned neighborhoods. The federal policy of "redlining" that arose during the New Deal era (1930s) also have contributed to the patterns of segregated neighborhoods. This discriminatory practice of determining who could qualify for home mortgages based on skin color led to widespread segregated communities across the country and prevented Blacks/African Americans from buying homes. In Santa Monica, areas that were redlined included the Pico Neighborhood, portions of the Mid-City neighborhood south of Santa Monica Boulevard, and Ocean Park. The pattern of redlined areas directly correlate with the areas where the non-White population, lower income households, and renter households are concentrated.

Redlining

The term "redlining" refers to the discriminatory policy instituted by the federal government to create color-coded maps of every metropolitan area in the country to indicate where it was safe to insure mortgage. These maps were based on racial composition, quality of housing stock, access to amenities, etc. and were color coded to identify best (green "A" grade), still desirable (blue "B" grade), definitely declining (yellow "C" grade), and hazardous (red "D" grade) neighborhoods. Areas of the City that were predominantly commercial/industrial were not color coded.

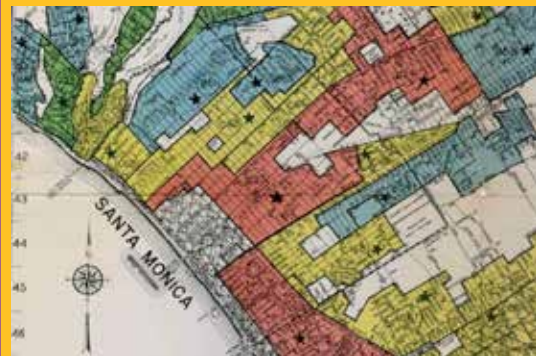
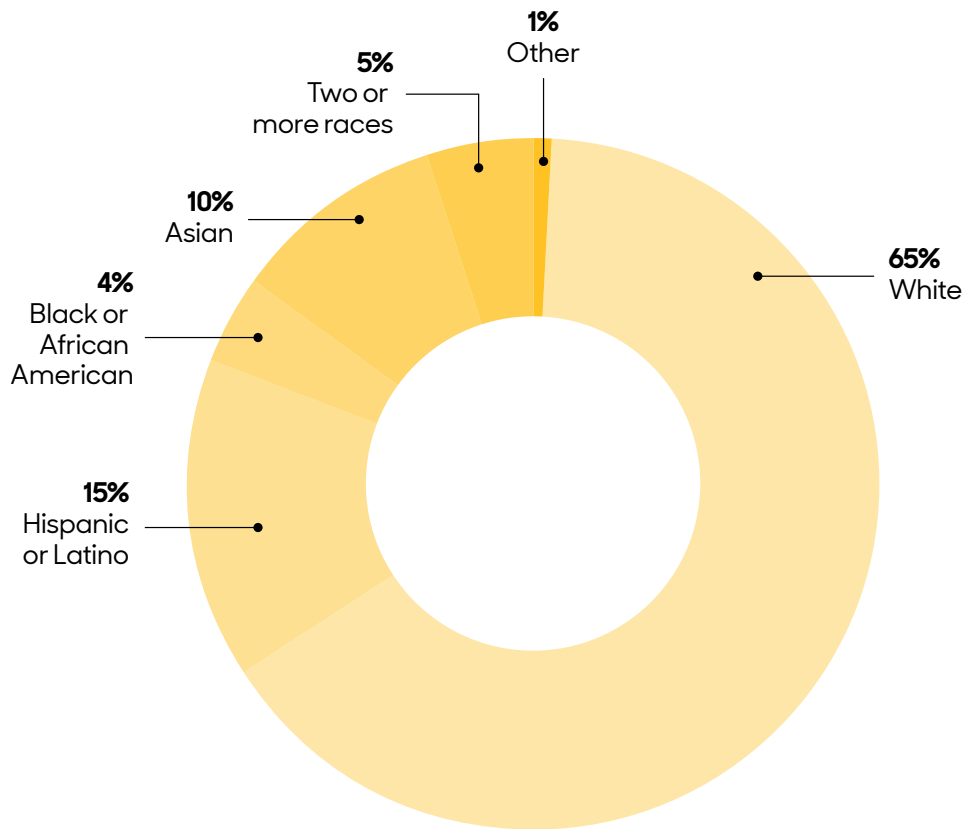


Figure 3-2: Santa Monica Population by Race, 2019



POLICIES

- Policy 4.1 Access to Opportunities.** Promote access to environmentally healthy neighborhoods that offer transportation services, jobs, high performing schools, parks, and residential amenities – particularly in areas that have historically excluded certain segments of the population.
- Policy 4.2 Equitable Distribution of Housing for All Income Levels.** Encourage fair distribution throughout the City of all housing types for extremely low-, very low-, low-, and moderate-income persons including the most vulnerable communities and the housing insecure.
- Policy 4.3 Targeted Investments.** Strategically target housing creation and preservation strategies (e.g., public funding, incentives, infrastructure investments, etc.) and diverse housing types in locations that will help overcome historic patterns of segregation as well as programs and measures such as a "Right to Return" program that will help support historically displaced families and individuals in Santa Monica with housing.

GOAL 5

Housing for persons experiencing homelessness.

Even prior to the COVID-19 pandemic, homelessness was and continues to remain a regional and local challenge. Homelessness is driven by a multitude of factors, including: inadequate housing supply at all affordability levels, rising rents that have outpaced stagnant wages, and discriminatory housing and employment policies that have kept low-income populations and people of color in poverty. These challenges are compounded by insufficient and inconsistent access to medical and behavioral healthcare, as well as other essential supportive services.



Up until 2020, City staff and volunteers had conducted annual point-in-time counts to approximate the number of homeless individuals within the City borders, along with a count of shelter use that same night. The last recent count took place on the night of January 22, 2020 with a total of 907 individuals counted outside on the streets, in cars and encampments, and in shelters and institutions within the City.

While this number represented a decrease from 2017, the situation is expected to worsen due to the economic recession caused by the COVID-19 Pandemic, especially once the City's eviction protection moratoriums expire.

The City's unhoused population includes veterans, women, persons with disabilities, older adults, and other vulnerable groups. A disproportionate number of Blacks/African Americans experience homelessness in Los Angeles County while the proportion of other racial and ethnic groups are either under or equal to their prevalence in the general population, making it clear that homelessness is also a social justice issue.

Figure 3-3: Homeless Count, 2015 - 2020

	City of Santa Monica	Service Planning Area 5 - Westside	Los Angeles County
2015	738	4276	41174
2016	728	4659	43854
2017	921	5411	52442
2018	957	4401	49955
2019	985	5262	56257
2020	907	6009	66436

Source: Los Angeles Homeless Services Authority, <https://www.lahsa.org/homeless-count/>

POLICIES

Policy 5.1 Regional Fair Share Approach. Encourage a regional fair share approach to providing housing opportunities and assistance to homeless, extremely low-, very low-, and low-income households, and households with special needs.

Policy 5.2 Housing and Supportive Services for the Homeless. Match housing and supportive service resources to the needs of priority homeless populations: Santa Monica’s chronically homeless; those whose last permanent address was in Santa Monica; and vulnerable members of Santa Monica’s workforce.

Policy 5.3 Removal of Barriers to Supportive Housing. Remove barriers to the provision of low barrier navigation centers, emergency shelters, and supportive/transitional housing.



GOAL 6

Provision of housing assistance and supportive programs and services to extremely low-, very low-, low-, and moderate-income households and households with special needs, families, seniors, and the homeless.

Certain segments of the population may have greater difficulty in finding decent, affordable housing due to special circumstances. Populations requiring housing assistance and supportive programs include low-income households, the elderly, persons with disabilities, families, persons in need of emergency shelter, and persons with developmental disabilities.

In 2017, 15.4% of the City's total households were Extremely Low Income (0% to 30% AMI), 8.8% were Very Low Income (31% to 50% AMI), 11.6% were Low Income (51% to 80% AMI), and 7.0% were Moderate Income (80% to 100% AMI). Income disparity by racial group is apparent at the City level. Households of colors are more likely to have lower income levels than White households.

Many lower-income families are considered housing cost-burdened – spending more than 30 percent of their monthly income for housing costs, leaving very little left for other basic needs like healthcare, food, and transportation. Others are forced into overcrowded or substandard housing conditions or join the increasingly large population of people experiencing homelessness.

The elderly population, large families, families with children, and individuals with disabilities also require support, as they may have specific housing requirements that are necessary for access and enjoyment of their residence.

Figure 3-4: Household Affordability Level by Race

Households	Total Households	Extremely Low (less than 30% AMI)	Very Low Incomes (30-50% AMI)	Low Income (51-80% AMI)	Moderate (80-120% AM)
White	33,400	.6%	7.6%	10.7%	7.2%
Hispanic	5,705	20.7%	13.4%	18.0%	7.5%
Asian	4,245	15.1%	4.8%	9.1%	4.8%
Black/African American	1,508	12.7%	28.4%	15.7%	6.4%
Other	1,495	14.9%	9.9%	12.6%	8.6%
All Households	46,353	15.4%	8.8%	11.6%	7.0%

Source: CHAS HUD Data, 2017.

POLICIES

- Policy 6.1 Financial Assistance for Residents; Rental Assistance Programs.** The City shall provide support in rental assistance programs for extremely low-, very low-, and low-income households and household types including seniors, families with children, persons with disabilities, and others with special needs. Explore funding strategies and identify additional funding sources to provide continued support with rental assistance programs.
- Policy 6.2 Technical Housing Assistance.** The City shall provide information and assistance to extremely low-, very low-, and low-income households and households with special needs and landlords to educate and increase awareness of, and provide oversight on federal and local housing and supportive programs and to assist residents in locating appropriate housing. Address housing barriers and resident challenges in securing and maintaining housing.
- Policy 6.3 Funding for Supportive Services.** Target funds to ensure a broad array of supportive services to extremely low-, very low-, and low-income persons to ensure their continued maintenance of housing once obtained. Ensure funding that supports emergency housing for the homeless.
- Policy 6.4 Consider Expanding the Preserving Our Diversity (POD) Program.** Evaluate expansion of the POD program to other rent burdened households including but not limited to additional seniors, families, and persons with disabilities and special needs.
- Policy 6.5 Reasonable Accommodations.** Provide regulatory relief to enable housing access designed to meet the needs for persons with disabilities to ensure equal housing opportunities, consistent with fair housing laws.
- Policy 6.6 Resident Protections During Rehabilitation.** The City shall provide resident protections including a temporary relocation program with oversight to minimize resident disruption and ensure that rehabilitation of existing units does not negatively impact or result in permanent displacement of existing residents.
- Policy 6.7 Explore Programs with the County of Los Angeles.** The City shall explore the possibility of entering into contracts with the County for project-based vouchers including, but not limited to, programs administered by the County of Los Angeles.

▶ GOAL 7

Eliminate housing discrimination on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, age, marital status, national origin, ancestry, familial status, income level, source of income, disability, veteran or military status, genetic information, or other such characteristics.

.....

Pursuant to the California Fair Employment and Housing Act [Government Code Section 12921 (a)], the opportunity to seek, obtain, and hold housing cannot be determined by an individual's "race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, marital status, national origin, ancestry, familial status, source of income, disability, veteran or military status, genetic information, or any other basis prohibited by Section 51 of the Civil Code."

Fair housing issues that may arise in Santa Monica (or any jurisdiction) include but are not limited to:

- Failure to make reasonable accommodations or modifications to make a dwelling unit accessible to an individual with a disability;
- Discrimination in the sale or rental of a dwelling unit against an individual based on race, national origin, familial status, disability, religion, sex, or other characteristic; and
- Tenant harassment because of race, color, religion, sex, disability, familial status, or national origin



A multi-unit housing development that provides accommodations for persons with a physical disability

The City of Santa Monica takes fair housing laws seriously and has enacted a number of local laws in support of fair housing including:

- **Chapter 4.28 of SMMC**, addressing fair housing for families with children, disability, and source of income discrimination
- **Chapter 4.40 of SMMC**, addressing fair housing regardless of sexual orientation or domestic partnership
- **Chapter 4.52 of SMMC**, addressing fair housing for persons living with HIV/AIDS
- **Chapter 9.49 of SMMC**, addressing reasonable accommodations for persons with disabilities

The Public Rights Division (PRD) of the City Attorney's Office enforces Fair Housing Laws, including investigation of fair housing complaints and litigation if necessary. The PRD also hosts an annual fair housing workshop and regularly publishes articles about fair housing in the Santa Monica



Daily Press. The COVID-19 pandemic has highlighted the importance of housing rights, as many Santa Monicans (especially families and people of color) are facing evictions. The rise in hate crimes against all protected classes has also made the issue of fair housing paramount.

POLICIES

Policy 7.1 Enforce Fair Housing Laws. Continue to enforce fair housing laws including but not limited to, prohibiting arbitrary discrimination in the building, financing, selling, or renting of housing, on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, age, marital status, national origin, ancestry, familial status, income level, source of income, disability, veteran or military status, or genetic information, and to promote racial diversity and equality in housing distribution.

Policy 7.2 Legal Support for Residents. Continue to provide and strengthen anti-discrimination legal assistance and support for tenants facing harassment or eviction.

Policy 7.3 Fair Housing Community Outreach. Continue to work with local organizations and partners to engage in community outreach strategies that provide information on fair housing laws, including community workshops and public awareness campaigns.



4:

Summary of Land Available for Housing



Chapter 4: Summary of Land Available for Housing

A. Regional Housing Needs Allocation

The Regional Housing Needs Allocation (RHNA) is a state-mandated process that determines the amount of future housing growth each city and county must plan for in its Housing Element. This “fair share” allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction’s projected share of regional housing growth across all income categories.

The RHNA process begins with the California Department of Housing and Community Development’s (HCD) projection of future statewide housing growth need, and the apportionment of this need to regional councils of government throughout the state. The Southern California Association of Governments (SCAG) then determines the share to be allocated to each city and county within its region based on its approved Final RHNA methodology.

On March 4, 2021, SCAG adopted the final RHNA allocation for all jurisdictions within its region. Figure 4-1 shows Santa Monica’s allocation in the Final Regional Housing Needs Allocation Plan—the planning period of October 2021 through October 2029. Approximately 69% of the units are allocated for households earning less than 120% of the Area Median Income (AMI).

The RHNA represents the minimum number of housing units for which each community is required to provide “adequate sites” through zoning and is one of the primary threshold criteria necessary to achieve State approval of the Housing Element.

On March 4, 2020, SCAG approved the Final RHNA methodology for determining each jurisdiction’s RHNA within the SCAG region. The methodology utilized a three-step process:

1. Determine the jurisdiction’s projected housing need using regional projected household growth and calculate a future vacancy need by applying a healthy vacancy rate to owner and renter households. Assign a replacement need based on local survey results.
2. Determine the jurisdiction’s existing housing need based on a jurisdiction’s proximity to transit and jobs.
3. Add the projected and existing housing need together to get a total and apply social equity adjustment factors to determine the four RHNA

Figure 4-1: Santa Monica’s 2021-2029 Regional Housing Needs Assessment

Income Level	% of AMI*	Units	% of RHNA Allocation
Very Low	31-50%	2,794	31%
Low	51-80%	1,672	19%
Moderate	81-120%	1,702	19%
Above Moderate	120%+	2,727	31%
Total		8,895	100%

1. Extremely Low Income Housing Needs

The RHNA does not include the income level of extremely low-income units (ELI). However, state law (AB 2634) requires Housing Elements to include the projected number of extremely low income housing needs, and the City’s AHPP requires the production of ELI units. HCD indicates that local agencies may calculate the projected housing need for ELI households by applying one of the following two methodologies to the RHNA for very low-income (VLI) households:

- Use available Census data to calculate the percentages of ELI and VLI households and apply these percentages; or
- Assume 50 percent of the VLI units would qualify as ELI.

Applying the first methodology, approximately 7,124 extremely low-income and 4,089 very low-income households were identified in Santa Monica as detailed further in Appendix B. This equates to 64 percent and 36 percent respectively, of the total ELI and VLI households (Figure 4-2). These percentages suggest that of Santa Monica’s RHNA share of 2,794 RHNA very low income units, a minimum of 1,788 units should be available for extremely low-income households and 1,008 units for very low-income households.

Figure 4-2: Low Income Housing Needs

	Existing # of Households	%	RHNA	Projected Need
Extremely Low	71,24	64%	2,794	1,788
Very Low	4,089	36%		1,006

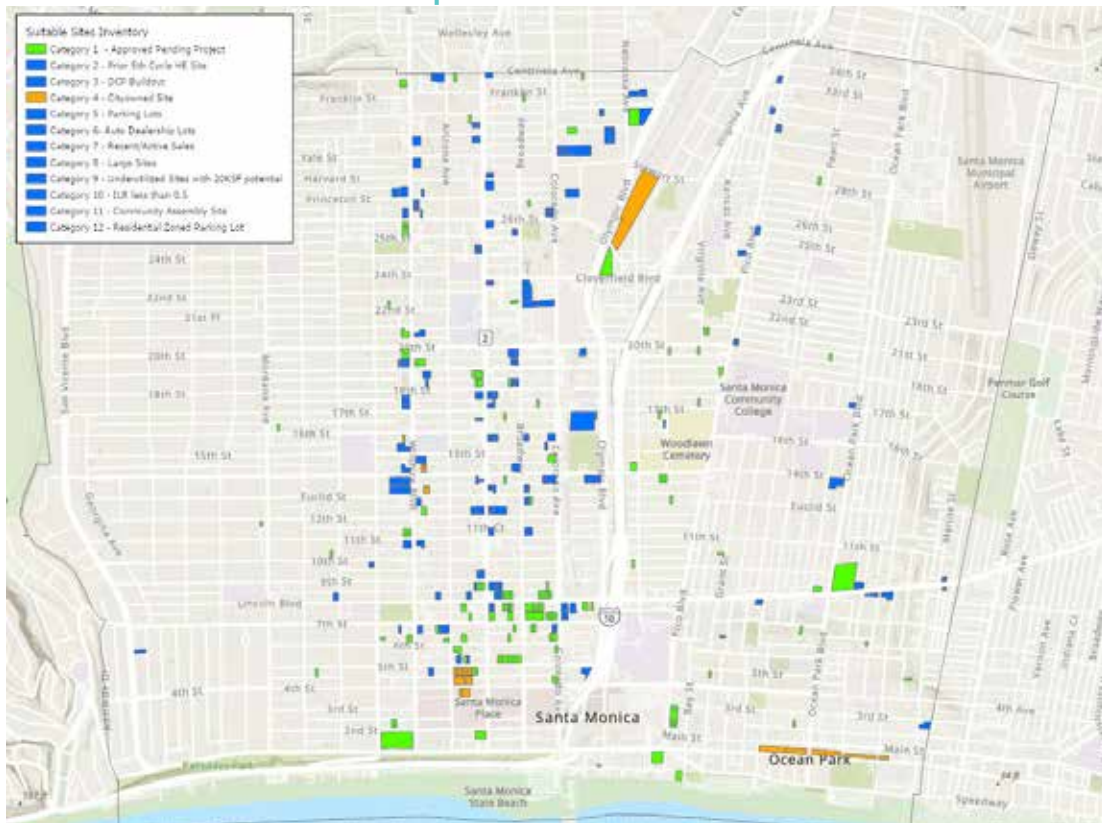
B. Suitable Sites Inventory

The Regional Housing Needs Allocation (RHNA) is a state-mandated process that determines the amount of future housing growth each city and county must plan for in its Housing Element. This “fair share” allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction’s projected share of regional housing growth across all income categories.

Government Code Section 65583(a)(3) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment, and an analysis of the relationship of zoning and public facilities and services to these sites. This inventory of land suitable for residential development, otherwise known as the Suitable Sites Inventory (SSI), is used to demonstrate that there is sufficient land at appropriate densities and development standards to accommodate the RHNA at the income levels specified within the planning period. For the 6th Cycle 2021–2029 Housing Element, the City’s RHNA is 8,895 units, of which 69% must be provided at affordable levels.

The SSI for the City of Santa Monica’s 6th Cycle Housing Element was prepared in accordance with State Housing Element law and HCD’s Housing Element Sites Inventory Guidebook. Appendix F provides a report of the methodology used to prepare the SSI.

Map 4-1: Suitable Sites



To prepare the SSI, the City's land use inventory was comprehensively reviewed to identify sites that are available for housing development within the Housing Element planning period, 2021-2029. The SSI process utilizes the Land Use Inventory to first identify which parcels are available for redevelopment based on zoning, general characteristics such as historic and land use designations, and market factors. City staff then further evaluated the sites individually using Google Streetview or site visits and assigned a potential redevelopment rating of "high, medium high, medium, or low" based on site-specific factors such as existing use, physical attributes, ownership, and other local knowledge by City Staff. Sites that were rated as "high" comprise the SSI. Following this process of identifying high potential SSI sites, the City applied development standards to the available sites to calculate housing capacity. The City then conducted a spot-check of individual parcels against current and past projects to confirm that the unit calculations resulted in realistic capacity. The City focused the inventory to underutilized commercial sites since these sites are most likely to be redeveloped based on evidence of past development trends. Based on the assessment of sites using the above factors and methodology, there are 138 parcels that have approved and pending projects for residential development and 180 non-vacant commercial/mixed use zoned parcels in the City identified to have high potential for residential redevelopment. In addition, 22 residentially zoned sites that are developed as parking lots have been identified as having high potential to be redeveloped for housing. Approximately 332 340 sites have been identified that have the highest potential to accommodate housing. These are shown on Map 4-1. Sites may be viewed interactively on the City's Housing Element Update webpage at: <https://www.santamonica.gov/housing-element-update>. The sites in the SSI are categorized according to Figure 4-3.

Accommodating for Very Low and Low Income Housing

The State uses the density allowed on a site as a "proxy" for determining whether a site can accommodate housing at lower-income levels.

- **Very Low and Low Income.** *State law establishes a "default density standard" of 30 units per acre for low-income units in the City of Santa Monica. This means that if a site's zoning allows for a density that is greater than 30 units per acre, the zoning is considered appropriate to accommodate the RHNA for lower income households.*

The City's Zoning Ordinance uses FAR rather than the density factor of units/acre. Therefore, to determine how many units per acre are possible on each site in the SSI, the number of units possible was calculated based on the allowable FARs established in Programs 1.F and 1.J. The number of units was then translated into units/acre based on the parcel size of each site. These calculations indicate that with the rezoning in Programs 1.F and 1.J, all the non-vacant, commercially zoned sites in the SSI can accommodate housing at greater densities than the "default density" of 30 units/acre. Therefore, per HCD, all sites can be identified as having the capacity and density to accommodate lower-income units.

- **Moderate-income.** *Since all the identified SSI sites can accommodate lower-income units, the City has also determined that each site can accommodate moderate-income housing since units affordable to lower-income households would also be affordable to moderate-income households.*

Figure 4-3: Suitable Sites Prioritization Categories

#	Category	Description
1	Approved and Pending Housing Projects	Santa Monica has a number of pipeline housing projects that have been approved or are pursuing entitlements. These units are expected to be constructed in the next eight years and would count toward the City's 6th Cycle RHNA.
2	Prior SSI Sites	83 parcels were listed in the 5th Cycle 2013–2021 Housing Element. Some of these parcels have undergone entitlements but the remaining have not.
3	DCP Buildout	As part of the Downtown Community Plan that was adopted in 2017, sites in the Downtown were identified for potential redevelopment.
4	City-Owned Sites	An important strategy for the City to meet its RHNA targets is the utilization of existing City-owned sites for housing, particularly affordable housing. All City-owned sites that are not currently developed with open space/parks, community centers, civic uses, utilities, etc. are categorized as Category 4 sites.
5	Parking Lots	A handful of sites in the City are parking lots, or parking structures. Parking lots are very underutilized and represent the greatest opportunity for new housing without displacement of existing uses.
6	Auto Storage Lots	These are parcels currently being utilized almost entirely as auto inventory surface lots for auto dealerships. Auto dealerships have indicated interest in turning over these large surface lots into redevelopment opportunities as they are rethinking their sales operations.
7	Parcels with recent/active sales	Based on a review of the Assessor's Parcel Data and a review of commercial real estate websites (such as Loopnet), a number of properties have recently sold between 2019–2021 or have active sales listing.
8	Underutilized Sites (20,000 excess sf development potential)	Category 8 sites are sites that do not meet the criteria of Categories 1–7 but have been identified to have a net new development potential of 20,000 sf or greater (based on their existing built sf compared against their currently allowable maximum floor area).
9	Large Parcels (15,000 sf+)	Most parcels in the City are 7,500 sf. Large parcels that are 15,000 sf have greater potential for redevelopment.
10	Remaining Sites with less than 0.5 AVRILR	All remaining City sites with an assessor's improvements to land (AVRILR) value ratio of 0.5 or less have the highest likelihood of redevelopment.
11	Religious Institutions	AB 1851 was passed in 2020 to remove an important barrier to housing construction on lands owned by a religious institution. The law states that a jurisdiction cannot deny a housing project proposed by a religious institution on the sole basis that it will remove parking. A number of religious institutions with large surface parking lots are located throughout the City.
12	A-Lots and Residentially Zone Parking Lots	"A-Lots" are residentially zoned (R1/R2/R3/R4) parcels with an "A" Off-Street Parking Overlay. Within the City, there are 42 A-lots. In addition, there are numerous residentially zoned parking lots that serve the parking needs of boulevard-fronting commercial uses.

1. Approved and Pending Housing Projects

The City has a significant number of housing projects in the pipeline that if constructed will count toward the City's 6th Cycle RHNA. As of ~~February 2021~~ May 2022, there were approximately ~~1,670~~ 2,594 approved units (of which ~~401~~ 637 are affordable) and ~~756~~ 2,550 pending units on ~~108~~ 137 parcels. The list of approved and pending projects is provided in Appendix F. A review of the past 5th Cycle Housing Element shows that 10% of approved and pending projects were withdrawn and/or have had permit approvals expire. It is not possible for City staff to predict how many and which specific approved and pending projects could be withdrawn or ultimately not developed. Doing so would be arbitrary and speculative. Therefore, a 10% discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. This results in ~~1,503~~ 2,205 approved units and ~~680~~ 2,168 pending units that are projected to count towards the 6th Cycle Housing Element.

2. Prior SSI Sites

The SSI identifies ~~214~~ sites that were in the last (5th) Cycle Housing Element with the capacity for approximately 1,500 units. According to Government Code Section 65583.2, if the SSI contains sites that were used in a prior housing element planning period, the City must allow by-right a development that includes at least 20% of the units as affordable. Sites where zoning already permits residential "use by right" as set forth in Government Code section 65583.2 (i), at the beginning of the planning period would be considered to meet this requirement. The City currently allows by-right housing projects through an interim zoning ordinance.

In order for the reused sites identified in the SSI to qualify for inclusion, this Housing Element includes Program 1.A to amend the Zoning Ordinance to establish a permanent by-right approval process for qualifying housing projects, including housing projects providing 20% of units as lower income affordable units.



City owned parking lot off of Main Street.

3. City-Owned Sites

Achieving the number of affordable housing units for the 6th Cycle RHNA will be challenging, especially given limited public funding and high land costs in the City. The City recognizes that City-owned land can play an important role in producing significant housing, particularly affordable housing, and therefore, has made a commitment to prioritizing such land for 100% affordable housing within this Housing Element. Program 2.E. commits City-owned sites for the development of affordable housing through a public process that would maximize the amount of affordable housing that could be feasibly developed. The City-owned sites in the SSI are: Public Parking lots 7, 8, and 12; Parking Structure 3, 4th & Arizona, Bergamot Arts Center, and Main Street parking lots.

With consideration to existing constraints (such as lease terms, financial resources, etc.), City-owned sites have the potential for accommodating ~~1,884~~ 1,880 units. Program 2.E commits the City to plan for a minimum of ~~1,884~~ 1,880 affordable housing units across available City-owned sites, which may include but shall not be limited to rezoning actions.



4. Community Assembly Sites (Including Religious Congregations)

A number of religious congregations with large surface parking lots are located throughout the City. State law has made it easier to develop housing on religious institutional properties by removing parking as a barrier to development. During the outreach process of the Housing Element, many of these religious congregation leaders have expressed interest in developing housing on their properties and indicated that the provision of affordable housing on these sites would be aligned with their core mission. With Program 4.B to amend the Zoning Ordinance to facilitate the development of housing on surface parking lots owned by community assembly uses, these sites could accommodate 257 units.

5. All Remaining Sites

The remaining sites in the inventory include parking lots, underutilized sites with low-scale buildings, recently sold/active sales sites, and large sites.

Mixed-Use Zones

Many of the SSI sites are located in the City's commercial and mixed-use zones (MUBL, MUB, GC, NC). Changes in the Downtown Community Plan and Zoning Ordinance as specified in Programs 1.F and 1.J will be required to support multi-unit housing and the production of inclusionary, affordable housing units in compliance with the City's Affordable Housing Production Program. In particular, the new increases in density and height would increase the likelihood of housing units to be developed in the NC zone (where housing has traditionally not occurred).

Office Campus/Industrial Conservation/Creative Conservation Sector

Sites in the OC, IC, and CCS zones are typically developed for office, business park, warehousing, light industrial, and other commercial uses. A number of sites in these zones have been determined to be compatible for residential uses. The Housing Element includes Program 4.A to amend the Zoning Ordinance to allow multi-unit residential in non-residential zones where housing is currently prohibited.

6. Capacity to Accommodate the RHNA by Income Levels

Per Government Code Section 65583.2(c), the SSI must include a calculation of the realistic residential development capacity of the sites. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that a jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA.

With the programs identified in this Housing Element, the sites identified for the SSI combined with anticipated ADU production has the capacity to accommodate at least ~~11,070~~ 13,600 units providing a ~~21~~ 53 percent buffer above the City's RHNA of 8,895 units. This number is based on the application of new development standards for housing projects as established in Programs 1.F and 1.J. The buffer accounts for the likelihood that not all identified SSI sites may be necessarily developed by a property owner for housing. ~~Approximately 150 additional units could be added to the total capacity if housing projects on these sites provided on-site affordable housing, rather than off-site.~~ The land inventory includes capacity for ~~2,444~~ 521 extremely low, ~~2,398~~ 2,819 very low income, ~~2,542~~ 2,703 low income, and ~~1,784~~ 1,901 moderate income units. Figure 4-4 breaks down the summary of the SSI capacity based on category and income levels.

Figure 4-4: Suitable Sites Capacity Summary Table - Base Tier 1 Housing

	Total Capacity	Capacity for Affordable Units				
	# Units	# Affordable Units	ELI	VLI	LI	Moderate
Category 1 Approved	2,205 1,503	637,416	127,104	177,104	185,104	148,104
Category 1 Pending	2,168,680	420,165	24,42	321,42	34,42	41,42
Category 4 City Sites	1,880,1,884	1,880,1,884	627,628	627,628	627,628	-
Category 11 Religious Sites	257	130,129	32	32	32	34,32
Category 12 Parking Lots	96,105	953	-13	-13	913	-13
All Remaining Categories	6,619 6,289	6,619 6,289	1,655 1,572	1,655 1,572	1,655 1,572	1,655 1,572
ADUs	376,352	249,232	56,53	87	162,151	23,21
Total	13,600 11,070	9,944 9,168	2,521 2,444	2,819 2,398	2,703 2,542	1,901 1,784
RHNA Targets	8,895	6,168	1,397	1,397	1,672	1,702
Buffer	+4,705 2,175	+3,776 3,000	+1,124 1,047	+1,422 1,001	+1,031 870	+199,82
	53,24%					

C. Accessory Dwelling Units

Accessory Dwelling Units (ADUs) and Junior Accessory Dwelling Units (JADUs) play an important role in the production of housing, particularly within single-unit residential zoning districts where historically only one unit is permitted. In recognition of this, over the past four years, the State has enacted several laws to help spur the production of housing through the development of ADUs and JADUs. On September 8, 2020, City Council approved an ordinance incorporating State law ADU requirements into a new ADU/JADU Section of the Zoning Ordinance, SMMC Section 9.31.025 Accessory Dwelling Units and Junior Accessory Dwelling Units. The ordinance further expands upon the new requirements by exempting all ADUs and JADUs from parcel coverage or floor area

calculations, providing more permissive development of ADUs. Figure 4-5 and Map 4-2 summarize ADU development and locations within the City since 2018, the start of when State law began to focus on incentivizing ADUs. However, it is important to note that the vast majority of these numbers are from ADU construction on R1 (Single-Unit Residential) zoned parcels. The City is just now starting to see property owners take advantage of the new ability to establish sometimes multiple ADUs with existing multiple-unit residential and mixed-use developments.

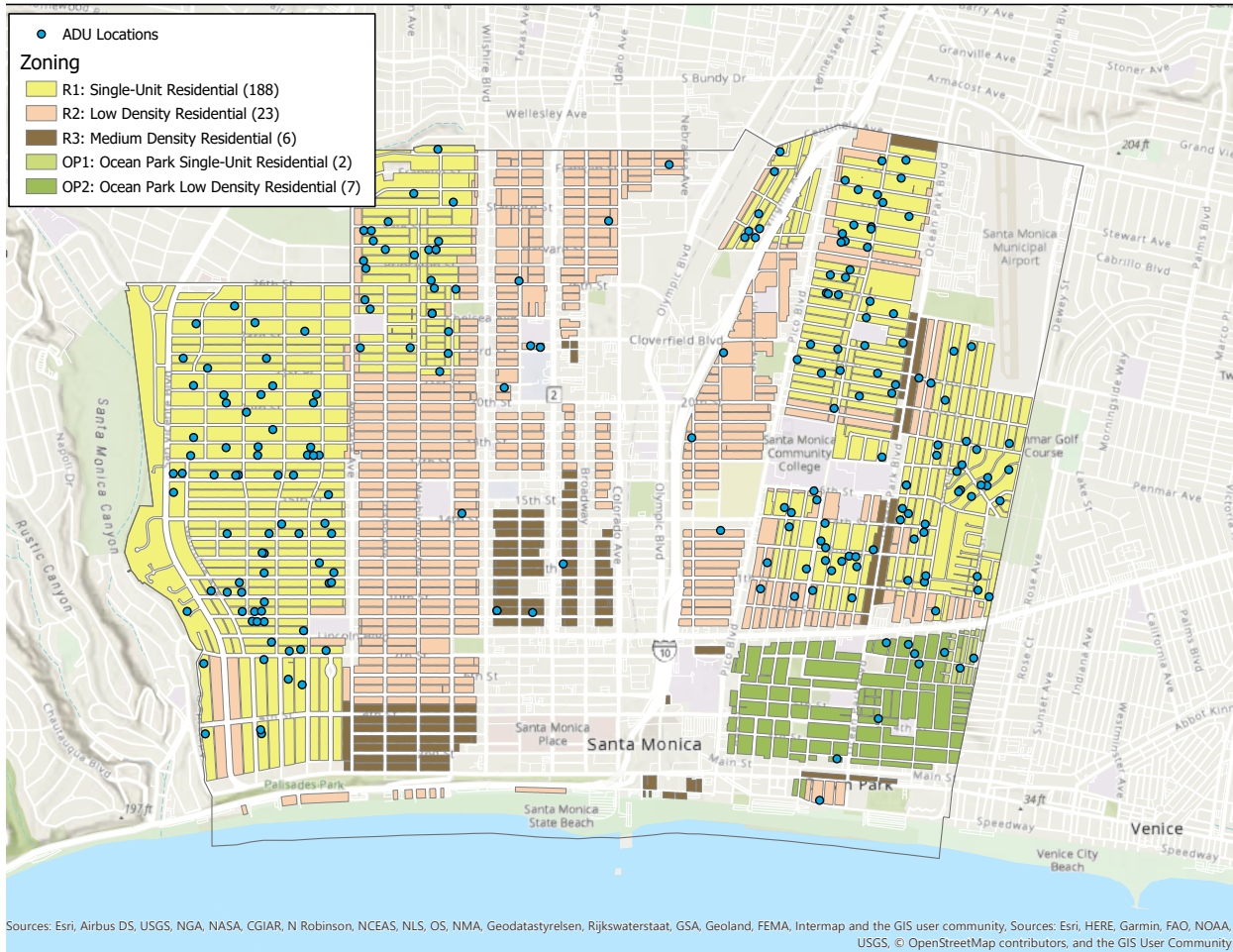
Figure 4-5: Santa Monica ADU Production

Building Permit Year	Permits Issued	Total
2018	2354	56
2019	6051	83
2020	4127	115
2021	1022	27
TOTAL	226134	281
Average 2018-2020	$(23+6+41+102)/4=56.5$ $(54+51+27)/3=44$ units per year	
Source: Building permit data as of June 1, 2021, May 31, 2022. Each ADU building permit is only accounted for once across all years.		



Source: Open Scope Studio

Map 4-2: ADU Locations



Per State law, a projection of the number of ADUs expected to be built within the 8-year planning period can be counted towards the RHNA. However, this projection must be based on the following factors:

- The number of ADUs or JADUs developed in the prior planning period;
- Community need and demand for these types of housing units;
- The resources and/or incentives available that will encourage the development of ADUs;
- The availability of ADUs and JADUs for occupancy;
- The unit must meet the Census definition of a housing unit and be reported to the Department of Finance as part of the annual City and County Housing Unit Change Survey; and
- The anticipated affordability of these units.

In order to project the increased potential of ADU development, HCD recommends the following options:

- Use the trends in ADU construction since January 2018 to estimate new production.
- Assume an average increase of five times the previous planning period construction trends prior to 2018.
- Use trends from regional production of ADUs.
- Include programs that aggressively promote and incentivize ADU and JADU construction.

As shown in the Figure 4-5 based on ADU building permit data between 2018 and 2021¹⁰, Santa Monica averaged 5644 ADUs per year. However, given that 36 of the ADUs (approximately 16%) were located on parcels with existing multi-unit dwellings, which are less typical applicants for ADUs, the average annual production estimate has been reduced by

16% to approximately 47 ADUs per year. Therefore Using this average production number, it can be expected that over the next eight-year Housing Element cycle, approximately 376352 ADUs will be built and can be used towards our RHNA. This estimate is conservative, as it accounts for a potential progressive decline in available land for ADU within single-unit zones. As noted, tThis forecast also does not account for possible future interest in ADUs to be incorporated into existing multiple-unit residential and mixed-use developments, which the City has only just started seeing very recently as the new law permitting this only took effect January 1, 2020.

In order to determine assumptions of ADU affordability in the Southern California region, SCAG conducted a regional analysis of existing ADU rents. Figure 4-6 shows assumptions for ADU affordability based on the SCAG assumptions.

Determining ADU Income Levels

SCAG conducted a regional analysis of current market rents that can be used to obtain credit towards each income category in the RHNA. SCAG's analysis was pre-certified by HCD and allows cities to assume that the total anticipated ADU production would be assigned to the following income categories:

- Extremely Low – 15%
- Very Low – 2%
- Low – 43%
- Moderate – 6%
- Above Moderate – 34%

Figure 4-6: Estimated Affordability of Projected ADUs 2021-2029

Income Level	Percent of ADUs ^a	Projected # of ADUs
Extremely Low Income	15%	5653
Very Low	2%	87
Low	43%	162151
Moderate	6%	2321
Above Moderate	34%	128120

^a Based on SCAG Survey of ADU Affordability

D. Adequate Sites Alternative - Rehabilitation and Conversion of Existing Units

Government Code Section 65583.1(c) allows for use of existing units to address up to 25 percent of the lower income RHNA by counting existing units made available or preserved through the provision of "committed assistance" to low- and very low-income households at affordable housing costs or affordable rents. This option is referred to as "Alternative Adequate Sites". However, there are limited parameters under which substantial rehabilitation, conversion, or preservation of units can be counted and the Housing Element would be required to identify exactly how the city will guarantee compliance in order to grant the credit. The units must be:

- Substantially rehabilitated and at imminent risk of loss to the housing stock
- In a multi-unit rental or ownership housing complex of three or more units that are converted from non-affordable to affordable rental
- Preserved at levels affordable to low- or very low-income households where the local government has provided those units with continued assistance

The City has a history of dedicating revenues to support the rehabilitation of substandard housing units. From 2005 onward, the City provided Housing Trust Fund loans to nonprofit developers for acquisition, rehabilitation, and deed restriction. The City also provides housing assistance to existing residents through a number of programs and has a demonstrated history of working with willing property owners and tenants to grant project-based housing vouchers that might allow some units to qualify towards the RHNA. Further, the Housing Element includes Program 2.C allowing market-rate projects to comply with the AHPP through the acquisition and rehabilitation of existing rental units and converting those to deed-restricted units. Based on past performance, it is expected that the City will continue to preserve the existing at risk housing stock through the acquisition and rehabilitation of existing low-income units. However, it would be difficult to predict how many rehabilitated units could be counted towards the RHNA.

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5:

Implementation Programs



Chapter 5: Implementation Programs

The City is committed to implementing the goals and policies in Chapter 3 through the programs in this chapter. These programs have been developed through extensive community engagement and with consideration for actions necessary to achieve a compliant Housing Element. The programs reflect what realistically could be completed in the eight-year planning period. Each program includes background, a description of the program action, timeframe by which the action will be completed, and the City agencies responsible for oversight of the program. The City will be reporting on each of these programs as part of its Annual Progress Report to the California Department of Housing and Community Development.

GOAL 1

Production of new housing that is sustainable, innovative, safe and resilient, appropriate with the surrounding neighborhood, offers opportunities for active and healthy living, including walking and biking, and increases equitable housing opportunities.

.....

Program 1.A By-Right Approvals For Housing Projects

The City shall make permanent amendments to the Zoning Ordinance that are currently interim and make amendments to the Land Use and Circulation Element (LUCE), Downtown Community Plan (DCP), Bergamot Area Plan (BAP) and Zoning Ordinance, as necessary, to allow, at a minimum: 1) 100% affordable housing projects; 2) non-Downtown housing projects that are code-compliant or are granted specified modifications/waivers to be established in the Zoning Ordinance; 3) Downtown housing projects that do not exceed Tier 2 maximums and are code-compliant or are granted specified modifications and waivers to be established in the Zoning Ordinance; and 4) housing projects that include at least 20% of units on-site as affordable to lower-income households [Government Code Section 65583.2(c)], to be reviewed through a by-right process. [The by-right process for housing projects is intended to achieve the RHNA target and at minimum, the Quantified Objectives established in this Housing Element.](#) Such by-right projects shall still be subject to design review, provided that design review shall not constitute a "project" for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.

The City shall extend interim zoning amendments for process thresholds pending the full implementation of this program.

The City shall also develop written procedures to implement the streamlined review process for eligible projects under SB35.

The City shall also continue to facilitate consolidation of sites for housing projects by processing administrative lot tie agreements as part of the plan check process.

Program Background:

Based on consultation with both affordable and market-rate housing providers, the uncertainty presented by a discretionary approval process is a factor in whether to move forward with housing projects in light of other risks that are out of the City’s control including land costs, construction costs, and lender requirements. On March 10, 2020, in efforts to streamline the process for housing production, the City Council adopted changes to the LUCE, DCP and BAP as well as an emergency interim ordinance to allow 100% affordable housing projects and housing projects up to Tier 2 maximums that are subject to the protections of the HAA to be reviewed through a by-right administrative process. The emergency interim ordinance expires December 31, 2021, unless extended by the City Council.

LUCE Tier System

The LUCE created a tiered land use system based on increments of height and floor area ratio (FAR). Tier 1 establishes a base height and FAR while Tier 2 establishes additional height and FAR that can be requested if community

Additionally, according to Government Code Section 65583.2, if the Suitable Sites Inventory (SSI) contains sites that were used in a prior housing element planning period, the City must allow by-right a development on those sites if the project includes at least 20% of the units as affordable. Therefore, in order for the 5th Cycle Housing Element sites identified in the SSI to qualify for inclusion, the by-right process must be included in the LUCE, Zoning Ordinance, DCP and BAP, as applicable.

- **Timeframe:** by ~~March 31~~, October 15, 2022
- **Responsibility:** City Planning Division; City Attorney Office
- **Objective:** Allow a ministerial approval process based on objective standards for 100% affordable housing projects and housing projects that do not exceed Tier 2 maximums and are subject to the Housing Accountability Act.

Program 1.B

Streamline the Architectural Review Process and Ensure Design Review Objectivity for Housing Projects

The City shall adopt new streamlining procedures to allow staff level design review for smaller housing projects and expedited design review of larger housing projects by shifting the design review process to before or concurrently with entitlement issuance. This will reduce processing timelines and increase certainty for housing providers. These procedural changes would involve amending the Municipal Code to assure that design review cannot unreasonably delay a housing project approval by, for example, placing limits on number of hearings and maximum time limits for design review. ~~The amendments The City shall review approval findings for design review and establish procedures or other mechanisms to promote approval certainty, also be clear that design review cannot be used to reduce density or deny a housing project.~~ Additionally, the City shall develop objective design standards ~~for applicable housing projects, which will also be used to ensure consistency anticipating compliance with SB35 for applicable housing projects.~~

Program Background:

Santa Monica Municipal Code Chapter 9.55 establishes the Architectural Review Board (ARB), and, along with certain provisions of the City’s Zoning Ordinance, sets forth the City’s design review processes. For all new construction, additions or remodel of an existing building, in all zones except R1 (single-unit), the ARB must make findings in its design review of development including compatibility with surroundings and design that is expressive of good taste, good design, and in general contributes to the image of Santa Monica as a place of beauty, creativity and individuality. While the findings, which have been in place since the 1970s, are not objective, the design review process occurs after project entitlements and focuses only on project design; as a result, the ARB’s review cannot be used to deny or reduce the density of a housing project.

Additionally, while the City is currently not subject to SB 35 under the 5th Cycle Housing Element reporting period (2013–2021) because the City has regularly met its RHNA targets, it is anticipated that the City will be subject to SB 35 in the coming 6th Cycle Housing Element reporting period (2021–2029), and will therefore be limited to use of objective design standards when reviewing housing projects eligible for SB 35’s expedited review process.

- **Timeframe:** ~~Objective Design Standards by June 30, 2023; Process streamlining by October 15, 2022 by September 30, 2022~~
- **Responsibility:** City Planning Division; City Attorney’s Office
- **Objective:** Streamlined housing approvals.

Program 1.C Incentivize Housing Development On Surface Parking Lots In Residential Zones

In order to provide new housing choices and affordability in high opportunity areas, the City shall adopt standards that incentivize housing production on surface parking lots in residential zones associated with existing commercial uses, including, but not limited to, removing density caps and commercial parking replacement restrictions, lot consolidation, street access to the project, and restoring underlying maximum allowable density.

The City shall also adopt standards that incentivize housing production on surface parking lots associated with existing residential uses as long as the existing residential use is not removed.

Program Background:

There are approximately 108 residentially-zoned surface parking lots associated with an adjacent commercial use. Of those parking lots, 32 are identified as high or medium-high potential for housing in the SSI. The parking lots serve the adjacent boulevard-facing commercial uses. The existing multi-unit residential zones have density caps of 4–6 units regardless of the size of the property, which limits their capacity for housing potential.

- **Timeframe:** by August 1, ~~2022~~ 2023
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Incentivize housing production on underutilized sites that would not displace existing residential tenants.



A typical "A-Lot" in Santa Monica. The residentially-zoned surface parking lot in the foreground with the associate commercial use in the background.

Program 1.D Reduce Minimum Parking Requirements For Housing Projects

The City shall reduce minimum parking requirements for all housing projects by applying Parking Overlay 1 rates.

Program Background:

Analysis of total development costs for housing projects have shown that stringent parking requirements add significantly to the cost of housing construction. In 2017, the City eliminated parking minimums in the Downtown as part of the adoption of the Downtown Community Plan. Eliminating and/or reducing minimum parking requirements would allow a housing developer to choose the “right-size” supply of parking to meet demand as necessary, and would significantly reduce the cost of housing construction.

- **Timeframe:** by August 1, 2022-October 15, 2022
- **Responsibility:** City Planning Division; Mobility Division; City Attorney’s Office
- **Objective:** Lower the cost of housing production.



The Downtown Community Plan eliminated parking minimum requirements in an effort to reduce construction costs.

Program 1.E

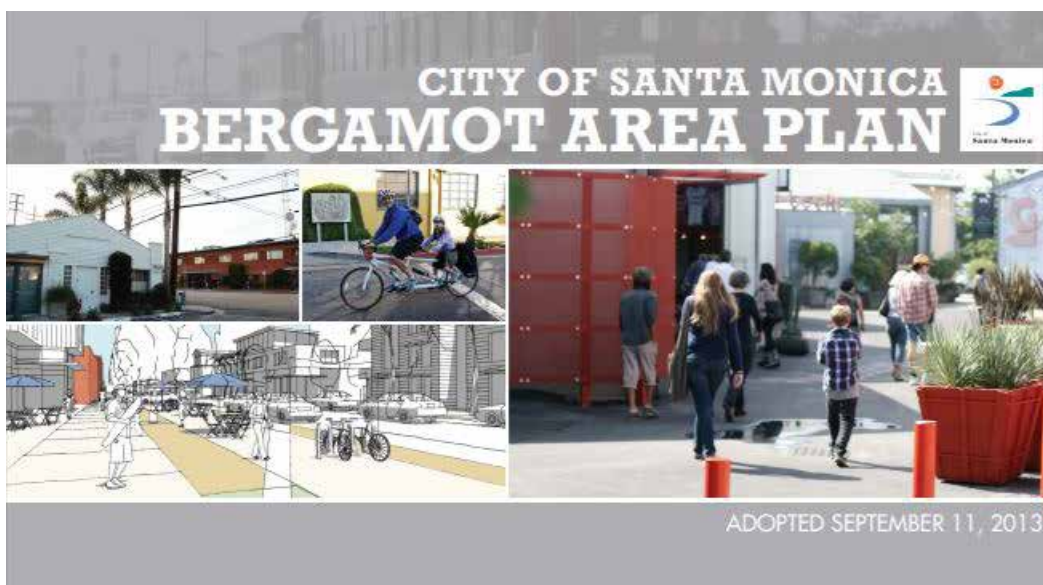
Revise The Design Standards In The Bergamot Area Plan (BAP) For Easier Understanding And To Support Housing Production

The City shall modify the design guidelines in the BAP to establish objective standards to support housing production by increasing certainty for housing providers. The revisions to design standards will address at minimum: building modulation, ground floor uses, street frontages/pedestrian orientation, open space, reduction in parking minimums, live/work artist and commercial living situations, etc. The standards shall be user-friendly with improved clarity to support housing production. The BAP should also consider the special housing needs of artists, such as live-work units, to promote artist residents in the Bergamot area.

Program Background:

The BAP was initiated to transition 142.5 acres of former industrial land into a walkable, sustainable, and innovative complete neighborhood. The BAP encourages affordable/market-rate housing to enable employees to live in the area and offer new lifestyle choices connected to transit. However, the design standards in the Plan are complex, unclear, onerous, and do not incentivize housing. As a result, since its adoption in 2013, only three housing projects have been proposed in the Bergamot area.

- **Timeframe:** by June 30, 2023
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Provide clarity in the regulatory environment for housing and incentivize housing production in the Bergamot area.



The Bergamot Area Plan was adopted in September of 2013, and covers 142.5 acres of former industrial land as well as the Beergamot Arts Center

Program 1.F Revise The Downtown Community Plan Development (DCP) Standards To Support Housing Projects

The City shall modify the development standards in the DCP to ensure they are set at levels that can support the minimum AHPP requirements and to support feasible housing projects. The City shall also amend the development standards and AHPP requirements to ensure Tier 2 and Tier 3 Downtown housing projects are feasible.

The City's assumptions of feasibility and the City's SSI are based on the results of a feasibility analysis prepared by HR&A dated June 9, 2021 and February 2, 2022. Based on the results of the feasibility analysis, the feasible FARs for housing projects range from a minimum 2.75 to 4.0 with heights ranging from 55 feet to 84 feet. The City reserves the right to adjust these heights and FARs up or down. Any changes will promote housing and ensure feasibility and that overall unit capacity assumed in the site inventory is met, including income category, and will be no lower than the minimum FAR and height shown in the table below, existing allowable height and FAR as of October 13, 2021. The off-site affordability requirement will be greater than the on-site requirement.

Zone	Approx. Acres to be Rezoned	Current Tier 1 FAR/ Height	Minimum Tier 1 FAR/ Height with Rezoning	Current Tier 2 FAR/ Height	Minimum Tier 2 FAR/ Height with Rezoning	Current Tier 3 FAR/ Height	Minimum Tier 3 FAR/ Height with Rezoning
LT (East)	12	1.50/39 ft	2.75/60 ft	2.25/50 ft	3.0/65 ft	=	=
LT (West)	11	1.50/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=
NV	31	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	=	4.0/84 ft
BC (Promenade)	12	2.25/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=
BC (2nd/4th)	25	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	=	=
TA	52	2.25/39 ft	2.75/60 ft	3.50/60 ft	3.50/70 ft	4.0/84 ft	4.0/84 ft
OT	15	2.25/39 ft	2.75/60 ft	2.75/60 ft	3.0/65 ft	=	=
WT	6	1.50/39 ft	2.75/60 ft	2.25/50 ft	3.0/65 ft	=	=

The City shall consider opportunities, including rezoning or the creation of new zoning districts, as necessary, to facilitate advancement of housing goals and/or historic preservation.

In addition to FAR and height, the City shall review and modify as appropriate all standards and regulations that may be considered a constraint to housing production including but not limited to development impact fees, unit mix, and design standards such as restrictions on ground floor residential use, minimum/maximum ground floor height, and daylight plane adjacent to existing residential neighborhoods.

Program Background:

The DCP was adopted in 2017 with a primary focus on producing thousands of new housing units at a range of sizes and affordability levels. The DCP provided both development and process incentives for housing projects through greater FARs relative to commercial development, no minimum parking requirements, and a ministerial approval process for typical mixed-use housing projects. In exchange for these strong incentives, Downtown housing projects are required to provide additional affordable housing and augmented fees for the portion of the floor area above Tier 1 maximums. Since DCP adoption, approximately 1,133 units have been approved in the Downtown with a lesser amount that have moved ahead into building permits. Of those 1,133 approved units, the vast majority were projects that pre-dated the DCP's inclusionary housing requirements. The current FARs and heights allowed in the DCP are shown below:

- **Timeframe:** by ~~March 31~~, October 15, 2022
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Continue to encourage housing production in Downtown area.



THE DOWNTOWN COMMUNITY PLAN

A City of Santa Monica Specific Plan

Maintaining character and vitality at the historic crossroads of community, culture and commerce.

The Downtown Community Plan was adopted in July of 2017, and covers the Downtown area between Wilshire Blvd and the I-10 from Lincoln Blvd west to Ocean Ave.

Program 1.G Incentivize And Facilitate The Development Of Accessory Dwelling Units (ADUs) Through An Adu Accelerator Program

The City shall develop an Accessory Dwelling Unit Accelerator Program that will simplify the ADU process by providing property owners interested in constructing ADUs throughout all neighborhoods with a handbook detailing all ADU standards and review procedures, and pre-approved ADU plans that can be selected to reduce time and costs associated with ADU development. The program will further streamline the City's ADU permitting review process with the aim of issuing building permits for an average of 47 ADUs/year.

Additionally, the City will review and update its locally adopted ADU Ordinance for consistency with State law.

Program Background:

An effective strategy to increasing the housing supply is facilitating the construction of Accessory Dwelling Units (ADUs), particularly in single-unit residential districts. Due to their smaller size and relatively lower cost of construction, ADUs can provide lower-cost housing opportunities within single-unit neighborhoods that are less accessible due to high housing costs.

In 2020, the City approved an ADU Ordinance (SMMC Section 9.31.025) to incorporate State law requirements for ADUs and Junior Accessory Dwelling Units (JADUs). The ordinance further encourages the production of ADUs/JADUs by exempting them from parcel coverage or floor area calculations and provides for a ministerial approval process for all ADUs and JADUs. Since implementation of these new State laws, the City has seen an increase in ADU production and interest each year.

- **Timeframe:** by December 31, 2022 June 30, 2023
- **Responsibility:** City Planning Division
- **Objective:** Streamline approvals and facilitate development of ADUs.

Program 1.H Adaptive Reuse Of Existing Commercial Buildings For Permanent Residential Use

As an alternative to constructing new housing, the City shall amend the Zoning Ordinance to encourage and incentivize the adaptive reuse of existing commercial tenant spaces citywide, for permanent residential use and also allow ~~an~~ adaptive reuse of existing ground floor commercial space for artists and live-work use. ~~The City shall also adopt policy and zoning c~~hanges to incentivize the conversion of existing commercial tenant space to residential use include but are not limited to, such as relaxing minimum parking requirements, unit mix, open space, and other typical zoning or building code requirements.

Program Background:

The COVID-19 pandemic has had a dramatic impact on the City's commercial real estate market. Even prior to the pandemic, the retail industry had been struggling to compete with online retailers and the office market had started to trend downward. Empty storefronts and partially-occupied office buildings are not an uncommon sight in the City. With the downturn of retail and office real estate accelerated by the pandemic, the concept of converting commercial into residential has gained significant interest as another avenue to increase the supply of housing in the City.

- **Timeframe:** by December 31, 2023-2024
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Increase flexibility for reuse of vacant commercial space to residential use.

Program 1.I Ensure That Local Regulations Support Innovations In Construction Technology To The Extent Technically Feasible

The City shall support innovative lower-cost, efficient, and environmentally sustainable construction techniques for housing. Program shall implement a streamlined building permit review process for housing projects utilizing innovative construction methods and technology, and project-based outcome-oriented permitting benchmarks.

Program Background:

New innovations in building and construction technology could help decrease both the time and cost of housing construction. This includes the use of modular/pre-fabricated (prefab) construction or the use of cross laminated timber. Prefab construction involves producing standardized components of a structure in an offsite factory, then assembling them onsite. When prefab construction is done at economies of scale, it can result in significant reduction in housing cost. Cross laminated timber (CLT) has recently started gaining traction in North America as a viable type of construction. In addition to being more sustainable, CLT can significantly reduce the time and labor costs for construction.

- **Timeframe:** by December 31, 2023-2024
- **Responsibility:** City Planning Division; Building and Safety Division
- **Objective:** Remove impediments to innovation in housing construction.

Program 1.J Rezoning By Revising Development Standards To Ensure That Housing Projects Are Feasible And Incentivized Over Commercial Development

The City shall amend the Zoning Ordinance, LUCE, and the Bergamot Area Plan (BAP) to increase FAR and height standards throughout the city's non-residential zoning districts (other than Downtown which is addressed in Program 1.F) to levels that can support feasible housing projects. The City's assumptions of feasibility and the City's SSI inventory are based on the results of a feasibility analysis prepared by HR&A dated June 9, 2021 and February 2, 2022. Based on the results of the feasibility analysis, the feasible FARs for housing projects range from a minimum 2.02-75 to 3.25 with heights ranging from 55 feet to 65 feet. ~~The City reserves the right to adjust these heights and FARs up or down.~~ Any changes will promote housing to ensure ensure feasibility and that overall unit capacity assumed in the site inventory is met, including income category, and will be no lower than minimum FAR and height shown in the tables below. existing allowable height and FAR as of October 13, 2021. The off-site affordability requirement ~~will~~shall be greater than the on-site requirement.

Zone	Approx. Acres to be Rezoned	Current Tier 1 FAR/Height	Current Tier 2 FAR/Height	Minimum FAR/ Height with Rezoning
<u>MUBL – N of I-10</u>	<u>107</u>	<u>1.50/36 ft</u>	<u>1.75/36 ft</u>	<u>3.25/70 ft</u>
<u>MUBL – Pico</u>	<u>15</u>	<u>1.50/36 ft</u>	<u>1.75/36 ft</u>	<u>2.00/45 ft</u>
<u>MUBL – Pico (West of Lincoln)</u>	<u>4</u>	<u>1.50/36 ft</u>	<u>1.75/36 ft</u>	<u>2.50/55 ft</u>
<u>MUBL – Main St</u>	<u>10</u>	<u>1.50/36 ft</u>	<u>1.75/36 ft</u>	<u>2.50/55 ft</u>
<u>MUBL – Lincoln</u>	<u>107</u>	<u>1.50/36 ft</u>	<u>1.75/36 ft</u>	<u>2.50/55 ft</u>
<u>MUB</u>	<u>59</u>	<u>1.50/39 ft</u>	<u>2.25/50 ft</u>	<u>3.25/70 ft</u>
<u>GC (SMB)</u>	<u>24</u>	<u>1.25/ -</u>	<u>1.50/35 ft</u>	<u>3.25/70 ft</u>
<u>GC (Lincoln)</u>	<u>19</u>	<u>1.50/36 ft</u>	<u>2.00/36 ft</u>	<u>2.50/55 ft</u>
<u>GC (Pico)</u>	<u>4</u>	<u>1.50/36 ft</u>	<u>2.00/36 ft</u>	<u>2.00/45 ft</u>
<u>NC</u>	<u>27</u>	<u>1.50/32 ft</u>	<u>N/A</u>	<u>2.25/50 ft</u>
<u>NC (Main)</u>	<u>14</u>	<u>1.00/27 ft</u>	<u>N/A</u>	<u>2.50/55 ft</u>
<u>NC (Ocean Park)</u>	<u>15</u>	<u>1.00/32 ft</u>	<u>N/A</u>	<u>2.50/55 ft</u>

<u>NC (Montana)</u>	<u>15</u>	<u>1.00/32 ft</u>	<u>N/A</u>	<u>2.50/55 ft</u>
<u>IC</u>	<u>77</u>	<u>N/A</u>	<u>N/A</u>	<u>3.00/65 ft</u>
<u>OC</u>	<u>88</u>	<u>N/A</u>	<u>N/A</u>	<u>2.75/60 ft</u>
<u>HMU</u>	<u>39</u>	<u>1.50/45 ft</u>	<u>2.50/70 ft</u>	<u>2.50/70 ft</u>

<u>Bergamot Area</u>	<u># Acres to be Rezoned</u>	<u>Current Tier 1 FAR/ Height</u>	<u>Current Tier 2 FAR/ Height</u>	<u>Current Tier 3 FAR/ Height</u>	<u>Minimum FAR/ Height with Rezoning</u>
<u>BTV</u>	<u>35</u>	<u>1.75/32 ft</u>	<u>2.00/60 ft</u>	<u>2.50/75 ft</u>	<u>4.0/84 ft</u>
<u>MUC – North of Pennsylvania Avenue parcel line between Stewart and Stanford; South of Expo Bike Path</u>	<u>31</u>	<u>1.50/32 ft</u>	<u>1.70/47 ft</u>	<u>2.20/57 ft</u>	<u>3.25/70 ft</u>
<u>MUC – Remainder</u>	<u>36</u>	<u>1.50/32 ft</u>	<u>1.70/47 ft</u>	<u>2.20/57 ft</u>	<u>4.0/84 ft</u>
<u>CCS</u>	<u>8</u>	<u>1.50/32 ft</u>	<u>N/A</u>	<u>N/A</u>	<u>2.50/55 ft</u>
<u>CAC</u>	<u>17</u>	<u>1.00/32 ft</u>	<u>1.00/60 ft</u>	<u>1.00/75 ft</u>	<u>2.50/55 ft</u>

The City shall consider opportunities, including rezoning or the creation of new zoning districts, as necessary, to facilitate advancement of housing goals and/or historic preservation.

In addition to FAR and height, the City shall review and modify as appropriate all standards and regulations that may be considered a constraint to housing production, including, but not limited to, development impact fees, unit mix requirements, and design standards such as restrictions on ground floor residential use, minimum/maximum ground floor height, and daylight plane adjacent to existing residential neighborhoods.

Program Background:

When the LUCE was adopted in 2010, its core strategy was to capitalize on the City’s extensive transportation system including the Metro Expo Light Rail and to protect the City’s residential neighborhoods with an emphasis on policies that discourage tenant displacement. This growth strategy has resulted in significant new housing production in the Downtown, but it has also perpetuated the historic patterns of housing segregation that remains to this day. Although all of Santa Monica is considered a high or highest resource area, there remain a handful of areas where housing would not be likely to develop due to FARs that are not high enough to support the City’s regulatory requirements. The current FARs and heights allowed in the Zoning Ordinance are shown below:

- **Timeframe:** by March 31, 2022-October 15, 2022
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Support the production of affordable housing and encourage the equitable production of housing across the City.

Program 1.K Adequate Sites Program

To accommodate the City's lower-income RHNA shortfall, the City shall make amendments to the Land Use and Circulation Element (LUCE), Downtown Community Plan (DCP), Bergamot Area Plan (BAP) and Zoning Ordinance, as necessary, to create the opportunity for 1,880 lower income units and establish that the City-owned sites identified in the Suitable Sites Inventory meet all requirements pursuant to Government Code Section 65583.2(h) and (i) including but not limited to allowing are allowed 100 percent residential use and require requiring residential use to occupy at least 50 percent of the floor area. Additionally, while not required to meet the shortfall of lower-income units, the Zoning Ordinance shall be amended to specify additional mixed-used zoning districts that shall be allowed 100 percent residential uses. To ensure that the City complies with SB 166 (No Net Loss), the City will monitor new residential and mixed use project applications to ensure an adequate inventory is available to meet the City's RHNA obligations.

Program Background:

Government Code section 65583(f) and Government Code section 65583.2(h) states that where the inventory of sites does not identify adequate sites to accommodate the RHNA for lower income households, a program must be included to identify sites that can be developed for housing within the planning period. As the City will be accommodating more than 50 percent of the low- and very low-income regional housing shortfall on City-owned sites, the City must allow these sites in the inventory to accommodate 100 percent residential use and require residential use to occupy at least 50 percent of the floor area in a mixed-use project.

- **Timeframe:** by August 1, 2022-June 30, 2023
- **Responsibility:** City Planning Division
- **Objective:** Create opportunity to accommodate the City's lower-income RHNA targets.

▶ GOAL 2

Housing production for all income categories including for the community's workforce and most vulnerable communities.

Program 2.A Establish A Moderate-Income Affordable Housing Zoning Overlay

The City shall amend the Zoning Ordinance to establish a 100% affordable housing overlay for moderate-income (up to 120% AMI) housing projects in at least three targeted areas of the City such as Downtown area, Bergamot area, and the immediate area around the 17th Street/Santa Monica College Expo station. The moderate-income affordable housing overlay would allow a height increase of up to three additional stories or 33 feet, 50% density bonus, up to four incentives and concessions, no minimum parking requirements, and flexibility in unit size/unit mix in exchange for additional common area amenities.

Program Background:

AB1763 amended State density bonus law (Government Code Section 65915) to allow 100% affordable housing projects unlimited density and up to 3 stories or 33 feet above maximum height limits within 1/2 mile of transit. The changes also provide relief from minimum parking requirements and allow requests for up to four incentives/concessions from local development standards.

State Density Bonus law incentives for 100% affordable housing projects only applies to projects up to 80% AMI. The City's Zoning Ordinance similarly defines 100% affordable housing as only including projects up to 80% AMI. As a result, there are no incentives for moderate income housing projects (serving households up to 120% AMI) even though the City has received a RHNA allocation for moderate income units. In the 5th Cycle Housing Element, the City did not meet its RHNA targets for moderate-income units. In addition, funding sources for 100% affordable projects generally focus on households earning up to 80% AMI and do not provide funding for moderate-income projects. Moderate-income housing units serve an important segment of Santa Monica workers and residents that do not qualify for lower-income affordable units yet cannot afford market rents.

-
- **Timeframe:** by August 1, 2022-June 30, 2023
 - **Responsibility:** City Planning Division; City Attorney's Office
 - **Objective:** Provide significant incentives for 100% affordable housing including moderate income households.
-

Program 2.B Right Of First Offer Ordinance For Nonprofit Affordable Housing Providers

Promote the use of SB1079 (2020) which created a new foreclosure sale process for 2-4 unit buildings that allows qualified parties a means to purchase property in foreclosure, subject to certain requirements. Building off this state law, the City shall consider adopting a Right of First Offer Ordinance that would provide nonprofit affordable housing providers the right of first offer for a specified time period to acquire private properties outside of foreclosure as they become available for purchase. As part of this effort, the City shall prioritize the scope of properties that would most effectively achieve the goal of making non-profit housing providers more competitive in the land buying market for the purpose of preserving or producing affordable housing. Given the lack of an identified funding source to assist nonprofit affordable housing providers in purchase of multi-unit residential buildings through this program, explore funding sources, including grants and loans, that would contribute to the acquisition/rehabilitation quantified objective of 40 units. Require purchasers to preserve units as permanently affordable.

Program Background:

Acquisition and rehabilitation of existing housing and conversion to affordable units can preserve naturally occurring affordable housing while also providing existing residents the opportunity to maintain their housing at an affordable level and minimize overall tenant displacement.

- **Timeframe:** by December 31, 2023~~4~~
- **Responsibility:** City Planning Division; Housing and Human Services Division; City Attorney's Office
- **Objective:** Support 100% affordable housing by assisting nonprofit affordable housing providers to be competitive in the land acquisition market.

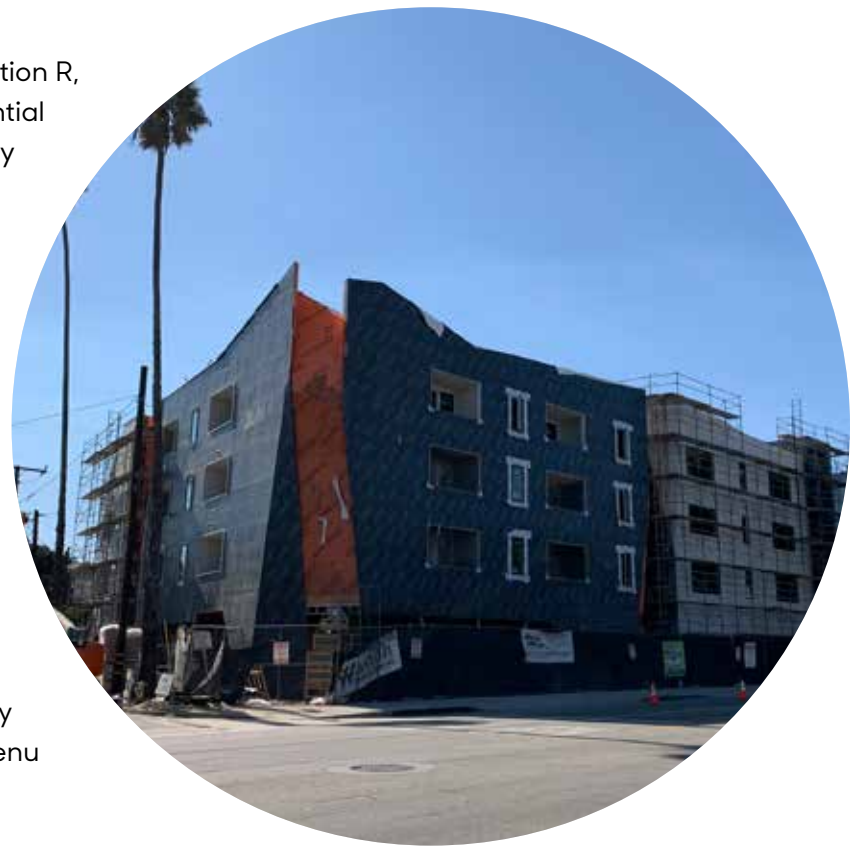
Program 2.C Update The City's Affordable Housing Production Program To Increase The Number Of Affordable Housing Units At All Income Levels

In order to increase the number of affordable housing units at all income levels such that 15% of all new multi-unit residential housing units are affordable to low and moderate income households and aim to achieve the Quantified Objective for lower income households as shown in Figure 5-1, Chapter 5, the AHPP on-site and off-site option for housing projects located outside of the Downtown shall be revised to maximize the contributions of the AHPP to achieving the RHNA affordable housing allocation and advancing the City's affordable housing goals. Areas to be considered may include, but not be limited to:

- Increase the threshold (to at least 6 units) at which projects are required to provide on-site or off-site affordable units.
- Eliminate the current “menu” option of affordability requirements and instead establish a new base affordability percentage
- Re-evaluate the in-lieu fee option for applicants to pay a fee instead of constructing affordable units to ensure that the fee supports the funding and construction of new affordable housing throughout the City; and
- Evaluate the possibility of a mixed-compliance option that would provide applicants more flexibility in meeting AHPP requirements
- Increase the minimum percentage of required off-site affordable units to be higher than the on-site option;
- Allow projects to locate off-site affordable housing anywhere in the City that is not a disadvantaged area as defined by SB535, which includes socioeconomic and environmental metrics
- Allow market-rate projects to comply with AHPP off-site option through acquisition and rehabilitation of existing rental units and converting those to deed-restricted units.

Program Background:

In 1990, Santa Monica voters adopted Proposition R, which requires 30% of all multi-family residential housing that is newly constructed in the City to be affordable for at least 55 years to and occupied by low- and moderate-income households. In July 1998, the City Council enacted an Affordable Housing Production Program (AHPP), requiring developers of market-rate apartment and condominium projects to contribute to affordable housing production and thereby help the City meet its affordable housing need. The current AHPP requires market-rate housing developers to select from a “menu” of options for the production of affordable housing (see table below). However, in 2013, the menu option of the AHPP was amended to add the extremely low-income option, and since that time, the menu



had the effect of producing many affordable units at the extremely low-income level at the cost of production of other income levels, with particular shortages happening at the 80% to 120% AMI income levels. In response, Option 1 (the extremely-low income option) was temporarily removed by adoption of Ordinance 26059(CCS) by the City Council on April 9, 2019 until November 26, 2019, which has since been extended by the City Council until February 28, 2022. This temporary elimination of the extremely low-income "menu" option had the effect of increasing the minimum inclusionary requirement to 10% of total units for Tier 1 projects, and 15% of Tier 2 and 3 projects affordable to 50% AMI households.

AHPP Menu Option	Tier 1	Tier 2/3
1	5% of the total units at 30% AMI	7.5% of the total units at 30% AMI
2	10% of the total units at 50% AMI	15% of the total units at 50% AMI
3	20% of the total units at 80% AMI	30% of the total units at 80% AMI
4	100% of the total units at 120% AMI	Not applicable

The AHPP also currently allows developers to fulfill their affordable obligation by providing units off-site or, in limited circumstances, paying an in-lieu fee. However, if a developer elects to provide affordable units off site, the units are required to be located within ¼ mile of the market-rate project, except that within the Downtown Community Plan area, developers of Tier 2 or Tier 3 housing project have the flexibility to locate the off-site housing anywhere within the Downtown.

- **Timeframe:** by ~~June 30, 2022~~ April 30, 2023
- **Responsibility:** Housing and Human Services Division; Economic Development Division; City Attorney's Office
- **Objective:** Ensure that the AHPP provides housing developers viable options for compliance.

Program 2.D Update Density Bonus Ordinance To Ensure Consistency With State Law And Integration Into The City's Land Use System

The City shall update the density bonus ordinance, Santa Monica Municipal Code Chapter 9.22, to ensure consistency with State Density Bonus Law and integration with the City's land use system, including the AHPP. The ordinance will clarify how to apply State density bonus law in the City's commercial and mixed-use districts that do not have maximum density controls, including application of State density bonuses to floor area dedicated to residential uses. The amendments to the Municipal Code shall also set forth a voluntary by-right menu of incentives & concessions that do not require following the

process under Government Code Section 65915(d) for approval. Requests for “off-menu” incentives and concessions may be requested pursuant to Government Code Section 65915(d).

Program Background:

On August 25, 2020, the City Council updated Santa Monica Municipal Code Chapter 9.22 which implements State density bonus law, to incorporate updates to the State Density Bonus Law for 100% affordable housing projects. At the time of the update in 2020, the City deferred amendments that would clarify how to apply State Density Bonus Law to the City’s commercial and mixed-use districts, pending further study, which has been ongoing since December 2019.

After the August 2020 update, Assembly Bill 2345 took effect on January 1, 2021, which expanded and enhanced development incentives for market rate projects that provide affordable housing. AB 2345 increases the maximum density bonus from thirty-five percent (35%) to fifty percent (50%). To be eligible for the maximum bonus of 50%, a project must set aside at least (i) fifteen percent (15%) of total units for very low-income households, (ii) twenty-four percent (24%) of total units for low-income households, or (iii) forty-four percent (44%) of for-sale units for moderate income households. Levels of bonus density between thirty-five percent (35%) and fifty percent (50%) are granted on a sliding scale

- **Timeframe:** by March 31, 2022 October 15, 2022
- **Responsibility:** City Planning Division; City Attorney’s Office
- **Objective:** Ensure consistency with State Law.

Program 2.E Commit To The Production Of Affordable Housing On City-Owned/Publicly- Owned Land

The City shall commit City-owned sites for the production of 100% affordable housing, with consideration of other community-serving purposes, including, but not limited, to green space, place making, and/or community-serving commercial and revenue generating uses.

The City shall plan for a minimum of ~~1,884~~ 1,880 affordable housing units across available City-owned sites, which are located throughout the city, as shown in Figure F-6, Appendix F, which may include, but shall not be limited to, rezoning actions in the LUCE, Specific Plans, and/or Zoning Ordinance amendments. Amendments to maximize affordable housing development potential on City-owned sites, and any subsequent development of those sites will be guided through a public process, including engagement of community stakeholders. At least three RFPs shall be issued for city-owned sites identified on the Suitable Sites Inventory to accommodate at least 1,880 affordable units. The first An RFP for a at least one city-owned site shall be issued by June 30, 2023. Future RFPs shall be staggered based on availability of resources. Subsequently, the City shall issue an RFP by

June 30, 2025, and June 30, 2027 accounting for existing constraints on city-owned sites such as existing leases as shown in Figure F-6, Appendix F. Following the regular process for production of affordable housing on city-owned land, at the conclusion of the RFP process, the City will select a developer partner for each city-owned site with the intent to develop each site for 100% affordable housing. The developer would negotiate a ground lease with the City, process any necessary loans through the City's local Housing Trust Fund, and concurrently process the Planning entitlements for the project through a ministerial process. The timeframe from selection of a developer to issuance of building permits typically takes approximately 24-30 months.

As has been done in the past, the City will use a variety of tools to facilitate 100% affordable housing development including but not limited to:

- .Facilitate appropriate zoning and process to support 100% affordable housing
- .Substantially reduced or free ground rent
- .Providing funding through local housing trust fund
- .Support applications for other funding sources for affordable housing (e.g. low-income-housing tax credits, grants, State funding, Federal funding)
- . Support measures that are not housing constraints to generate and allocate tax revenue for the acquisition and development of deed-restricted affordable housing

Further, the City will continue to assess appropriate City-owned properties for the development of affordable housing, or in some cases may consider the most appropriate disposition of City properties to nonprofit developers for the development of affordable housing.

Program Background:

As a built-out community, the City of Santa Monica has few remaining vacant sites for residential development. This shortage of vacant land necessitates the use of alternative mechanisms for providing sites for housing. In the past, the City has used such mechanisms as long-term leases of City-owned or publicly-owned land. City-owned land is subject to the same development standards as privately-owned land, but may benefit from additional flexibility in order to maximize the development potential for 100% affordable housing.

An RFP to redevelop Parking Structure 3 located on the Third Street Promenade as affordable housing was issued in August 15, 2019 and a developer partner was selected is currently pending review. The Parking Structure 3 RFP required that proposals including a significant commitment to permanent supportive housing for people experiencing homelessness and established parameters for affordable housing including long-term income eligibility and affordability covenants, tenant selection from the City's below-market-rate list, and allowance to target other populations such as working families, seniors, and artist live/work housing.

- **Timeframe:** RFPs issued by June 30, 2023; June 30, 2025; June 30, 2027 by December 31, 2023 and Annual Ongoing
- **Responsibility:** Housing Division: City Planning Division; Economic Development Division
- **Objective:** Prioritize affordable housing production on city-owned land.

Program 2.F **New Affordable Housing Finance Programs To Enable Continued Provision Of Technical And Financial Assistance For Housing Production**

The City shall leverage its commitment to use of City-owned land for affordable housing with advocacy for new sources of state, federal, and philanthropic funding that may be used for housing. Once appropriate funding sources are identified, the City will take the necessary steps to move forward.

The City has adopted policy on prioritizing our local funding through a Housing Trust Fund plan that includes spending commitments for affordable housing production and preservation for special needs and ELI households, including exploring new funding for conversion to deed-restricted, multi-unit developments in areas of affluence. The plan outlines a funding strategy for ELI households including seniors and persons living with disabilities. The City will continue to implement the policy and execute funding commitments to produce housing targeted to persons experiencing homelessness or at-risk of homelessness. Local funding through the Housing Trust Fund will also help support the production of at least 1,880 affordable housing units production on City-owned/publicly owned land in accordance with Program 2E. On an ongoing basis, the City will continue to communicate with local affordable housing providers on potential housing projects based on funding availability.

Financial and technical assistance shall be provided when resources are available and committed to nonprofit housing providers to the greatest extent possible to support the development of affordable housing, including special needs housing and arts housing. The City will research creative financing tools like a regional housing trust fund and infrastructure financing plans to learn how they are used elsewhere and how the City might best leverage these tools to support the construction of affordable housing

Support measures that are not housing constraints to generate and allocate tax revenue for the acquisition and development of deed-restricted affordable housing

Program Background:

The City has historically provided technical and financial support to a variety of nonprofit housing providers to support affordable housing development through the local Housing Trust Fund. Since the dissolution of the City of Santa Monica’s Redevelopment Agency (RDA), the main funding source for the Housing Trust Fund comes from a 0.5% sales tax passed by the voters in 2016. Remaining funding

sources, such as the affordable housing commercial linkage fee and the affordable housing in-lieu fee, and contributions from negotiated development agreements, do not provide sufficient funding to fill the gap left from the loss of RDA funds. The City continues to work with nonprofit partners to seek out and apply for federal and state funding, as it has done in the past, which resulted in numerous successful funding efforts by nonprofit affordable housing providers.

Santa Monica has been awarded a total of \$10 million from the Local Housing Trust Fund (LHTF) program for the 2020 and 2021 funding rounds and is also eligible to receive an estimated \$3.285 million from the first five years of the Permanent Local Housing Allocation (PLHA) entitlement program. The awarded State grants, as well as future State grants, are essential to Santa Monica's ability to create affordable housing on City-owned land and further the goals of the City's Housing Element.

In the current environment, the City will need to think creatively and support efforts at the state and federal level to create new funding opportunities for affordable housing in order to maintain current productivity levels. This Housing Element commits City-owned land for 100% affordable housing. Because land acquisition is typically the largest cost driver for affordable housing, it is anticipated that use of City land will alleviate the impact of land cost on the feasibility of an affordable housing project and allow limited funding resources to be used more effectively in producing affordable housing.

- **Timeframe:** Annual Ongoing
- **Responsibility:** City Planning Division; Housing and Human Services Division
- **Objective:** Seek innovative affordable housing financing tools to increase production.

Program 2.G Expand Housing Choice By Facilitating The Development And Maintenance Of Special Needs Housing

The City shall continue to utilize available financial resources and partnerships with service providers to create and retrofit existing housing for special needs households throughout the city with a target of 20 minor home repairs over the Housing Element cycle. This includes the provision of new programs, services, infrastructure and amenities that can help seniors who choose to live independently remain in their homes as long as possible.

Within legal constraints, encourage or require housing providers to assign affordable housing units designed for persons with disabilities, including physical or developmental disabilities, for use by those who require those features. The City shall encourage barrier-free construction and adaptation.

Through the 5-year Consolidated Plan process, the City shall continue to identify housing and supportive service gaps for various special needs groups and propose policy and priorities based on the analysis.

Program Background:

Santa Monica has a significant residential population in classes protected by California State housing law, which include the elderly, Individuals with mental, physical, and developmental disabilities, large families, female-headed households, and homeless individuals and families without permanent housing. Finding access to resources and adequate, affordable housing is often challenging for individuals and families under such circumstances. Housing for seniors and those with disabilities should incorporate features that contribute to a barrier-free environment, ensuring that anyone who uses a wheelchair or other mobility device is able to visit a building, and accessibility to transit and services.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division; Building and Safety Division
- **Objective:** Housing for individuals with special needs.

Program 2.H Maintain Proposition I Monitoring

The City shall monitor utilization of Proposition I authority through annual reporting of new "low rent-housing projects.

Program Background:

Article 34 of the State Constitution requires that any low rent housing project developed, constructed, or acquired by a public agency must first be approved by a majority of the voters living in that jurisdiction. In compliance with this article, the City of Santa Monica put a referendum (Proposition N) before the voters in 1978 in order to win approval to "develop, finance, or rehabilitate, but not own or operate within the city, housing for rental to low- and moderate-income persons, no less than 50% of which shall be reserved for persons age 60 or older, not to exceed in total throughout the city, 1% of the dwelling units in the city." On November 3, 1998, Santa Monica's voters approved Proposition I, which provides the City with an annual authorization to develop, construct, acquire, and finance low- income housing units, including senior housing. The City's annual authorization is equal to one-half of 1% of the total dwelling units existing in the city at the end of the prior fiscal year. This annual authorization may be carried over the three years.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Ensure the City continues to report on compliance with Proposition I.

Program 2.I

Zoning For A Variety Of Housing Types Including Special Needs Housing And Housing Access For Persons With Disabilities

The City shall review and update the Zoning Ordinance and BAP, as applicable, to ensure consistency with State law **as-needed** regarding special needs housing types and residential land use classifications **as-needed**. Review and expected revisions will include, but are not limited to, updating parking requirements for Emergency Shelters pursuant to AB 139, the city’s definition of “household”, and land use requirements for Residential Care Facilities for seven or more persons to promote objectivity and approval certainty.

Program Background:

Since the 2015 Zoning Ordinance update, the State has passed various laws that have removed barriers for special needs housing types, such as emergency shelters, group residential, and supportive/ transitional, as well as other residential land uses. These laws have been put into place to ensure that cities zone for a variety of housing types.

- **Timeframe:** by December 31, 2022³ and Annual Ongoing
- **Responsibility:** City Planning Division; City Attorney’s Office; Housing and Human Services Division
- **Objective:** Ensure the City is compliant with all State laws for special needs housing types and residential land uses.

Program 2.J

Prioritize Water And Sewer Service To Housing Projects With On-Site Affordable Units

The City shall establish written procedures to grant priority to developments with on-site units affordable to lower-income households if availability of service is limited.

Program Background:

Government Code Section 65589.7 requires water and sewer service providers to establish procedures that grant priority water and sewer service to developments that include units affordable to lower-income households.

- **Timeframe:** by December 31, 2022³
- **Responsibility:** Public Works Department
- **Objective:** Prioritize infrastructure service to developments with lower income units to support the production of affordable housing throughout the City.

▶ GOAL 3

Preservation of the existing supply of housing and prevent displacement of existing tenants.

.....

Program 3.A Restrict The Removal Of Existing Rental Units For Site Redevelopment And Require That Protected Units Are Replaced

The City shall amend the Municipal Code to adopt local requirements that make permanent and potentially expand upon the anti-displacement requirements of SB 330 to ensure that **100% of all** protected units proposed to be demolished in order to construct a new housing development project are replaced.

As required by Government Code Section 65583.2(g)(3), the City shall amend the Zoning Ordinance to require that sites that currently have residential use, or within the past five years have had residential uses that have been vacated or demolished, that (1) are or were subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of low or very low income (approximately 1,150 deed-restricted affordable units within market-rate housing projects on private property), or (2) subject to any other form of rent or price control through a public entity's valid exercise of its police power (approximately 27,484 units), or (3) within the past five years were occupied by low or very low income households, shall be required to replace all of those units as affordable to the same or lower income level as a condition of any development on the site. Replacement requirements shall be consistent with those set forth Government Code Section 65915(c)(3).

Program Background:

SB 330 (effective 01/01/21 through 01/01/25) and SB 8 (extended SB330 through 01/01/30) enacted a program that establishes unit replacement requirements and tenant protections for new housing projects proposing the demolition or removal of "protected units", generally defined as units subject to any form of rent restrictions or price control. These "protected units" include rent-controlled units that must be replaced as part of a new housing project until SB330 sunsets in 2030.

-
- **Timeframe:** by August 1, 2022 June 30, 2023
 - **Responsibility:** City Planning Division
 - **Objective:** Protect existing residents by preserving existing rental housing stock; no net loss of units.
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Program 3.B

Develop Tenant And Landlord Programs To Address State And Federal Legislative Mandates Regarding Anti-Discrimination

The City shall continue to implement programs throughout the City, including tenant and landlord education/outreach through workshops that are held twice as well as regular noticing of fair housing issues, that strive to protect tenants against landlord discrimination and cancellation of existing Section 8 contracts (including City and/or private foundation-funded subsidy) to enable tenants to remain and pay the maximum allowable rent (MAR). The City will continue to fund the acquisition and rehabilitation of existing rental units and continue to investigate new, innovative ways to increase the affordability of housing in light of the loss of formerly affordable units due to vacancy de-control and Ellis withdrawals. The City will also continue to work with community partners to keep the public aware of fair housing rights and obligations (along with the now much-needed rental assistance programs), and to use enforcement of our laws to help stop housing discrimination in Santa Monica whenever it appears, such as the Legal Aid Foundation of Los Angeles

Program Background:

Residents of Santa Monica adopted the City's rent control law in 1979. Passage of the Costa-Hawkins Rental Housing Act in 1995 by the State Legislature gradually required vacancy de-control/re-control in apartments, and de-control of houses and most condominiums by January 1999; this enables apartment building landlords to raise the price of rent-controlled apartments to market rate when the unit is vacated and is to be rented to a new tenant, establishing a new base rent for the unit. This has allowed 74% of the rent-control housing stock to reset to market rents.

Even with Santa Monica's exception to the HUD payment standard granted in 2016, the vast majority of Santa Monica's existing housing supply is out of reach for lower income households. With limited federal funding resources being allocated to cities, the demand for housing assistance outpaces available resources.

The City's progressive legal protections, such as the just-cause eviction protections in rent-controlled units, have contributed to keeping rent-controlled units affordable to current low- and very low-income tenants. In addition, to help reduce the impact of Costa-Hawkins, the City has developed an Housing Anti-Discrimination ordinance (Santa Monica Municipal Code chapter 4.28), which prohibits various types of housing discrimination--such as refusal to rent, differential treatment, discriminatory statements--on the basis of disability, age, source of income, parenthood, pregnancy, or the potential or actual occupancy of a minor child. In 2015, as an affordable housing measure, the City added Source of Income as a protected class and then added an extra layer of protection with a pioneering definition for Source of Income. For the first time in Santa Monica and in California, the fair housing law expressly protected recipients of rental assistance such as Section 8.

Furthermore, the City and has launched a 2-year pilot Right to Counsel program to assist tenants facing eviction. The City also provides one-time homeless prevention grants to households in danger of losing their housing.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division (lead); Rent Control Board
- **Objective:** Develop programs to address State and Federal housing mandates.

Program 3.C Facilitate The Conservation Of Restricted And Non-Restricted At-Risk Housing

There are approximately 770 affordable, deed-restricted units that are at-risk of conversion to market rate in the next 10 years. The City will continue to monitor over this Housing Element cycle the status of the approximately 770 affordable deed-restricted at-risk projects units throughout within the City, ensure that required notice is given to tenants, advise property owners and tenants in advance of potential conversion dates, and assist in answering questions from residents of at-risk housing. As a part of the ongoing monitoring, the City will continue to provide information on maintaining long-term affordability and assist federally-funded housing properties with seeking funding assistance in applying for allocations of housing vouchers from the federal government to maintain housing affordability. On an ongoing basis, the City will continue to communicate with local affordable housing providers on conserving housing projects .

The City will exercise its right of first refusal to purchase properties if necessary and financially feasible to ensure the continued availability of affordable housing units. Additionally, the City shall continue to report annually on research and implement strategies on conserving non-covenant residential units such as the approximately 27,484 rent-controlled units and naturally occurring affordable units.

Program Background:

The City has a variety of affordable housing projects, consisting of 3,902 deed-restricted residences that are currently serving the community. Publicly-assisted housing units with federal rental assistance subsidies are protected by covenants. Those units with covenants nearing expiration are considered "at-risk" of potential conversion to market-rate housing. According to the City's local data, a total of 770 publicly-assisted housing units protected by covenants that are due to expire in the next 10 years. They are, therefore, at risk of potential conversion to market rate. These units serve seniors or persons with special needs, with one property serving families.

In addition to the federal covenants, the affordability of the units in these projects is further protected through additional requirements or incentives that the City placed on their loans when they were constructed. Some units are considered to have a lowered risk of conversion to market rate because they are owned and operated by nonprofits whose mission is to create and maintain affordable housing. As the cost of conserving existing deed-restricted affordable units is far less than the cost of producing new ones, and the need for affordable units remains strong, efforts should be directed at ensuring the long-term affordability of these units for low-income households.

- **Timeframe:** Annually: staff will identify funds and work with nonprofits as necessary to secure at-risk units, where appropriate and feasible; Ongoing: Monitoring
- **Responsibility:** Housing and Human Services Division
- **Objective:** The City proactively monitors units at risk of conversion due to expiring covenants and takes actions to ensure their long-term affordability.

Program 3.D Maintain An Acquisition And Rehabilitation Program

As resources are available, the City shall continue to provide loan assistance to nonprofit affordable housing providers and work with providers to identify new funding sources [for acquisition and rehabilitation throughout the city](#). As outlined in Program 2.B, the City shall adopt a Right of First Offer Ordinance that would provide nonprofit affordable housing providers the right of first offer to acquire existing private properties as they become available for purchase.

Program Background:

The City provides Housing Trust Fund loans to nonprofit housing providers to assist with the purchase and rehabilitation of existing rental properties occupied primarily by low-income households. The acquisition and rehabilitation of existing housing and conversion to affordable rental units preserve naturally occurring affordable housing while also ensuring housing stability for existing tenants by allowing them to remain in their units at deed-restricted affordable rents.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division; Santa Monica Housing Authority
- **Objective:** Protect existing residents by acquiring and rehabilitating existing housing.

Program 3.E Maintain A Low-Income Residential Repair Program

The City shall support and fund the rehabilitation of 38 multi-family units and provide 20 minor home repairs [throughout the City](#).

Program Background:

The City implements the Residential Rehabilitation Program for owners of multifamily rental properties occupied by low- and moderate-income tenants; and the Owner-Occupied Rehabilitation Program for low- and moderate-income owners.

Minor home modifications improve physical access for people with disabilities and seniors that assist with independent living. Modifications are funded through the City’s Human Services Grants Program using Community Development Block Grant (CDBG) funds.

- **Timeframe:** by 2024
- **Responsibility:** Housing and Human Services Division; Santa Monica Housing Authority
- **Objective:** Rehabilitate 38 multi-unit dwellings and provide 20 minor home repairs.

Program 3.F Enhance Code Enforcement Response To Housing-Related Violations

The City shall continue to respond to residential building code violation complaints throughout the City. Code Enforcement and Building and Safety Divisions will coordinate with the Housing and Human Services Division to provide information on available rehabilitation assistance to correct code deficiencies. The City shall continue to respond to residential substandard housing complaints that affect habitability (which are a Priority 1 complaint) within 1 day.

Program Background:

The Code Enforcement Division responds to complaints of violations of City building codes and in coordination with the Building and Safety Division, provides inspections and notices to property owners to bring their units into compliance. In the case of a residential building code violations that do not affect habitability, the City provides up to 30-days to correct the violation. If the work necessitates a building permit, the City provides up to 180 days to correct the violation (the life of the permit). In the case of substandard housing that affects habitability, the City requires the landlord to promptly commence the work to restore the unit(s) to a habitable condition and return tenants to their units through the Habitability Determination Form and Relocation Order and provide tenant protections (temporary relocation).

- **Timeframe:** Annual Ongoing
- **Responsibility:** Building and Safety Division, Code Enforcement Division, Housing and Human Services Division
- **Objective:** Require property owners to respond to Building Code violations and complete routine maintenance on their residential buildings.

Program 3.G Maintain A Mandatory Seismic Retrofit Program

The City shall continue to implement the Seismic Retrofit Program pursuant to the City’s Seismic Retrofit Ordinance. The City shall aim to issue building permits for seismic retrofit throughout the city of at least 900 buildings by the end of this Housing Element Cycle.

Program Background:

In March 2017, the City Council adopted a Seismic Retrofit Ordinance and the City implemented the Seismic Retrofit Program that proactively seeks to strengthen existing earthquake-vulnerable buildings and enhance the safety and security of their occupants. Nearly 2,000 commercial and residential buildings in the City were identified as potentially seismically vulnerable in need of possible structural improvement and are required to comply with the Program within established timeframes based on building types (20-year program overall). Ongoing seismic retrofit improvements to existing multi-unit residential buildings will help maintain the safety and structural integrity of the City’s aging housing stock.



- **Timeframe:** Annual Ongoing
- **Responsibility:** Building and Safety Division
- **Objective:** Protect existing residents by ensuring the safety and structural integrity of existing residential buildings.

Program 3.H Information And Outreach For Property Owners Regarding Rehabilitation And Maintenance Of Housing Units

The City shall provide additional education and outreach to multi-unit property owners on available City programs to support continued rehabilitation, maintenance, repairs, and upgrades of their housing units. Outreach will continue to include at least one annual seminar dedicated to providing information to rental property owners on rehabilitation and maintenance of properties.

Program Background:

Tenants in rent-controlled units who allege that their rental units need repairs or maintenance, or that their housing services have been reduced, may petition to have their monthly rent decreased. In 2019, eighty decrease petitions were filed. Both the City and Rent Control Board co-sponsor an annual Maintenance of Residential Rental Property seminar and coordinate regarding relocation disputes, use of withdrawn properties, and maintenance and enforcement issues. Annual tenant and landlord forums also educate both groups on their rights and responsibilities including but not limited to available programs, resident qualifications, and benefits of program participation.

- **Timeframe:** Annual Ongoing
- **Responsibility:** ~~Housing and Human Services Division~~; Rent Control Board
- **Objective:** Inform property owners regarding proper maintenance of residential units.

Program 3.I Right To Counsel Program

The City shall continue to implement a Right to Counsel pilot program and evaluate its overall effectiveness, program capacity, and long-term feasibility.

Program Background:

In April 2021, the City initiated a two-year pilot Right to Counsel program, an initiative to provide legal assistance and support for tenants facing eviction, particularly amid the COVID-19 pandemic. This pilot program is available to Santa Monica tenant households whose income is at or below 80% of the County’s Area Medium Income (“AMI”), and facing eviction attempts by their landlord. The program includes a contract with the Legal Aid Foundation of Los Angeles (LAFLA), the nonprofit law firm for low-income residents, to provide full-scope eviction defense services in which LAFLA attorneys will represent tenants in court. This partnership seeks to provide emergency support to low-income tenants in need of legal assistance. Under the City’s pilot program and Los Angeles County’s parallel program, StayHousedLA, LAFLA has already helped 40 Santa Monica tenants facing eviction obtain full-scope legal representation. Another 42 have received limited scope services.

- **Timeframe:** Ongoing
- **Responsibility:** City Attorney’s Office
- **Objective:** Prevent the displacement of tenants by providing access to legal assistance and support for tenants facing eviction.

Program 3.J Restrict Conversion Of Existing Rental Housing To Condominiums

The City shall continue to regulate condominium conversions pursuant to SMMC Section 9.24.040. The City will continue to track the City’s vacancy factor of rental units, and restrict conversions if vacancy factor is 5 percent or less of the total rental housing inventory. Furthermore, the City will monitor removal of rental housing units from the rental housing market and provide annual data.

Program Background:

Displacement of residents due to economic pressure is one of the main contributing factors to housing segregation. Displacement and gentrification are widespread in Santa Monica with the Ellis Act and Costa-Hawkins Rental Housing Act allowing owners to either exit the rental business and evict all tenants or raise the rents of vacated rent-controlled **units**. Restrictions on condominium conversions are in place to ensure that required noticing is provided to tenants and that conversions can only occur if there is a surplus of rental housing inventory in the immediate period before approval of a conversion.



Conversion restrictions will continue to protect and retain older

Condominium conversions are currently regulated by SMMC Section 9.24.040. The Condominium Conversion ordinance sets out the conditions under which a condo conversion could be approved including:

1. Rent Control Board approval to remove units from the rental market
2. Tenants have been given required notice of intent to convert and to seek alternative housing
3. Preparation of a conversion report by City staff
4. Notice of any public hearings
5. Structural, electrical, fire and life safety, and plumbing systems are in good repair and maintenance
6. Findings as required by the Planning Commission including finding that the vacancy factor of rental housing units exceeds 5 percent of the total rental housing inventory for a period of 90 days prior to the date of approval.

-
- **Timeframe:** Ongoing
 - **Responsibility:** City Planning Division
 - **Objective:** Restrict loss of rental housing units to condominium conversions.
-

GOAL 4

A community that provides equitable housing access to all neighborhoods.

Program 4.A Zoning Ordinance Amendment To Permit Multiple-Unit Housing In Non-Residential Zones Where Not Currently Permitted

The City shall amend the Zoning Ordinance, LUCE, and associated specific and area plans to add multi-unit housing as a permitted use in non-residential zones where housing is currently prohibited. To promote the fair and equitable distribution of new housing opportunities across the City, land use regulations shall be amended to add multi-unit housing as a permitted use in areas where housing is currently prohibited. Land use regulations, FAR, and height (as indicated in Program 1.1J) will be revised to allow housing in the three areas-zones that currently do not allow housing such as the Office Campus, Industrial Conservation, and Creative Conservation Sector zones.

To promote fair and equitable housing opportunities throughout the City, the City shall amend the Zoning Ordinance, LUCE, and the Bergamot Area Plan (BAP) including in areas that have historically not permitted or accommodated housing, to allow for higher maximum allowable FAR and height in the NC, IC, and OC zoning districts.

For the purposes of addressing environmental health considerations, the City shall amend the Zoning Ordinance to specify locations in the City where housing projects are required to conduct an air quality assessment and implement recommendations from the assessment.

Program Background:

When the LUCE was adopted in 2010, its core growth strategy was to encourage housing in close proximity to major transportation systems, such as the Metro Expo Light Rail and transit corridors, and to protect the City's residential neighborhoods by discouraging development that would result in displacement of tenants. The housing incentives were balanced with a plan to support the City's economic base by incentivizing retention of existing commercial and industrial space in select areas of the City to support existing and growing businesses. This growth strategy has resulted in new housing production largely in the Downtown and some limited areas on the boulevards, but it has also perpetuated the historic patterns of housing segregation that remain to this day. Although all of Santa Monica is considered a "high resource" area based on maps produced by the California Tax Credit Allocation Committee, there remain a handful of areas that provide little to no housing opportunities.

- **Timeframe:** by August 1, 2022 October 15, 2022
- **Responsibility:** City Planning Division; City Attorney's Office
- **Objective:** Support the production of affordable housing and encourage the equitable production of housing across the City.

Program 4.B Facilitate The Development Of Housing On Surface Parking Lots Owned By Community Assembly Uses

In order to Affirmatively Further Fair Housing, the City shall adopt standards that support the production of affordable housing on surface parking lots owned by community assembly uses, including religious congregations, including allowing not more than 50% market-rate units to support the affordable housing, unlimited, density, no minimum parking requirements, an additional 33 feet of building height, and allowance for the primary community assembly use and related ancillary use, for the support or expansion thereof, on or above the ground floor.

Program Background:

AB1851 was passed in 2020 to remove an important barrier to housing construction on lands owned by a religious institution. The law states that a jurisdiction cannot deny a housing project proposed by a religious institution on the sole basis that it will remove parking. Approximately fifteenseven parcels with religious congregations, which are classified in Santa Monica as community assembly uses, have large surface parking lots, have been identified on the SSI, and are located within high or highest resource areas.



During the outreach process of the Housing Element, many of these religious congregations have expressed interest in developing housing on their properties; however, the Zoning Ordinance development standards for these sites severely limits the housing potential of these sites.

- **Timeframe:** by August 1, 2022 June 30, 2023
- **Responsibility:** City Planning Division
- **Objective:** Increase equitable access to all residential neighborhoods and incentivize affordable housing in areas that have historically excluded diverse housing opportunities.

Program 4.C

Provide New Housing Choices And Affordability In High Opportunity Areas Through Incentives For Additional ADUs In R1-Zone Neighborhoods

The City shall establish programs to address historically exclusionary single-unit dwelling zones by encouraging and incentivizing the production of ADUs in single-unit residential districts in accordance with Program 4.F. This would include allowing an additional ADU to be constructed if the ADU is deemed restricted as a rental unit. As ADUs are naturally more affordable by design given their size, the program would help affirmatively further fair housing by helping to provide new housing choices and affordability in high opportunity areas of the City that are largely unaffordable to many people.

Program Background:

Historic practices like redlining and restrictive covenants have perpetuated housing segregation and hindered fair access to housing. Although the City has been a leader in encouraging diverse neighborhoods through fair housing, rent control and tenant protections, predominantly homeowner neighborhoods have accommodated very little diversity in housing types reducing housing access for even middle-income households and a large percentage of Santa Monica workers. R1-zoned neighborhoods make up approximately 35% of the land area in the city but contain 13% of the housing units in the city. In comparison, commercial zoning comprises only 7% of the City's land area but contains 15% of the housing units in the City.



The construction of new ADUs in recent years has increased housing opportunities in single-family zones, areas which have traditionally been out of reach for renters. The vast majority of new ADUs constructed or under development in the past 3 years have been in the City's R1 (single-unit) neighborhoods, providing a valuable source of rental housing access in otherwise high cost neighborhoods. Under State law, properties are permitted to have one ADU and one JADU. This program will further allow one more ADU on single-unit dwelling parcels with the requirement that the additional third ADU be restricted to permanent rental housing. This program will incentivize the production of ADUs thus providing new housing choice and affordability in the high opportunity areas of the R1 neighborhoods.

- **Timeframe:** by August 1, 2022 June 30, 2023
- **Responsibility:** City Planning Division
- **Objective:** Increase equitable access to all neighborhoods by lowering barriers to housing access in areas that have historically excluded diverse housing opportunities.

Program 4.D Right To Return Program

The City shall continue to implement a Right to Return Pilot Program and evaluate outreach strategies, applicant demand, the availability of historical documentation, verification processes, compliance with government legislation, and the administrative resources required to implement a broader long-term program. The program will provide priority in City-funded affordable housing and inclusionary housing for up to 100 households or descendants of households.

Program Background:

In July 2021, the City initiated a Right of Return Pilot Program that prioritizes housing for the historically displaced households in Santa Monica during the 1950s and 1960s due to urban renewal policies. The pilot program implements historical displacement policy by providing housing access to former residents or their descendants who were displaced by the creation of the Civic Auditorium in the Belmar Triangle neighborhood and the I-10 freeway in the Pico neighborhood, both of which disproportionately impacted low-income communities and communities of color. The program will provide priority in City-funded affordable housing and inclusionary housing for up to



Construction of the Civic Center Auditorium in 1957
Source: Santa Monica Public Library

~~100 households or descendants of households.~~ Qualifying households will be placed on the City of Santa Monica’s affordable housing waitlist (Below Market Housing waitlist) with Second Priority and will be referred to affordable housing providers as housing units become available.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Address the historical displacement of Santa Monica households which resulted from the development of the Civic Auditorium and I-10 freeway through the Pico neighborhood during the 1950s and 1960s that disproportionately impacted low-income communities and communities of color and displaced thousands of households living in Santa Monica.

Program 4.E

PROVIDE NEW HOUSING CHOICES AND AFFORDABILITY IN HIGH OPPORTUNITY AREAS THROUGH INCENTIVES FOR SB9 UNITS IN R1-ZONE NEIGHBORHOODS

The City shall adopt a local ordinance implementing SB9, which shall establish an administrative process without any discretionary action, and shall include strong incentives to densify larger parcels in R1-Zone neighborhoods by allowing property owners on parcels of at least 10,000 sf to add ADUs as allowed under State Law in addition to SB9 projects. This will open up the possibility for property owners to construct up to 6 units through a multi-step process and create more housing choices and affordability in some of the most affluent areas of the city in accordance with Program 4E.

Program Background:

Historic practices like redlining and restrictive covenants have perpetuated housing segregation and hindered fair access to housing. Although the City has been a leader in encouraging diverse neighborhoods through fair housing, rent control and tenant protections, predominantly homeowner neighborhoods have accommodated very little diversity in housing types reducing housing access for even middle-income households and a large percentage of Santa Monica workers. R1-zoned neighborhoods make up approximately 35% of the land area in the city but contain 13% of the housing units in the city. In comparison, commercial zoning comprises only 7% of the City’s land area but contains 15% of the housing units in the City.

SB9, also known as the California Housing Opportunity and More Efficiency (HOME) Act, is a state bill that requires cities to allow one additional residential unit onto parcels zoned for single-unit dwellings. Allowing homeowners proposing SB9 projects to also construct ADUs, particularly on larger parcels, will increase new housing opportunities in high opportunity areas and also promote place-based strategies for community revitalization by increasing housing opportunities in all areas of Santa Monica.

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- **Timeframe:** June 30, 2023
- **Responsibility:** City Planning Division
- **Objective:** Increase equitable access to all neighborhoods through small increases that may lower the barriers to housing access in high opportunity neighborhoods
-

Program 4.F

ESTABLISH TARGET TO INCREASE HOUSING PRODUCTION IN R1 ZONES AND INCLUDE MID-CYCLE MONITORING

The City shall aim to issue at least 47 building permits per year for additional housing units and types in R1 zones. Review progress towards targets by December 31, 2025 and if targets are not being met, adjust land use strategies as necessary and appropriate within one year.

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- **Timeframe:** Assess progress by December 31, 2025
- **Responsibility:** City Planning Division
- **Objective:** Increase the number of net new housing units in R1 zones
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GOAL 5

Housing for persons experiencing homelessness.

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Program 5.A Reduce The Number Of Homeless Individuals Living On The Streets Of Santa Monica Through The Provision Of A Range Of Housing Options, With An Emphasis On Affordable, Permanent, Supportive Housing

The City shall continue to seek and leverage funds that contribute to the development of a range of permanent, supportive housing options, within and outside of Santa Monica. Focus case management and housing resources on the most chronic and vulnerable homeless individuals that have been identified on the City’s Homeless Service Registry. Continue to serve other priority homeless populations through City- funded programs. Continue strategies to reunite those not first-homeless in Santa Monica with family and friends in their home communities. Review City policies and practices that may contribute to homelessness.

Program Background:

Santa Monica has a long history of investing in housing and supportive services to prevent and address the impacts of homelessness. In March 2019, the City introduced the Four “Pillars” upon which the City’s homeless strategies are based; 1) preventing housed Santa Monicans from becoming homeless and increasing affordable housing opportunities; 2) addressing the behavioral health needs of vulnerable residents; 3) maintaining equitable access to safe, fun, and healthy open spaces; and 4) strengthening regional capacity to address homelessness. These strategies have been implemented through interdepartmental and community partnerships that contributed to a sustained reduction in homelessness in the City’s downtown and beach areas, and helped contribute to an 8% local reduction in the City of Santa Monica’s annual Homeless Count in 2019.

On an annual basis, the City supports agencies that provide supportive services, emergency shelter, and transitional and permanent supportive housing beds to Santa Monica’s priority homeless populations.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Continue to invest in and implement housing and supportive services to prevent and address the impacts of homelessness.

Program 5.B Low Barrier Navigation Centers As By-Right Use

The City shall amend the Zoning Ordinance to allow Low Barrier Navigation Centers as a by-right permitted use in all non-residential zones permitting multi-unit uses.

Program Background:

Assembly Bill 101, passed in 2019, requires that a low barrier navigation center be a use permitted by right in mixed-use zones and nonresidential zones permitting multi-unit uses if it meets specified requirements. AB 101 defines "low barrier navigation center" as a housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter and housing.

- **Timeframe:** December 31, 2023
- **Responsibility:** City Planning Division
- **Objective:** Ensure the City's regulations and procedures are in conformance with State Law.



The Ocean Park Community Center (OPCC), an example of a Low Barrier Navigation Center in Santa Monica.

▶ GOAL 6

Provision of housing assistance and supportive programs and services to extremely low-, very low-, low-, and moderate-income households and households with special needs, families, seniors, and the homeless.

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Program 6.A Enhance Housing Mobility By Maintaining Rental Housing Voucher Programs Throughout the City And Expand To Assist All Persons With Disabilities

The City shall continue to operate strong rental housing voucher programs throughout the City and advocate for funding guidelines for Section 8 that are competitive for Santa Monica; and shall pursue additional funding to maintain and expand voucher programs, if possible. Review and update the Housing Authority Administrative Plan annually to ensure compliance with the latest HUD regulations and to provide flexibility to respond to tenants' needs consistent with legal requirements. Utilize vouchers as a tool to prevent senior homelessness where eligible. When funding opportunities are available, expand the rental housing voucher programs to fill the gap between income levels and the cost of housing for persons with permanent disabilities, including persons with Developmental Disabilities.

Program Background:

The Santa Monica Housing Authority (SMHA) administers two types of rental assistance vouchers, tenant-based and project-based, across five different federal housing programs: Housing Choice Voucher (HCV); Continuum of Care (CoC); HOME Investment Partnerships Program (HOME); Veterans Affairs Supportive Housing (VASH), and Emergency Housing Voucher (EHV) programs. Tenant-based vouchers are allocated to specific individuals, which allow participants to choose where to lease rental housing, whereas project-based vouchers are allocated to specific properties rather than participants. In FY2020~~1~~-21, the Santa Monica Housing Authority (SMHA) administered approximately 1,600 rental housing vouchers, including Section 8, Continuum of Care vouchers, HOME vouchers, and Veterans Affairs Supportive Housing (VASH) vouchers. The HOME program targets rent-burdened households at-risk of becoming homeless and persons who have been homeless for at least a year. Of the 772 vouchers that were used, voucher households reside throughout Santa Monica's multifamily neighborhoods, with no concentration in one zip code. Five properties in Santa Monica representing senior and supportive affordable housing with significant allocations of project-based vouchers are located in zip codes 90401 (Downtown), 90403 (Wilshire-Montana/Northeast) and 90405 (Ocean Park/Sunset Park) representing a total of 340 affordable housing opportunities.

Distribution of Voucher Households 2017-2021 by Santa Monica Zip Code

	<u>Tenant-Based Vouchers</u>	<u>Project-Based Vouchers</u>	<u>Total Rental Housing Vouchers</u>
90401 (Downtown)			
<u>Count</u>	<u>154</u>	<u>155</u>	<u>309</u>
<u>Percentage</u>	<u>31%</u>	<u>57%</u>	<u>40%</u>
90402 (North of Montana)			
<u>Count</u>	<u>2</u>	<u>0</u>	<u>2</u>
<u>Percentage</u>	<u>0%</u>	<u>0%</u>	<u>0%</u>
90403 (Wilshire-Montana/Northeast)			
<u>Count</u>	<u>44</u>	<u>102</u>	<u>146</u>
<u>Percentage</u>	<u>9%</u>	<u>37%</u>	<u>19%</u>
90404 (Mid-City/Pico)			
<u>Count</u>	<u>178</u>	<u>0</u>	<u>178</u>
<u>Percentage</u>	<u>36%</u>	<u>0%</u>	<u>23%</u>
90405 (Ocean Park/Sunset Park)			
<u>Count</u>	<u>120</u>	<u>17</u>	<u>137</u>
<u>Percentage</u>	<u>24%</u>	<u>6%</u>	<u>18%</u>

- **Timeframe:** Annual Ongoing
- **Responsibility:** Santa Monica Housing Authority; Housing and Human Services Division
- **Objective:** Maintain voucher programs to ensure availability and choice of housing for households at all income levels.

Program 6.B Seek Funding Sources To Support Rental Assistance For Vulnerable Individuals And Households At-Risk Of Displacement

The City shall continue to pursue and identify new funding sources that support rental assistance programs, including emergency rental assistance for individuals and households at risk of displacement throughout the city with a goal to provide emergency rental assistance to at least 100 households throughout the city over the Housing Element cycle to the extent feasible.

Program Background:

The City monitors the availability of Federal, State, and County funding sources to support rental assistance programs on an ongoing basis. The City also undertook eviction prevention efforts to focus on keeping residents housed during the ongoing COVID-19 pandemic. The Legal Aid Foundation of Los Angeles (LAFLA) supported residents in maintaining housing through their general legal services program, which provides eviction defense services. Since April 2021, under the City's Right to Counsel pilot program and County's Stay Housed LA Program, LAFLA has provided 81 tenants facing eviction with legal representation. In FY2020-21 LAFLA's general legal services program served 590 Santa Monica households utilizing \$506,149 in Human Services Grants Program funding.

The City also created an enhanced communications campaign to inform renter residents and property owners about the State Rental Assistance program, Housing is Key, and to support with application completion. Educational efforts focus on multilingual outreach to the most vulnerable residents who may not have access to online information. Application support was provided by City staff who answered questions, ran a clinic, and connected residents with the State's help center and established partner organizations. As of June 7, 2022, 2,207 Santa Monica households were served with an average assistance of \$15,566 and \$34,354,444 total funds paid.

In addition to the State Rental Assistance program, the City implemented the COVID Emergency Rental Assistance Program (ERAP) using \$2,549,979 in federal Community Development Block Grant funds (CDBG) and General Funds of \$251,535 to provide three months' rent up to \$5,000 to 640 households economically impacted by COVID. A total of 1,106 applications were submitted; 104 households did not qualify for or declined assistance, and an additional 362 households were not offered assistance due to lack of funding (of these 86 received assistance through the LA County program). Funding for program administration came from CDBG and the re-purposing of a County homelessness grant through the Westside Cities Council of Governments (WSCCOG).

The Los Angeles County Development Authority (LACDA) also administered a rental assistance program that opened in August 2020 to assist applicants throughout the County with a total of \$133 million from the Coronavirus Aid, Relief, and Economic Security Act (CARES) and County General Funds. At the close of the program, 435 Santa Monica residents were awarded approximately \$3.81 million in assistance through the County program.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Maintain housing stability for vulnerable individuals and households.

Program 6.C Maintain And Expand The Preserving Our Diversity (Pod) Program

The City shall continue to operate the POD program and pursue additional funding to maintain assistance to seniors and evaluate expanding program assistance to other rent burdened residents vulnerable to displacement, if possible. The program shall ensure that POD subsidies do not result in an increase in rents. The City intends the POD Program to serve at least 150 participants within this Housing Element cycle.

Support measures that are not housing constraints to generate and allocate tax revenue for income assistance.

Program Background:

The City's POD program provides cash-based assistance to low-income, long-term Santa Monica residents in rent-controlled apartments to help achieve a "basic needs budget" for seniors to have a minimum amount of income remaining after rent is paid each month for food and medical expenses. Currently, the program is available for qualifying long-term senior residents. In FY2020-21, the POD program served 196 low-income senior households providing an average monthly assistance of approximately \$500 per month, allowing participants to age in place. Applications for POD are accepted both online and by mail, with assistance for those seeking a reasonable accommodation.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Assist POD beneficiaries in achieving a basic needs budget.

Program 6.D Information And Outreach Coordination For Tenants And Landlords On Housing Programs And Resources

The City shall prioritize additional education and outreach to tenants and landlords throughout the City to increase awareness of federal and local housing programs and their rights and legal obligations, including Section 8 housing voucher program and anti-discrimination regarding income source. The City shall strengthen outreach and connect vulnerable residents with housing assistance and resources, including, but not limited to, credit counseling and support services addressing resident needs in securing adequate housing and hosting two educational webinars per year.

Program Background:

Rental housing vouchers provide extremely low- and very low-income households with rent subsidies to bridge the gap between what the household can afford and market rents, although there is a limit to the subsidy amount. The Santa Monica Housing Authority has collaborated with owners of senior

housing developments to obtain hundreds of new vouchers allocated to the senior developments allowing property owners to fund rehabilitation and maintenance and ensuring long-term affordability for the existing tenants. The Municipal Code and State law require rental property owners to accept Section 8 or housing vouchers and prohibit discrimination against an applicant based on source of income, including housing vouchers. Comments from tenants and landlords during the community engagement for this Housing Element update indicate that there continues to be lack of awareness of the availability of housing programs that could benefit both groups.

- **Timeframe:** Ongoing subject to additional staffing resources
- **Responsibility:** Housing and Human Services Division
- **Objective:** Raise awareness of housing assistance programs and tenant and landlord rights and responsibilities.



The Rent Control Department hosts several workshops and seminars for tenants and landlords throughout the year.

Program 6.E **Maintain A Community Development Grant Program**

The City shall continue to fund supportive services that serve the priority homeless populations, striking a balance between existing programs that have demonstrated effectiveness and national best practices that are consistent with the City’s adopted Action Plan to Address Homelessness in Santa Monica.

Program Background:

Santa Monica currently provides funding to 19 nonprofit human service and housing development organizations supporting different programs through the Community Development Grant Program. These programs serve, in part, to assist homeless persons, very low-, and low-income households, and special need populations. Funds are provided through a broad array of funding sources including but not limited to the City’s General Fund, HOME, and Community Development Block Grant Fund.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Housing and Human Services Division
- **Objective:** Maintain a grant program to fund programs that service priority homeless populations, lower-income households, and special needs populations.

Program 6.F Provide Tenant Relocation Assistance

The City shall continue to implement the Tenant Relocation Assistance program; periodically review existing City policies and ordinances and recommend modifications if deemed necessary, including but not limited to, additional support in locating new housing for displaced residents upon relocation. [The City shall continue to prioritize displaced residents on the City's Below Market Housing waiting list in order to provide opportunities to identify comparable replacement housing within Santa Monica.](#)

Program Background:

The City's Municipal Code provides several tenant relocation programs to protect tenants living in rent-controlled units, with certain exceptions. When a unit is withdrawn from the housing stock, or the landlord recovers possession of a unit, landlords are required to pay a relocation fee for each unit based upon the size of the unit. An additional fee is required if one or more of the tenants is a senior, disabled, or a minor. In lieu of providing financial relocation assistance, the landlord may provide actual physical relocation if the new unit is comparable to the original unit.

- **Timeframe:** Annual Ongoing
- **Responsibility:** City Attorney's Office, Housing and Human Services Division, Rent Control Board
- **Objective:** Provide displaced tenants with cash-based relocation assistance.

Program 6.G Maintain A Temporary Relocation Program

The City shall continue the Temporary Relocation Program, including program oversight and enforcement, and coordination in providing accommodations to minimize impacts to residents including emergency hotel vouchers for tenants who have been ordered to vacate their units by the City for code violations, safety improvements, or maintenance. [The City shall continue to require that all temporarily displaced tenants are relocated to comparable housing within Santa Monica, or close proximity, and that temporary relocation is for the amount of time necessary to restore habitability](#)

to the dwelling unit or if the landlord demonstrates that tenancy was legally terminated.

Program Background:

This program is designed to provide housing for persons temporarily displaced as a result of repairs to their dwelling unit due to health and safety violations or to comply with mandatory programs such as the Seismic Retrofit Program.

- **Timeframe:** Annual Ongoing
- **Responsibility:** Building and Safety Division, Housing and Human Services Division
- **Objective:** Provide housing for tenants temporary displaced from their units due to required maintenance.

Program 6.H Maintain Reasonable Accommodations To Ensure Equal Opportunity For Housing

The City shall maintain and continue to support reasonable accommodations to ensure equal housing opportunities, consistent with fair housing laws.

Program Background:

With the anticipated demographic changes resulting in an aging population and increased interest in enhancing opportunities to age in place and live independently, the Zoning Ordinance includes a reasonable accommodation procedure to enable persons with a disability to request an accommodation from land use and zoning regulations, policies and practices as needed to provide those individuals with an equal opportunity to use and enjoy a dwelling, consistent with fair housing law.

- **Timeframe:** Ongoing
- **Responsibility:** City Planning Division
- **Objective:** Provide regulatory relief to enable housing access for disabled persons.

▶ GOAL 7

Eliminate housing discrimination on the basis of race, color, religion, sex, gender, gender identity, gender expression, sexual orientation, age, marital status, national origin, ancestry, familial status, income level, source of income, disability, veteran or military status, genetic information, or other such characteristics.

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Program 7.A Maintain Fair Housing Enforcement And Outreach Programs

The City shall continue to implement fair housing programs. The City shall educate landlords about discrimination and educate the real estate community on the necessity of ensuring that their practices meet the objectives of the fair housing laws. The City shall also conduct targeted outreach by hosting a Fair Housing Workshop to the general public twice a year that covers fair housing. The City shall also continue to provide and tenant application assistance and support to special needs populations including seniors, persons with disabilities, and individuals transitioning from institutional settings and individuals who are at risk of institutionalization.

Program Background:

The City Attorney's Office, through its Public Rights Division (PRD), along with other government agencies, enforces federal, state and local fair housing laws. The PRD has an in-house attorney with expertise in fair housing law and a Spanish-speaking community liaison who works with the attorney. The PRD investigates discrimination complaints and offers education and programs to residents on their rights and responsibilities under the fair housing laws, and takes complaints involving housing discrimination based on all protected classes, but primarily on disability, family status, source of income, and race. Most of the cases are resolved informally, using demand letters, calls, and meetings to either to persuade the need for a change in what the landlord is doing or to conclude that there is insufficient evidence of a fair housing violation. However, if there is sufficient evidence of ongoing fair housing violations and the landlord has refused to correct the problem, then the PRD often files a lawsuit in court to enforce the fair housing laws.

Since 2007, the PRD hosts a Fair Housing Workshop twice a year. The workshop covers several topics, including reasonable accommodations for tenants with disabilities, the City's Right to Return program, pandemic-related issues in fair housing, and source-of-income discrimination laws which protect Section 8 voucher-holders and users of rental assistance. All owners, property managers, attorneys, social-service providers, and tenants are invited to attend, free of charge. Over the years, hundreds of tenants and housing providers have attended.

The PRD's workshops continued even through the pandemic, with a switch to virtual settings. The

City has also made fair housing presentations to other local and regional groups. Just since April 2020, the City presented or even co-hosted housing rights events sponsored by Santa Monica Rent Control Board, the Legal Aid Foundation of Los Angeles, Western Center for Law & Poverty, Santa Monicans for Renters' Rights, Fair Housing Council of San Diego, ACLU of Southern California, WISE & Healthy Aging, St. Joseph's Center, and the Santa Monica Committee for Racial Justice.

- **Timeframe:** Ongoing
- **Responsibility:** City Attorney's Office
- **Objective:** Education of tenants and landlords of their rights and responsibilities under fair housing laws.

Program 7.B Provide Tenant/Landlord Mediation And Legal Services

The City shall continue to support tenant/landlord mediation and legal services assistance.

Program Background:

The Santa Monica Rent Control Board also mediates disputes between tenants and property owners that arise from rent control law. The City has also partnered with the Status Institute for Dispute Resolution at Pepperdine University School of Law to provide mediation services to help resolve landlord tenant for Santa Monica residents, free of charge. The Housing and Human Services Division funds the Los Angeles Legal Aid Foundation to provide legal services related to housing to low-income Santa Monica residents. Referrals are also made to local dispute resolutions services.

- **Timeframe:** Ongoing
- **Responsibility:** City Attorney's Office; Rent Control Board; Housing and Human Services Division
- **Objective:** Provide tenant/landlord dispute resolution services.

Program 7.C Maintain The Anti-Discrimination And Tenant Protection Program

The City shall continue to prevent discrimination, tenant harassment, and unlawful evictions through monitoring and enforcing of "just cause" eviction protections, and continue to provide fair housing services through the Public Rights Division of the Santa Monica City Attorney's Office. The City shall review current laws and recommend any needed modifications to ensure protection of tenants to the maximum extent possible.

Program Background:

Santa Monica has long maintained anti-discrimination protections, which among other prohibitions, prevents a tenant from being evicted if the eviction is based on the tenant's familial status, including tenant's status of being married or having children. The Public Rights Division (PRD) of the Santa Monica City Attorney's Office handles complaints, answers questions about possible violations of the Fair Housing laws in Santa Monica and investigates possible fair housing violations.

- **Timeframe:** Ongoing
- **Responsibility:** City Attorney's Office; Rent Control Board; Housing and Human Services Division
- **Objective:** Protect existing tenants from harassment and unlawful eviction.

A. Quantified Objectives

Pursuant to Government Code Section 65583(b), the City has developed quantified objectives for housing production, housing rehabilitation, and housing assistance as required by State law. The following sets forth these objectives for the 2021–2029 planning period.

1. New Construction Objectives

The City of Santa Monica was allocated 8,895 units, of which 6,168 units must be affordable, in the 2021–2029 Regional Housing Needs Assessment (RHNA) adopted by the Southern California Association of Governments (SCAG) and certified by the State Department of Housing & Community Development in March 2029.

As one of the required components of a Housing Element, State law [Government Code Section 65583(b)] requires the following:

1. A statement of the community’s goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing.
2. It is recognized that the total housing needs identified pursuant to subdivision (a) [i.e., the RHNA] may exceed available resources and the community’s ability to satisfy this need within the content of the general plan requirements. The quantified objectives need not be identical to the total housing needs. The quantified objectives shall establish the maximum number of housing units by income category, including extremely low income, that can be constructed, rehabilitated, and conserved over a five-year time period.

The City’s success in producing housing units that are deed-restricted to be affordable for the 5th Cycle Housing Element has been made possible by public assistance through the City’s Housing Trust Fund, inclusionary units required by the City’s Affordable Housing Production Program, inclusionary units negotiated in development agreements, and pursuit of new funding resources. The lack of a significant and consistent funding source for affordable housing coupled with high land and construction costs in Santa Monica makes it unrealistic that the City will be able to achieve its 6th Cycle RHNA for affordable housing units. Funding to produce all of the affordable units in Santa Monica’s RHNA allocation would likely continue to require a mix of inclusionary units and public assistance (i.e. any combination of federal, state, county, and tax credits). Even on City-owned land, the funding gap is estimated at approximately \$152,000 that would need to be filled by sources other than the City. For privately-funded inclusionary units, the estimated cost to a developer is approximately \$480,000.

Figure 5-1 presents Santa Monica’s RHNA along with the City’s new construction objectives by income level. The quantified objective represents a level that the City believes is reasonable given the uncertainty of available funding resources from the State and other sources. The City Council has prioritized funding and land use policies to develop affordable housing.

Figure 5-1: RHNA vs. Quantified Objective

Household Income Category	RHNA	% of Total	Quantified Objective	% of Total
Very Low	2,794	31%	1,116,150	1622%
Low	1,672	19%	654,572	1011%
Moderate	1,702	19%	479,351	7%
Above Moderate	2,727	31%	4,459,180	6761%
Total	8,895		6,798,253	

Source: City of Santa Monica Community Development Department

The goal of 6,798,253 units can be achieved based on current approved and pending projects, zoning standards, use of City-owned land, and incentives for ADU production. The lower quantified objectives reflect the lack of public financing available for affordable housing. Even with maximizing affordable housing on City-owned sites and the City’s inclusionary requirements from the AHPP and DCP, providing 69% of the future units as affordable will be difficult.

The quantified objective aims for almost 5033% of units produced to be affordable to low and moderate ~~er~~ income households. This is in excess of the requirement set forth in the City’s Proposition R (passed in November 1990). Proposition R specifies that at least 30% of all new multifamily-residential housing constructed in the city on an annual basis be permanently affordable to low and moderate-income households with at least 50% of the newly constructed units required to be permanently affordable to low-income households.

2. Housing Rehabilitation and Conservation Objectives

Housing Rehabilitation programs are important for maintaining the integrity of existing housing stock, preventing displacement of existing residents, preserving the overall quality of neighborhoods, and contributing to a higher quality of life.

With respect to housing conservation, the City provides rehabilitation assistance through two main programs:

- The Residential Rehabilitation Program for owners of multifamily rental properties occupied by low- and moderate-income tenants
- The Owner-Occupied Rehabilitation Program for low- and moderate-income owners (typically used for mobile-home owners).

The City of Santa Monica's goal for the Housing Element planning period is to support and fund the rehabilitation of 38 units of multi-family and provide 20 minor home repairs, as shown in Figure 5-2. A new program has been added for this Housing Element based on the analysis of affordable housing units with covenants that expire, putting them potentially at risk of losing their affordability.

While the City has focused its efforts in recent years on new construction, acquisition and rehabilitation continues to be an important tool for conserving existing rental housing. The housing is restricted as affordable housing for a period ranging from 55-80 years. Such units were not 'counted' toward fair share housing production, but are consistent with the City's policies for preserving affordable housing units. During the last Housing Element period (2014-2021), the City invested more than \$33 million in the acquisition and rehabilitation of existing rental housing, creating four projects with 88 units for very-low and low-income households.

Available funding continues to be a significant issue to support this program's capacity at present levels. The Housing Plan therefore reflects a reduced quantitative objective for the acquisition and rehabilitation of 40 housing units affordable to very-low income households over the next eight years (Figure 5-2). The City will continue to seek funding sources to maintain this program and exceed the objective.

The City's housing and supportive services supports long-term residency and housing affordability. As outlined in the next section, the City has an aggressive program for funding housing and supportive services to special needs populations. These supportive programs help to conserve housing units in that rental/housing assistance, in the form of financial support and legal support for tenants against eviction, assist tenants in maintaining housing, prevent resident displacement, and preserve housing stock. Accordingly, an estimated number of housing vouchers and qualifying tenants for supportive services are reflected as "units" in Table 5-2 under the conservation objective:

- The Preserving Our Diversity (POD) Program provides cash-based assistance to low-income, long-term Santa Monica residents in rent-controlled apartments to help achieve a "basic needs budget" for seniors. It is estimated to include at least 150 participants within the next housing cycle.
- Rental assistance voucher programs include Section 8, Continuum of Care, HOME Tenant-Based Rental Assistance (TBRA) vouchers, and Veterans Affairs Supportive Housing. The City will continue to provide an estimated 1,600 housing vouchers for qualified residents.

- The City's Right to Counsel Program is an initiative to provide legal assistance and support for tenants facing eviction, particularly amid the COVID-19 pandemic. This pilot program is available to Santa Monica tenant households whose income is at or below 80% of the County's Area Medium Income ("AMI"), and facing eviction attempts by their landlord. Maintaining housing for low-income residents also contributes to the conservation of existing units. Assuming the current two-year pilot program will be renewed regularly and annual funding remains consistent over the next 8 years, the goal of the City is to provide assistance to an estimated 210 participants within the next housing cycle.

Figure 5-2: 2021-2029 Housing Rehabilitation and Conservation Quantified Objective

Income Category	Rehabilitated Units			Conservation Units			
	Definition	Multi-Family Rehabilitation	Minor Home Repairs	Acquisition & Rehabilitation	POD	Rental Assistance Vouchers	Right to Counsel
Very Low	0-50% of County MFI	19	10	40	150	1,600	0
Low	51 to 80% of County MFI	19	10	0	0	0	210
Moderate	81 to 120% of County MFI	0	0	0	0	0	0
Upper	Over 120% of County MFI	0	0	0	0	0	0
Totals		38	20	40	150	1,600	210
		58		2,000 1,900			

3. Housing and Supportive Services

The City of Santa Monica has an aggressive program for funding housing and supportive services to special needs populations. These include households with very low or extremely low incomes, persons with disabilities, large families, seniors, the homeless, and other persons in need of assistance. The City's goals for housing assistance and supportive services during the 2021-2029 Housing Element period, contingent upon the availability of adequate funds and annual City Council approval, are:

- Rental Assistance Vouchers: Continue to provide about 1600 vouchers, including Section 8, Continuum of Care, HOME Tenant-Based Rental Assistance (TBRA) vouchers, and Veterans Affairs Supportive Housing vouchers.
- Homeless Services: Focus efforts on the priority populations defined in the Action Plan for Addressing Homelessness in Santa Monica:
 - o The long-term chronic and vulnerable of the homeless population living on the streets of Santa Monica, including homeless veterans
 - o Persons whose last permanent address is in Santa Monica
 - o Vulnerable members of Santa Monica's workforce
 - o High users of local first responder services
- Regional Partner: Continue to be an active partner in finding regional solutions to the problem of homelessness.
- Health Care for Low Income Persons: Provide primary health care for over 2,700 low-income Santa Monica residents annually.
- Legal Assistance: Provide legal advice and referrals to over 700 low-income Santa Monica residents in the areas of housing, government benefits, and family-law issues annually.
- Senior and Disabled Services: Support and fund a variety of services for senior and disabled individuals, including:
 - o Provide paratransit services for approximately 2,200 seniors and persons with disabilities annually. This includes providing approximately 1,400 one-way, escorted trips for people who need extra assistance, as well as limited after-hours taxi service.

- o Provide a range of health and mental health services, including health screenings, primary medical care, health education, peer counseling (individual, group, and family), caregiver services, and care coordination
 - o Provide intensive care management services primarily to low-income Santa Monica seniors that include in-home assessments, purchase of services necessary to maintain the client in his/her home, benefits assistance, referrals to other agencies, and close monitoring of clients.
 - o Provide care management and other support services in conjunction with the Santa Monica Police Department's efforts to address elder abuse.
 - o Through the non-profit WISE & Healthy Aging (WISE) Diner Meal Program, provide a well-rounded lunch to older adults at three City sites. Boxed meals were provided via pickup or delivery while COVID-19 restrictions were in place.
 - o Provide home-delivered meals to approximately 300 home-bound seniors and persons with disabilities annually. With COVID-19, the need for home-delivered meals increased significantly, with about 650 individuals having accessed this service.
 - o Provide ongoing operating support for WISE's Adult Day Care Center serving frail seniors, including seniors with Parkinson's and Alzheimer's Disease.
 - o Provide expanded healthy living and arts programming, and opportunities for socialization for older adults with linkages to supportive services, through the consolidation of services in a one-stop facility.
- Housing Modifications for Individuals with a disability: Continue to provide funding to the Disability Community Resource Center, which provides home modifications to low-income households that include a person with a disability. Modifications include the installation of grab bars, nonslip bath mats, ramps, shower benches, and toilet seat hand rails, as well as larger projects such as stair lift installations. Provide assistance to approximately 15 individuals annually.

way

447 LINCOLN



Glossary



Glossary of Terms and Acronyms

- ADU:** Accessory Dwelling Unit
An attached or detached residential dwelling unit that provides complete independent living facilities for one or more persons and that is located on a parcel with a proposed or existing primary single-unit or multi-unit dwelling.

JADU: Junior Accessory Dwelling Unit
A dwelling unit that is no more than 500 square feet in size and is contained entirely within an existing or proposed single-unit dwelling.
- AFFH:** Affirmatively Furthering Fair Housing
Taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws.
- AHO:** Affordable Housing Overlay
Program 2.A that would amend the Zoning Ordinance to establish a 100% affordable housing overlay for moderate-income (up to 120% AMI) housing projects in targeted areas of the City such as the Downtown, Bergamot area, and the immediate area around the 17th Street station.
- AHPP:** Affordable Housing Production Program (SMMC 9.64)
Requires developers of market rate multi-family developments to contribute to affordable housing production and thereby help the City meet its affordable housing need.
- FAR:** Floor Area Ratio
The ratio of the total floor area of all buildings on a parcel to the total area of the parcel.
- HCD:** California Department of Housing and Community Development
- HUD:** U.S. Department of Housing and Urban Development
- LUCE:** Land Use and Circulation Element
Key components of the City's General Plan establishing the City's vision, goals, and long-term framework for the City's future physical development.
- QO:** Quantified Objective
Estimated number of units likely to be constructed, rehabilitated, or conserved/preserved by income level during the upcoming 6th housing cycle. After the City identifies housing needs, surveys land and financial resources, analyzes constraints, and develops appropriate programmatic and policy responses that reflect the community's unique needs and circumstances, it then sets quantified objectives, a target goal for the City to achieve based on needs, resources, and constraints.

10. **RHNA:** Regional Housing Needs Assessment
RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. RHNA quantifies the need for housing within each jurisdiction during the upcoming 6th housing cycle between October 2021 through October 2029.
11. **SDB:** State Density Bonus
State law that allows a density increase of residential units based on a specified percentage of affordable units provided in a proposed project.
12. **SSI:** Suitable Sites Inventory
An inventory of land suitable and available for residential development to meet the locality's regional housing need by income level.

Affordability Levels

13. **ELI:** Extremely-Low Income
A household whose gross income does not exceed 30% of the area median income.
14. **VLI:** Very-Low Income
A household whose gross income does not exceed 50% of the area median income.
15. **LI:** Low-Income
A household whose gross income does not exceed 80% of the area median income.
16. **Moderate-Income:**
A household whose gross income exceeds the maximum income for an 80% income household and whose gross income does not exceed 120% of the area median income.

Zoning Districts, Area Plans, and Neighborhoods

17. **R 1:** Single-Unit Residential District
Areas for single-unit housing on individual parcels at densities of one unit plus one accessory dwelling unit (ADU) and one junior accessory dwelling unit (JADU) per parcel.
18. **R2:** Low Density Residential District
Areas for a variety of low-density housing types. These include single-unit housing, duplexes, triplexes, low-scale multi-unit housing, ADUs, etc.
19. **MUBL:** Mixed-Use Boulevard Low District

20. **MUB:** Mixed-Use Boulevard District
21. **GC:** General Commercial
22. **NC:** Neighborhood Commercial District (Main Street, Ocean Park Blvd, Pico Blvd, Montana Ave)
23. **IC:** Industrial Conservation
24. **OC:** Office Campus
25. **HMU:** Healthcare Mixed Use
26. **OF:** Oceanfront District
27. **DGP:** Downtown Community Plan
 - o **LT:** Lincoln Transition
 - o **NV:** Neighborhood Village
 - o **BC:** Bayside Conservation (Promenade)
 - o **BC:** Bayside Conservation (2nd & 4th Streets)
 - o **TA:** Transit Adjacent
 - o **OT:** Ocean Transition
 - o **WT:** Wilshire Transition
28. **BAP:** Bergamot Area Plan
 - o **BTV:** Bergamot Transit Village
 - o **MUC:** Mixed-Use Creative
 - o **CAC:** Conservation: Arts Center
 - o **CSC:** Conservation: Creative Sector
29. **NOMA:** North of Montana Neighborhood
30. **Wilmont:** Wilshire-Montana Neighborhood



Appendix E:

Constraints on Housing



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INTRODUCTION

The City of Santa Monica has consistently placed the provision of adequate and affordable housing for all residents as one of its primary goals. However, many factors can encourage or constrain the development, maintenance, and improvement of housing including governmental, market, construction, and infrastructure constraints. Pursuant to Government Code Section 65583(a)(5-6), this appendix identifies potential governmental and nongovernmental constraints and analyzes the extent to which the City can mitigate the negative impacts of these constraints where possible. A thorough understanding of the current constraints to housing development can help to create appropriate policy responses to mitigate constraints and make it easier and more affordable to develop housing.

A. GOVERNMENTAL CONSTRAINTS

Governmental policies and regulations can result in both positive and negative effects on the availability and production of housing. This section, as required by Government Code Section 65583(a)(5), describes and evaluates City policies and regulations that could potentially constrain the City's ability to achieve its housing goals. Potential constraints to housing include land use controls (through General Plan policies and zoning regulations), development standards, infrastructure requirements, development impact fees, and development approval processes. While government policies and regulations are intended to serve public objectives and further the public good, the City of Santa Monica recognizes that its actions can potentially constrain the availability and affordability of housing to meet the community's future needs. The City has implemented several measures, and proposes additional programs, to streamline the approval process and remove barriers to all types of housing throughout Santa Monica as described in this section.

1. Land Use Controls

Land use controls, such as use regulations and development standards, have the most immediate impact on the location and construction of new housing. Below is a description of the various plans, documents, and other controls that set forth the goals, policies, and standards that affect both where various types of housing can be located in the City [see Section A(2) below] as well as the development standards and requirements that shape housing developments. Pursuant to Government Code Section 65940.1(a)(1)(B), all documents and standards summarized below can be found on the City's Community Development Department website.

a. Land Use and Circulation Element

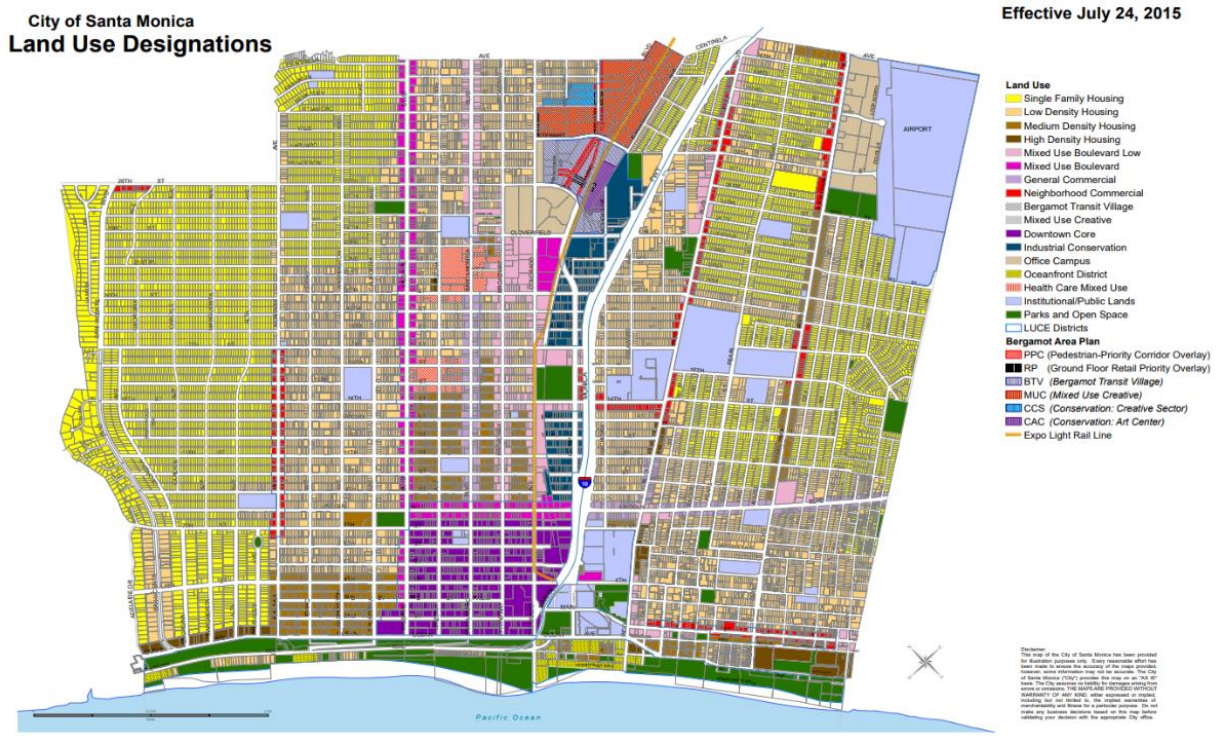
Santa Monica adopted its General Plan Land Use and Circulation Element (LUCE) in 2010 (subsequently updated in 2015 with the Zoning Ordinance update, 2017 with the adoption of the Downtown Community Plan, and 2020 with the revisions to housing process thresholds) which substantially revised the City's land use policies, goals, and standards in non-residential zones but generally maintained the status quo in the city's traditional residential neighborhoods. The overarching goal of the LUCE is to create significant new additional housing opportunities within transit-served areas in a manner that provides more affordable options, enhances sustainability, creates complete neighborhoods, and provides easy access to local services. Additionally, the LUCE established policies to preserve the existing pattern of uses for the protection and long-term conservation of established neighborhoods. To accomplish these goals, the LUCE implemented a variety of strategies including, but not limited to the following:

- Encourage the creation of new housing in selected transit-accessible areas such as Downtown, Bergamot, and along the City's boulevards.
- Established Activity Center Overlays, which would provide opportunity to promote the creation of mixed-use gathering areas at transportation crossroads on parcels of sufficient size offering goods and services for the neighborhood, convenient transit access, and unique urban spaces. Each Activity Center relied upon cooperation from multiple property owners to consolidate large parcels, an area plan, and a development agreement for each individual project.
- Establish a Neighborhood Conservation Strategy to promote the protection of housing in existing neighborhoods, much of which is under rent control, strengthen standards for demolition, and redirect growth to appropriate locations along transit corridors and in the vicinity of the Metro E (formerly Expo) light rail stations.
- Establish a maximum base height for ministerial project review and require projects exceeding the base height to incorporate community benefits, such as additional affordable housing.

The LUCE established 17 land use designations, as shown in Map E-1, grouped into the following five broad categories:

- Neighborhoods
- Boulevards
- Mixed Use Centers
- Employment and Commerce
- Community and Public Uses

Map E-1 LUCE Land Use Designations



The LUCE encouraged the expansion of housing opportunities into new areas of the City with residential uses permitted in all but three (Industrial Conservation, Office Campus, and Parks and Open Space) of the 17 land use designations. While the implementing Zoning Ordinance established specific development standards, the LUCE set forth standards for building height, densities (in neighborhood designations), and intensities that establish the outer parameters for zoning. The LUCE does not specify maximum densities for non-neighborhood designations. Instead, density is regulated through building intensities such as Floor Area Ratio (FAR) and height which has provided flexibility to housing developments. In most land use designations, the LUCE also established a tiered system that affords additional building height and density (through traditional means or through an increase in FAR depending on the designation) beyond the base (Tier 1) standards for projects that provide community benefits or that are 100% affordable housing. However, these established outer parameters for Tier 1 projects, which were established in 2010, currently present constraints on the City's ability to meet its updated housing goals due to low FARs and building heights that were demonstrated to be infeasible in studies conducted in the spring of 2021. Therefore, Housing Element Programs 1.F and 1.J propose to reevaluate development standards and regulations, both independently and cumulatively, to not only ensure housing projects are feasible, but that they also incentivize housing production citywide.

Figure E-1 presents the 17 LUCE land use designations and summarizes the base (Tier 1) height and density/intensity standards and the Tier 2 and 3 standards for projects which provide identified community benefits and/or 100% affordable housing developments.

Figure E-1 LUCE Land Use Designation – Height and Density/Intensity Parameters

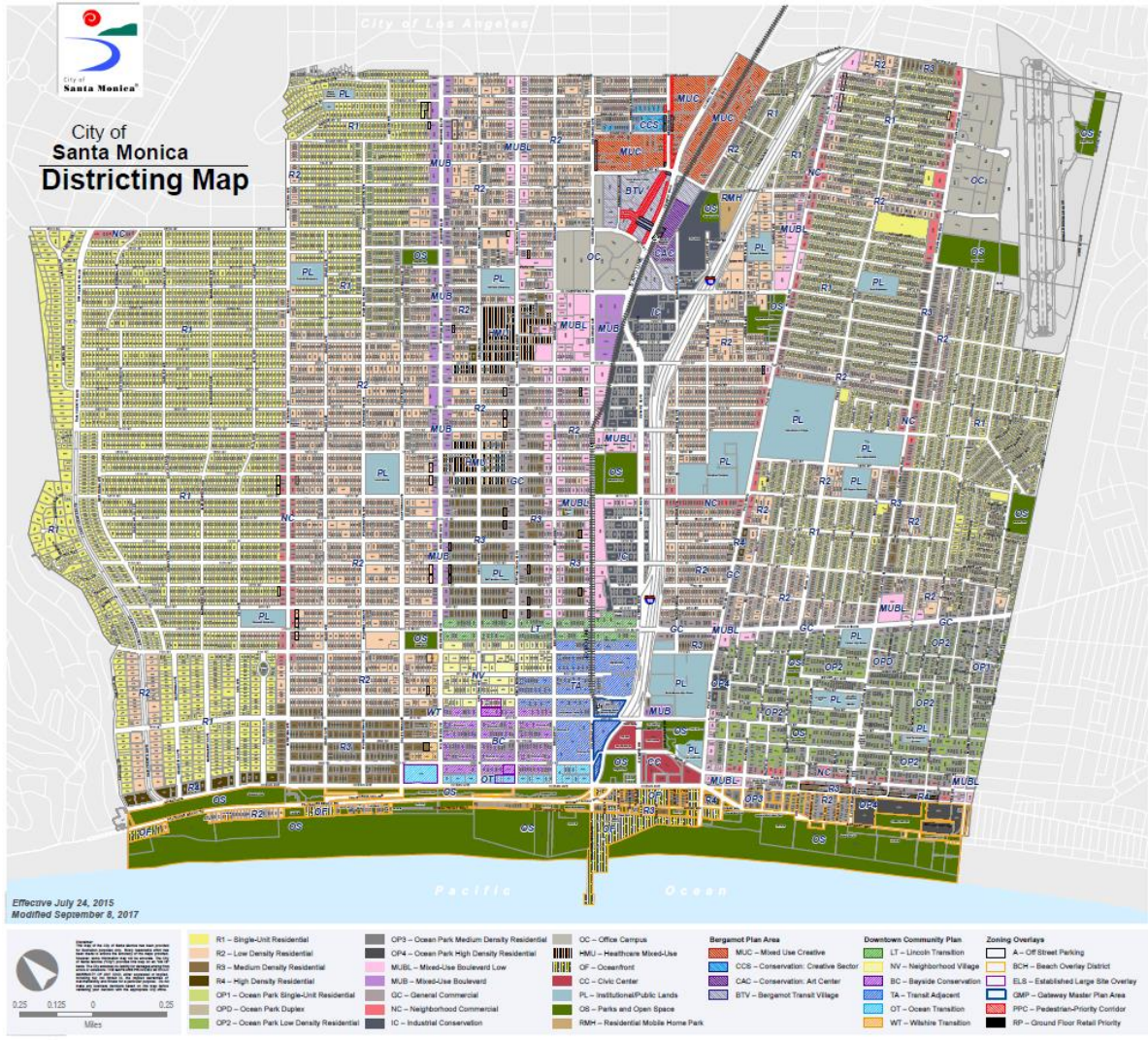
LUCE Land Use Designation	Max. Building Height and Density/Intensity			
	Tier 1	Tier 2	Tier 3	100% Affordable Housing
Neighborhoods				
Single-Unit Housing	No tiers. Height: 28' – 35' depending on parcel size, dimensions, and location; Density: 1 du/parcel			
Low Density Housing	No tiers. Height: 30' – 40' depending on parcel location; Density: 29 du/acre			
Medium Density Housing	30' / 29 du/acre	40' / 35 du/acre	-	40' / 35 du/acre
High Density Housing	30' / 35 du/acre	45' / 48 du/acre	-	45' / 48 du/acre
Boulevards				
Mixed Use Boulevard Low	32' / 1.5 FAR 36' / 1.5 FAR*	36' / 1.75 FAR	47' / 2.0 FAR	47' / 2.0 FAR
Mixed Use Boulevard (100% residential above ground floor)	32' / 1.5 FAR 39' / 1.5 FAR*	50' / 2.25 FAR	55' / 2.75 FAR	55' / 2.75 FAR
		DCP – East Side of Lincoln Blvd: 50' / 2.25 FAR	-	DCP – East Side of Lincoln Blvd: 60' / 2.75 FAR
		DCP – West Side of Lincoln Blvd: 60' / 2.75 FAR	-	DCP – West Side of Lincoln Blvd: 70' / 3.25 FAR
		DCP – Wilshire Blvd West of Lincoln Blvd: 50' / 2.25 FAR	-	-
Mixed Use Boulevard (All Other Projects)	32' / 1.5 FAR 35' / 1.5 FAR*	45' / 2.25 FAR	55' / 2.75 FAR	55' / 2.75 FAR
		DCP – East Side of Lincoln Blvd: 40' / 1.75 FAR	-	DCP – East Side of Lincoln Blvd: 55' / 2.75 FAR
		DCP – West Side of Lincoln Blvd: 50' / 2.25 FAR	-	DCP – West Side of Lincoln Blvd: 55' / 3.25 FAR
		DCP – Wilshire Blvd West of Lincoln Blvd: 40' / 1.75 FAR	-	DCP – Wilshire Blvd West of Lincoln Blvd: 40' / 1.75 FAR
General Commercial (Santa Monica Blvd)	32' / 1.25 FAR	35' / 1.5 FAR	-	35' / 1.5 FAR
General Commercial (Lincoln & Pico Blvds)	32' / 1.5 FAR 36' / 1.5 FAR*	36' / 1.75 FAR 2.0 FAR***	-	40' / 2.0 FAR
Mixed Use Centers				
Neighborhood Commercial	32' / 1.5 FAR 1.75 FAR**	-	-	32' / 1.75 FAR 40' / 2.0 FAR (Pico Blvd)
Bergamot Transit Village	32' / 1.75 FAR 39' / 1.75 FAR*	60' / 3.0 FAR	75' / 3.5 FAR	75' / 3.5 FAR
Mixed Use Creative	32' / 1.5 FAR 36' / 1.5 FAR*	47' / 2.0 FAR	57' / 2.5 FAR	57' / 2.5 FAR
Beach and Oceanfront	32' / 1.5 FAR 36' / 1.5 FAR*	47' / 2.0 FAR 2.25 FAR***	-	47' / 2.25 FAR
Downtown Core	Downtown Community Plan establishes development standards			

LUCE Land Use Designation	Max. Building Height and Density/Intensity			
	Tier 1	Tier 2	Tier 3	100% Affordable Housing
Employment and Commerce				
Industrial Conservation	Residential uses are not permitted			
Office Campus	Residential uses are not permitted			
Healthcare Mixed-Use	No tiers. Hospital Area Specific Plan establishes development standards			
Community and Public Uses				
Institutional/Public Lands/ Civic Center	No tiers. Civic Center Specific Plan establishes development standards			
Office Campus	Residential uses are not permitted			
<i>* Height bonus for provision of on-site affordable housing.</i> <i>** FAR bonus for provision of on-site affordable housing.</i> <i>*** FAR bonus for provision of additional affordable housing.</i>				

b. Zoning Ordinance

In 2015, the City completed a comprehensive update of its Zoning Ordinance to ensure consistency with the new policies, goals, and standards set forth in the LUCE and specified implementation mechanisms for achieving these policy standards. Through the Zoning Ordinance, land use regulations regarding where types of housing can be developed within the City and various development standards such as parcel size, density (for residential zones), number of stories, building height, parcel coverage/FAR, setbacks, and open space are provided for each of the City’s 21 zone district classifications governed by the Zoning Ordinance (as shown in Map E-2). Except in the City’s residential zones where traditional means of density are prescribed, density limitations are controlled through a combination of building height and FAR limitations. The Zoning Ordinance defines a “dwelling unit” as “one or more rooms designed, occupied, or intended for occupancy as separate living quarters, with full cooking, sleeping and bathroom facilities for the exclusive use of a single household” that exceeds 375 square feet. Additionally, the Zoning Ordinance and its associated land use regulations provide additional regulations for affordable units to ensure consistency with market rate unit sizes including standards for minimum unit sizes and unit mix/bedroom counts. Typically, these unit size requirements range from 500 square feet for a studio unit to 850 square feet for a two-bedroom unit.

Map E-2 Zoning Ordinance Zone District Classifications



While the Zoning Ordinance also implements the tiered development concept that was established in the LUCE, between the adoption of the LUCE in 2010 and the Zoning Ordinance update in 2015, Santa Monica’s growth management strategy fluctuated based on a multitude of factors that influenced how the community’s priorities were identified and addressed. This resulted in a reduced tiered system implemented in the Zoning Ordinance that eliminated the Tier 3 option identified in the LUCE for certain land use designations. The changes also removed four of the five “Activity Centers” which were intended to incentivize mixed-use residential development around the City’s transit stations through additional height above Tier 3 limits and FAR increases. As established in the LUCE, Tier 3 projects were voluntary and required a discretionary process and negotiated community benefits, while Activity Centers required cooperation of multiple property owners of large sites, an area plan, and individual development agreements for each project. As a result of the extensive process necessary to achieve Tier 3 or an Activity Center, the City moved toward a more standardized and simplified process through creation of an objective community benefits system.

Even with the removal of these concepts, the City's development standards are generous toward housing projects especially in mixed-use and commercial zones where setbacks are minimal (if any) and density limits are not established. The tiered system, with its provision of pre-established community benefits in exchange for increased building heights and densities/intensities, has also proven to be the preferred route for many housing developers to capture some level of additional development potential. However, based on feasibility testing conducted by the City's economic consultant, current development standards such as low FAR and building height limitations have been identified to be constraints on the City's ability to meet its updated housing goals. Additionally, other development standards such as minimum/maximum ground floor heights, active ground floor use requirements, daylight plane, and maximum building footprint have been brought to the City's attention as other possible constraints. In some cases, a developer may apply for a modification or waiver to provide relief from these development requirements, but this adds time and uncertainty to housing project approvals. Therefore, Housing Element Program 1.J proposes to reevaluate development standards and regulations, both independently and cumulatively, to not only ensure housing projects are feasible, but that they also incentivize housing production citywide. The new development standards for FAR and building height will be higher than existing standards and in some cases, higher than what was initially adopted as part of the original 2010 LUCE.

Within the residential zone districts (R2, R3, R4, OPD, OP2, OP3, and OP4), housing development is subject to a density limitation based on a units per acre calculation or a total maximum number of units, whichever is less. Most of the City's rent control and more naturally occurring "affordable" housing stock is located in these residential districts, and as such, the density limits are intended to prevent the widespread displacement of tenants in existing residential units, particularly rent control units. However, there are a number of residentially zoned sites that are developed as surface parking lots for commercial uses on boulevard fronting parcels. The current density limits, as well as other development regulations (such as access requirements), are an existing barrier to development of these surface parking lot sites. Therefore, Housing Element Program 1.C proposes to remove the density limits for these parcels and revise the Zoning Ordinance to incentivize the development of surface parking lots in residential zones.

Figures E-2, E-3, and E-4 present the main development standards that control housing development within the City's residential, commercial, and other zone districts, respectively.

Figure E-2 Development Standards in Residential Zone Districts

Development Standard	Residential Zone Districts								
	R1	R2	R3	R4	OP1	OPD	OP2	OP3	OP4
Minimum Parcel Size	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.	4,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.
Maximum Parcel Area per Unit (Density)									
Tier 1 – Base Standard	1 unit	2,000 (or 4 total units, whichever is less)	1,500 (or 5 total units, whichever is less)	1,250 (or 6 total units, whichever is less)	1 unit	2 units	2,000	1,500	1,250
Tier 2 – With Provisions of Community Benefits	-	-	1,250	900	-	-	-	-	-
100% Affordable Housing Projects	-	1,500	1,250	900	-	-	-	-	-
Maximum Parcel Coverage (% of Parcel Area)									
Base Standard	45% – 55% depending on number of stories and new/existing development	Ground floor: 45% Upper Stories: 90% of allowable ground floor coverage	Ground floor: 50% Upper Stories: 90% of allowable ground floor coverage	Ground floor: 50% Upper Stories (% of allowable ground floor coverage): 2 nd Story: 80% 3 rd Story: 60% 4 th Story: 50%	50%	50%	50%	50%	50%
100% Affordable Housing Projects	-	90% of allowable ground floor	90% of allowable ground floor	50% of allowable ground floor	60%	60%	60%	60%	60%
Maximum Building Height (Stories/Feet)									
Tier 1 – Base Standard	2 / 28' – 32' depending on parcel size	2 / 30'	2 / 30'	3 / 30'	2 / 20' – 27' depending on roof type	2 / 23' – 30' depending on roof type	2 / 23' – 30' depending on roof type	2 / 23' – 30' depending on roof type	3 / 35'
Tier 2 – With Provisions of Community Benefits	-	-	3 / 40'	4 / 45'	-	-	-	-	-
100% Affordable Housing Projects	-	No limit / 30'	No limit / 40'	No limit / 45'	2	No limit / 23' – 30' depending on roof type	No limit / 23' – 30' depending on roof type	No limit / 23' – 30' depending on roof type	No limit / 35'
Minimum Setbacks									
Front	Varies by street	20'	20'	20'	15'	30'	20'	20'	15'
Sides	10% or 30% aggregate	Parcel 50' or greater: 8' Parcel less than 50': 4' or 16%	Parcel 50' or greater: 8' Parcel less than 50': 4' or 16%	Parcel 50' or greater: 8' Parcel less than 50': 4' or 16%	Development/ Parcel Specific	Development/ Parcel Specific	Development/ Parcel Specific	Development/ Parcel Specific	Development/ Parcel Specific
Rear	15'	15'	15'	15'	10'	15'	15'	15'	15'
Minimum Outdoor Living Area per Unit (Sites with 3+ Units)									
Private	-	60 sq. ft.	60 sq. ft.	60 sq. ft.	-	60 sq. ft.	60 sq. ft.	60 sq. ft.	60 sq. ft.
Total	-	150 sq. ft.	150 sq. ft.	150 sq. ft.	-	150 sq. ft.	150 sq. ft.	150 sq. ft.	100 sq. ft.

Figure E-3 Development Standards for Commercial Zone Districts

Development Standard	Commercial Zone Districts						
	MUBL	MUB	GC (Santa Monica Blvd)	GC (Lincoln & Pico Blvds)	NC	NC (Main St)	NC (Ocean Park Blvd & Montana Ave)
Minimum Parcel Size	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	5,000 sq. ft.	5,000 sq. ft.	5,000 sq. ft.
Maximum FAR							
Tier 1 – Base Standard	1.25	1.25	1.0	1.25	1.25	0.75	0.75
Tier 1 – Projects Including On-site Affordable Housing in Compliance with AHPP	1.5	1.5	1.25	1.5	1.5	1.0	1.0
Tier 2 – With Provisions of Community Benefits	1.75	2.25	1.5	1.75 (2.0 if on-site affordable housing provided)	-	-	-
100% Affordable Housing Projects	2.0	2.75	1.5	2.0	1.75; 2.0, on Pico Blvd only	1.25	1.25
Maximum Building Height (Stories/Feet)							
Tier 1 – Base Standard	2 / 32'	2 / 32'	2 / 32'	2 / 32'	2 / 32'	2 / 27'	2 / 32'
Tier 1 – Projects Including On-site Affordable Housing in Compliance with AHPP	3 / 36'	3 / 39' if 100% residential above ground floor, 3/35' for all other projects	-	3 / 36'	2 / 32'	2 / 27'	2 / 32'
Tier 2 – With Provisions of Community Benefits	3 / 36'	3 / 45'	2 / 35'	3 / 32' (3 / 36' if on-site affordable housing provided)	-	-	-
Tier 2 – With Provisions of Community Benefits and 100% Residential Above the Ground Floor	No limit / 36'	No limit / 50'	No limit / 35'	No limit to stories / 32' (36' if on-site affordable housing provided)	-	-	-
100% Affordable Housing Projects	No limit / 55'	No limit / 55'	No limit / 35'	No limit / 40'	No limit / 32'; 40' on Pico Blvd only	No limit / 32'	No limit / 32'
Minimum Setbacks							
Interior Side and Rear if Adjacent to Residential District	10'	10'	10'	10'	10'	10'	10'
Minimum Outdoor Living Area per Unit (Sites with 3+ Units)							
Private	60 sq. ft.	60 sq. ft.	60 sq. ft.	60 sq. ft.	60 sq. ft.	60 sq. ft.	60 sq. ft.
Total	100 sq. ft.	100 sq. ft.	100 sq. ft..	100 sq. ft.	100 sq. ft.	100 sq. ft..	100 sq. ft.

Figure E-4 Development Standards for Other Zone Districts

Development Standard	Zone Districts			
	IC	OC	HMU	OF
Minimum Parcel Size	15,000 sq. ft.	15,000 sq. ft.	7,500 sq. ft.	5,000 sq. ft.
Maximum Density	-	-	-	Parcels Along PCH between Santa Monica Pier and the north City limits: Parcels 4,000 sq. ft. or more: 1 dwelling unit/1,500 sq. ft. Parcels less than 4,000 sq. ft.: 1 dwelling unit/parcel if existing, no new dwelling units
Maximum FAR				
Tier 1 – Base Standard	1.0	1.5	1.5	1.5; 0.5 for parcels located along the PCD between the Santa Monica Pier and the north City limits
Tier 2 – With Provisions of Community Benefits	1.75	1.75	2.5	2.0
100% Affordable Housing Projects	2.25	-	2.5	2.25
Maximum Parcel Coverage	-	-	-	70; 50 on parcels along the PCH between the Santa Monica Pier and the north City limits
Maximum Building Height (Stories/Feet)				
Tier 1 – Base Standard	2 / 32'	2 / 32'	3 / 45'	2 / 32' – 30' depending on roof type and location
Tier 1 – Projects Including On-site Affordable Housing in Compliance with AHPP	-	-	-	3 / 36'
Tier 2 – With Provisions of Community Benefits	3 / 45'	3 / 45'	5 / 70'	3/47'
Tier 2 – With Provisions of Community Benefits and 100% Residential Above the Ground Floor	-	-	-	No limit / 47'
100% Affordable Housing Projects	No limit / 45'	-	No limit / 70'	No limit / 47'
Minimum Setbacks				
Street Frontage	-	-	-	5' except for 20'. on PCH between northern City limits and Santa Monica Pier
Side	-	-	-	Parcel specific
Rear	-	-	-	15' if adjacent to a residential use; 25' for beach rear setback on parcels over 100'. in depth located along the PCH between the Santa Monica Pier and the north City limits
Interior Side and Rear if Adjacent to Residential District	15'	15'	15'	-
Minimum Outdoor Living Area per Unit (Sites with 3+ Units)				
Private	-	-	60 sq. ft.	60 sq. ft.
Total	-	-	100 sq. ft..	100 sq. ft.

i. Affordable Housing

Santa Monica has consistently tried to remove barriers and incentivize 100% affordable housing projects in all of its zone districts citywide through the following methods:

- Greater FAR, density, and building height allowances
- No limit to the number of stories within the maximum building height
- Parking reductions
- Ministerial permit processing
- No City Planning application fees or development impact fees
- Compliance with California Assembly Bill (AB) 1763 (addition of 3 stories or 33' in height, four incentives/concessions, no parking requirements)

Through new Housing Element programs and concepts, such as the Moderate Income Housing Overlay identified in Housing Element Program 2.A, Santa Monica will continue to provide and expand benefits for 100% affordable housing projects throughout the City.

ii. Affordable Housing Production Program

The City's Affordable Housing Production Program (AHPP), implemented through Santa Monica Municipal Code (SMMC) Chapter 9.64, requires that residential and mixed-use projects of two or more units contribute to affordable housing production to assist the City in addressing its overall affordable housing needs. Figure E-5 summarizes the options for fulfilling the City's AHPP requirements through a menu option. However, Housing Element Program 2.C proposes revisions to the City's AHPP, including re-evaluation of the minimum required percentage of on-site or off-site units, to determine the best means of achieving the City's housing goals, which may include increasing the threshold for providing on-site units, adding flexibility in meeting goals through an in lieu fee or hybrid option, and increases to the number of units to be produced per project. To the extent Program 2.C proposes amendments to the AHPP to increase the number of units that must be produced per project to increase the number of affordable units throughout the City, Programs 1.F and 1.J will ensure that the new FARs and building heights for housing projects that comply with the minimum AHPP requirements will be feasible.

Figure E-5 Affordable Housing Production Program Options

	Projects with 2-3 Ownership Units OR 2+ Rental Units	Projects with 4-15 Ownership Units	Projects with 16 or More Ownership Units
On-site Option	5% extremely low income units (option currently unavailable until after February 28, 2022); or 10% very low income units, or 20% low income units, or 100% moderate income units	20% moderate or 20% low or 10% very low income units	25% moderate or 25% low or 15% very low income units
Off-site Option	Same as on-site option	25% more than required number of on-site units	25% more than required number of on-site units
Affordable	\$36.49/SF for apartments	Not Applicable	Not Applicable

Housing Fee (2020)	\$42.62/SF for condominiums Unit Development Cost: \$382,795.00		
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iii. Community Benefits

The purpose of community benefits is to implement LUCE policies that require community benefits in exchange for increased development parameters. As discussed above, for a housing project to receive Tier 2 or 3 increased building heights and/or densities/intensities, the project must provide community benefits as prescribed in SMMC Chapter 9.23 or SMMC Section 9.10.070 for projects located within the Downtown Community Plan area. Community benefits consist of the following:

1. Housing (Increased provision of Affordable Housing and Unit Mix requirements)
2. Transportation Impact Fee
3. Open Space (Additional fee or provision of publicly accessible open space)
4. Transportation Demand Management (Preparation of a Developer TDM trip reduction plan, Transportation Allowance equivalent to 75% the cost of a monthly transit pass, and on-site shared bicycles)

While some community benefits require on-site features such as increased affordable units and unit mix requirements (prescribed percentages and ratios of studio, two, and three bedroom units), others only require increases to development impact fees (an additional 14% applied only to the increase above Tier 1). While community benefits can add additional requirements and fees to housing projects, they are an elective process (i.e., voluntary Tier 2 or Tier 3 projects) and are offset by increased development potential. Furthermore, Housing Element Program 1.J will be reevaluating and increasing development standards (FAR and building height) in mixed-use and commercial zones to support housing production. The new FARs and building heights for housing projects will be based on feasibility analysis that takes into account development costs inclusive of the requirements for community benefits, local fees, local building code requirements, as well as affordable housing requirements in the City's AHPP. Additionally, 100% affordable housing projects are deemed to have satisfied the housing community benefit requirement and are not required to provide additional community benefits.

iv. Parking Requirements

Figure E-6 summarizes Santa Monica's parking requirements for residential uses throughout the City except for those areas governed by the Bergamot Area Plan (BAP). Single-unit dwellings are required to provide a flat rate of two parking spaces, whereas for other residential uses parking is calculated on a per-bedroom basis and in some cases per bed for certain housing types.

Figure E-6 Parking Requirements for Residential Uses, Excluding the Bergamot Plan Area

Residential Use/Facility	Citywide (Excluding Parking Overlay Area 1, Downtown Community Plan Area, and Bergamot Area Plan Area)	Parking Overlay Area 1	Downtown Community Plan Area (Maximum Parking Allowed)
Single-Unit Dwelling	2 spaces per dwelling unit	2 spaces per dwelling unit, which may be tandem	2 spaces per dwelling unit
Accessory Dwelling Unit	1 space per dwelling unit	1 space per dwelling unit	N/A
Junior Accessory Dwelling Unit	N/A	N/A	N/A
Multiple-Unit Dwelling	Market Rate Units: Guest = 1 space per 5 units Studio, no bedroom = 1 space per unit 1 bedroom = 1.5 spaces per unit 2 or more bedrooms = 2 spaces per unit Deed Restricted Affordable Units: Studio, no bedroom = 0.5 space per unit 1 bedroom = 0.75 spaces per unit 2 or more bedrooms = 1 spaces per unit	Market Rate Units: Guest = 1 space per 10 units Studio, no bedroom = 1 space per unit 1 bedroom = 1 space per unit 2 or more bedrooms = 1.5 spaces per unit Deed Restricted Affordable Units: Studio, no bedroom = 0.5 space per unit 1 bedroom = 0.5 spaces per unit 2 or more bedrooms = 1 spaces per unit	Market Rate Units: Guest = 1 space per 15 units Studio, no bedroom = 0.5 space per unit 1 bedroom = 0.5 space per unit 2 or more bedrooms = 1 space per unit Deed Restricted Affordable Units: Guest = 1 space per 30 units Studio, no bedroom = 0.25 space per unit 1 bedroom = 0.25 spaces per unit 2 or more bedrooms = 0.5 spaces per unit
Senior Citizen Multiple-Unit Dwelling	0.5 space per unit Guest = 1 space per 5 units Low and moderate income units = 0.25 space per unit	0.5 space per unit Guest = 1 space per 6 units Low and moderate income units = 0.25 space per unit	0.5 space per unit Guest = 1 space per 6 units Low and moderate income units = 0.25 space per unit
Single-Room Occupancy	See Multiple-Unit Dwelling	See Multiple-Unit Dwelling	See Multiple-Unit Dwelling
Group Residential	0.5 space per bed	0.5 space per bed	0.5 space per bed
Congregate Housing	1 space per 5 beds	1 space per 5 beds	1 space per 5 beds
Senior Group Residential	0.5 space per unit Guest = 1 space per 5 units Deed restricted affordable = .025 space per unit	0.5 space per unit Guest = none required Deed restricted affordable = .025 space per unit	0.5 space per unit Guest = none required Deed restricted affordable = .025 space per unit
Elderly and Long-Term Care	0.5 space per bed plus one visitor space per 5 beds	0.2 space per bed	0.2 space per bed
Residential Care, General	If more than 6 residents = 0.5 space per bed plus 1 visitor space per 5 beds	If more than 6 residents = 0.5 space per bed plus 1 visitor space per 5 beds	If more than 6 residents = 0.5 space per bed plus 1 visitor space per 5 beds
Residential Care, Limited	None required other than what is required for existing residence	None required other than what is required for existing residence	None required other than what is required for existing residence
Residential Care, Senior	If more than 6 residents = 0.25 space per bed plus 1 visitor space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 0.25 space per bed plus 1 visitor space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 0.25 space per bed plus 1 visitor space per 5 beds If less than 6 residents = none other than what is required for the existing residence
Hospice, General	If more than 6 residents = 0.25 space per bed plus 1 visitor space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 1 space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 1 space per 5 beds If less than 6 residents = none other than what is required for the existing residence
Hospice, Limited	None required other than what is required for the existing residence	None required other than what is required for the existing residence	None required other than what is required for the existing residence
Supportive Housing	If more than 6 residents = 0.5 space per bed plus 1 visitor space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 1 space per 5 beds If less than 6 residents = none other than what is required for the existing residence	If more than 6 residents = 1 space per 5 beds If less than 6 residents = none other than what is required for the existing residence
Transitional Housing	None other than what is required for residential type	None other than what is required for residential type	None other than what is required for residential type
Live-Work	1 space per unit plus 1 guest space per unit	1 space per unit plus 1 guest space per unit	1 space per 500 sq.ft.

Realizing the constraint parking can have on housing projects, the City provides the following alternatives to relieve and/or lessen parking requirements for new development:

- Reduced parking requirements for deed-restricted affordable housing units
- No minimum parking requirements for 100% affordable housing projects located within 1/2 mile of a major transit stop consistent with State density bonus law (AB 1763)
- Reduced parking requirements for projects located in close proximity to transit, identified as Parking Overlay Area 1
- Reduced parking requirements for the provisions of car-sharing parking spaces. Parking is reduced by two spaces for every one car-sharing space provided, up to a maximum of 25% of the required parking spaces, not exceed 10 spaces
- Allowance for shared parking in nonresidential zone districts for projects within close proximity to each other
- Elimination of parking requirements and the need to replace displaced existing parking in conjunction with the construction/establishment of Accessory Dwelling Units and Junior Accessory Dwelling Units
- No minimum parking requirements in the Downtown area

Additionally, Housing Element Program 1.D proposes to revise minimum parking requirements for housing projects.

As for the Downtown area, instead of minimum parking requirements, the numbers provided in Figure E-6 stipulate parking maximums. This regulatory shift from parking minimums to parking maximums has allowed housing providers to right-size their parking needs including the option to provide no parking at all in the City's Downtown area.

Unlike the majority of the City where residential parking requirements are based on bedroom count, residential parking in the BAP is based on unit count. Additionally, the BAP provides both minimum and maximum parking requirements which gives developers the ability to provide the appropriate amount of parking to serve each development. Also unique to the BAP is the concept of requiring less parking per unit when the plan area reaches 5,000 new parking spaces after the plan was adopted, which was in 2013. This eventual reduction will further lessen the constraint parking places on housing projects within the plan area. Figure E-7 summarizes the parking requirements for residential uses in the BAP.

Figure E-7 Parking Requirements for Residential Uses in the Bergamot Plan Area

Stage of Plan Development	Minimum Space Required per Unit		Maximum Spaces Permitted per Unit	
	Tier 1 & 2	Tier 3	Tier 1 & 2	Tier 3
At Plan Adoption	1.5, of which at least 1.0 must be reserved	1.5, of which at least 1.0 must be reserved and 0.5 must be shared	2.0, of which no more than 1.5 may be reserved (With voluntary shared parking)	2.0, of which no more than 1.5 may be reserved
At 5,000 Net New Spaces	1.0, which may be reserved or shared	1.0, which must be shared	1.5, of which no more than 1.0 may be reserved (With voluntary shared parking)	1.5, of which no more than 0.5 may be reserved

v. State Density Bonus

State law (California Government Code Section 65915-65918) requires cities and counties to approve density bonuses for housing developments that contain specified percentages of affordable housing units or units restricted to occupancy by seniors. A density bonus is the allocation of development rights that allows a parcel to accommodate additional square footage or additional residential units beyond the maximum for which the parcel is zoned. Projects that qualify for a density bonus are also eligible for reduced parking standards and additional concessions or incentives and waivers of development standards. The legislature has

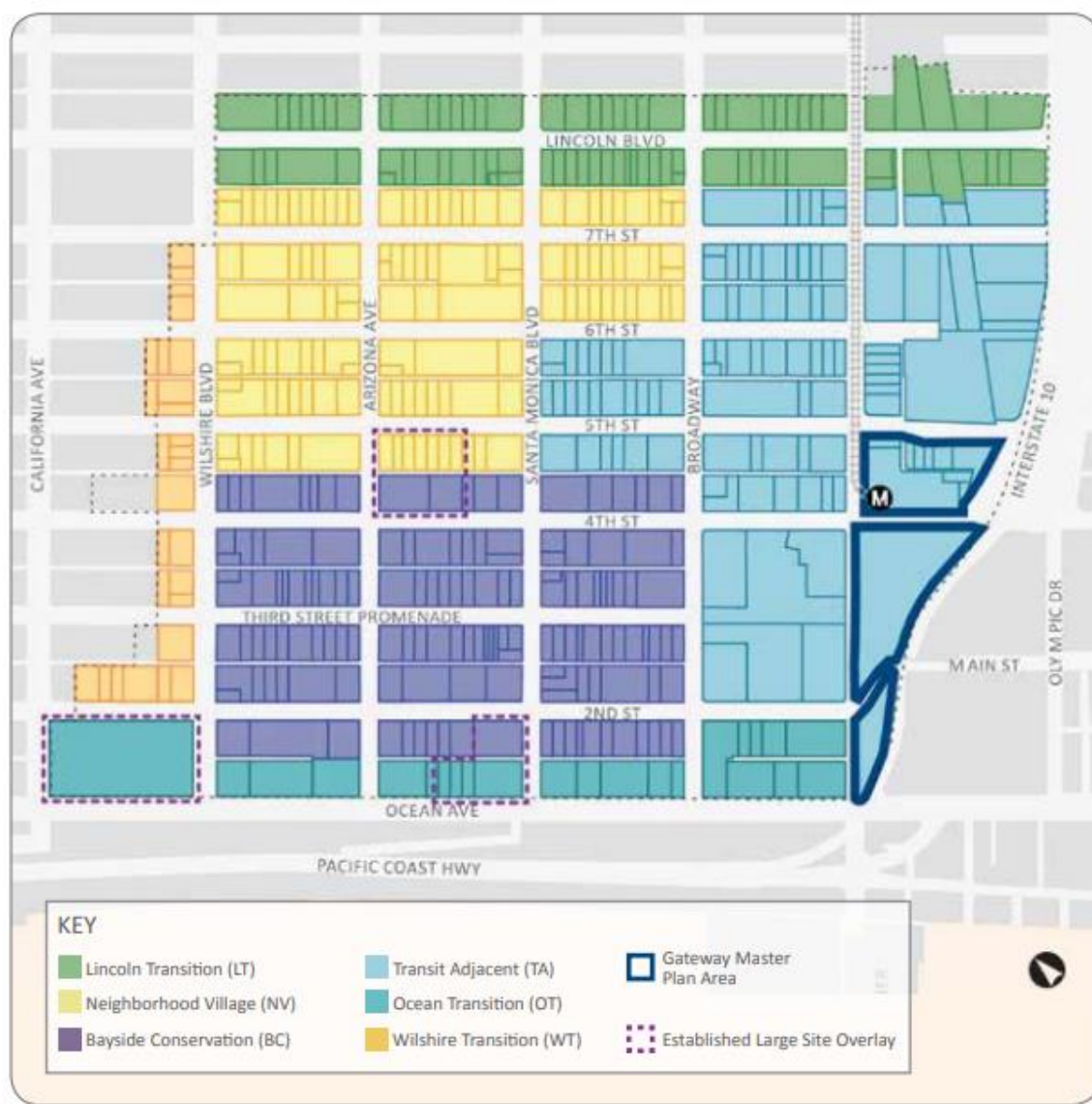
made frequent changes to State density bonus law over the years, including AB 1763 which significantly increased density bonus provisions for 100% affordable projects and AB 2345 which increased density bonus provisions for housing development projects that are not 100% affordable but qualify for a density bonus.

The City’s density bonus law is outlined in SMMC Chapter 9.22, was last updated in 2020, but does not reflect certain recent changes in State law that became effective in 2021. As currently written, Chapter 9.22, applies to projects in the City’s residential districts, and to 100% affordable housing projects located anywhere in the City. When Chapter 9.22 was updated in 2020, the City deferred including provisions for application of the State Density Bonus Law for projects other than 100% affordable projects in the City’s nonresidential districts, which do not implement a maximum density control, pending further study. Nevertheless, in accordance with State law and City Council direction given on June 15, 2021, the City is implementing State density bonus law in all districts for all housing projects. As described in Housing Element Program 2.D, the City will update its density bonus ordinance to be consistent with State law requirements.

c. Downtown Community Plan

The Downtown Community Plan (DCP), adopted in July 2017, is a specific plan to implement the LUCE goals and policies for the City’s Downtown core. The DCP addresses important issues in the Downtown including, but not limited to, historic preservation, high quality architecture, sensitive urban design, diverse housing opportunities, sustainability, expansion of cultural arts offerings, additional open spaces that support quality of life, walkability, additional office space to meet the needs of creative businesses, and integration with the Metro E light rail stations.

Map E-3 Downtown Community Plan Zone District Classifications



The DCP established six zone district classifications as shown in Map E-3. Similar to the LUCE and Zoning Ordinance, the DCP specifies land use regulations regarding where various types of housing can be developed and various development standards such as parcel size, FAR, building height, setbacks, and open space for the zone districts it governs. The DCP also established a tiered system for developments with housing and community benefits specific to the DCP. These community benefits, as described in SMMC Section 9.10.070, include increased affordable housing, unit mix requirements, Transportation Demand Management plans, and increased fees for transportation impacts, open space, and affordable housing commercial linkage. As with other commercial zone districts within the City, the DCP does not impose density limits, but rather density is controlled through a combination of maximum building heights, FAR limitations, and other massing/siting development standards, which has provided flexibility for housing projects. Additionally, similar to the Zoning Ordinance, minimum dwelling unit sizes and unit mix/bedroom counts are prescribed for affordable units to ensure their consistency with market rate units.

Overall, the DCP standards largely allow for the greatest amount of flexibility and incentives for housing developments within the City. Housing projects in the Downtown are given additional FAR and building height as compared to commercial projects. However, development standards such as low FAR and building height limitations have been identified to be constraints on the City's ability to meet its housing goals. Additionally, development standards such as a minimum/maximum ground floor heights, active ground floor commercial use requirements, daylight plane, and maximum building footprint have been brought to the City's attention as other possible constraints. In general, while these standards can be perceived as onerous for housing developers, they have not precluded the development of housing in the Downtown, as demonstrated by the 20 applications for housing projects in the Downtown over the past 5 years. However, Housing Element Program 1.F proposes to reevaluate development standards and regulations, both independently and cumulatively, to not only ensure housing projects are feasible, but that they also incentivize housing production in the Downtown area. Increases to FAR and building heights for housing projects through Program 1.F will be based on feasibility analysis which has taken into account development costs inclusive of the requirements for community benefits, local fees, local building code requirements, as well as affordable housing requirements in the City's AHPP.

Figure E-8 presents the main developments standards that control residential development within the DCP zone districts.

Figure E-8 Development Standards for Downtown Community Plan Zone Districts

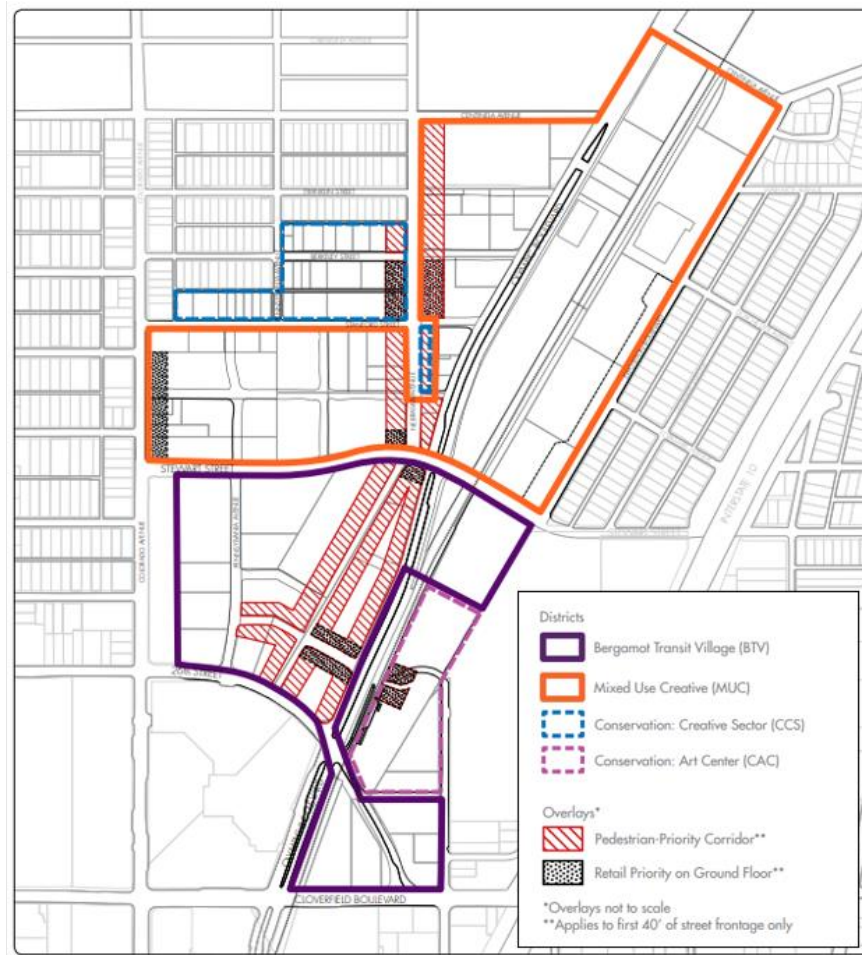
Development Standard	Downtown Community Plan Zone Districts							
	LT (East)	LT (West)	NV	BC (Promenade)	BC (2 nd & 4 th Streets)	TA	OT	WT
Minimum Parcel Size	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.	7,500 sq. ft.
Maximum FAR								
Tier 1 – Base Standard	1.25	1.25	1.75	1.75	1.75	1.75	1.75	1.5
Tier 1 – With Housing	1.5	1.5	2.25	2.25	2.25	2.25	2.25	1.5
Tier 2 – With Provisions of Community Benefits	1.75	2.25	2.75	2.75	3.0	3.0	2.25	1.75
Tier 2 – With Housing and Provisions of Community Benefits	2.25	2.75	3.5	2.75	3.5	3.5	2.75	2.25
Tier 2 – With Housing for parcels that front on Wilshire Blvd, are not located adjacent to a residential district, and have a LUCE designation of Downtown Core	-	-	-	-	-	-	-	2.75
Tier 3 – With Provisions of Community Benefits	-	-	-	-	-	3.5	-	-
Tier 3 – With Housing and Provisions of Community Benefits	-	-	-	-	-	4.0	-	-
100% Affordable Housing Projects	2.75	3.25	4.0	3.25	4.0	4.0	3.25	2.75
100% Affordable Housing Projects – Parcels that front on Wilshire Blvd, are not located adjacent to a residential district, and have a LUCE designation of Downtown Core	-	-	-	-	-	-	-	3.25
Maximum Building Height								
Tier 1 – Base Standard	32'	32'	32'	32'	32'	32'	32'	32'
Tier 1 – Projects Including On-Site Affordable Housing In Compliance with AHPP	39'	39'	39'	39'	39'	39'	39'	39'
Tier 2 – With Provisions of Community Benefits	40'	50'	60'	60'	60'	60'	50'	40'
Tier 2 – With Housing and Provisions of Community Benefits	50'	60'	60'	60'	60'	60'	50'	50'
Tier 2 – With Housing for parcels that front on Wilshire Blvd, are not located adjacent to a residential district, and have a LUCE designation of Downtown Core	-	-	-	-	-	-	-	60'
Tier 3 – With Provisions of Community Benefits	-	-	-	-	-	84'	-	-
Tier 3 – With Housing and Provisions of Community Benefits	-	-	-	-	-	84'	-	-
100% Affordable Housing Projects	60'	70'	70'	70'	70'	84'	60'	60'
Minimum Setbacks								
Interior Side and Rear if Adjacent to Residential District	10'	10'	-	-	-	-	-	10'
Minimum Open Space (% of Buildable Area)								
Lot Width of 50' or Less	-	-	-	-	-	-	-	-
Lot Width between 52- and 150'	20%	20%	20%	-	20%	20%	20%	20%
Lot Width greater than 150'	25%	25%	25%	-	25%	25%	25%	25%

d. Bergamot Area Plan

The Bergamot Area Plan (BAP), adopted in September 2013, is a specific plan that provides guidance on transitioning former industrial lands of the Bergamot Area into an arts-focused, mixed-use, pedestrian-oriented neighborhood.

As shown on Map E-4, the BAP established two main zone district classifications, Bergamot Transit Village (BTV) and Mixed Use Creative (MUC), with two conservation districts, Conservation Arts Center (CAC) and Conservation Creative Sector (CCS). Similar to the LUCE and Zoning Ordinance, the BAP specifies land use regulations regarding where types of housing can be developed and development standards such as FAR, building height, and open space for the zone districts it governs. The BAP also requires a minimum mix of uses for developments within the MUC zone district. As with the DCP and other commercial zone districts, the BAP institutes a tiered system for developments that provide community benefits and controls density through maximum building heights and FAR limitations. Additionally, similar to the Zoning Ordinance, minimum dwelling unit sizes and unit mix/bedroom counts are prescribed for affordable units to ensure their consistency with market rate units.

Map E-4 Bergamot Area Plan Zone District Classifications



However, unique to the BAP, is the concept of flexible standards. While some development standards are mandatory, others are flexible if it is determined that the project promotes design creativity, architectural innovation, and the vitality of the street and sidewalk environment and setting. Mandatory standards include FAR and building height, while flexible standards include mix of uses and open space standards. However, this concept of having flexible standards has led to more discretionary process for projects. Therefore, Housing Element Program 1.E proposes to revise the design standards in the BAP for easier understanding and support of housing production.

Since adoption of the BAP, the transit and job-rich Bergamot area has experienced a lack of housing production. Two potential reasons for this may include insufficient Tier 2 development standard increases that would otherwise incentivize housing over commercial development and a general concern about risk and predictability with the development agreement process that is required to access the heightened Tier 3 development standards. Therefore, Housing Element Program 1.J proposes to reevaluate development standards and regulations, both independently and cumulatively, to not only ensure housing projects are feasible, but that they also incentivize housing production in the BAP area to meet the City’s housing goals. This program includes, but is not limited to, increasing FAR and building height limits.

Figure E-9 presents the main developments standards that control residential development within the BAP zone districts.

Figure E-9 Development Standards for Bergamot Area Plan Zone Districts

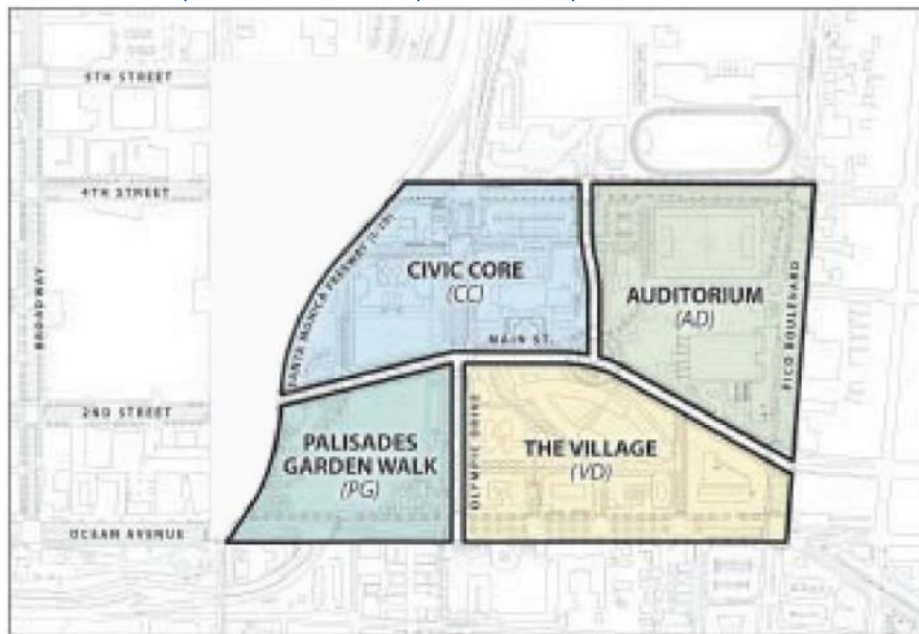
Development Standard	Bergamot Area Plan Zone Districts			
	BTV	MUC	CCS	CAC
Maximum FAR (Parcel 100,000 SF or Greater / Parcel Less Than 100,000 SF)				
Tier 1	1.75 / 1.75 (25% FAR bonus for projects providing additional affordable units)	1.5 / 1.5 (25% FAR bonus for projects providing additional affordable units)	1.5	1.0 / 1.0
Tier 2	2.0 / 2.0 (25% FAR bonus for projects providing additional affordable units)	1.7 / 1.7 (25% FAR bonus for projects providing additional affordable units)	-	1.0 / 1.5
Tier 3	2.5 / 2.5	2.2 / 2.5	-	1.0 / 2.5
Maximum Building Height (Standard / Variation)				
Tier 1	32' / 39' if housing is provided	32' / 36' if affordable housing is provided	32' / 36' if live/work component is provided	32' / -
Tier 2 – With Provisions of Community Benefits	60' / -	47' / -	-	60' / -
Tier 3 – With Provisions of	75' / 86' with increase ground	57' / -	-	75' / 86' with increase ground

Development Standard	Bergamot Area Plan Zone Districts			
	BTV	MUC	CCS	CAC
Community Benefits	floor-to-floor height			floor-to-floor height
Minimum Open Space - % of Site Area (Site Greater than 80,000 SF / Site 40,000 SF - 80,000 SF / Site Less than 40,000 SF)				
Tier 1	20% / 15% / 10%	15% / 12% / 7%	15%	-
Tier 2	20% / 15% / 10%	15% / 12% / 7%	12%	15%
Tier 3	25% / 20% / 15%	20% / 15% / 10%	7%	10%
Minimum Required Mix of Uses for Parcels over 120,000 SF	-	50% Commercial / 50% Residential (Ratio can vary up to 10%)	-	-

e. Civic Center Specific Plan

The Civic Center Specific Plan, adopted in June 2005 with subsequent amendments, is unique in that it established a vision that promotes civic buildings and public open spaces and also provided standards that are more building specific for one of its four special use districts. Currently the plan area is built out and development of additional residential units, which would likely come from the redevelopment of existing buildings, would require an amendment to the plan. However, Housing Element Program 4.A will be removing limitations on where housing can be located within the City, which will enable greater housing opportunities in areas such as the Civic Center Specific Plan areas. Map E-5 presents the Civic Center Specific Plan Special Use Districts.

Map E-5 Civic Center Specific Plan Special Zone District



f. Local Coastal Program

The California Coastal Commission (Coastal Commission), in partnership with coastal cities and counties, plans and regulates the use of land, water, and coastal resources in the Coastal Zone. The Coastal Zone in Santa Monica encompasses the mean high tide line as the western border and generally up to 4th Street north of Pico Boulevard and Lincoln Boulevard south of Pico Boulevard. For projects in the Coastal Zone, a Coastal Development Permit (CDP) is required, which is issued by the Coastal Commission unless a local government has a Commission-certified Local Coastal Program (LCP). CDPs are required for development activities broadly defined by the Coastal Act to include (among others) construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters.

Currently, the City is in the process of certifying an updated LCP to reflect the combined policies, goals, and objectives set forth in the City's LUCE, Zoning Ordinance, and DCP (all of which were adopted after the City's existing LCP was partially certified in 1992). In October 2018, the updated Land Use Plan was adopted by the Santa Monica City Council (the first step in the process), but is still awaiting certification from the Coastal Commission. The Implementation Plan, which began in June 2019, is currently in progress.

As the City does not yet have a certified LCP, housing projects within the Coastal Zone are required to obtain a CDP from the Coastal Commission before receiving a building permit from the City. While this can add both an additional process and timing constraint on housing projects, the City currently has no control over this process.

2. Zoning for a Variety of Housing Types

The City of Santa Monica encourages and facilitates the development of a variety of housing types beyond traditional single-unit and multiple-unit dwellings. These additional housing types include such uses as accessory dwelling units and junior accessory dwelling units, emergency shelters, employee housing, farmworker housing, group residential, low barrier navigation centers, manufactured homes and mobile home parks, residential facilities, single-room occupancy housing, and supportive and transitional housing, as well as accessible housing for the disabled [see Section A(3) below].

Figure E-10 presents a comprehensive matrix of land use regulations compiled from all City implementation plans (Zoning Ordinance, DCP, BAP) that specify where and how each housing type is permitted. Of the 32 zone districts within Santa Monica, all but one (OS) allow for some type of housing. How each housing type is processed is identified with either a "P" for when the use is permitted by right, an "L" for the when use is permitted if it complies with specific limitations such as location or size, or either an "MUP" or "CUP" for when the use requires discretionary approval [see Section 7(e) below]. If the use does not have a process identified it means that the use is not permitted, and if an "L" is coupled with another process it either means that the use must comply with both processes or if separated by a "/", the use must comply with the second process listed if it cannot abide by the first.

While Santa Monica has made efforts to remove barriers to all housing types, some land use classifications and zoning implementations might not be consistent with updates to State law that have occurred since the City adopted its comprehensive Zoning Ordinance update in 2015. Therefore, Housing Element Program 2.I states that the City will be reviewing all special needs housing types and residential land uses to ensure consistency with State law and to remove any unintended constraints, including those for persons with disabilities.

Additionally, Housing Element Program 4.A proposes to amend the Zoning Ordinance and all specific plans to add multi-unit housing as a permitted use in all non-residential zones where housing is currently prohibited. Housing Element Programs 1.F and 1.J will also be reevaluating other restrictions that prohibit the location of housing, such as limitations on the ground floor.

Figure E-10 Permitted Housing Types by Zone District

Residential Uses	R1	R2	R3	R4	OP1	OPD	OP2	OP3	OP4	LT	NV	BC (Prom.)	BC (2nd/4th)	TA	OT	WT	MUBL	MUB	GC	NC	BTV	MUC	CAC	CCS	IC	OC	HMU	OF	CC	PL	OS	RMH	
Single-Unit Dwelling	P	P	P	P	P	P	P	P	P	L(1)	L(1)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	-	-	-	-	-	-	P	P	-	-	-	-	
Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	-	-	P	P	P	-	-	-	
Junior Accessory Dwelling Unit	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	P	-	-	-	-	-	-	P	P	-	-	-	-	
Duplex	MUP	P	P	P	-	P	P	P	P	P	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	-	-	-	-	-	-	P	-	-	-	-		
Multiple-Unit Structure	-	P	P	P	-	-	P	P	P	L(1)	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	-	P	P	L(1)	-	-	-	
Senior Citizen Multiple-Unit Residential	-	P	P	P	-	-	P	P	P	L(1)	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	-	P	P	L(1)	-	-	-	
Single-Room Occupancy Housing	-	P	P	P	-	-	P	P	P	L(1)	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	-	P	P	L(1)	-	-	-	
Group Residential	-	MUP	MUP	MUP	-	-	MUP	MUP	MUP	MUP	MUP, L(3)	MUP, L(1)	MUP, L(1)	MUP	MUP	MUP	MUP	MUP	MUP	MUP	MUP	P	P	CUP	-	-	-	-	MUP	L(1)	-	-	-
Congregate Housing	-	P	P	P	-	-	P	P	P	P	MUP, L(3)	CUP, L(1)	CUP, L(1)	MUP	MUP	MUP	P	P	P	P	P	P	CUP	-	L(1)	L(1)	P	P	L(1)	-	-	-	
Senior Group Housing	-	P	P	P	-	L(2)	P	P	P	P	MUP, L(3)	MUP, L(1)	MUP, L(1)	MUP, L(1)	MUP, L(1)	MUP, L(1)	P	P	P	P	P	P	CUP	-	CUP	CUP	P	P	L(1)	-	-	-	
Elderly and Long-Term Care	-	CUP	CUP	CUP	-	-	CUP	CUP	CUP	P	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	P	P	P	-	-	-	-	
Emergency Shelters	-	-	CUP	CUP	-	-	CUP	CUP	CUP	L(6)/CUP	L(6)/CUP	CUP/L(1)	L(1/6), CUP	L(6)/CUP	L(6)/CUP	L(6)/CUP	L(3)/CUP	L(3)/CUP	L(3)/CUP	L(3)/CUP	P	P	CUP	-	L(2)/CUP	L(2)/CUP	L(2)/CUP	CUP	-	P	-	-	
Residential Care, General	-	MUP	MUP	MUP	-	-	MUP	MUP	MUP	P	L(3)	L(1)	L(1)	P	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	-	-	P	L(1)	-	-	-	
Residential Care, Limited	P	P	P	P	P	P	P	P	P	P	L(3)	L(1)	L(1)	P	L(1)	L(1)	P	P	P	P	P	P	CUP	-	P	P	P	P	L(1)	-	-	-	
Residential Care, Senior	-	L(2)/MUP	L(2)/MUP	L(2)/MUP	L(2)	L(2)	L(3)/MUP	L(3)/MUP	L(3)/MUP	P	L(3)	L(1)	L(1)	P	L(1)	L(1)	P	P	P	P	P	P	CUP	-	P	P	P	P	L(1)	-	-	-	
Hospice, General	-	MUP	MUP	MUP	-	MUP	MUP	MUP	MUP	P	L(3)	L(1)	L(1)	P	L(1)	L(1)	P	P	P	P	P	P	CUP	-	-	-	-	-	-	-	-	-	
Hospice, Limited	P	P	P	P	P	P	P	P	P	P	L(3)	L(1)	L(1)	P	L(1)	L(1)	P	P	P	P	P	P	CUP	-	P	P	P	P	-	-	-	-	
Supportive Housing	P	P	P	P	P	P	P	P	P	P	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	P	P	P	P	L(1)	-	-	-	
Transitional Housing	P	P	P	P	P	P	P	P	P	P	L(3)	L(1)	L(1)	L(1)	L(1)	L(1)	P	P	P	P	P	P	CUP	-	P	P	P	P	L(1)	-	-	-	
Live-Work	-	-	-	-	-	-	-	-	-	L(13)	L(3/13)	L(1/13)	L(13)	L(13)	L(1/13)	L(13)	L(14)	L(14)	L(14)	L(14)	P	P	CUP	P	L(14)	CUP	L(14)	-	L(1)	-	-	-	
Existing Mobile Home Park	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	P	-	-	-	-	-	-	-	-	-	-	
Mobile Home Park	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	P	

"P" = Permitted by right without discretionary action.
 "L(#)" = Limited uses, which are permitted by right, provided they comply with specific limitation.
 "MUP" = Use classifications that are permitted after review and approval of a Minor Use Permit.
 "CUP" = Use classifications that are permitted after review and approval of a Conditional Use Permit.
 "-" = Not permitted

The following analysis details how the City facilitates specific special housing types consistent with State law requirements.

a. Accessory Dwelling Units / Junior Accessory Dwelling Units

Accessory Dwellings Units (ADUs) play an important role in the production of housing particularly within single-unit residential zoning districts where historically only one unit is permitted per parcel. In recognition of this, the State over the past four years has enacted laws to help spur the production of housing through the development of ADUs. Building off of initial State law passed in 2017 that began removing barriers to ADU production, three new State laws [AB 68, AB 881, and Senate Bill (SB) 13] came into effect on January 1, 2020 that significantly expanded potential ADU development. Statewide, these new laws revised development standards that sometimes limited ADU construction such as eliminating minimum parcel size, establishing larger unit sizes based on bedroom count, reducing minimum side and rear setbacks, and removing on-site parking requirements. In addition, the new laws extended ADUs into multiple-unit residential and mixed-use zoning districts, introduced the new concept of deed restricted Junior Accessory Dwelling Units (JADUs) when in conjunction with single-unit dwellings, and established a strict 60-day processing timeframe and development parameters for ADUs that must be approved ministerially.

On September 8, 2020, the City approved an ordinance incorporating these State law requirements into a new ADU/JADU section of the Zoning Ordinance, SMMC Section 9.31.025: Accessory Dwelling Units and Junior Accessory Dwelling Units. Additionally, to further encourage the production of ADUs and JADUs, the City expanded upon the new requirements by exempting all ADUs and JADUs from parcel coverage or floor area calculations and requiring only a ministerial process for review and approval of ADUs and JADUs. Additionally, no development fees are collected for the construction or establishment of ADUs or JADUs. Figure E-11 summarizes the main development standards adopted for an ADU or JADU consistent with State law.

Figure E-11 ADU and JADU Development Standards

Standard	Requirement
Minimum Parcel Size	No minimum parcel size
Maximum Number of Units	<p><i>Single-Unit Development:</i></p> <ul style="list-style-type: none"> • One ADU or one JADU is permitted per parcel, except that one JADU and one detached ADU may be permitted on a single parcel • JADUs are only permitted within single-unit zone districts <p><i>Multi-Unit Development:</i></p> <ul style="list-style-type: none"> • Two detached ADUs <p>AND/OR</p> <ul style="list-style-type: none"> • Any area not used as livable space and that can be brought up to State building standards for dwellings, can be converted to at least one ADU or to a maximum number that equals 25% of the existing unit count.

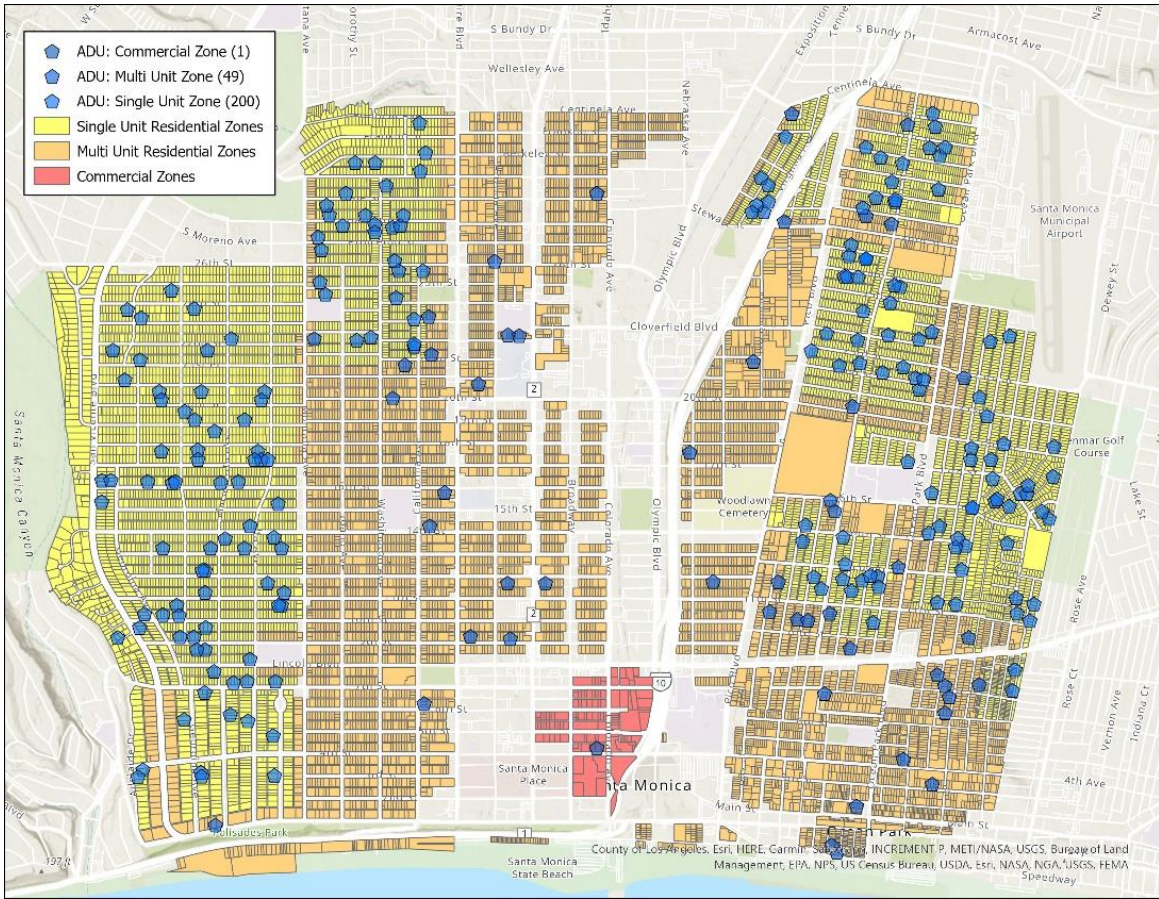
Standard	Requirement
Maximum Size	<p><i>ADUs:</i></p> <ul style="list-style-type: none"> • Studio/1 bedroom – 850 square feet • 2+ bedrooms – 1,000 square feet or 1,200 square feet for parcels greater than 10,000 square feet <p><i>JADUs:</i></p> <ul style="list-style-type: none"> • 500 square feet
Parcel Coverage / Floor Area	Exempt
Setbacks	Rear and side setbacks – 4 feet
Unit Requirements	<p><i>ADUs:</i></p> <ul style="list-style-type: none"> • No interior access between the ADU and primary dwelling is permitted • Exterior access separate from the primary dwelling shall be provided • Independent eating and cooking facilities including, but not limited to, a sink, refrigerator, and a stovetop and/or oven shall be provided • Independent sanitation facilities including, but not limited to, a sink, toilet, and a shower and/or bathtub shall be provided <p><i>JADUs:</i></p> <ul style="list-style-type: none"> • Exterior access separate from the primary dwelling shall be provided; however, interior connection is permitted. • An efficiency kitchen that includes a cooking facility with appliances and a food preparation counter and storage cabinets that are of reasonable size in relation to the size of the JADU shall be provided • May provide individual or share sanitation facilities with the primary dwelling
Parking	<ul style="list-style-type: none"> • Additional on-site parking is not required for an ADU • Converted parking spaces are not required to be replaced

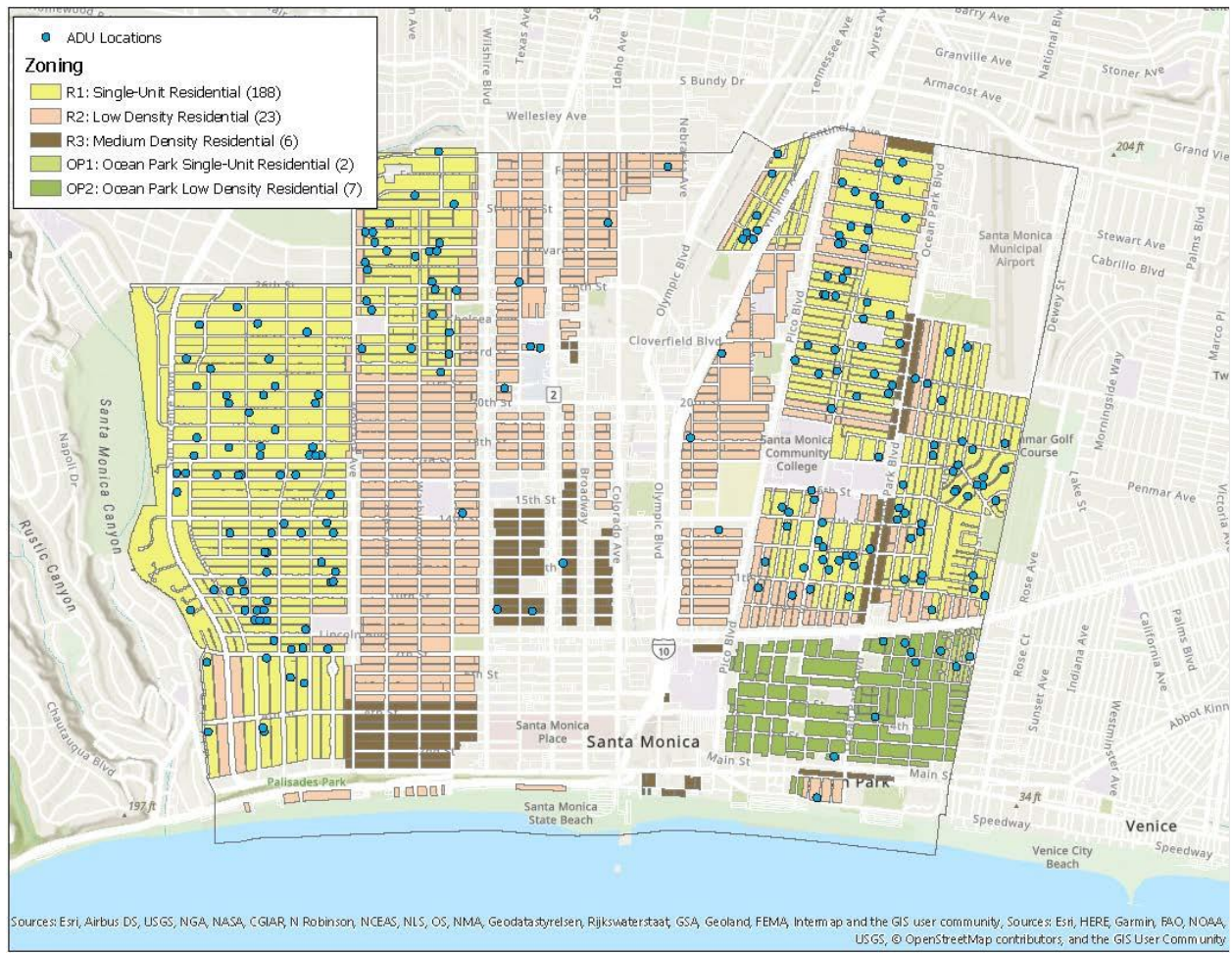
Since implementation of these new State laws, the City has seen an increase in ADU production and interest, averaging 56.5 ADUs per year between 2018 and 2021 each year. Based on building permit data as of June 1, 2021, Figure E-12 and Map E-6 below summarize ADU development and location within the City since 2018 when State law began to focus on incentivizing ADUs.

Figure E-12 Santa Monica ADU Production

Building Permit Issuance Year	Permits Issued
2018	5423
2019	5160
2020	2741
2021	2102
TOTAL:	134226

Map E-6 ADU Locations





While Santa Monica has taken steps beyond what is required by State law to streamline and incentivize the production of ADUs, Housing Element Program 4.C proposes an ADU incentive program for single-unit residential zone districts. The incentive program will allow a property owner the ability to construct an additional ADU if they deed restrict one of the ADUs as a rental unit. This incentive program would help achieve the Housing Element goal of affirmatively furthering fair housing by providing more housing opportunities that are affordable by design within single-unit residential zone districts, which are areas of the city that have largely been unaffordable to many. To further remove barriers and help facilitate ADU production, Housing Element Program 1.G proposes to develop an ADU Accelerator Program to simplify the ADU process by providing prospective ADU developers with a handbook detailing all ADU standards and review procedures and pre-approved ADU plans that can be selected to reduce time and costs associated with ADU development. Additionally, to ensure compliance with State law, Program 1.G also includes language regarding continuing to review State law and updating the City's locally adopted ordinance as needed.

b. Emergency Shelters

State law [Government Code Section 65583] requires each jurisdiction to identify one or more zoning districts where emergency homeless shelters are allowed without a discretionary permit. Additionally, Government Code Section 65583(a)(4) limits the development standards and locational restrictions that can be applied to emergency shelters. Emergency shelters may only be subject to those development and management standards that apply to residential or commercial development within the same zone except that a local government may apply written, objective standards that include all the following:

- The maximum number of beds or persons permitted to be served nightly by the facility;
- Sufficient parking to accommodate all staff working in the emergency shelter, provided that the standards do not require more parking for emergency shelters than other residential or commercial uses within the same zone;
- The size and location of exterior and interior onsite waiting and client intake areas;
- The provision of onsite management;
- The proximity to other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart;
- The length of stay;
- Lighting; and
- Security during hours that the emergency shelter is in operation.

Emergency shelters are defined in the Zoning Ordinance as “a temporary, short-term residence providing housing with minimal supportive services for homeless families or individual persons where occupancy is limited to six months or less, as defined in Section 50801 of the California Health and Safety Code. Medical assistance, counseling, and meals may be provided.” As shown in Figure E-10, emergency shelters are permitted by-right in the BTV, MUC, and PL zone districts with no limitations and by-right up to 55 beds in 13 other mixed-use/commercial zone districts (identified by the L2, L3, and L6 designations).

Additionally, SMMC Section 9.31.130 of the Zoning Ordinance sets forth standards for emergency shelters to ensure they do not adversely impact adjacent parcels or the surrounding neighborhood and that they will be developed in a manner that protects the health, safety, and general welfare of the nearby residents and businesses while providing for the housing needs of a vulnerable segment of the community. The standards include provisions and limitations on lighting, laundry facilities, common facilities, security, outdoor activity, services (including lengths of stay), maximum unit density, and health and safety standards. In terms of density, emergency shelters that are located in residential zone districts, when not developed in an individual dwelling unit format, are not subject to the underlying zone district’s maximum unit density standard, but the number of beds are limited to three times the maximum number of dwelling units which would otherwise be permitted on the site. Temporary shelter is also available to residents for no more than six months with extensions up to 180 days available if the

shelter operator determines that no alternative housing is available. Additionally, minimum parking requirement for emergency shelters is one space per 10 beds, which is less parking required compared to other similar type of special needs housing.

Therefore, the City is in compliance with State law by allowing emergency shelters by-right in at least one zone district and is within the limits of all development and management standards. However, as stated above, through Housing Element Program 2.I the City will be reviewing all special needs housing types and residential land uses to ensure consistency with State law and to remove any unintended constraints. Revisions will also include, but are not limited to, updated parking requirements for Emergency Shelters pursuant to AB 139.

i. Capacity for Emergency Shelters

Government Code Section 65583(a)(4)(A) requires the Housing Element to demonstrate that the zones where emergency shelters are allowed by-right include sufficient capacity to accommodate the need for emergency shelter identified in the most recent point-in-time count conducted before the start of the planning period. According to the most recent annual point-in-time homeless count performed in 2020 (2021 count cancelled due to COVID-19 restrictions), a total of 907 individuals were counted on the streets, in cars and encampments, and in shelters and institutions within the City.

In order to determine the City’s capacity for emergency shelters, properties on the Suitable Sites Inventory (SSI) with development potential to accommodate emergency shelters were evaluated based on size and location to transit and services. According to the SSI, there are ~~410~~ parcels within the BTV and MUC zone districts ~~of adequate size~~ that can accommodate emergency shelters with no limitations on bed count and ~~178-118~~ parcels in the LT, NV, ~~BC, TA, MUBL, MUB, and GC, NC, IC, and OC~~ zone districts that limit emergency shelters to 55 bed per parcel. SF ~~Of e~~Existing facilities accommodating an approximate range of 16-70 beds have an average parcel size of 20,525 square feet~~XX~~, and of the ~~178~~128 SSI parcels, ~~XX~~33 parcels would fall within this range ~~SF, NV, BC, TA, MUBL, MUB, GC, BC, IC, and OC SF.~~ Therefore, it can be concluded that the parcel sizes on the SSI can accommodate emergency shelters of at least 55 beds. In order to quantify the number of beds that can be established on sites with no bed count limit, a 160 square foot per bed size was applied based on both local analysis and County of Los Angeles standards . As shown in Figure E-13, the City has capacity of ~~3,013~~ ~~3,838~~1,823 emergency shelter beds. Therefore, Santa Monica has sufficient capacity to accommodate its emergency shelter need based on the 2020 point-in-time count of 907.

Figure E-13 Santa Monica Emergency Shelter Capacity

Zone District	Number of Parcels	Total Land Area (SF)	Emergency Shelter Bed Capacity
LT**	214	141,689,996	770
NV**	181	22,651,480	990
BC**	4	82,478	220

TA**	5	57,5820	275
MUBL**	513	781,058467,399	2805715
MUB**	22929	499,449740,520273,121	15951210495
GC**	383	380,72981,457	2090165
NC**	14	92,5140	770
BTV*	1	38,54838,333	240240
MUC*	104	197,327287,036	1,7931233
IC**	1	19,662	55
OC**	4	26,117	220
Total:	3348189	2,590,3421,646,5691,124,283	11,8233,013838
* No limitation on bed count (160 SF per bed applied)			
** 55 bed limit per parcel			

c. Employee Housing

The provisions of Section 17021.5 of the California Health and Safety Code state that employee housing for six or fewer employees must be treated as a single-unit dwelling in regards to land used designation, processing procedure, and fees. As the City does not regulate the occupancy of single-unit dwellings and there are no provisions in the City's code to restrict employee housing for six or fewer employees, the City complies with this requirement. However, as discussed below in Section A(3), the City's definition of "household" may present a constraint. Therefore, through Housing Element Program 2.1, regulations impacting special needs housing and residential land uses will be reviewed.

d. Farmworker Housing

While Santa Monica is highly urbanized and does not have any agricultural industries, according to the 2017 United States Department of Agriculture (USDA) Agricultural Census, there were 1,035 farms with 1,793 total producers within Los Angeles County. Additionally, the California Employment Development Department estimated that the 2020 annual average of agricultural employment was between 1,501 and 5,000 within the County. Therefore, within the region there is a need for farmworker housing, whether that be permanent or seasonal. In order to accommodate this need, Santa Monica provides a variety of housing types, such as employee housing and group residential, that are further discussed in this appendix that would be able to accommodate housing needs for these workers.

e. Group Residential

Group Residential is defined by the Zoning Ordinance as "shared living quarters without a separate kitchen or bathroom facilities wherein two or more rooms are rented to individuals under separate rental agreements or leases, either written or oral, whether or not an owner, agent or rental manager is in residence, offered for rent for permanent or semi-transient residents for periods generally of at least 30 days." This land use classification includes rooming

and boarding houses, dormitories, fraternities, convents, monasteries, and other types of organizational housing, and private residential clubs but excludes extended stay hotels intended for long-term occupancy and residential facilities. As shown in Figure E-10, group residential is allowed in the same zone districts as multiple-unit structures but typically requires discretionary approval of a Minor or Conditional Use Permit.

Within the land use category of group residential, the subcategories of Congregate Housing and Senior Group Residential have special standards and are treated separately.

Congregate Housing is defined as "a residential facility with shared kitchen facilities, deed-restricted or restricted by an agreement approved by the City for occupancy by low- or moderate-income households, designed for occupancy for periods of six months or longer, providing services that may include meals, housekeeping, and personal care assistance as well as common areas for residents of the facility." Similar to the requirement for transitional housing, the Zoning Ordinance establishes maximum density limitations for beds in congregate housing facilities that is three times the maximum number of dwelling units that would otherwise be permitted, as well as requiring a management plan for the facility.

Senior Group Residential is defined as "a residential facility that provides residence for a group of senior citizens as defined in Health and Safety Code Section 1569.2(k) with a central kitchen and dining facilities and a separate bedroom or private living quarters." To ensure that senior group residential does not "adversely impact adjacent parcels or the surrounding neighborhood and are developed in a manner that protects the health, safety, and general welfare of nearby residents, while providing for the housing needs of an important segment of the community," the land use must adhere to standards related to location, development, and operation. This includes such standards as maximum number of private living quarters, kitchen and laundry facilities, common area facilities, security, minimum age requirements, minimum private living quarter sizes, and outdoor living area requirements.

As shown in Figure E-10, unlike the rest of the group residential land use, both subcategories are permitted by right in all multiple-unit residential and mixed-use districts and only need discretionary approvals in the DCP and employment zone districts. However, as stated above, through Housing Element Program 2.I the City will be reviewing all special needs housing types and residential land uses to ensure consistency with State law and to remove any unintended constraints.

f. Low Barrier Navigation Centers

AB 101, passed in 2019, requires that a low barrier navigation center be a use permitted by right in mixed-use zones and nonresidential zones permitting multiple-unit uses if it meets specified requirements. AB 101 defines "low barrier navigation center" as a "housing first, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing". Housing Element Program 5.B proposes to amend the Zoning Ordinance to comply with this new land use requirement.

g. Manufactured Homes and Mobile Home Parks

State law requires jurisdictions to allow the placement of manufactured homes (also referred to as factory-built homes and modular homes) meeting Federal construction standards and manufactured home subdivisions in single-unit neighborhoods. Government Code Sections 65852.3 through 65852.5 require that manufactured homes be permitted in single-unit districts subject to the same land use regulations as conventional homes.

In accordance with State law, the City's Zoning Ordinance includes manufactured housing units within its single-unit dwelling land use classification. This allows manufactured homes to be permitted wherever single-unit dwellings can be located which is in all residential, commercial, and DCP zones districts (single-unit dwellings are not a permitted land use within the BAP area). As manufactured homes are considered single-unit dwellings, they must be compatible in design and appearance with other residential structures in the vicinity and be built on a foundation as well as meet other standards regarding roofing materials, siding, and skirting.

Santa Monica defines the "Mobile Home Park" land use as "any area or tract of land where 2 or more lots are rented, leased, or held out for rent or lease, to accommodate mobile homes used for human habitation." There are only two remaining mobile home parks located within Santa Monica: (1) the Village Trailer Park that consists of 10 units and is located in the MUC zone district and (2) the Mountain View Mobile Home Park. Mountain View, with an approved capacity of 105 units, is located in the specially zoned "Residential Mobile Home Park District" which was established to preserve and protect existing mobile home parks as developments that offer alternative types of residential units and opportunities for affordable housing with special development standards and processes specific to the zone.

h. Residential Facilities

The City of Santa Monica's Zoning Ordinance classifies a group home as a "Residential Facility", which is defined as follows:

"Facilities that 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. Living accommodations are shared living quarters with or without separate kitchen or bathroom facilities for each room or unit. This classification includes facilities that are operated for profit as well as those operated by public or not-for-profit institutions, including group homes for minors, persons with disabilities, people in recovery from alcohol or drug addictions, and hospice facilities."

Within the Residential Facility classification, the use is divided between five subtypes with the following distinctions:

- *Residential Care, General:* A residential facility licensed by the State of California providing care for more than 6 persons.

- *Residential Care, Limited:* A residential facility licensed by the State of California providing care for 6 or fewer persons.
- *Residential Care, Seniors:* housing arrangement chosen voluntarily by the resident, the resident's guardian, conservator, or other responsible person, where residents are 60 years of age or older and where varying levels of care and supervision are provided as agreed to at the time of admission or determined necessary at subsequent times of reappraisal. This classification includes continuing care retirement communities and life care communities licensed for residential care by the State of California.
- *Hospice, General:* A facility that provides residential living quarters for more than 6 terminally ill persons.
- *Hospice, Limited:* A facility that provides residential living quarters for up to 6 terminally ill persons.

California State law mandates that State-licensed group homes of six or fewer residents must be regulated in the same manner as single-unit dwellings for zoning purposes. As shown in Figure E-10, Santa Monica is consistent with State law as Residential Care Limited is permitted in the same zone districts and/or to the same locational standards as single-unit dwellings and in some cases even where single-unit dwellings are not permitted such as in the BTV, MUC, CAC, IC, and OC zone districts. As for Residential Care General, the use is permitted by right in most of the City's mixed-use and commercial zone districts that allow for larger development, but it is only permitted if certain locational standards are met or if the use obtains approval of either a Minor or Conditional Use Permit in the City's multiple-unit residential zone districts. As Residential Care Facilities are treated as residential uses, they are subject to the same development standards as any permitted residential use of the same housing type in the district in which they are located. However, Residential Care General is required to be located a minimum distance of 300 feet from any other Residential Facility.

Hospice Limited and Hospice General generally follow the same approval process as their Residential Care counterparts, whereas Residential Care Senior follows the approval process based on the number of residents the facility holds.

While Santa Monica is in compliance with State law for group homes of six or fewer residents, through Housing Element Program 2.1 the City will be reviewing all special needs housing types and residential land uses to ensure compliance with all State laws and to remove any unintended constraints, such as when and how land uses are permitted. This would include reviewing requirements for group homes with seven or more residents.

i. Single-Room Occupancy Housing

Single-Room Occupancy (SRO) housing is defined in the City's Zoning Ordinance as "multiple-unit residential buildings containing housing units that may have kitchen and/or bathroom facilities and are guest rooms or efficiency units as defined by the State Health and Safety Code." Additionally, SROs are only permitted to be "occupied by no more than two persons,"

must be “offered on a monthly rental basis or longer,” and are subject to specific standards that all SROs must abide by as set forth in SMMC Section 9.31.330. These standards include the following:

- *Maximum Occupancy.* Each SRO unit shall be designed to accommodate a maximum of two persons.
- *Minimum Size.* An SRO unit must have at least 150 square feet of floor area, excluding closet and bathroom. No individual unit may exceed 375 square feet.
- *Minimum Width.* An SRO of one room shall not be less than 12 feet in width.
- *Entrances.* All SRO units must be independently accessible from a single main entry, excluding emergency and other service support exits.
- *Bathroom.* An SRO unit is not required to but may contain partial or full bathroom facilities. A partial bathroom facility shall have at least a toilet and sink; a full facility shall have a toilet, sink and bathtub, shower or bathtub/shower combination. If a full bathroom facility is not provided, common bathroom facilities shall be provided in accordance with the California Building Code for congregate residences with at least one full bathroom per floor.
- *Closet.* Each SRO unit shall have a separate closet.
- *Common Area.* Four square feet per living unit shall be provided, excluding janitorial storage, laundry facilities and common hallways. At least 200 square feet in area of interior common space provided as a ground floor entry area that provides a central focus for tenant social interaction and meetings.
- *Tenancy.* Tenancy of SRO units shall be for 30 or more days.
- *Facility Management.* An SRO structure with ten or more units shall provide full-time on-site management. An SRO structure with fewer than ten units shall provide a management office on-site.

SROs are classified by the City’s Zoning Ordinance under the multiple-unit dwelling land use classification and are therefore permitted wherever and however multiple-unit structures are allowed; however, it is important to note that since 2019, SROs are only permitted if they are 100% affordable housing projects, elderly and long-term care, emergency shelters, residential facilities, supportive housing, or transitional housing. This change was made in response to a threat of over-proliferation of market-rate SROs that would have been inconsistent with the City’s longstanding commitment to providing a range of housing types. This is not a constraint given the wide range of alternatives available.

j. Supportive/Transitional Housing

Consistent with the State Health and Safety Code, the City defines supportive housing as “housing with no limit on length of stay, that is occupied by the target population, and that is linked to on-site or off-site services that assist the supportive housing resident in retaining the

housing, improving their health status, and maximizing their ability to live and, when possible, work in the community.” The target population for supportive housing is defined as persons, including persons with disabilities, and families who are homeless or who are homeless youth.

While transitional housing is similar to supportive housing, transitional housing units are meant to be for a limited length of stay and “are operated under a program requiring recirculation to another program recipient at some future point in time.” Transitional housing may be designated for homeless or recently homeless individuals or families transitioning to permanent housing, and the classification includes domestic violence shelters. Also, unlike supportive housing, transitional housing has maximum density limitations for beds that is three times the maximum number of dwelling units that would otherwise be permitted and requires a management plan for the facility.

In compliance with Government Code Section 65583, both land uses are considered residential uses and are subject only to those restrictions that apply to other residential dwellings of the same type in the same zone. Therefore, supportive and transitional housing are both permitted uses without discretionary action within the City wherever and however single or multiple-unit dwellings are permitted and even in the IC and OC zone districts where most housing is not currently permitted as demonstrated in Figure E-10.

Additionally, pursuant to recent changes in State law to Government Code Section 65651 (AB 2162), the City must allow 100% affordable housing projects that include at least 25% or 12 units of supportive housing by right where multiple-unit and mixed-use developments are permitted, including nonresidential zones permitting multi-unit uses. Santa Monica is already in compliance with this requirement as all affordable housing projects of any housing type mix are permitted where multi-unit structures are permitted. Additionally, as shown in Figure E-10, Supportive Housing on its own is a permitted use without discretionary action in all multi-unit zones and commercial zones where multi-unit housing is a permitted use.

However, as stated above, through Housing Element Program 2.I the City will be reviewing all special needs housing types and residential land uses to ensure consistency with State law and to remove any unintended constraints.

3. Zoning Regulations and Practices for Persons with Disabilities

The City of Santa Monica recognizes the importance of addressing the housing needs of persons with disabilities. This section reviews potential governmental constraints to the development and improvement of housing for persons with disabilities.

a. Definition of a Family

Local governments may unintentionally restrict access to housing for households failing to qualify as a “family” by the definition specified in a zoning code. Specifically, a restrictive definition of “family” that limits the number of and differentiates between related and unrelated

individuals living together may impermissibly limit the development and siting of group homes for persons with disabilities but not housing for families that are similarly sized or situated.

Santa Monica's Zoning Ordinances does not include a definition of "family", nor is family used in any of the City's land use classification titles. Instead, it defines the persons who occupy a housing unit as a "household". A household is defined as follows:

"One or more persons living together in a single dwelling unit, with access to and use of all common living and eating areas and all common areas and facilities for the preparation and storage of food and who maintain a single mortgage, lease, or rental agreement for all members of the household."

This definition of household does not refer to related or unrelated persons who may occupy a housing unit. Therefore, the zoning regulations do not discriminate against unrelated individuals with disabilities who reside together in a congregate or group living arrangement. However, the provision of requiring a "single mortgage, lease, or rental agreement" may inadvertently be a constraint on housing options for persons with disabilities. Therefore, Housing Element Program 2.I will be evaluating all special needs housing types and all provisions related to housing access for persons with disabilities to ensure consistency with State law and to remove any unintended constraints.

b. Definition of Disability

With the adoption of the updated Zoning Ordinance in 2015, Santa Monica incorporated the following definition of "disability" consistent with the Federal Fair Housing Act:

"Physical or mental impairment that substantially limits one or more of a person's major life activities or a record of having an impairment, but the term does not include current, illegal use of, or an addiction to, a controlled substance. Current users of illegal controlled substances, persons convicted with illegal manufacture or distribution of a controlled substance, sex offenders, and juvenile offenders are not considered disabled under the Fair Housing Act, by virtue of that status."

The addition of this definition provides consistency with Federal law and brings clarity to land use classifications within the Zoning Ordinance.

c. Reasonable Accommodation

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodations (*i.e.*, modifications or exceptions) in their zoning laws and other land use regulations when such accommodations may be necessary to afford disabled persons an equal opportunity to use and enjoy a dwelling. One of the primary reasons for a reasonable accommodation procedure is to provide a way – other than through a discretionary entitlement – for residents with disabilities to request a

modification from zoning, building, and land use rules, standards, policies, practices, and procedures.

In the 2015 Zoning Ordinance update, Santa Monica adapted reasonable accommodation procedures (SMMC Chapter 9.49) that specify the applicability of eligible applicants and requests, application requirements, reviewing authority and procedures, findings and decisions, appeal process, and the duration limits of the accommodation. The findings for approval include:

1. That the housing or other property which is the subject of the request for reasonable accommodation will be used by an individual or organization entitled to protection;
2. The request for accommodation is necessary to afford an individual with a disability an equal opportunity to use and enjoy a dwelling or common areas of the premises;
3. The request for accommodation would not impose an undue financial or administrative burden on the City; and
4. The request for accommodation would not require a fundamental alteration in the nature of the City's land use and zoning or building program.

Generally, a reasonable accommodation is a self-certified process consisting of a simplified application with limited information requested by the City in order to approve a request. On average, the City receives two applications per year, and both the findings above and the overall process have never presented a constraint. To date, a reasonable accommodation has never been denied.

4. Building Codes and Code Compliance

Building codes regulate the construction of dwellings and apply to plumbing, electrical, and mechanical systems. The purpose of building codes and their enforcement is to protect the public from unsafe conditions associated with faulty construction.

a. Building Code Implementations

The City of Santa Monica enforces State building code standards for all structures subject to the Code, including the construction and rehabilitation of housing, and has adopted the 2019 California Building Standards Code (based on the 2018 International Building Code), the 2019 California Green Building Standards Code, and the 2019 California Residential Code. For historic resources, the City allows determinations to be made based on the State Historical Building Code. The State Building Standards Code establishes accessibility requirements in Chapters 11A (Housing Accessibility) and 11B (Accessibility to Public Buildings, Public Accommodations, Commercial Buildings and Publicly Funded Housing). Consistent with the Federal Fair Housing Act, the Code requires all multiple-unit structures with four or more units built after March 13, 1991 to provide accessible routes throughout the property, and "adaptable" dwelling units to

allow conversion to a fully accessible unit without significant costs and the need to make significant structural modifications. In multiple-unit structures with an elevator, 100% of the units must meet the accessibility requirements, whereas in buildings without an elevator, all of the ground floor units must be accessible. The Code requires compliance with the following seven basic design and construction requirements for accessible routes and unit adaptability:

1. Accessible building entrance on an accessible route
2. Accessible and usable public and common-use areas
3. Usable doors by a person in a wheelchair
4. Accessible route into and through the dwelling unit
5. Light switches, electrical outlets, thermostats, etc. in accessible locations
6. Reinforced bathroom walls for later installation of grab bars
7. Usable kitchens and bathrooms for persons in a wheelchair

These accessibility requirements pertain to new construction only and not renovations or remodels. However, the Building Code applies a more stringent standard for publicly funded housing requiring 20% of public funds utilized on renovation, structural repair, alterations, or additions to existing multiple-unit buildings be allocated towards removal of architectural barriers.

Section 504 of the Federal Rehabilitation Act of 1973 adds additional accessibility requirements for projects receiving federal funds such as the HOME Investment Partnership Program (HOME) or Community Development Block Grants (CDBG). In federally assisted new construction or substantially rehabilitated housing with five or more units, 5% of the units, or at least one unit, must be accessible for persons with mobility disabilities. An additional 2% of the dwelling units, or at least one unit, must be accessible for persons with hearing or visual disabilities. These units must be constructed in accordance with the Uniform Federal Accessibility Standards (UFAS) or a standard that is equivalent or stricter. UFAS generally defines an accessible housing unit as a unit located on an accessible route that can be approached, entered, and used by individuals with disabilities.

b. Local Amendments

In 2019, along with the adoption of the California Building Code, the City adopted various local amendments. Local amendments provide for higher orders of seismic safety, structural safety, fire safety, occupant safety, and environmental conservation. The local amendments are reasonably necessary given the City's local climactic, geological and topographical conditions, particularly the specific seismic conditions of Santa Monica with known earthquake faults and the special environmental conditions of the City's beach community. The majority of the amendments, particularly for the Building Code and Residential Code, were discussed, conceived, and authored by the collaborative group of building officials in Los Angeles County. City staff participated in each of the committees of this collaborative group, and staff

determined that the technical suggestions of the collaborative group were applicable to Santa Monica.

In accordance with local amendments to the California Energy Code, new buildings in Santa Monica have two design pathways: all-electric design and mixed-fuel design. As an incentive to design all-electric buildings, a higher level of energy efficiency is required for mixed-fuel buildings. All-electric buildings are not subject to higher levels of energy efficiency and may be built to the State's standard design requirements. For residential projects specifically:

- New single-family, duplex, and multi-family residential buildings up to three stories:
 - All-Electric Building: shall be designed to code established by the 2019 CEC.
 - Mixed-Fuel Building: shall be designed to CalGreen Tier 1 established by the 2019 CEC. CalGreen Tier 1 buildings have additional integrated efficiency and on-site renewable energy sufficient to achieve a Total Energy Design Rating of 10 or less.

- New multi-family buildings, four stories and greater:
 - All new buildings shall have a solar photovoltaic system with a minimum rating of 2 watts per square foot of the building's footprint.
 - All-Electric Building: shall be designed to code established by the 2019 CEC.
 - Mixed-Fuel Building: shall be designed to be 5 percent more efficient than the code established by the 2019 CEC. (The change from the current Energy Reach Code, which requires these buildings to be 10 percent more efficient is the result of a cost-effectiveness study.)

In accordance with local amendments to the Green Building Standards Code, major additions to one- and two-unit dwellings shall install a solar photovoltaic system with a minimum total wattage of 1.5 times the square footage of the addition. All major additions to multi-family and non-residential buildings are required to install a solar photovoltaic system with a minimum total wattage of 2 times the square footage of the addition's footprint.

Local amendments to the 2019 California Energy Code and 2019 California Green Building Standards Code are reasonably necessary because of local climatic, geological, topographic, and environmental conditions. The amendments are consistent with the City's Climate Action & Adaptation Plan and establish requirements to increase energy efficiency and the use of renewable energy, including in particular solar energy, which will reduce demands for local energy and resources, reduce regional pollution, and promote a lower contribution to greenhouse gases. Cost effectiveness studies prepared by the California Statewide Investor Owned Utilities Codes and Standards Program in conjunction with consultants and cities (collectively known as the "Reach Code Team"), demonstrate that the local amendments are cost-effective and do not result in buildings consuming more energy than is permitted by the 2019 California Energy Code.

In addition to local amendments to the Building Code, Santa Monica has specific High-Rise Safety Code requirements for buildings over 55 feet in height. In contrast, State law (Health & Safety Code Section 13210(b)) classifies buildings over 75 feet in height as high-rise. The local high-rise amendment was put in place after the 1994 Northridge earthquake when there were multiple building fires and collapses. With limited resources at the time and since the City is surrounded on all sides by the City of Los Angeles, there were inadequate resources coming into the City in a timely manner. Since the City is very compact in many sections, especially in the downtown area, the purpose of this local amendment to the high-rise definition is to provide an extra level of occupant safety and fire protection in the event of a citywide emergency that might overwhelm the Fire Department's ability to respond. Essentially, buildings over 55 feet high are required to add a higher level of safety to the building to ensure greater reliance on the built-in safety systems. While this can be a cost constraint on housing projects over 55 feet, it is a necessary safety precaution to ensure protection of human life.

c. Compliance and Enforcement

Santa Monica's Building and Safety Division ensures compliance with all State building and accessibility requirements as part of the plan check process. During the construction phase, building inspectors conduct site visits to ensure the project adheres to the approved project plans and required accessibility specifications prior to signing off on the final certificate of occupancy (CofO).

Code enforcement can be a potential fair housing concern because code compliance actions may create disproportionate impacts on protected groups such as minority populations. In Santa Monica, however, code enforcement is triggered by complaints, and the City seeks voluntary code compliance through administrative processes that allow for retroactive compliance. In some cases, proactive campaigns are also undertaken when a widespread problem or a specific life/health/safety concern is identified. In conjunction with inspecting and noticing property owners regarding a violation, Code Enforcement personnel inform property owners of assistance provided through the City's various housing rehabilitation programs.

5. On- and Off-Site Improvements

Various City departments implement on- and off-site improvement requirements, including standards for street construction, sidewalks, curbs, gutters, on-street parking and bicycle lanes. Residential development may also necessitate constructing water, sewer, and drainage improvements. All improvements are generally required as conditions of approval and are developer financed. Complying with certain infrastructure improvements may be perceived as a constraint on the provision of housing for all income levels.

For infill projects, the SMMC Section 7.04.800 requires the construction of standard improvements that may include repair of defective sidewalks, construction of standard driveways, and maneuvering areas. The Code also requires dedication and improvement of

full-street or alley frontages. The City's respective departments may approve variances from City standards based on hardship considerations on a case-by-case basis per City Code. Although infrastructure requirements represent a cost to developing housing, these improvement standards are not unreasonable nor do they represent a significant constraint. However, the City recognizes there are issues with infrastructure adequacy in certain areas of the City, including infill areas with aging infrastructure. These infrastructure deficiencies are a recognized constraint for infill development.

6. Entitlement and Development Impact Fees

Similar to other cities throughout California, Santa Monica collects various impacts fees, charges, and taxes on new residential development. Charges for such things as entitlement applications or development impact fees are set at rates designed to recover the cost of permit processing and to provide public services to residents as well as to mitigate certain development impacts (e.g., parks and open space and affordable housing). The City annually reassesses its fees to ensure they reflect the actual cost of providing services with most user fees adjusted annually based on the change in the Consumer Price Index (CPI).

The City has been active in meeting State requirements of Government Code Section 65940.1(a)(1)(A) to increase transparency and predictability of fees. All entitlement application and development impact fees, as well as building permit and plan check estimates, are posted on the City's Finance Department website. Figure E-14 and E-15 summarize the City's adopted entitlement application processing fees and potential development impact fees for new housing developments, respectively. The cost of development impact fees is determined by the type of development or uses proposed, the size of the project (square footage or unit count), and the development tier of a project as described above in Section A(1). When a housing development project requires multiple entitlement applications, the City charges 100% of the cost for the highest application fee and 50% of the cost of associated applications filed concurrently or after the initial filing for the project.

It should be noted that while some entitlements are listed in Figure E-14, such as Conditional/Minor Use Permits, Variances, and Modifications, these fees are either not required for typical housing projects within Santa Monica or are self-imposed by a developer. Conditional Use Permits (CUPs) are not required for typical multiple-unit residential projects. CUPs are unusual for residential use classifications in the Zoning Code and a CUP for a residential use has not been requested in the past 10 years. Application fees, including CUPs, are based on cost recovery of services provided (i.e. staff time spent processing the permit), which typically requires significant analysis and development of conditions to mitigate potential impacts (e.g. noise, circulation, loading) on surrounding land uses. Additionally, as discussed below in Section 7, Entitlement and Permit Processing, housing projects in Santa Monica are largely processed ministerially and will continue to be with implementation of Housing Element Program 1.A, which has removed the need for a Development Review Permit. Furthermore, all application fees and development impact fees are waived for 100% affordable housing projects.

Figure E-14 City Planning Residential Development Application Fees, Fiscal Year 2020-2021

Entitlement Application Type	Total Fee Amount
Administrative Approval: Non-Downtown	\$7,990.46
Administrative Approval: Downtown - Non-residential Projects Up to 10,000 SF	\$7,990.46
Administrative Approval: Downtown - Housing Projecting up to 75,000 SF	\$13,947.51
Architectural Review Board: New Construction	\$4,563.52
Coastal Zone (Approval in Concept)	\$190.38
Conditional Use Permit	\$19,727.12
Deed Restrictions	\$887.68
Development Review Permit	\$28,539.79
Final Subdivision Map	\$1,993.13
Major Modification	\$5,486.47
Minor Modification	\$2,027.74
Minor Use Permit	\$8,065.39
Pre-Submittal Review	\$3,553.16
Tentative Subdivision Map	\$9,001.05
Variance	\$15,120.46
Waiver of Zoning Ordinance	\$5,486.47
Waiver of Parcel Map	\$3,042.71

Most planning and construction fees and taxes are due at building permit issuance, but some fees and charges such as the in-lieu AHPP fee may be paid at the end of the construction process (e.g., Certificate of Occupancy). In limited cases, off-site improvements may be required to mitigate project impacts (e.g., street, utility, or sewer capacity improvements), to repair public facilities damaged during project construction (e.g., sidewalk and curb reconstruction or alley repaving), and to protect the public health, safety and general welfare of city residents, businesses, and visitors.

Figure E-15 Development Impact Fees, Fiscal Year 2020-2021

Transportation Impact Fee					Parks and Recreation Development Impact Fee		
Land Use	Adopted Fee			Fee Basis	Land Use	Adopted Fee	Fee Basis
	Area 1	Area 2	Area 3				
Residential					Residential		
Single Unit	\$8,901.19	\$9,135.43	\$9,135.43	per unit	Single Unit	\$8,584.88	per unit
Multi-Unit	\$3,045.14	\$3,864.99	\$3,045.60	per unit	Multi-Unit (Studio/1 BR)	\$4,652.20	per unit
Non-Residential					Multi-Unit (2+ BR)		
Retail	\$24.60	\$35.25	\$35.25	per SF	Non-Residential		
Office	\$11.36	\$12.65	\$12.65	per SF	Office/Creative Office	\$2.60	per SF
Medical Office	\$32.91	\$34.90	\$34.90	per SF	Medical Office/Hospital	\$1.43	per SF
Hospital	-	\$17.22	\$17.22	per SF	Retail/Auto Sales	\$1.68	per SF
Lodging	\$4.21	\$4.21	\$4.21	per SF	Hotel	\$3.50	per SF
Industrial	\$1.40	\$1.53	\$1.53	per SF	Industrial	\$1.46	per SF
Auto Sales Display	\$1.40	\$1.53	\$1.53	per SF	-	-	-
Cultural Arts Contribution					Affordable Housing Commercial Linkage Fee		
Land Uses	Onsite	In-Lieu	Fee Basis	Land Uses	Adopted Fee	Fee Basis	
New Residential/ Commercial	2% of \$200	1% of \$200	per SF	Office	\$12.60	per SF	
Commercial Tenant Improvement	2% of 50	1% of \$50	per SF	Creative Office	\$10.78	per SF	
Childcare Linkage Fee				Medical Office	\$7.75	per SF	
Land Use	Adopted Fee	Fee Basis	Hospital	\$6.91	per SF		
Residential	\$156.54	per unit	Retail	\$10.96	per SF		
Office	\$7.43	per SF	Hotel	\$3.45	per SF		
Retail	\$5.31	per SF	Industrial	\$8.47	per SF		
Hotel	\$3.73	per SF	Institutional	\$11.50	per SF		

Santa Monica’s AHPP allows eligible housing projects of three or fewer units to pay an affordable housing fee in-lieu of providing units on-site or off-site. Calculations resulting in a fractional unit of less than 0.75 can also be met through payment of a unit development cost fee. The unit development cost fee reflects the average cost to the City to develop an affordable housing unit and is adjusted annually based on changes in land and construction costs. Figure E-16 provides the affordable housing in-lieu fee costs.

Figure E-16 Affordable Housing In-Lieu Fee, Effective November 1, 2020

Affordable Housing In-Lieu Fees	
Apartment Developments	\$36.49 per sq. ft. of entire project
Condominium Developments	\$42.62 per sq. ft. of entire project
Unit Development Cost	\$382,795.00

As a means of assessing the total cost that fees contribute to development in Santa Monica, Figure E-17 provides a breakdown of individual and cumulative costs of City permit fees, charges, and taxes applicable to three typical housing development types: (1) a mixed-use development, (2) a three-unit condominium development, and (3) a single-unit dwelling. As Figure E-17 shows, total development fees are approximately \$27,155.75 per unit (\$23.04 per square foot) for the mixed-use development, \$124,588.59 per unit (\$64.66 per square foot) for the three-unit condominium development, and \$35,870 (\$10.63 per square foot) for the single-unit dwelling.

Figure E-17 Development Fees Applicable to Prototypical Residential Development Projects

Fees	Mixed-Use Development	3-Unit Condo Development	Single-Unit Dwelling
Zone	MUBL	R2	R1
Stories	3	2	2
Market Rate	25 units	3 units	1 unit
Affordable	3 units	0 units	N/A
Total Units	28 units	3 units	1 unit
Residential Floor Area	24,000 SF	5,780 SF	3,375 SF
Ground Floor Commercial	9,000 SF Retail	N/A	N/A
Avg. Unit Size	704 SF per Unit	1,926 SF per unit	N/A
Tenure Type	Rental	Ownership	Ownership
# Parking Spaces	49 spaces	6 spaces	2 spaces
Entitlement and Development Impact Fees			
Administrative Approval	\$7,990.46	Exempt	Exempt
Subdivision Map	Exempt	\$10,994.63	Exempt
Architectural Review Board: New Construction	\$4,563.52	\$4,563.52	Exempt
CEQA analysis	Exempt	Exempt	Exempt
Aff. Housing In-lieu	Exempt	\$246,343.60 ³	Exempt
Aff. Housing Comm. Linkage	\$4,393.96	Exempt	Exempt
Parks & Rec.	\$146,110.38	\$14,986.44	Exempt
Transportation Impact Fee	\$115,085.58	\$7,729.98	Exempt
Cultural Arts	\$66,000.00	Exempt	Exempt
Childcare Linkage	\$52,173.12	\$469.62	Exempt
Construction Fees			
Plan Check	\$34,353	\$11,156	\$7,773
Building Permits/ Inspections	\$41,581	\$10,152	\$6,203
Water Meter ¹	\$8,429	\$8,429	\$8,429
Fireline Meter ²	\$84,292	\$26,973	\$0
Wastewater Capital Facilities	\$128,492	\$13,767	\$4,589

Fees	Mixed-Use Development	3-Unit Condo Development	Single-Unit Dwelling
Other Requirements and Taxes			
School Facilities Fee	\$66,900	\$15,201	\$8,876
Condo Tax	\$0	\$3,000	\$0
Total Fees and Taxes	\$760,361.02	\$373,765.79	\$35,870
Total Fees/Unit	\$27,155.75	\$124,588.59	-
Total Fees/ Sq. Ft.	\$23.04	\$64.66	\$10.63
<i>1 Assume 1 inch water meter</i> <i>2 Assumes 4 inch Fireline meter</i> <i>3 Only required when a developer choses to not provide an on-site affordable unit</i>			

In 2021, the average cost to develop an apartment unit in Santa Monica is approximately \$735,000¹, including construction and land costs. Given that cost, the percentage of cumulative development fees the City imposes on an apartment unit is approximately 3.7% of the construction cost. Additionally, using the mixed-use development prototype above, the cost City fees contribute to an 100% affordable housing project is approximately \$364,047 (mixed-use development total minus all entitlement and development impact fees) or \$13,001.68 per unit. As of November 2020, with the average cost for the City to develop an affordable housing unit at \$382,795.00, it can be assumed that applicable City fees amount to approximately 3.4% of the cost to construct an affordable unit.

Similarly, it is estimated that one condominium unit in a three-unit development in Santa Monica costs approximately \$1.6 million² to develop in some areas of the City. Given this cost, the percentage of cumulative development fees the City imposes is approximately 7.8% of the development cost of one condominium unit. However, it should be noted that the main reason City fees are high for the above prototype is because typically developers of three-unit condominium developments elect to pay an affordable housing in-lieu fee. This fee could be avoided if a developer provided an affordable unit on-site, which would lower the total fee amount to \$127,422.79 or \$42,474.26 per unit, which is 2.6% of the total development cost for one condominium. Therefore, this fee in a self-imposed constraint and the City provides an alternative to not pay it.

As for single-unit dwellings, the development cost range is too wide and varied to approximate a realistic cost. However, as detailed in Section E of Appendix B, the average price in 2019 for a single-unit dwelling within Santa Monica was \$3,966,251. Given this price, the percentage of cumulative development fees the City imposes is approximately 0.9% of the average single-unit dwelling sales price.

Given the percentages that City fees represent of average development and sales prices, combined with the fact that the volume of new housing construction in the last housing cycle exceeds the City's regional housing need, it can reasonably be concluded that the City's permit fees and other development charges and taxes do not impose an undue constraint on the

¹ From investigation of total development cost for market-rate housing by HR&A in 2021

² From investigation of total development cost for 3-unit condominium projects by HR&A in 2021

production of new housing. However, in addition to development standards, Housing Element Programs 1.F and 1.J propose to review all development impact fees applied to housing projects.

7. Entitlement and Permit Processing

Housing development in Santa Monica is subject to varying ministerial and discretionary processes depending on such parameters as size, development tier, and land use. Below is a description of typical processes, thresholds, requirements, and timeframes housing projects may encounter.

a. Processes and Thresholds

New housing developments within Santa Monica are reviewed through one of three processes based on size, use, and location thresholds – Building Permit review, Administrative Approvals, or Development Review Permits. In August 2020, an Interim Zoning Ordinance (IZO) was adopted that temporarily revised the processing thresholds for most housing projects. The intent behind the IZO was to streamline and incentivize housing projects, especially those that are subject to the protections of the Housing Accountability Act (HAA), by making projects that were once discretionary now ministerial. This has had the effect of shortening project approval time as well as allowing for housing projects to be exempt from the environmental review process mandated by the California Environmental Quality Act (CEQA). Housing Element Program 1.A proposes to make these interim process thresholds permanent and to expand the streamlining applicability to housing projects that are granted deviation from certain zoning ordinance objective standards through the minor modification process.

Figure E-18 and E-19 summarize the IZO thresholds and typical processes for housing projects within the City, respectively. With these IZO thresholds, the vast majority of housing projects fall into a ministerial (by-right) process which alleviates the processing time and discretionary review barriers that provide constraints for housing production in Santa Monica.

Figure E-18 Entitlement Application Thresholds

Review Process	Entitlement	Development Thresholds
Ministerial	Building Permit Review Only	<ul style="list-style-type: none"> Projects in residential zone districts Single-Unit Dwellings
	Administrative Approval	<ul style="list-style-type: none"> Projects more than 1,000 sq. ft. in nonresidential zone districts All 100% affordable housing projects Any project that meets the definition of "housing development project" under the HAA, up to Tier 2 maximum limits and meets all objective standards*
Discretionary	Development Review Permit	Projects that exceed: <ul style="list-style-type: none"> Tier 2 maximum limits in the DCP and BAP Tier 1 maximum limits for projects that do not meet the definition of "housing development project" under the HAA or do not meet all

		<p>objective standards*</p> <ul style="list-style-type: none"> • 10,000 sq. ft. of floor area located in Residential Zone Districts • 7,500 sq. ft. of floor area in the NC and OF Zone Districts • 15,000 sq. ft. of floor area located in Nonresidential Zone Districts (Not including NC and OF) • 30,000 sq. ft. of floor area in projects containing no more than 15% commercial floor area located in Nonresidential Zone Districts (Not including NC and OF) • 7,500 sq. ft. feet of floor area located in the Pico Neighborhood Area
<p>* The Housing Accountability Act defines a "housing development project" as a project that is either (1) residential units only, (2) a mixed-use development consisting of residential and nonresidential uses with at least two-thirds of the square footage designated for residential use, or (3) transitional or supportive housing.</p>		

Figure E-19 Housing Development Project Processes

Step in Entitlement Process	Building Permit Review Only	Administrative Approval	Development Review Permit
Application Submittal	X	X	X
ARB Preliminary Review		X (DCP only)	X
Staff Administrative Review and Approval		X	
Planning Commission Review and Approval			X
ARB Formal Review and Approval	X	X	X
Plan Check / Building Permit Approval	X	X	X

b. Ministerial Approvals

Housing projects that require either an Administrative Approval or only a building permit are processed ministerially for conformance with objective development standards with no discretion exercised by the Community Development Director, Planning Commission, or City Council, although certain projects are required to receive design review approval by the Architectural Review Board (ARB) [see Section 7(d) below]. Below is a description of these processes.

i. Administrative Approvals

The Administrative Approval (AA) entitlement is intended to allow for the approval of projects which conform to the standards established for the applicable zone district in which the project is located and do not require discretionary review or approval by the Director, Planning Commission, or City Council. AAs provide for an administrative review and assessment of the proposed development project in light of explicit standards which have been designed to ensure that the completed project will be in harmony with existing or potential development in the surrounding area consistent with the goals, objectives, and policies of the LUCE.

Generally, the AA process consists of the following steps:

1. Application submittal
2. ARB preliminary review for Downtown projects only

3. Staff review and approval
4. ARB review and approval
5. Plan Check/Building Permit approval

For an AA to be issued, only approval from the City Planning, Mobility, and Resource Recovery and Recycling Divisions are required, and the following findings must be made in the affirmative:

1. The proposed development conforms precisely to the development standards for the area and the Santa Monica Municipal Code and General Plan.
2. The proposed development does not require discretionary review or approval as outlined in the Municipal Code.

The typical processing time for an AA is approximately three months, not including building permit or ARB review and approval. This timeframe coupled with the lack of discretionary review does not present a constraint on housing development projects. The lack of discretionary review also means that AA projects cannot be appealed.

ii. Building Permit Only Projects

Projects that only require building permit approval consist of single-unit and multiple-unit dwellings in residential districts. However, ARB review is required for all multiple-unit structures and in limited cases, for single-unit dwellings. Building permit review time varies based on project type, but due to the lack of discretionary approval these projects are not constrained by the building permit process. Building permit projects also cannot be appealed.

c. Discretionary Approval

Housing developments that fall within the discretionary category for processing are required to obtain approval of a Development Review Permit (DRP). Below is a description of the DRP process and requirements.

i. Development Review Permit

A DRP is intended to allow for the construction of certain projects provided that the building design, siting, and use are compatible with the site and neighborhood, and the project does not result in an adverse impact on the surrounding area. DRPs are reviewed and approved by the Planning Commission, and as part of the review, consideration is given to the location, size, massing, and placement of structures on a site as well as to the location of proposed uses within a project. A DRP review also consists of an evaluation of a project's compliance with the development standards of the Zoning Ordinance, and approval of a DRP takes into account the potential impacts of a project, as evaluated under the aforementioned aspects of review, and weighs it against the public need for benefits derived from the project.

Generally, the current DRP process consists of the following steps, subject to compliance with SB 330 limitations on number of hearings:

1. Application submittal
2. ARB preliminary review
3. Planning Commission review and approval
4. ARB review and approval
5. Plan check/Building permit approval

A DRP will only be granted if the Planning Commission determines that the following findings of fact can be made in support of the project as submitted or modified. The inability to make one of the following required findings is grounds for denial of an application.

1. The physical location, size, massing, setbacks, pedestrian orientation, and placement of proposed structures on the site and the location of proposed uses within the project are consistent with applicable standards and are both compatible and relate harmoniously to surrounding sites and neighborhoods;
2. The rights-of-way can accommodate autos, bicycles, pedestrians, and multi-modal transportation methods, including adequate parking and access;
3. The health and safety services (police, fire etc.) and public infrastructure (e.g., utilities) are sufficient to accommodate the new development;
4. The project is generally consistent with the Municipal Code, General Plan, and any applicable Specific Plan;
5. Based on environmental review, the proposed project has no potentially significant environmental impacts or any potentially significant environmental impacts have been reduced to less than significant levels because of mitigation measures incorporated in the project or a Statement of Overriding Considerations has been adopted;
6. The project promotes the general welfare of the community;
7. The project has no unacceptable adverse effects on public health or safety; and
8. The project provides Community Benefits consistent with SMMC Chapter 9.23.

In granting a DRP, the Planning Commission (or the City Council if appealed) must make findings that the use and development of the property conform with a site plan, architectural drawings, or statements submitted in support of the application, or in such modifications thereof, as may be deemed necessary to protect the public health, safety, and general welfare and secure the objectives of the LUCE and the Zoning Ordinance. They may also impose any other conditions as deemed necessary to achieve these purposes and to support the findings for approval.

The typical time to process a DRP takes between six to nine months not including building permit or ARB review and approval. Given the discretionary process of DRPs, the lack of predictably

and timing can be a constraint on housing production. Additionally, DRP approvals can also be appealed which results in a project having an additional public hearing before a higher decision-making body (City Council) adding more time and uncertainty to the overall process. However, with the IZO thresholds in place and the intent to make them permanent through Housing Element Program 1.A, DRPs for housing projects are only required in very limited circumstances when a project is greater than 75,000 square feet in the Downtown Community Plan area. Additionally, it should be noted that if a project is compliant with the Housing Accountability Act as described further below, the City is unable to deny a housing project.

The DRP process also triggers environmental review requirements under CEQA. In the past, many housing projects were subject to a rigorous environmental review process (such as preparation of an Environmental Impact Report) that could take up to 2 years or more. However, with passage of new CEQA legislation in recent years, most housing projects in the City are determined to be CEQA exempt.

d. Architectural Review Board

The Architectural Review Board's (ARB) role in the development of housing is to preserve existing areas of natural beauty and cultural importance, and to assure that buildings, structures, signs, or other developments are in good taste, good design, harmonious with surrounding developments and in general contribute to the preservation of Santa Monica's reputation as a place of beauty, spaciousness, and quality. The ARB's purview relative to housing production is over all new multiple-unit and mixed-use developments within the City and only single-unit dwellings if they are located on sloped parcels.

Currently, for housing projects in residential zone districts that only require a building permit or for housing developments that only require an AA, the ARB's review and approval happens either before the building permit process or after the AA is approved. When it comes to housing development projects that require DRPs, in addition to the formal ARB review and approval after the entitlement is approved, a preliminary review takes place prior to the discretionary public hearing in order to provide initial design feedback that can be considered by the Planning Commission. This preliminary review also serves to provide the project applicant feedback on their design as the project advances through the entitlement process.

In order for the ARB to approve a project, the following findings must be made:

1. The plan for the proposed building or structure is expressive of good taste, good design, and in general contributes to the image of Santa Monica as a place of beauty, creativity, and individuality.
2. The proposed building or structure is not of inferior quality such as to cause the nature of the local neighborhood or environment to materially depreciate in appearance and value.
3. The proposed design of the building or structure is compatible with developments on land in the general area.

4. The proposed development conforms to the effective guidelines and standards adopted pursuant to Chapter 9.55 – *Architectural Review Board*, and all other applicable ordinances insofar as the location and appearance of the buildings and structures are involved.

Projects that are subject to ARB review are typically approved on the first or second round of review which can take approximately six weeks to three months. The City does not prohibit applicants from submitting an application for a building permit prior to obtaining ARB approval, but there is risk that the ARB process may result in changes to the building permit application.

While good design is a priority to the City, the ARB process can add a constraint on housing projects as it adds ~~either~~ a discretionary process to otherwise ministerial projects or another level or review to projects that are already going through one discretionary process. ARB approvals can also be appealed which results in a project having to go to an additional public hearing at a higher decision-making body (Planning Commission) adding more time and uncertainty to the overall process. Additionally, while the design review process focuses only on project design and cannot be used to reduce density or deny a housing project, the approval findings can be perceived as not objective.

To help remove barriers to some housing projects, the City has made recent revisions to staff-level ARB review and approval thresholds. Projects such as exterior remodels and the addition of new housing units in the rear of the parcel can now be reviewed and approved by staff. However, Housing Element Program 1.B stipulates adoption of additional streamlining efforts to expedite ARB review for housing projects. This includes expansions to the staff-level approvals, shifting the design review process to occur before or be concurrent with entitlement review, placing time and hearing limits on projects, review and establish mechanisms to promote approval certainty, and developing objective design standards. Together, these efforts will help remove constraints on housing projects by reducing processing time and will bring increased certainty for housing providers.

e. Use Permits and Other Processes

Additional processes are described below that some residential land use types may need to adhere to.

i. Conditional and Minor Use Permits

As shown in Figure E-10, the only kinds of residential use classifications that very few residential land uses require approval of a Conditional Use Permit (CUP) are elderly and long-term care facilities and emergency shelters. Residential use classifications that require approval of a Minor Use Permit (MUP) in some zones are group residential, residential care general, residential care senior, and hospice general. These uses are not typical multiple-unit residential uses in that they typically consist of shared living quarters and provide care for persons in need

of personal services, supervision, protection, or assistance for sustaining the activities of daily living. These use permits and the processes they require are to help ensure that the uses being proposed are consistent with the purposes of the zone district in which they are located and that special consideration is given to the design, location, and operation of the use in a manner that will not interfere with the use and enjoyment of surrounding properties.

Both use permits are required to be reviewed by a decision-making body (Planning Commission for a CUP and the Community Development Director for a MUP) and can only be granted if the following findings can be made in the affirmative:

1. The proposed use is conditionally allowed within the applicable Zoning District and complies with all other applicable provisions of the Zoning Ordinance and all other titles of the Municipal Code.
2. The proposed use is consistent with the General Plan and any applicable specific plan.
3. The subject parcel is physically suitable for the type of land use being proposed.
4. The proposed use is compatible with any of the land uses presently on the subject parcel if the land uses are to remain.
5. The proposed use is compatible with existing and permissible land uses within the District and the general area in which the proposed use is to be located which may include but not be limited to size, intensity, hours of operation, number of employees, or the nature of the operation.
6. The physical location or placement of the use on the site is compatible with and relates harmoniously to the surrounding neighborhood.
7. Based on environmental review, the proposed project has no potentially significant environmental impacts or any potentially significant environmental impacts have been reduced to less than significant levels because of mitigation measures incorporated in the project or a Statement of Overriding Considerations has been adopted.
8. The proposed use and related project features would not be detrimental to the public interest, health, safety, convenience, or general welfare.

In granting a CUP or MUP, the decision-making body shall require that the use and development of the property conform with a site plan, architectural drawings, or statements submitted in support of the application, or in such modifications thereof, as may be deemed necessary to protect the public health, safety, and general welfare and secure the objectives of the General Plan and the Zoning Ordinance. The decision-making body may also impose any other conditions as may be deemed necessary to achieve these purposes and to support the findings of approval.

Typically, a CUP or MUP is processed concurrently with other associated entitlements that are being proposed but on their own can take approximately three months to process. However, use permit approvals can be appealed which results in a project having to go to an additional

public hearing at a higher decision-making body (City Council for CUP appeals and Planning Commission for MUP appeals) adding more time and uncertainty to the overall process. These timeframes can add a constraint on certain types of housing that require a use permit, but as shown in Figure E-10, the vast majority of residential land uses are permitted by right and therefore, would not be required to go through any of these processes. However, through Housing Element Program 2.I, the City will be reviewing all special needs housing types and residential land uses to ensure consistency with State law and to remove any unintended constraints.

ii. Subdivision Maps

For some housing projects, such as condominiums or mixed-use developments that have commercial and residential components, developers may choose to subdivide the airspace rights of individual units or uses. For example, this typically happens when a housing developer wants to develop for-sale housing units. Additionally, a developer may also choose to process a subdivision map in order to vest current development standards at time of application.

The process is conducted in two steps: a Tentative Map that is approved by the Planning Commission and a Final Map that is approved by City Council. The Tentative Map may be denied by the Planning Commission on any of the grounds provided by City ordinances or the California Subdivision Map Act. The Planning Commission may deny approval of the Tentative Map if it makes any of the following findings:

1. The proposed map is not consistent with applicable general and specific plans as specified in Government Code Section 65451.
2. The design or improvement of the proposed subdivision is not consistent with applicable general and specific plans.
3. The site is not physically suitable for the type of development.
4. The site is not physically suitable for the proposed density of development.
5. The design of the subdivision or the proposed improvements are likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat.
6. The design of the subdivision or the type of improvement is likely to cause serious public health problems.
7. The design of the subdivision or the type of improvements will conflict with easements, acquired by the public at large, for access through or use of, property within the proposed subdivision. In this connection, the governing body may approve a map if it finds that alternate easements for access or for use will be provided, and that these will be substantially equivalent to ones previous acquired by the public. This subsection shall apply only to easements of record or to easements established by judgment of a court of competent jurisdiction and no authority is hereby granted to a legislative body to determine that the public at large has acquired easements for access through or

use of property within the proposed subdivision.

8. The proposed subdivision is inconsistent with any ordinance or law of the City of Santa Monica.

The subdivision process can add a time constraint on a housing project, but a subdivision map is only a requirement if the developer is selecting to develop for-sale units, wants to divide the uses within a building for financing reasons, or wants to vest development standards. While the processing time for a subdivision map is approximately 50 days, the approval can also be appealed which results in a project having to go to an additional public hearing at a higher decision-making body (City Council). This possibility adds more time and uncertainty to the overall process. However, the requirements of the Subdivision Map Act cannot be waived or amended by local ordinance when a subdivision of airspace or land is a part of the proposed project.

f. State Law

Existing and new State laws have an impact on housing developments and how they are processed. Below is a description of three pertinent laws.

i. *Senate Bill 330*

Senate Bill (SB) 330, "The Housing Crisis Act of 2019", established a statewide housing emergency to be in effect until January 1, 2025 ("housing emergency period"). During the housing emergency period, the City of Santa Monica, as an urban area, is generally prohibited from enacting any development policy, standard, or condition that would have the effect of the following:

1. Changing the land use designation or zoning to a less intensive use or reducing the intensity of land use within an existing zoning district below what was allowed on January 1, 2018;
2. Imposing or enforcing a moratorium on housing development;
3. Imposing or enforcing new non-objective design standards established on or after January 1, 2020; or
4. Establishing or implementing certain limits on the number of permits issued for housing development projects or the population of Santa Monica.

SB 330 also limits the demolition of existing housing units in conjunction with a housing development project, as that term is defined for purposes of SB 330, unless replacement units are provided and only allows the demolition of affordable, rent-controlled, or other protected units if certain tenant protections are met.

Additionally, new specific requirements and limitations on development application procedures have been established by SB 330. Housing developers may now submit a "preliminary application" for a housing development project that requires a specified subset of information prior to providing a formal application. Submittal of the preliminary application secures the applicable development standards and fees adopted at that time. The project is considered vested unless the project changes substantially or no formal entitlement application is filed within 180 days. SB 330 also limits the processing time of housing development projects to 60 or 90 days depending on environmental review requirements and limits the number of public hearings to no more than five including Planning Commission, Architectural Review Board, and City Council. To facilitate this process, Santa Monica has developed a preliminary application form consistent with SB 330.

ii. Senate Bill 35

Senate Bill (SB) 35, passed in 2017, requires jurisdictions that have not approved enough housing projects to meet their Regional Housing Needs Allocation (RHNA) to provide a streamlined, ministerial entitlement process for housing developments that incorporate affordable housing. Pursuant to SB 35, if a jurisdiction has not approved enough market rate or affordable housing units to meet its RHNA, review and approval of proposed projects with at least 10% affordability or 50% affordability must be based on objective standards and cannot be based on subjective design guidelines, respectively. However, to be eligible, projects must also meet a long list of other criteria including prevailing wage requirements for projects over 11 units. In order for applicants to take advantage of SB 35, per Government Code Section 65913.4 (10)(b)(1)(a)(et seq.), they need to submit a Notice of Intent, and jurisdictions need to give Native American tribes an opportunity for consultation.

The City is currently not subject to SB 35 under the 5th Cycle Housing Element reporting period (2013–2021) because the City meet its RHNA targets. Nevertheless, the City will be undertaking the development of objective design standards and written procedures for implementation of SB 35's streamlined review should the City become subject to SB 35 in the coming 6th Cycle Housing Element reporting period (2021–2029) as part of Housing Element Programs 1.A and 1.B. It should also be noted that the City has enacted an interim ministerial approval process for nearly all housing projects that meet objective standards of the Zoning Ordinance, and Housing Element Program 1.A proposes to make those interim process thresholds permanent.

iii. Housing Accountability Act

The Housing Accountability Act (Government Code Section 65589.5) (HAA) is a State law that restricts the City's ability to deny, reduce the density of, or make infeasible any housing development project that complies with objective general plan, zoning, and subdivision standards and criteria (collectively, "Objective Standards") in effect at the time that the housing development's application is determined to be complete. The HAA has been in effect since 1982 and has undergone several amendments to further reinforce the state legislature's intent to

increase the supply of residential housing stock. The most recent amendments went into effect on September 25, 2020.

In essence, the HAA precludes the City from denying or imposing any conditions upon any housing project (including residential units only or mixed-use projects with at least two-thirds of square footage designated for residential use) unless specific findings are made. However, the HAA does not preclude the City from exercising its discretion and imposing design conditions as part of its review as long as any such conditions does not have the effect of reducing the number of residential units and/or the residential density of this mixed-use project. The City reviews all housing development projects that meet objective LUCE, zoning, and subdivision standards and criteria in accordance with the limitations set forth in the HAA.

As discussed above, the City expanded its ministerial processing thresholds for housing development projects to now include all Tier 2 projects that meet the definition of "housing development project" under the HAA and all Objective Standards. This expansion was to not only acknowledge that the HAA limits the ability to deny or reduce the density of such housing development projects but, also was a way to further streamline the vast majority of new housing projects in the City. In addition, Housing Element Program 1 A will expand this streamlining to projects that seek and are granted deviation from certain objective standards through the ministerial Minor Modification process.

8. Local Measures, Propositions, Rent Control Law, and Ordinances

The following section focuses on key policies in Santa Monica which serve to promote the production and preservation of housing for all residents, many of which have been in place during prior Housing Elements cycle. As evidenced by the robust housing development the City has seen in recent years, these policies are not impeding housing production and should not prevent the City from achieving its quantitative housing goals.

a. Santa Monica City Charter Section 615

Santa Monica Charter Section 615 sets forth processes for adoption of ordinances by the City Council. On November 6, 2018, Santa Monica voters approved Measure SM, which amended Charter Section 615 to require five affirmative votes of the City Council in order to adopt or approve an amendment to either the LUCE or the DCP that would increase any maximum height limit or floor area ratio. All members of the City Council that are eligible to vote must be present to vote on an adoption or an amendment to increase height or floor area ratio pursuant to Measure SM. Measure SM includes express exemptions for 100% affordable housing projects and development on property owned by the Santa Monica-Malibu Unified School District or successor school district in the City. The provisions of Measure SM are set to expire on November 6, 2028.

The City Council has not considered any adoptions or amendments to the LUCE or DCP that would be subject to the provisions of Measure SM since it was adopted in November 2018.

Housing Element Programs 1.F and 1.J propose to revise the City's development standards to incentivize housing projects over commercial development which will likely result in proposed increases in height or floor area ratio subject to the requirements of Measure SM. However, because the amendments to Charter Section 615 enacted by Measure SM expressly exempt 100% affordable housing projects, the provisions of Measure SM will not serve as a constraint on the development of 100% affordable housing projects.

b. Rent Control

Santa Monica Rent Control was adopted by the voters in April 1979 in response to a shortage of housing units, low vacancy rates, and rapidly rising rents. The law was intended to alleviate the housing shortage and to ensure that owners received no more than a fair return. Regulations were adopted by the Rent Control Board to implement and enforce the Rent Control Law. Changes to the City Charter can only be made by the voters, whereas changes to the implementing Regulations are made by the Board.

The City's Rent Control Law does the following:

- Controls the amount that may be charged for a rental unit during a tenancy and provides remedies for the collection of excess rent.
- Determines the amenities and services that are included as part of the rent and provides remedies for removal or reduction of those amenities.
- Limits the reasons why tenants may be evicted.
- Limits removal of controlled units from rental market.

The following units are covered under the Law:

- Most residential rental buildings in the City constructed prior to April 10, 1979 and certain units constructed after that date (e.g., those on properties on which a rent-controlled building stood within the last five years) are covered by Rent Control.
- In addition to apartment buildings, Rent Control also applies to some single-unit dwellings and condominiums used as rentals.
- Duplexes and triplexes where one unit is occupied by the owner are eligible for an exemption from rent control.

The services of the Rent Control Agency are financed by a per unit annual registration fee charged to owners of controlled rental units. Owners who are in compliance with the law may pass through half of the fee to the tenant(s) on a monthly basis. The Rent Control Board provides waivers of Rent Control registration fees to units occupied by their owners, subsidized by HUD (Section 8 or HOME program), or occupied by low-income tenants who are at least 62 years old or who are disabled. There are also fee waivers for condominiums and single-unit dwellings on

which rent restrictions have been lifted pursuant to the Costa-Hawkins' Rental Housing Act and in mobile home parks for units where tenants have signed long-term leases.

i. Vacancy Decontrol

The Costa-Hawkins Rental Housing Act, passed by the State Legislature in 1995, has had a significant impact on local rent affordability. Under this State law, a unit's rent is decontrolled at the end of a tenancy. The owner can set a new rent for the next tenancy which is then recontrolled using the new rent as the base leading some to characterize Costa-Hawkins as a system of "vacancy decontrol-recontrol." The following highlights some of the major effects Costa-Hawkins has had on the Santa Monica rental market during its 22 years of implementation (1999-2020)³:

- Since the passage of Costa-Hawkins, nearly 20,000 controlled units have received vacancy increases, representing 73% of the City's total rent-controlled housing stock. Market-rate rents are on average roughly double that of long-term controlled rents.
- Median rents for decontrolled-recontrolled apartments have gone up by well over 200% between 1999-2020
- 84% of Santa Monica's rental units that have now been re-rented at least once were affordable to low income households (<80% AMI) prior to Costa-Hawkins with 73% of the rental stock decontrolled-recontrolled as of 2020 due to tenant turnover. Even moderate-income households (<120% AMI) are challenged to afford the majority of rental housing in the community.

The impact of this increase in rents on lower income households is significant. For example, many young people earning entry-level pay will be unable to afford to live in Santa Monica, and those living on fixed incomes—principally seniors and the disabled—will likely be unable to continue to live here if they lose their long-term rent-controlled housing.

As passed by Santa Monica voters, the Rent Control Law provides Just Cause Eviction protections to help protect existing tenants in rent-controlled housing from unfair evictions. The voters expanded these protections in 2010 through Measure RR to most residential tenants regardless of rent control status. The City Council has also enacted Tenant Anti-Harassment laws to protect all renters in the city.

ii. Just Cause Eviction

Santa Monica's Rent Control Law establishes "Just Cause Eviction" provisions and defines procedures that a property owner must follow to lawfully evict a tenant. These local provisions

³ Santa Monica Rent Control Board, 2020 Annual Report, March 2021

are in addition to State regulations on landlord and tenant rights and responsibilities. The Rent Control Law identifies the following permissible grounds for eviction:

- Fault-Based Evictions
 - Nonpayment of rent
 - Materially and substantially breaching the lease
 - Causing or permitting a substantial nuisance or damage to the unit
 - Being convicted of using the unit for an illegal purpose
 - Refusing to renew or extend the lease on the same terms as the original lease when lawfully asked to do so by the landlord
 - Refusing to grant the landlord reasonable access to the unit to make necessary or agreed-upon repairs or improvements, or show the property for sale
 - Subletting in violation of the lease

- No Fault Evictions
 - The landlord seeks possession of a unit in good faith for use and occupancy by herself or himself, or her or his children, parents, grandparents, brother, sister, father-in-law, mother-in-law, son-in-law, or daughter-in-law
 - The landlord seeks to recover possession to demolish or otherwise remove the controlled rental unit from rental residential housing use after having obtained all proper permits from the City of Santa Monica.
 - The landlord seeks to recover possession of the unit to remove the rental unit permanently from rental housing use pursuant to the Ellis Act enacted by the State Legislature.

In November 2010, Santa Monica voters passed Measure RR amending the City Charter to further strengthen tenant protections against eviction in the following three ways:

- Extending “just cause” eviction protections to all tenants in multi-unit apartment buildings that are permanently exempt from rent control, as well as two- and three-unit owner-occupied properties, and newly constructed rental units.
- Requiring owners to give tenants a reasonable opportunity to correct an alleged lease violation, nuisance activity, or failure to provide lawful access before serving a three-day notice to perform or quit.
- Forbidding owners to evict for owner occupancy any tenant who has occupied a rental unit for at least five years and is 62 or older, disabled, or terminally ill, unless the owner (or qualified relative intending to occupy the unit) meets at least one of these same criteria.

The strengthened eviction protections under Measure RR have had a noticeable impact. From 2005 to 2010, the Rent Control Board received on average copies of 109 eviction notices per year for reasons other than non-payment of rent. By comparison, the Board received on average 85 notices annually after Measure RR took effect (excluding 2020 when eviction moratoria related to the COVID-19 pandemic reduced the number to just 31).

iii. Tenant Harassment Protections

In 2002, the City Council adopted a Tenant Harassment Ordinance to protect tenants in rent-controlled units from landlords' conduct in derogation of tenants' rights. The ordinance prohibits the following acts by landlords if they are done with the intent to harass:

- Taking away services provided for in the lease (such as parking or laundry)
- Failure to perform repairs and maintenance required by law
- Entering the apartment without proper notice
- Using lies or intimidation intended to make a tenant move out
- Giving a "3-day notice" or other eviction notice that is based on false charges where the landlord does not intend to take the case to court
- Threatening the tenant, by word or gesture, with physical harm
- Intentionally disturbing a tenant's peace and quiet
- Interfering with a tenant's right to privacy
- Refusing to acknowledge receipt of a tenant's rent payment without justification
- Violating any law which prohibits discrimination based on race, gender, sexual preference, sexual orientation, ethnic background, nationality, religion, age, parenthood, marriage, pregnancy, disability, Acquired immunodeficiency syndrome (AIDS), or occupancy by a minor child

In December 2011, the City Council extended these tenant harassment protections to all tenants covered by just cause eviction rules. Tenant harassment complaints are referred to the City Attorney's Office for investigation and enforcement of the law. As a neutral enforcer of the law, the City cannot represent tenants directly and refers tenants requiring representation to Legal Aid (located near City Hall) and the Santa Monica Bar Association.

iv. Relocation Assistance

Under the City's Municipal Code, a property owner is required to pay relocation assistance to a tenant when terminating a tenancy for any of the following reasons:

- The owner seeks to withdraw all rental units from the rental market as provided for under the Ellis Act
- The owner seeks to recover possession of a rental housing unit for use by the owner or

family member

- The landlord seeks to demolish or otherwise withdraw a rental housing unit from residential rental housing use, including units that were illegally converted to residential use, after having obtained the proper permits from the City

Santa Monica had not increased its permanent relocation benefit amounts (other than cost of living increases) since 2007, during which time rent levels in the city had increased and vacancies had decreased. In December 2011, the City Council adopted increased relocation fees. In addition, the City established augmented relocation amounts to households with seniors, disabled persons, and children because these households are particularly vulnerable. It increased the assistance amounts again effective February 2019 to mitigate the financial impacts of involuntary displacement and to keep pace with living costs. Figure E-20 presents the City's adopted relocation amounts effective July 1, 2020. The fees are adjusted each July to reflect increases in the cost of living.

Figure E-20 Residential Relocation Fee Amounts, Fiscal Year 2020/2021

Unit Size	Fee Amount	Augmented Fee Amount*
Single or Studio	\$16,500	\$17,200
One bedroom	\$22,700	\$24,250
Two or more bedrooms	\$31,550	\$33,650

Source: City of Santa Monica, Ordinance #2383
*Eligible households include those with a senior citizen, occupant with a disability, or an occupant with whom a minor child resides.

v. Rent Control Dispute Resolution

The Rent Control Law provides processes for filing of petitions, complaints, and applications to resolve disputes between landlords and tenants.

- Excess rent complaints are reviewed by staff, and the owner is given a chance to resolve the complaint. Complaints which are unable to be resolved administratively are referred to the Hearings Division for mediation and/or hearing.
- Owner-occupied exemption applications are reviewed by staff and granted or denied by the Rent Control Board. If staff review indicates an exemption may be recommended to be denied, or if a tenant challenges the granting of an exemption, it is referred to the Hearings Division for an evidentiary hearing and for preparation of a recommendation to the Board.
- The Hearings Division provides mediation services as part of the decrease and excess rent processes, as well as for issues involving lack of maintenance, loss of housing services, and unreasonable construction impacts. Mediators have been very

successful in settling a large percentage of these cases.

The City has found that mediation may be particularly useful when a building is purchased. For example, new owners may want to fix up the building and make improvements in the common areas yet may be unaware of how the Rent Control Law affects those changes such as proper notice being required before entering the tenants' units or the tenants being entitled to certain amenities. The tenants maybe concerned about changes to their home and disruptions to the longstanding practices or "culture" of a building and may not know how to communicate their concerns effectively. Mediation is often appropriate and helpful in this type of situation.

c. State of California, Article 34

Article 34 of the State Constitution requires local jurisdictions to obtain voter approval for specified "low rent" housing projects that involve certain types of public agency participation. Generally, a project is subject to Article 34 if more than 49% of its units will be rented to low-income persons. If a project is subject to Article 34, it will require an approval from the local electorate. This can constrain the production of affordable housing since the process to seek ballot approval for affordable housing projects can be costly and time consuming with no guarantee of success. Local jurisdictions typically place a measure or referendum on the local ballot that seeks "general authority" to develop a certain number of low-income units during a given period of time. If the electorate approves general parameters for certain types of affordable housing development, the local jurisdiction will be able to move more quickly in response to housing opportunities that fall within those parameters.

In compliance with this article, the City of Santa Monica put a referendum (Proposition N) before the voters in 1978 in order to win approval to "develop, finance, or rehabilitate, but not own or operate within the city, housing for rental to low- and moderate-income persons, no less than 50% of which shall be reserved for persons age 60 or older, not to exceed in total throughout the city, 1% of the dwelling units in the city." On November 3, 1998, Santa Monica's voters approved Proposition I, which provides the City with an annual authorization to develop, construct, acquire, and finance low- income housing units including senior housing. The City's annual authorization is equal to 1/2 of 1% of the total dwelling units existing in the city at the end of the prior fiscal year. Any portion of an annual authorization that is not used may be carried over into future for up to three additional years.

To date, the City has never exceeded any annual Proposition I low-rent housing production limits. The Suitable Sites Inventory includes a number of City-owned sites that are considered to have the highest potential to accommodate the production of affordable housing. Housing Element Program 2.E proposes to explore means of maximizing housing potential on these sites subject to a public process. The City estimated the realistic capacity of these sites with consideration to existing constraints (such as lease terms, financial feasibility, etc.). Based on this estimate and applying a density factor of 150 units/acre, the City estimates that these City-owned sites have the potential for accommodating for 1,693 units.

Due to the high cost of construction in Santa Monica, the City's financial assistance to an affordable housing developer consisting solely of land conveyance is not likely sufficient to construct a 100% affordable housing project without additional sources of government funding (typically federal tax credits) which are typically awarded on a competitive basis. In theory, however, if sufficient funding were available to construct all 1,693 units on City-owned property, the Proposition I limitation on the annual cap of affordable dwelling units that could be produced with each conveyance would need to be considered. This would require coordination to ensure that the conveyances of City-owned property are staggered to fall below the Proposition I limits or, alternatively, the City Council could place a measure on the ballot to increase the cap. However, based upon the current "cushion" of Proposition I authority (due to affordable housing development below the annual Proposition I thresholds in the last three fiscal years) and assuming that government funding remains constrained at historical levels, it does not appear realistic to assume that Article 34/Proposition I would be a likely constraint on affordable housing development for City-owned sites during the 6th Cycle of the City's proposed Housing Element.

d. Home Sharing (Short-Term Rental) Ordinance

In response to the increase in vacation rentals due to the popularity of Airbnb and other online platforms, the City desired to reaffirm its long-standing prohibition of vacation rentals in Santa Monica while allowing individuals to be able to rent a spare room in their homes for periods of thirty days or less ("home-sharing"). Therefore, on May 12th, 2015, the City adopted the "Home-Sharing Ordinance" adding Chapter 6.20 to the SMMC to expressly adopt and confirm its longstanding prohibition against short-term vacation rentals and establish regulations for home-sharing. This law became effective on June 12th, 2015, and was subsequently amended by ordinances adopted on January 24, 2017, June 27, 2017, and September 24, 2019. The Home-Sharing Ordinance allows eligible residents (owners and long-term residents) to apply for a home-sharing permit and business license so that they can home-share their primary residence. In addition, the September 24, 2019 amendments to the ordinance contain listing and advertising requirements, restrictions on the number of group bookings, occupancy and visitor vehicle limitations, and other prohibitions. These amendments took effect on October 24, 2019 and apply to all home-shares including those operating under business licenses obtained prior to the effective date of the ordinance.

The Home-Sharing Ordinance provides for regulations of two types of Short-Term Rentals:

- "Home-Sharing" – The rental of 30 consecutive days or less of one or more bedrooms in the home that is the primary residence of the host while the host lives on-site in the home throughout the visitor's stay. The Home-Sharing Ordinance authorizes home-sharing.
- "Vacation Rental" – A vacation rental is the rental of 30 consecutive days or less of a home, in whole or in part, for exclusive transient use. The visitor enjoys the exclusive private use of the unit. The Home-Sharing Ordinance restates and clarifies the City's

longstanding prohibition against Vacation Rentals.

The City's Home-Sharing Ordinance does not present a constraint on the production or preservation of housing.

e. Residential Leasing Requirements Ordinance

To protect the City's rental housing stock for use as long-term permanent housing, the City enacted a Residential Leasing Requirement Ordinance on September 8, 2020. The ordinance established the following new leasing requirements which apply to all rental housing units in Santa Monica:

- Units must be rented only to natural persons
- Units must be rented only to tenants intending the unit to be their primary residence
- Units must be rented for an initial term of not less than 1 year
- Units must be rented unfurnished

Subsequent to adoption, on October 13, 2020 the requirements were amended to allow the following limited exemptions to the residential leasing regulations:

- Leases of owner-occupied rental housing units for more than 30 days and less than a year no more than twice a year for a total period of 6 months. This would not apply to a unit that had been the subject of an Ellis Act or owner-move-in eviction within the last ten years.
- Leases that provide temporary relocation for tenants who are subject to a temporary relocation order under the City's tenant protection laws.
- Leases of ADUs and JADUs for which plans are submitted for plan check before December 2020 for more than 30 days and less than one year. This would only apply if the ADU or JADU is located on a parcel with an owner-occupied single-unit dwelling and the owner of the single-unit dwelling resides onsite throughout the duration of the lease.

The City's Medium-Term Housing Ordinance does not present a constraint on the production of housing and helps preserve the City's rental housing supply.

f. City Anti-Discrimination Ordinances

Santa Monica maintains the following anti-discrimination protections within its Code:

i. Sexual Orientation or Domestic Partnership

Chapter 4.40 of the Municipal Code prohibits housing discrimination against persons based upon sexual orientation or domestic partnership. Specifically, the Code prohibits unlawful real estate practices, generally defined as the refusal to treat persons fairly in the sale, lease, or rental of housing; the provision of credit or insurance; the advertisement of housing; and the provision of tenant services. In addition, the Code prohibits evictions against any tenant on the grounds that he or she has breached a rental agreement if the alleged breach arises from an increase in the number of occupants due to the domestic partnership of the tenant provided that the occupancy by the tenant's domestic partner and children of the domestic partner is otherwise lawful.

ii. Persons Living with AIDS

Passed by the City Council in 1988 as one of the first ordinances in California to address AIDS discrimination, Chapter 4.52 of the Municipal Code prohibits housing discrimination against a person with AIDS, a history of AIDS, or those regarded as having or transmitting AIDS. Specifically, the Code prohibits unlawful real estate practices, which are generally defined as the refusal to treat persons fairly in the sale, lease, or rental of housing; the provision of credit or insurance; the advertisement of housing; and the provision of tenant services. The only exception applies to the rental or leasing of any housing unit in which the owner or lessor or any member of his or her family occupies one of the living units and it is necessary for the owner or lessor to use a bathroom or kitchen facility in common with the prospective tenants.

iii. Families with Children

Chapter 4.28 of the SMMC establishes the following actions as unlawful for any person offering for rent, leasing, or listing any housing accommodation, or any authorized agent or employee of such person:

- Refuse to rent or lease a housing accommodation, allow access to or use of the common areas and facilities, serve a notice of termination of tenancy, commence an unlawful detainer action or otherwise deny or withhold a housing accommodation on the basis of age, parenthood, pregnancy, or the actual or potential occupancy of a minor or child.
- Advertise, represent, or include in any contract with regard to a housing accommodation offered by that person a statement that indicates any preference, limitation, or discrimination with respect to age, parenthood, pregnancy, or the potential actual occupancy of a minor child.
- Include in any rental agreement or lease for a housing accommodation a clause providing that as a condition of continued occupancy, the tenants shall remain childless or shall not bear children or otherwise not maintain a household with a person or persons of a certain age.

- Threaten to commence or commence eviction proceedings against any tenant head of household on the grounds of breach of a rental agreement due to an increase in the number of occupants arising out of the marriage of the tenant, or the birth, adoption, or change of legal custody of a minor child of whom the tenant head of household or his or her spouse is the parent or legal guardian.

Exceptions to this chapter include housing designed and operated exclusively for senior adults and their spouses, or any nursing, convalescent, or retirement home.

g. Rent Control Bootleg Unit Ordinance

In the past, City regulations regarding the status of certain units that had been illegally created and then registered with Rent Control caused conflict. To address this, the City passed an ordinance in 2008 that set forth terms to allow these “bootleg units” to become legal, non-conforming. Pursuant to SMMC Section 9.27.090, a “bootleg unit” is defined as “a rental unit registered with the Santa Monica Rent Control Board, which was built or created without City planning or building permits.” Typically, these units do not meet applicable development standards, but the ordinance allows for the unit to not be required to meet setback and density requirements if the unit is or can be made habitable pursuant to the Building Code. While the legalization of these units might require the addition of parking for the unit, if the Community Development Director determines it is not feasible, the requirement may be waived. The Rent Control Bootleg Unit Ordinance does not present a constraint on housing as it provides a path forward to legalize existing units.

h. Water Neutrality Ordinance

In response to the State emergency proclamations in 2014 and the Governor’s drought-related executive orders in 2014 and 2015, the City developed a water neutrality ordinance in order to counterbalance increasing potable water demand from new development. Adopted in 2017, the City’s water neutrality ordinance, which is codified in SMMC Section 7.16.050 (the “Water Neutrality Ordinance”), imposes a land use requirement that new development offset net new potable water demand through on-site water saving measures or, alternatively, by installing equivalent off-site improvements (such as water saving toilets and shower heads) or paying an in-lieu offset fee, which is used by the city to fund off-site improvements.

The City of Santa Monica is an urban water supplier. Urban water suppliers are required to prepare and implement an Urban Water Management Plan (UWMP) and a Water Shortage Contingency Plan (WSCP) in accordance with California Water Code, §10610-10656 and §10608. The Water Neutrality Ordinance is an effective water conservation tool that is considered an integral part of the City’s UWMP and WSCP. These plans support the City’s long-term resource planning to ensure that adequate water supplies are available to meet existing and future water needs. The City’s UWMP and WSCP were last updated and adopted by the City Council on June 8, 2021.

The Water Neutrality Ordinance applies to new development, including new housing development. A 1:1 offset of the new potable water demand is required for new development, however, the ordinance allows a lower offset of 0.5:1 for new affordable housing development and new ADUs

New development projects with projected usage equal to or less than their calculated baseline water demand (i.e. the average annual water demand the previous five years) are not required to offset water usage. Therefore, these projects are not impacted by the Water Neutrality Ordinance at all since they do not generate net new water demand.

In reviewing the Water Neutrality Offset Fees assessed to multi-family and mixed-used developments over the past four years, the actual fee assessed in comparison to the development's job value is minimal or insignificant. Thirty-six projects were analyzed with an average valuation of approximately \$7.2 million. For these thirty-six projects, the average Water Neutrality Offset Fee assessed was \$67,585, or less than 1% of the valuation for the development. City staff is not aware of any development project that has been reduced in scope or not built due to Water Neutrality Offset Fees, nor has any project appealed the fees due to undue hardship.

In addition to the minimal Offset Fee to project valuation percentage described above, the following factors also contribute to minimizing or reducing any perceived constraints of Water Neutrality compliance on housing developments:

- When older developed sites are redeveloped, the impact of Water Neutrality Offset Fees on the development can be insignificant or non-existent as the redevelopment will use new high-efficiency water saving fixtures (e.g., low flow toilets and high efficiency faucets) that will replace older, higher water consumption fixtures.
- Projects that choose to, or may be required to in the future, use recycled water, will have a significant reduction in potable water demand, resulting in a corresponding reduction, or elimination, of the Water Neutrality Offset Fee.
- 100% Affordable Housing projects have a reduced offset of 50% of the projected new potable water demand, thus lowering the Water Neutrality Offset Fee accordingly.
- ADU projects (conversions or additions) for both single-unit and multi-unit properties are exempt from Water Neutrality Offset Fees if the total water demand for the parcel (including the demand created by the new ADU) is below the property's Water Conservation Threshold.
- If an ADU project is not exempt from the Water Neutrality Offset Fee (per the previous bullet), the new water demand offset is reduced to 50%, thus lowering the Water Neutrality Offset Fee accordingly.

Water Neutrality Fees are assessed on a case-by-case basis since the baseline water usage (the average annual water demand the previous five years) is specific to each site and its land use. The City recognizes that there may be potential sites where the Water Neutrality Offset Fee could potentially pose impactful constraints such as redeveloping an existing parking lot (i.e., where the baseline is typically zero) or a single-story commercial site for housing purposes

(i.e., a change of use with a relatively low baseline for the new project). The City is in the process of evaluating potential impacts and identifying mitigation measures (e.g., reduced offsets, default baseline values), if necessary, in such cases and balance that with water supply availability to ensure the community has access to a reliable and affordable water supply.

B. NON-GOVERNMENTAL CONSTRAINTS

State law [California Government Code, Section 65583(a)(6)] requires Housing Elements to contain an analysis of nongovernmental constraints to the maintenance, improvement, or development of housing for all income levels including cost of construction, the price of land, and the availability of financing. Potential nongovernmental constraints are largely determined by market conditions over which local jurisdictions have little control. However, local governments can influence market conditions and their associated costs even if only indirectly.

1. Construction Costs

A number of factors, such as the type of construction, site conditions, application of parking, unit size, fire safety requirements, and amenities, all impact the cost of housing. In general, multiple-unit housing projects are less expensive to construct than single-unit housing. However, construction costs vary significantly depending on the size of the unit and the number and quality of amenities offered. These include features such as parking supply, swimming pools, rooftop gardens, gyms, and other less obvious decisions based on the types of flooring, appliances, light fixtures, and quality of cabinetry and woodwork.

Based on recently completed affordable housing projects built in the City, Santa Monica Housing Office data indicate that total development costs average \$480,000 per unit⁴. Of these total costs, it is estimated that \$300,000, or 69%, are "hard costs" related to construction. Total development costs have increased in the past several years due to labor and material availability constraints. Based on construction cost estimates prepared by a third-party City consultant and interviews with market-rate developers, total development costs of apartment projects are approximately \$799,000 per unit. Of these total costs, it is estimated that \$413,000, or 52%, are "hard costs" related to construction⁵. Though construction costs comprise a large portion of the total development cost of a project, the costs in Santa Monica are not atypical compared to Los Angeles County and therefore, would not constitute an actual constraint on housing production.

⁴ November 20, 2019 HR&A Feasibility Analysis

⁵ HR&A Advisors and MGAC 2021

2. Land Costs and Availability

Land costs include the cost of acquiring land. Land costs typically account for a large share of the total housing production costs. In Santa Monica, one of the primary market constraints to producing market rate and affordable housing is land cost. This is directly attributable to the City's desirable location and limited availability of vacant and developable land for residential development. Land costs can vary depending on which area of the City the project is located, ranging from \$690 per square foot in Downtown to \$430-\$435 on Lincoln Boulevard/Main Street and the Boulevards. Land costs on recent affordable housing projects in the city averaged \$180,000 per unit⁶ comprising 37% of the total unit development cost. Land costs for market-rate apartment projects are approximately \$233,000 per unit comprising 29% of the total unit development cost⁷.

The persistent demand for housing and competition for limited available land has kept Santa Monica residential land values high for many years. The combination of non-governmental constraints (e.g. high land costs) and governmental constraints (low-density development standards) are a constraint to new residential development. It is often challenging to find sites that are large enough to accommodate projects at a preferred development scale (i.e., 60- to 100-unit projects at four to five stories). To the extent that total development costs can be reduced through changes in zoning, development standards, City-imposed development costs, and/or permit processing time, affordability goals can be better accomplished.

3. Availability of Financing

The availability of financing is a critical factor that can influence the cost and production of housing. There are generally two types of financing used in the multi-unit housing market: (1) construction financing used for initial site preparation and construction; and (2) permanent financing used to purchase existing buildings or to pay off more-expensive construction financing. Both of these products are generally distinguished from financing available to purchasers of single-unit dwellings as they are commercial real estate products, and there is less government involvement to stabilize rates and availability of debt.

The availability and cost (i.e., interest rates) of financing can substantially impact housing production either because it adds cost to a project or because it reduces the value or attractiveness of the sale/purchase of a completed project. Generally, the cost of development in Santa Monica and associated risks present challenges for developers to secure financing for new multiple-unit buildings. The COVID-19 pandemic has also had an impact broadly on the availability of financing although less so for multiple-unit developments. While interest rates remain reasonably low, lenders have been underwriting projects more conservatively during the pandemic leading to tightened credit despite affordable interest rates. These impacts are likely to ease as pandemic conditions continue to improve and the economy recovers.

⁶ November 20, 2019 HR&A Feasibility Analysis

⁷ HR&A Advisors and MGAC 2021

4. Requests for Housing Development at Reduced Densities

State law requires the Housing Element to include an analysis of requests to develop housing at densities below those anticipated in the sites inventory. In Santa Monica, density is controlled differently between residential and nonresidential zone districts. In residential zones, density limitations are traditionally prescribed, whereas in nonresidential zones, density is controlled through a combination of building height and FAR development standards. Through a review of projects within these different zone types, projects in residential zones have typically been developed at or below density maximums. This is largely due to when the City's Affordable Housing Production Program (AHPP) requires affordable units to be provided on site versus when a developer can pay an in-lieu fee. While this can be viewed as a constraint on housing production, it must be weighed against the need for affordable housing. However, Housing Element Program 2.C proposes to reevaluate the City's AHPP in comparison to achieving the City's housing goals, and Programs 1 F and 1 J will ensure that housing development projects remain feasible, taking into consideration any AHPP requirements. As for the City's nonresidential zones, it is rare for developers to not maximize the allowable development potential of a parcel, and therefore, it can be assumed that developers are not under-densifying their developments. Additionally, as described throughout this appendix, the City has implemented several measures to streamline housing projects, which limits or removes the City's discretion to reduce densities.

The sites inventory analysis takes into account past production trends when calculating the capacity for residential redevelopment amongst various zone districts throughout the City.

5. Length of Time Between Project Approval and Applications for Building Permits

State law requires an analysis of the length of time between receiving approval for a housing development and submittal of an application for a building permit. On average, the time between these two stages of a housing project varies between three to six months for smaller projects, and sometimes up to a year or more for larger mixed-use projects. This time between approval and applying for a building permit can be contributed to the applicant preparing necessary construction drawings, finalizing construction financing, and retaining various contractors, amongst other actions.

Appendix F:

Report on Suitable Sites

Inventory Analysis



Introduction

Santa Monica’s Regional Housing Needs Allocation for the October 2021 through October 2029 planning period is 8,895 units broken down as follows:

Income Level	% of AMI*	Units	% of RHNA Allocation
Very Low	31-50%	2,794	31%
Low	51-80%	1,672	19%
Moderate	81-120%	1,702	19%
Above Moderate	120%+	2,727	31%
Total		8,895	100%

Source: <http://SCAG.ca.gov/Housing/rhna.htm>
 * AMI – Area Median Income.
 Note: SCAG’s RHNA does not include the income level of Extremely Low Income (ELI) (0-30% AMI) units, which are required by the City’s AHPP. ELI units produced in the City are counted towards SCAG’s Very Low Income category.

The housing element of the general plan must include an inventory of land suitable and available for residential development to meet the locality’s regional housing need [allocation \(RHNA\)](#) by income level. This inventory is known as the Suitable Sites Inventory (SSI) [and is used to demonstrate that there is sufficient land at appropriate densities and development standards to accommodate the RHNA at the income levels specified](#). This document has been prepared to outline the methodology used for identifying potential housing sites for the City of Santa Monica’s 6th Cycle Housing Element SSI. The methodology follows State Housing Element Law and the guidance of the Housing Element Site Inventory Guidebook prepared by the Housing and Community Development Department (June 2020).

Overview of the City’s Suitable Sites Inventory

[Per State law, the City’s SSI consists of sites that are reasonably likely to be redeveloped into residential during 6th Cycle planning period. The SSI includes sites with approved/pending projects, underdeveloped sites that were identified, and non-site-specific accessory dwelling unit potential. A total of 340 sites are identified.](#)

[Under current zoning, the SSI has an anticipated unit potential of 7,596 units with capacity for 4,064 affordable units. Therefore, the City will have an anticipated shortfall of 1,109 lower income units and 1,003 moderate units. State law dictates that if sufficient capacity to meet the RHNA cannot be demonstrated based on existing zoning, the City is required to rezone sites on the inventory by October 15, 2024 to demonstrate the ability to meet sufficient capacity. The rezoning programs are Programs 1.F, 1.J, 1.K, and 4.A. With these rezoning programs, the City’s](#)

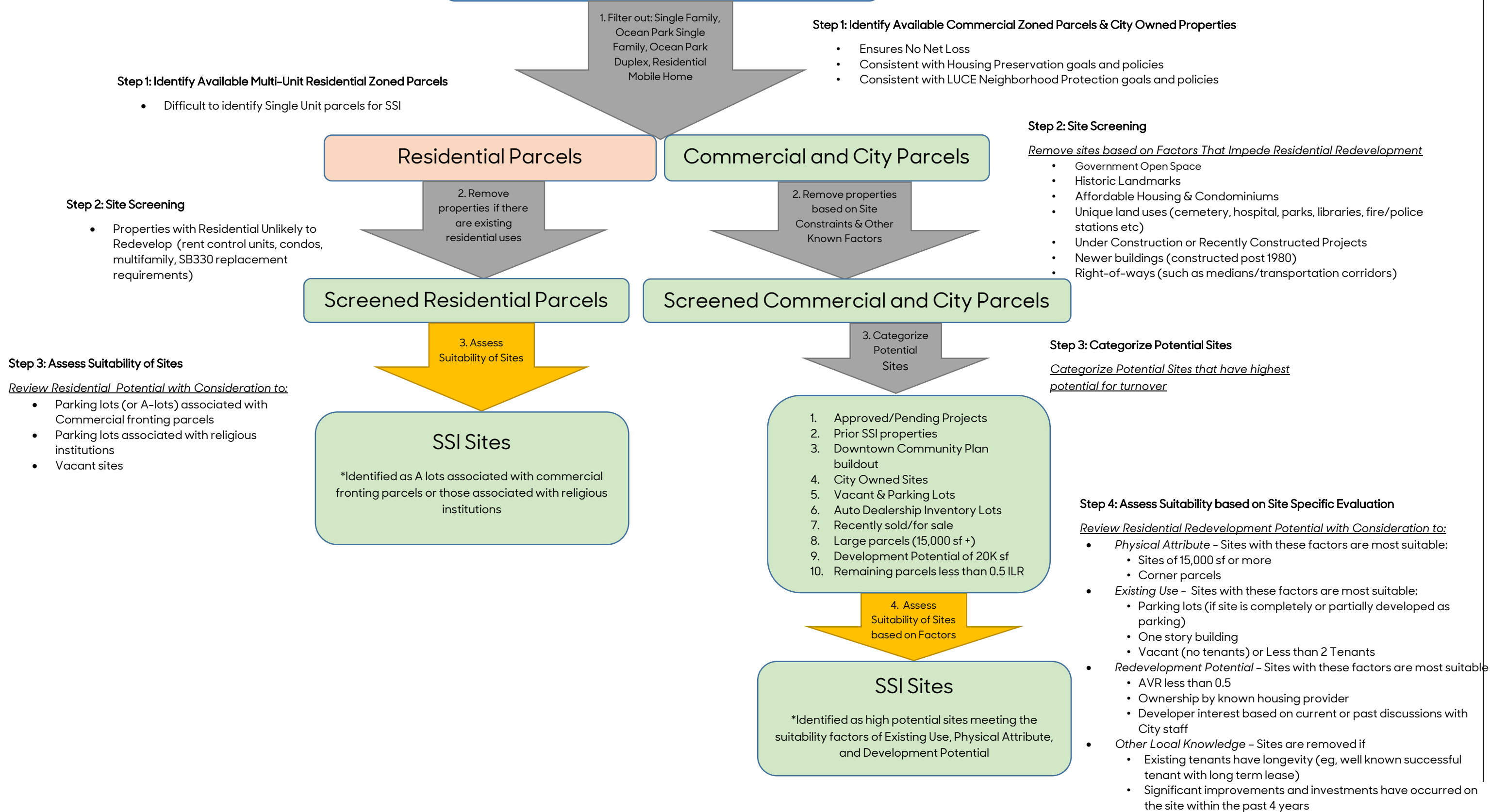
SSI capacity is estimated to be approximately 13,600 units which includes capacity for 8,044 lower income units and 1,901 moderate income units.

Methodology for Suitable Sites Inventory

The City of Santa Monica maintains a comprehensive land use inventory that includes details for every parcel within City limits. The methodology for the Suitable Sites Inventory consists of a multistep process that narrows down the list of suitable sites from the City's Land Use Inventory. The Land Use Inventory was first created in 2010 during preparation of the City's Land Use and Circulation Element, and is a master inventory of each parcel in the City that identifies existing uses, ownership, building age, zoning, and other information. The Land Use Inventory is updated every two years using assessor land use information, the City's building permit database (for demolitions and new construction), and site visits to confirm existing uses.

The SSI process utilizes the Land Use Inventory to first identify which parcels are available for redevelopment based on zoning and general site constraints such as historic designations and land use. After screening out unavailable sites, City staff then further evaluated the sites individually using Google Streetview or site visits and assigned a potential redevelopment rating of "high, medium high, medium, or low" based on site-specific factors such as existing use, market factors, physical attributes, ownership, and other local knowledge by City Staff. Sites that were rated as "high" comprise the SSI. Following this process of identifying high potential SSI sites, the City applied development standards to the available sites to calculate housing capacity. The City then conducted a spot-check of individual parcels against current and past projects to confirm that the unit calculations resulted in realistic capacity. The methodology is described step by step below:

City Land Inventory



Step 1: Identify Available Commercial and Residential Parcels

As a first step in the SSI process, parcels that are not available for residential redevelopment due to zoning were removed from consideration. Parcels in the City's single unit zones (R1, OP1, and OPD) were filtered out from the SSI process for the following reasons:

- Lack of vacant parcels in these zones
- Difficulty in identifying specific parcels for the inventory since there are no known factors that could assist in determining which parcels would be redeveloped.
- Even if parcels were identified, redevelopment would likely consist of demolition and replacement of existing on-site units
- Parcels in the Residential Mobile Home (RMH) and Open Space (OS) districts are also removed from the SSI process since these parcels are protected by the City for low income housing and open space uses respectively.

Step 12: Site ~~Filtering~~ Screening for Non-Suitable Parcels

~~The City of Santa Monica maintains a comprehensive land use inventory that includes details for every parcel within City limits. This inventory was utilized to prepare the SSI.~~ As a second step in preparing the SSI, parcels in the City that are not potential candidates for housing development during the Housing Element planning period were ~~filtered~~ screened out based on a set of criteria. Since housing development on residential and commercial parcels are influenced by different sets of factors, residential and commercial parcels were separately screened.

Commercial Parcels

In general, commercial parcels meeting any of these criteria were determined to not be suitable as a housing site and screened out from the SSI:

- ~~RMH (residential mobile home), OS (open space) zones~~
- Historic Designations: Parcels Designated with existing Landmarks or hHistoric Resources, including Landmarks and/or Structures of Merits, are protected by the City's Landmark Ordinance and the California Environmental Quality Act. Demolition of historic resources are only permitted with a Certificate of Hardship. While there have been instances where new residential development is proposed on larger parcels in conjunction with the preservation or adaptive reuse of historic resources, such instances are uncommon. Therefore, the presence of historic resources is presumed to preclude new housing development on the site.
- Under Construction or Recent Construction Projects: Parcels that are under construction, or have recently completed projects are not available for redevelopment into housing and therefore, are screened out from the SSI process, approved entitlements, and
- Commercial Entitlements: Parcels that have approved or pending entitlements for solely for commercial commercial uses only uses are screened out from the SSI process since these parcels will be redeveloped into commercial.

- **Government or Institutional Uses:** Parcels that have unique land uses such as governmental or institutional uses are unavailable for redevelopment and are also screened out from the SSI process. These include parcels with uses such as the Civic Center government uses (Santa Monica City Hall, Los Angeles County Courthouse, Civic Auditorium), UCLA and Providence Saint John hospitals, Santa Monica Cemetery, SMUUSD schools, Santa Monica College, public parks, churches/religious facilities, utilities, government offices, libraries, police/fire stations, transportation infrastructure/Metro Expo Light Rail and the Santa Monica Airport. The City and institutions are unable to remove these uses in this housing element cycle as they are necessary to serve the community.
- **Residential Uses:** The City filtered the inventory to remove parcels that are currently occupied by residential uses. In particular, pParcels developed with affordable housing, condominium units, and rent control units are highly unlikely to be redeveloped. Affordable housing is protected by long term deed restrictions, and therefore were screened out. Condominium units are common interest properties with multiple owners, and therefore, are screened out due to infeasibility of acquiring all condo ownership parcels. Rent control units are governed by the City's Rent Control laws that limit the removal of such units and are therefore screened out from the inventory.
- **Newer Buildings:** Parcels with newer buildings developed post 1980 are highly unlikely to be redeveloped as supported by a review of current approved and pending projects (see Attachment 1, Table 2).

Residential Parcels

The City screened the inventory to remove residential parcels that are currently occupied by residential uses. This approach is conservative since the City's general plan emphasizes the protection of existing residential units and because parcels with residential uses are governed by SB330 unit replacement requirements. Furthermore, parcels developed with affordable housing, condominium units, and rent control units are unlikely to be redeveloped. Affordable housing is protected by long term deed restrictions, condominium units are common interest properties with multiple owners, and rent control units are governed by the City's Rent Control laws that limit the removal of such units.

Step 23: Categorizing Sites

After screening out parcels that are not available for redevelopment, the remaining list of sites were categorized.

Commercial Parcels

Based on this first set of filtering screening criteria, 1,300-368 potential commercially zoned sites and City-owned sites were initially identified. These sites were then categorized according to the figure below:

Figure F-1 Category of Potential Commercially Zoned and Mixed Use Zoned Sites

Category	Description	Count of Parcels	Land SF
1	Approved and Pending Housing Projects	17248	3,222,092 2,439,430
2	Prior SSI Sites	4650	1,015,545 1,098,659
3	DCP Buildout	1220	180,263 240,248
4	City-Owned Sites	106100	3,723,505 3,641,062
5	Parking Lots	11648	1,026,709 1,037,700
6	Auto Inventory Lots	4143	407,651 422,680
7	Parcels with recent/active sales	4741	385,129 340,818
8	Underutilized Sites (20,000 excess sf development potential)	183217	5,953,899 7,520,075
9	Large Parcels (15,000 sf+)	6617	2,268,697 274,850
10	Remaining Sites less than 0.5 AVRILR	579576	3,721,870 3,675,065

Category 1 Sites: Pending/Approved Housing Entitlements

The RHNA projection period for the 2021-2029 Housing Element begins on June 30, 2021. Therefore, pipeline housing projects that are pending or have received approved entitlements but did not receive a building permit as of July 1, 2021 are expected to count toward the 6th Cycle RHNA. As of February 2021, there were approximately 1,670 approved units (of which 401 are affordable) and 756 pending units.

Category 2 Sites: Prior Sites listed in the 2013-2021 5th Cycle Housing Element

83 parcels were listed in the 5th Cycle 2013-2021 Housing Element. Some of these parcels have undergone entitlements but the remaining have not. These are categorized as Category 2 Sites.

Category 3 Sites: Downtown Buildout Sites

As part of the Downtown Community Plan (DCP), sites in the Downtown were identified for potential redevelopment. A number of these sites have already undergone pending and approved entitlements (captured in Category 1), and as such, are eliminated from further consideration. In addition, a small number were previously identified in the prior SSI for the 5th Cycle Housing Element (hence are captured in Category 2). The remaining DCP sites are classified as Category 3.

Category 4 Sites: City-owned Sites

An important strategy for the City to meet its RHNA targets is the utilization of existing City owned sites for housing, particularly affordable housing. All City owned sites that are not currently developed with open space/parks, community centers, civic uses, utilities, etc. are categorized as Category 4 sites. Public parking structures such as Parking Structure (PS) #3, PS#1, PS#2, and PS#4 are reviewed in this category since these structures require seismic retrofit improvements for their continued operation. Additionally, the City's parking lots on Main Street are reviewed as potential housing sites.

Category 5 Sites: Parking Lots

There are no vacant sites in the City as it is highly urbanized. No vacant sites are located in the commercial and mixed use zones. However, a number of sites in the City are developed as surface parking lots. Surface parking lots are very underutilized and represent the greatest opportunity for new housing without displacement of existing uses. Redevelopment of these lots are considered with the commercial uses they serve.

Category 6 Sites: Auto Inventory Lots

These are parcels currently being utilized almost entirely as auto inventory surface lots, with the majority occurring on the eastern end of Santa Monica Boulevard. Auto dealerships have indicated interest in turning over these large surface lots into redevelopment opportunities as they are rethinking their sales operations.

Category 7 Sites: Recent/Active Sales

Based on a review of the Assessor's Parcel Data and a review of commercial real estate websites (such as Loopnet), a number of properties have recently sold during 2019-2021 or have active sales listings. These sites could have redevelopment potential.

Category 8 Sites: Underutilized Sites (20,000 sf excess development potential)

Category 8 sites are sites that do not meet the criteria of Categories 1-7 but have been identified to have a net new development potential of 20,000 sf or greater (based on their existing built area compared against the maximum floor area permitted).

Category 9 Sites: Remaining Large parcels

Category 9 sites are all remaining sites that are 15,000 sf and larger.

Category 10 Sites: Remaining Parcels with 0.5 AVRILR or less

Category 10 sites are all the remaining sites (not meeting Category 1-9) with an [assessor's improvements to land](#) value ratio (AVRILR) of 0.5 or less.

Residential Parcels

For residentially-zoned parcels, sites that ~~are developed with existing residential uses were filtered out to be consistent with the City's goal of preserving existing housing and preventing displacement of residents.~~ [were not screened out are categorized as religious institutional uses, or parking lots.](#) Approximately 38 parcels were identified as parking lots that are associated with religious institutions and 97 parcels are surface parking lots for adjacent street fronting commercial uses.

Figure F-2 Category of Potential Residentially Zoned Sites

Category	Description	Count of Parcels	Land SF
11	Religious Institutions	38	555,589
12	A-Lots and Residentially Zoned Parking Lots	97	911,847

Category 11 Sites: Religious Institutions

Category 11 sites are properties of religious congregations (churches, synagogues, etc.). AB1851 was passed in 2020 to remove an important barrier to housing construction on lands owned by a religious institution. The law states that a jurisdiction cannot deny a housing project proposed by a religious institution on the sole basis that it will remove parking. A number of religious institutions with large surface parking lots are located throughout the City. These lots could play an important part in providing affordable housing. Program 4.B of the Housing Element would amend the Zoning Ordinance to create special standards for housing projects on sites owned by community assembly uses so that these sites would be incentivized for the production of housing.

Category 12 Sites: A-Lots and Residentially Zoned Parking Lots

"A-Lots" are residentially-zoned (R1/R2/R3/R4) parcels with an "A" Off-Street Parking Overlay. Within the City, there are 42 A-lots. Zoning regulations prevent their use to enable the expansion of associated commercial uses, but also effectively prevent their redevelopment for housing. Additionally, there are other residentially-zoned parcels without the A-Lot overlay that are similarly developed as surface parking lots. These surface parking lots are intended to support the parking needs of commercial corridors and neighborhood commercial areas, and to serve as a buffer between commercial and residential uses. The existing multi-unit residential zones have density caps of 4-6 units regardless of the size of the property, which limits their capacity for housing potential

Step 34: Evaluating Suitability of Nonvacant Sites for Housing Potential
Government Code section 65583.2(g)(1) requires that, where non-vacant sites comprise over 50% of the Suitable Sites Inventory, existing uses are presumed to impede development unless findings with substantial evidence are provided that the use is likely to be discontinued. Santa Monica is a dense, urban coastal community and is entirely built out with little to no vacant land remaining. Therefore, the methodology used to identify the suitability of non-vacant sites for housing potential must consider factors such as site physical characteristics, existing uses, improvements to land value ratio, ownership, development interest, location and context, local knowledge, and environmental constraints.

Per HCD, a vacant site is a site without any houses, offices, buildings, parking lot, or other significant improvements on it. The City of Santa Monica is a dense, urban coastal community and is entirely built out with no vacant land remaining. Nonvacant, underutilized sites will be relied on to achieve the 6th Cycle RHNA. This is supported by past residential development trends which has primarily consisted of new multi-unit buildings replacing older one-story buildings on infill sites (see Attachment 1).

Methodology

~~As a second step~~Once all the screened sites were categorized, all individual sites in Category 1-10 were reviewed by the City's Housing Policy team using Google Streetview, City Accela permit database, and if necessary, in-person site visits. All of the sites are non-vacant, and have an existing use or are developed as parking lots. The City focused the list of non-vacant sites to those that are underutilized and primarily located

within the mixed use and commercial districts where the City has encouraged housing. These districts include, but are not limited to, the Downtown districts, the Bergamot Area, and the corridors of Santa Monica Boulevard, Wilshire Boulevard, Colorado Avenue, Broadway, and Lincoln Boulevards. Recent project applications that have been filed by the City support the assumption that there is a strong housing demand in these districts.

Each site was analyzed to determine its likelihood and suitability for residential redevelopment based on a set of site-specific factors. These factors were selected based on City Staff's experience and long standing knowledge of the current projects in the pipeline and development interest in certain areas of the City. Interviews with local developers and architects from the Housing Production Technical Working Group and the general public confirmed also informed the factors and assumptions in the Site Inventory. The criteria and factors for the City's Housing Element site inventory was presented to the public, Planning Commission, and City Council where all agreed these are appropriate criteria.

The City also verified its assumptions by analyzing recent project application since adoption of the LUCE to assess development trends. Since July 2010, 152 residential and mixed use residential development applications have been received for more than 5,553 new housing units - all of which have occurred on non-vacant sites. A review of these past and current housing projects support the use of these site specific fFactors (see Attachment B)-, which are described below~~considered included:~~

- **Site Physical Characteristics** - Sites were reviewed for physical characteristics that could make them more amenable to residential development, such as size, location relative to the urban grid, and shape of the site.
 - Size: Based on a review of past and current housing projects (see Attachment 2), housing projects have occurred on commercial and mixed used zoned sites that are as small as 7,500 sf. This includes 100% affordable housing projects where site sizes have ranged from 7,500 sf to 30,000 sf.

Housing development trends in the City indicate that a site that is 15,000 sf is generally considered sufficiently sized for residential redevelopment in the mixed-use, commercial zones (see Attachment 2). Since the majority of the housing projects (more than 90%) have occurred on sites that are 15,000 sf or greater, City staff used a size threshold of 15,000 sf for the SSI process. Sites as small as 7,500 sf may be appropriate for certain projects such as those in the Downtown and/or 100% affordable housing projects which do not require parking. Individual parcels less than 15,000 sf are unlikely to be developed. However, if two smaller adjacent parcels share common ownership, there could be potential for housing development depending on the remaining factors. The City does not have any restrictions on lot consolidations for the commercial or mixed use zoning districts, and consolidation is a common practice. Housing developers have historically consolidated lots for development and such consolidations are administratively approved as part of the plan check process. Based on review of past housing projects, a site that is 15,000 sf is generally considered sufficient sized for residential redevelopment in the mixed-use, commercial zones. Sites as small as 10,000 sf may be appropriate for certain projects such as those in the Downtown and/or 100% affordable housing projects which do not require parking. Appendix B provides evidence of past and current housing projects that have occurred on sites that are 15,000 sf or less.
 - Corner Parcels or Parcels with Alleys: As a general policy, the City's General Plan discourages vehicular access from the main boulevard. Therefore, based on City staff experience as well as current trends of development, sites with corner parcels are more likely to be redeveloped given that vehicular access can be taken from the side street or from the alley.
 - Other Factors: In addition to size, sSites were reviewed for any other potential physical characteristics that could ~~make them more amenable to~~preclude residential development, such as ~~access to an alley, shape of the site (including narrow depth/width),~~ grade, and other physical constraints such as lack of access~~location relative to the urban grid.~~
- **Existing uses** - Due to the built up nature of the City, As listed in Attachment B, past and currently proposed housing projects have all occurred ~~all~~ on non-vacant sites.

These sites were built or proposed on sites with existing uses consisting of older buildings or surface parking lots [as listed in Attachment B](#). ~~Based on City staff's knowledge of the community~~ [Using Google Streetview supplemented with site visits as necessary](#), existing uses on the site were assessed to determine its future viability and likelihood for the uses to be discontinued. ~~For example, uses that are more unique in a particular location (such as a successful grocer in a residential neighborhood, a popular restaurant, long-standing reputable business, etc.) have demonstrated longevity, and, as such, may be considered an impediment to redevelopment of the site. Similarly, sites with multiple tenants are more unlikely to turn over than single tenant sites. Sites that are developed as parking lots are considered more likely to be redeveloped than sites with existing building improvements.~~ [Based on past experiences as well as review of approved/pending projects \(see Attachment 1, Table 2\)](#), City staff determined that sites with these existing uses are most suitable:

- [Parking lots \(if site is completely or partially developed as parking\) – Sites that are developed as parking lots are considered more likely to be redeveloped than sites with existing building improvements.](#)
- [One story building – Sites that are developed with one story buildings are also more likely to be redeveloped as they are considered underutilized.](#)
- [Vacant \(no tenants\) or Less than 2 Tenants – Similarly, sites that are vacant or have only a single tenant are more likely to turn over than multiple tenant sites.](#)
- ~~**Location and Context** – The location of the site was also considered in terms of its access to schools, jobs, transit, residential amenities such as parks/open space, health care services, and retail shops such as grocers. Many of the sites south of Olympic Boulevard lack access to these amenities and services, and, as such, were determined to not be suitable. Additionally, existing/past housing development trends in the site surrounding area were considered – reviewing if the project is located in an area where there is significant residential growth.~~
- [Redevelopment Potential – Sites were also reviewed using redevelopment potential factors such as the improvements to land ratio based on assessor's value of land to improvements ratio, ownership information, and known developer interest.](#)
 - [Improvements to Land Value Ratio – A low improvements to land value ratio \(ILR\), which is the ratio of improvement value to the land value, is a strong indicator of the likelihood that a site has a high probability of being redeveloped.¹ A review of current pending and approved projects show that these projects have occurred almost all on commercial/mixed use zoned parcels with ILR less than 0.5 \(see Attachment 1, Table 2\).](#)

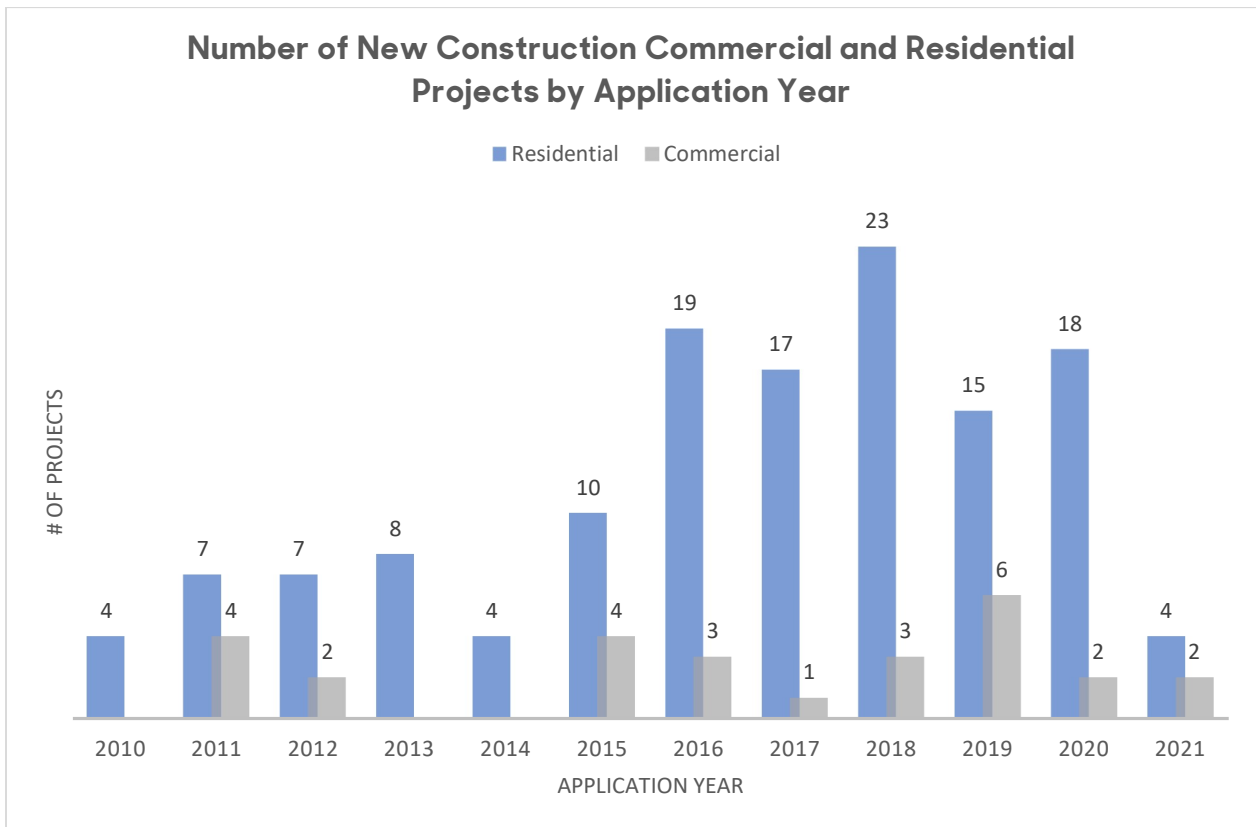
¹ [The Institute of Urban and Regional Development \(IURD\) at the University of California, Berkeley suggests that a ratio of improvement value to land value that is below 1.0 is an appropriate factor to identify potential housing sites on infill commercial properties.](#)

- Ownership – Ownership of properties was also considered in the analysis. As previously stated, if two smaller adjacent parcels share common ownership, there is a high potential for housing development. The City does not have any restrictions on lot consolidations for the commercial or mixed use zoning districts, and will continue to facilitate consolidation through administrative lot tie agreements as part of the plan check process. Therefore, adjacent parcels that are held by the same owner could be developed jointly as evidenced in the City’s list of approved and pending projects (see Attachment 1, Table 2).

Furthermore, parcels that are owned by known housing developers, for example, are very likely to be redeveloped. Several underutilized sites in the City are owned by State entities, institutions, and public utility companies that have the potential to accommodate housing, including the Department of Motor Vehicles (DMV) site at 2235 Colorado Ave, Santa Monica Municipal Unified School District (SMMUSD) former district offices at 1651 16th St, and the University of California, Los Angeles (UCLA)-owned parking lots at 1521 & 1601 Santa Monica Blvd. The City initiated discussions with these entities to inquire about their potential interest in housing development. Both the DMV and UCLA indicated that they had no plans for future housing on their properties. However, the SMMUSD indicated their intent and interest in developing housing for their staff at their former district offices (see Attachment 4). If State controlled sites are included in the SSI, HCD requires documentation be provided that shows that housing can be accommodated with the Housing Element planning cycle.

- Known Developer Interest – If a developer has expressed interest in developing a site either through a pre-submittal meeting with the City or through general inquiry, then there is a higher likelihood that the site will be redeveloped.
- Location and Context – The location of the site was also considered in terms of its access to schools, jobs, transit, residential amenities such as parks/open space, health care services, and retail shops such as grocers. Many of the sites south of Olympic Boulevard lack access to these amenities and services, and, as such, were determined to not be suitable. Additionally, existing/past housing development trends in the site surrounding area were considered – reviewing if the project is located in an area where there is significant residential growth.
- Other Local Knowledge – City Staff have in-depth local knowledge of properties that could preclude site development. For example, specific parcels were removed if:
 - Existing tenants have longevity (eg, well known successful tenant with long term lease) – For example, uses that are more unique in a particular location (such as a successful grocer in a residential neighborhood, a popular restaurant, long-standing reputable business, etc.) have demonstrated longevity, and, as such, may be considered an impediment to redevelopment of the site.

- o Significant improvements and investments have occurred on the site within the past 4 years – Where there has been significant investments and improvements that have been made to a site, the site is unlikely to be redeveloped in the near term. *Assumptions of Residential Probability vs Commercial*



- ❖ ~~Market Conditions – The Housing Element will continue to incentivize commercial projects over residential projects across the City through Program 1.J, which will rezone the mixed-use and commercial zoning districts with higher maximum allowable FAR and height for housing projects. The FARs for housing projects will be at least 75% greater than the commercial FARs. Financial feasibility testing conducted by the City’s economic consultant indicates that with the new higher FARs and heights, housing projects will be more likely to occur than commercial projects. All the sites selected on the SSI will be rezoned with the new higher FARs and heights for housing projects. Therefore, it is highly likely that the sites will be redeveloped for residential rather than commercial.~~
- ❖ ~~Availability of Regulatory Incentives – The City has also most recently adopted regulatory incentives to encourage residential development, including adopting an Emergency Interim Ordinance on March 10, 2020, allowing 100% affordable housing~~

projects and housing projects up to Tier 2 maximums that are subject to the protections of the Housing Accountability Act to be reviewed through a by-right administrative process. Program 1.A would make this streamlining provision permanent and expand the applicability to other housing projects, including projects that are granted minor modifications.

- Environmental and Infrastructure Constraints** –HCD requires that cities identify any environmental constraints (e.g., fault hazard zones, flood areas, landslide zones, very high fire hazard severity zones) and infrastructure limitations that have the potential to impact the development viability of the identified sites. These constraints can include natural resources, hazards/safety concerns, or lack of sufficient infrastructure capacity. All parcels included in the sites inventory were reviewed for any known environmental constraints, such as flood zones, steep slopes, and other possible constraints to development feasibility. The sites included in the inventory are not constrained by topography, known environmental factors, or other site-specific constraints that would limit development. As summarized in Attachment 3, environmental concerns do not pose a ~~significant~~ constraint to housing production. Infrastructure upgrades, ~~however~~, would be necessary to accommodate the development of 8,895 units in the next 8 years but these are anticipated to occur with the City’s Capital Improvements Program or in conjunction with housing projects. Therefore, infrastructure systems do not pose a constraint to housing.

Evaluation

City staff reviewed the current status of each site and evaluated the sites using the factors above. Sites were given a ~~rating~~ ~~evaluation~~ of whether they had low, medium, medium high, and high potential for housing redevelopment. The table below show the qualifying factors for each rating. Staff did extensive research on the site, reviewing physical conditions, existing uses and other factors and removed any identified sites with demonstrated impediments. Finally, staff also conducted additional market research to support assumptions around parcel turnover at the sites. In general, as shown in the table, high potential sites include those that are adequately sized or have common ownership with adjacent parcels, are occupied with single tenants, are underutilized and occupied with aging, one story buildings, and are located in proximity to other recent housing projects.

Figure F-3 Sites Inventory Evaluation Factors

Factors Utilized		Redevelopment Potential			
		High	Medium High	Medium	Low
<i>Physical Attribute</i>					
	<u>Sites of 15,000 sf or more</u>	x	x	x	
	<u>Corner parcels</u>	x	x		
<i>Existing Use</i>					
	<u>Parking lot or One Story</u>	x	x		
	<u>Vacant or Less than 2 tenants</u>	x			
<u>Redevelopment Potential</u>					

	ILR less than 0.5		X		
	Ownership by Developer	At least one			
	Known Developer Interest				
Location					
	Near transit/amenities	X	X	X	
Other Local Knowledge					
	Existing uses have longevity				X
	Recent investments				X

The Suitable Sites Inventory is comprised of ~~332~~341 high potential sites [categorized as follows](#).

Category 1 Sites: Pending/Approved Housing Entitlements

[As of May 2022, there were approximately 2,594 approved units \(of which 637 are affordable\) and 2,550 pending units \(of which 420 are affordable\)](#)~~As of February 2021, there were approximately 1,670 approved units (of which 401 are affordable) and 756 pending units.~~ All approved and pending projects are considered high potential sites.

Category 2 Sites: Prior Sites listed in the 2013–2021 5th Cycle Housing Element

The parcels listed in the 5th Cycle 2013–2021 Housing Element were re-evaluated to determine suitability for housing potential. Parcels were determined to have low potential if they are inadequately sized (less than 7,500 sf), have undergone recent tenant improvements, or are occupied with newer tenants (indicating long term leases). Remaining sites were evaluated and considered high potential if they are adequately sized and if there is a low ~~AVR~~[ILR](#) of less than 1.0 FAR, the existing buildings on the site are more than 40 years old, there is known developer interest, or if the existing use doesn’t appear to have longevity (e.g., existing aging one story building, single tenant or unoccupied, etc).

Category 3 Sites: Downtown Buildout Sites

As part of the Downtown Community Plan (DCP), sites in the Downtown were identified for potential redevelopment. All these sites have low ~~AVR~~[ILR](#) and have older buildings, indicating high potential. The Downtown is one of the most attractive areas for housing development due in part to higher development standards for housing, access to a variety of amenities, proximity to transit, and no parking minimums. In general, the limiting factor is site size. Based on discussions with developers from the Housing Element Housing Production working group, single lot parcels (generally consisting of 7,500 sf) are infeasible to develop. Therefore, sites within the DCP that are 7,500 sf or smaller were eliminated. The remaining DCP sites are considered high potential.

Category 4 Sites: City-owned Sites

City staff reviewed all City-owned land to determine if there is potential for housing development. A number of City-owned sites have the highest potential to accommodate the

production of affordable housing. These sites do not have long-term leases with outside parties that extend beyond the 6th Cycle Housing Element planning period and do not have existing uses that are non-City operated, and therefore are considered high potential. High potential City-owned sites include the parcels serving as the parking lots on Main Street and along Wilshire Boulevard, the Bergamot Arts Center, Public Parking Structure 3, and the Bank of America/Chase bank site at 4th Street/Arizona.

Category 5 Sites: Parking Lots

As previously stated, there are a number of sites in the City that are developed as surface parking lots. Many of these lots serve one-story commercial uses. These surface parking lots were considered in conjunction with the commercial uses they serve, if any. Sites were considered high potential if they are adequately sized, if there is common ownership with adjacent commercial parcels they serve, the existing buildings on the site are more than 40 years old, there is known developer interest, and if the existing use doesn't appear to have longevity (e.g., existing aging one story building, single tenant or vacant, on-site business is not well known in the community, etc.).

Category 6 Sites: Auto Inventory Lots

Santa Monica has a number of auto dealerships with large surface parking lots used for auto inventory. In some cases, auto dealerships span multiple parcels with some on adjoined lots and some on separate lots. Some of the parcels serve as inventory parking for used cars or new cars. Sites were considered high potential if they are adequately sized, there is common ownership with adjacent parcels, there are other multiple parcels located elsewhere that are also owned by the same owner (if so, they can adequately serve as inventory for both used and new cars), or if there has been known developer interest.

Category 7 Sites: Recent/Active Sales

Properties that have recently sold during 2019–2021 or have active sales listings were evaluated and considered high potential if they are adequately sized and located in an area where residential has occurred or occurred nearby. Recently sold sites that are occupied with new tenants were excluded and determined to have low potential.

Category 8 Sites: Underutilized Sites (20,000 sf excess development potential)

Category 8 sites have a net new development potential of 20,000 sf or greater (based on their existing built area compared against the maximum floor area permitted). Sites were evaluated and considered high potential if they are adequately sized and if there is a low **AVRILR**, the existing buildings on the site are more than 40 years old, there is known developer interest, or if the existing use doesn't appear to have longevity (e.g., existing aging one story building, single tenant or vacant, etc).

Category 9 Sites: Remaining Large parcels

Category 9 sites are all remaining sites that are 15,000 sf and larger. Sites were evaluated and considered high potential if they are adequately sized and if there is a low **AVRILR**, the existing

buildings on the site are more than 40 years old, there is known developer interest, or if the existing use doesn't appear to have longevity (e.g., existing aging one story building, single tenant or vacant, etc.).

Category 10 Sites: Remaining Parcels with 0.5 AVR/LR or less

Category 10 sites are all the remaining sites (not meeting Category 1-9) with an **assessor's improvements to land** value ratio (AVR/LR) of 0.5 or less.

~~Sites were evaluated and considered high potential if they are adequately sized and if there is a low AVR, the existing buildings on the site are more than 40 years old, there is known developer interest, or if the existing use doesn't appear to have longevity (e.g., existing aging one-story building, single tenant or vacant, etc).~~

Based on the **review assessment** of sites **using the above factors and methodology**, there are ~~108-137~~ parcels **that have approved and /pending projects** for residential development (**Category 1**) and ~~200-185~~ **commercially/ mixed used zoned and City-owned non-vacant commercial/mixed use zoned parcels (Categories 2-10)** in the City identified to have high potential for residential redevelopment. ~~Together these 308 parcels comprise approximately 4.4 million sf of land area and are included in the SSI.~~

An additional ~~24-22~~ residentially zoned sites developed as surface parking lots are identified as having high potential, and therefore are also included in the SSI. The Housing Element includes Program 1.C to adopt standards that will incentivize A-Lots and residentially zoned parking lots to be developed in support of multi-unit housing development. **Together these 340 parcels comprise approximately 5.2 million sf of land area and are included in the SSI.**

Figure F-3-4 Summary of Commercial and Mixed Use Zoned Sites in SSI

High Potential for Redevelopment			
Category	Description	Total Land Area	Count of Parcels
1	Approved and Pending Housing Projects	1,301,284 <u>921,522</u>	108 <u>138</u>
2	Prior SSI Sites	535,920 <u>466,371</u>	23 <u>21</u>
3	DCP Buildout	124,517 <u>94,015</u>	13 <u>7</u>
4	City-Owned Sites	726,027 <u>778,481</u>	25 <u>24</u>
5	Vacant Sites/Parking Lots	164,891	21
6	Auto Storage Lots	243,704 <u>206,212</u>	27 <u>23</u>
7	Parcels with recent/active sales	253,802 <u>168,576</u>	23 <u>17</u>
8	Underutilized Sites (20,000 excess sf development potential)	814,893 <u>767,643</u>	32 <u>30</u>
9	Large Parcels (15,000 sf+)	135,267	6
10	Remaining Sites with less than 0.5 AVR/LR	214,016 <u>210,996</u>	31
Grand Total		4,498,158 <u>4,913,974</u>	308 <u>318</u>

Figure F-4-5 Summary of Residentially Zoned Sites in SSI

High Potential Residentially Zoned Sites			
Category	Description	Total Land Area	Count of Parcels

	Description		
11	Religious Institutions	149,307	7
12	A-Lots/Residentially Zoned Parking Lots	185,083 168,609	17 15
Grand Total		334,390 317,916	24 22

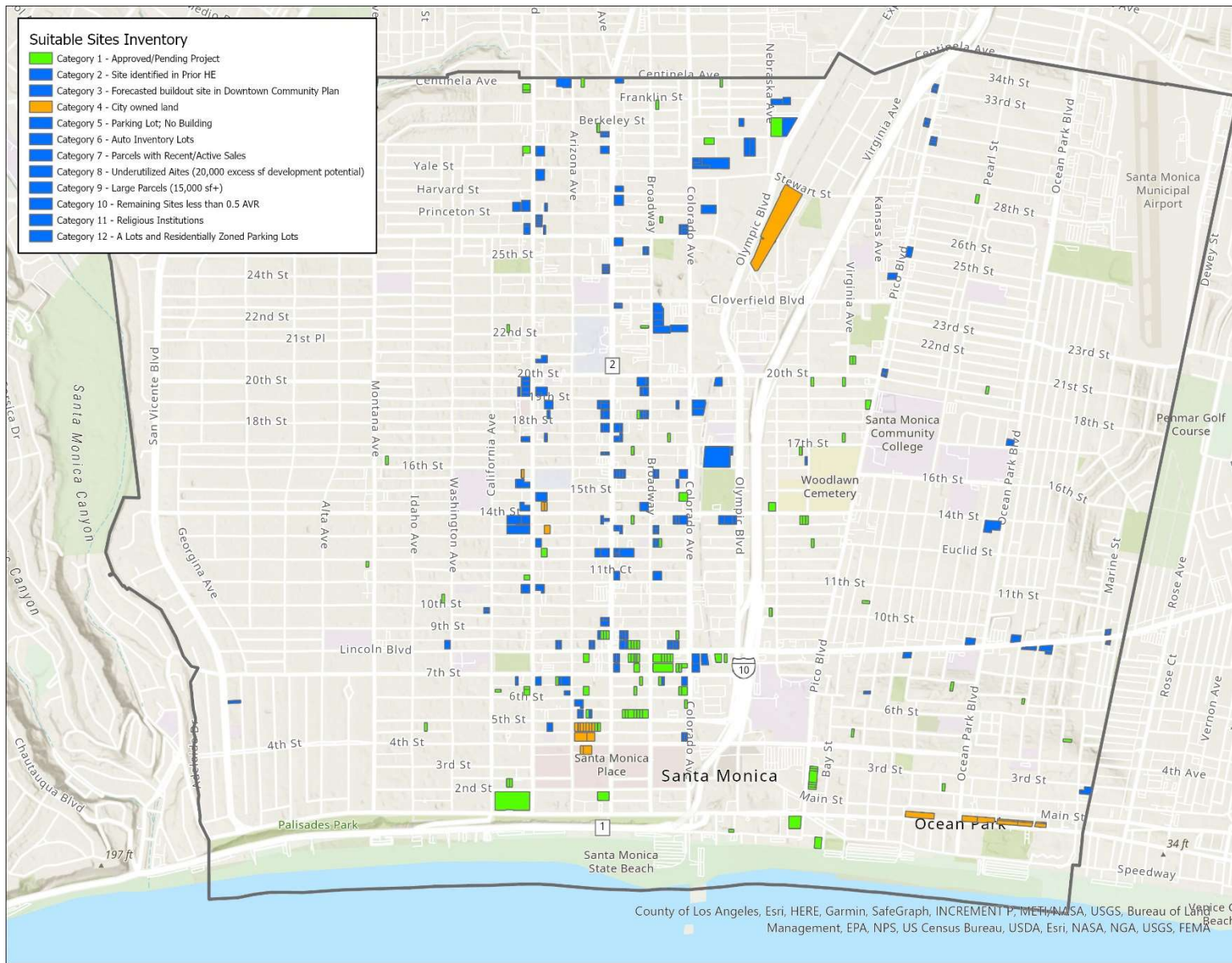
Reliance on Nonvacant Sites to Accommodate more than 50 percent of RHNA

The City of Santa Monica is a dense, urban coastal community and is entirely built out with little to no vacant land remaining. As such, this Housing Element relies on nonvacant sites to accommodate 100 percent of its RHNA for lower income households. Based on analysis of the factors discussed above for each category of sites (such as age of buildings, known developer interest, low ~~AVR~~ILRs, size of sites, development trends, market conditions, ownership information), the City anticipates that the existing uses on the SSI sites will likely be discontinued during the planning period. Pursuant to Government Code Section 65583.2(g)(2), as part of its resolution adopting this Housing Element, the City will include findings stating that uses on nonvacant sites identified in the SSI to accommodate the RHNA for lower income is likely to be discontinued during the planning period.

Replacement of Affordable Units

Excluding approved and pending housing projects (Category 1 sites), two sites on the SSI have existing residential uses. As required by Government Code Section 65915(c)(3), this Housing Element includes Program 3.A, which would require new housing projects on sites with existing residential units or within the last 5 years, that have or had residential units that are lower income, rent control, or affordable units to replace those units at the same or lower income level.

Map F-1 Suitable Sites Inventory



Step 45: Housing Realistic Capacity Analysis of Suitable Sites

Per Government Code Section 65583.2(c), the SSI must include a calculation of the realistic residential development capacity of the sites. To ensure that sufficient capacity exists in the housing element to accommodate the RHNA throughout the planning period, HCD recommends that a jurisdiction create a buffer in the housing element inventory of at least 15 to 30 percent more capacity than required, especially for capacity to accommodate the lower income RHNA.

Category 1 – Approved and Pending Projects

As previously stated, as of ~~February 2021~~ May 2022, there were approximately ~~1,670~~2,594 approved units (includes ~~416~~637 affordable) and ~~756~~2,550 pending units (includes ~~165~~420 affordable) ~~on 109 parcels~~. These sites are listed in Appendix A. A review of the past 5th Cycle Housing Element show that ~~10~~15% of approved and pending projects are withdrawn, ~~and/or~~ have had permit approvals expire, or have not pulled building permits within 8 years of project approval (i.e., housing element cycle). It is not possible for City staff to predict which specific approved and pending projects would be withdrawn or ultimately not developed. Eliminating some projects and not others would be arbitrary and speculative. However, based on information from the prior Housing Element cycle, a ~~10~~15% discount factor was applied to the current number of approved and pending units to allow for the possibility that some projects may never proceed to construction. This results in ~~1,503~~2,205 approved units and ~~680~~2,168 pending units that are projected to be counted towards the 6th Cycle Housing Element.

Figure F-5.6 Approved and Pending Projects Housing Capacity

	# of Units	# Units Counted for SSI (w/ 10% discount)
Category 1 Approved	1,670 <u>2,594</u>	1,503 <u>2,205</u>
Category 1 Pending	756 <u>2,550</u>	680 <u>2,168</u>

Category 4 – City-Owned Sites

The City-owned sites determined to have the highest potential to accommodate the production of affordable housing include parcels serving as parking lots on Main Street and along Wilshire Boulevard, the Bergamot Arts Center, Parking Structure 3, and the site at 4th Street/Arizona. All parcels are developed as public parking or have uses with expiring lease terms during this 6th Cycle planning period, which provide for the most housing development potential. Furthermore, these sites do not have any existing residential uses. However, the existing density standards and FARs limit housing potential. For example, the public parking parcel on Main Street is zoned R3 and has a density cap of 5 units on a parcel. Therefore, this 6th Cycle Housing Element includes Program 2.E, which would commit City-owned sites for the development of affordable housing through a public process, which would include necessary rezoning to accommodate the estimated realistic capacity for these sites. To determine the estimated realistic capacity, the City engaged with HR&A advisors and local architects who considered existing constraints, including, but not limited to, lease terms for commercial uses on the property located at 4th/Arizona and [Property Management Agreement with associated](#)

~~annual an Exclusive Negotiating Agreement leases for potential development of~~ at the Bergamot Arts Center ~~which are set to expire during the 6th Cycle~~, financial feasibility, available funding sources, etc. Based on an assumption that affordable housing would likely not be greater than 6-7 stories (due to increasing costs associated with construction type - e.g., Type 3 vs. Type 4 construction), it is estimated that the City-owned sites could accommodate a density of 150 units per acre. Therefore, applying a density factor of 150 units/acre, City-owned sites have the potential for accommodating ~~1,884~~ 1,880 units. To ensure that City-owned SSI sites can be counted towards meeting the RHNA, Program 2.E commits the City to plan for a target of ~~1,884~~ 1,880 affordable units across City-owned sites which may include, but shall not be limited, to rezoning actions in the LUCE, Specific Plans, and/or Zoning Ordinance amendments.

Figure F-6-7 City-Owned SSI Sites

Address	Parcel Nos.	GP Designation	Zoning	Existing Use	Existing Base Allowable Density or FAR	Proposed Density with Program 2.E	Land Area (sf)	Unit Capacity with Program 2.E	Other Info
1146 16 th St	4281005900	Low Density Residential	R2	Public parking lot 8 behind Café Zella	1 unit/2000 sf or 4 units (whichever less)	150 units/acre	7,500	26	No leases – parking is City operated
1217 Euclid St	4282004900	Medium Density Residential	R3	Public parking lot 7	1 unit/1500 sf or 5 units (whichever less)	150 units/acre	7,500	52	No leases– parking is City operated
1217 14 th St	4282003900	Medium Density Residential	R3	Public parking lot 12 behind Petco	1 unit/1500 sf or 5 units (whichever less)	150 units/acre	22,500	52	No leases– parking is City operated
	4282003901								
(Blank) Main St between Ocean Park Blvd and Kinney St	4288009900	High Density Residential	R3/R4	Public parking lots 9, 10, and 11 on Main St (excludes alleys)	1 unit/1500 sf or 5 units (whichever less)	150 units/acre	175,56816 7,388	605577	No leases– parking is City operated; but replacement parking will be necessary (Coastal Zone)
	4288010900								
	4288010901 288014901								
	4288011900								
	4288011901								
	4288012902								
	4288013905								
	4288015901								
1333 4 th St	4291011909	Bayside Conservation	BC	Bank of America; Chase bank	2.25 FAR	150 units/acre	44,60952 489	154181	Bank of America's lease ends in 2026 and Chase Bank has requested to extend their lease to 2026 and terminate alongside the BofA lease.
	4291011910								
1324 5 th St	4291011900	Neighborhood Village	NV	Public parking lot 27	2.25 FAR	150 units/acre	53,30052 470	184181	No leases– parking is City operated
	4291011901								

Address	Parcel Nos.	GP Designation	Zoning	Existing Use	Existing Base Allowable Density or FAR	Proposed Density with Program 2.E	Land Area (sf)	Unit Capacity with Program 2.E	Other Info
	4291011902								
	4291011903								
	4291011904								
	4291011905								
	4291011908								
1318 4th St	4291012900	Bayside Conservation	BC	Parking Structure 3	2.25 FAR	150 units/acre	30,000	104	City Council authorized exclusive negotiation agreement on 1/22/2022 with EAH for development of affordable housing; Demolition began March 2022
	4291012901								
2500 Olympic	4268013919	Conservation Arts Center	CAC	Bergamot Arts Center ¹	1.0 FAR	150 units/acre	205,000	707	Property Management Agreement until April 2027. City has annual leases with 30 businesses (expiring 12/31) that will be renewed each year until redevelopment Interim Ground Lease and ENA with Private Developer expires on 12/31/22
	4268014900								
Total Estimated Capacity								1,884,880	

¹ The 205,000 sf land area accounts for half of the Bergamot Arts Center parcel being occupied by an existing leased R&D building which precludes housing development on this portion of the site

Category 11 and 12- Religious Congregations and Parking Lots

Surface parking lots located in the multi-unit residential zoning districts have the ability to accommodate housing. These include parking lots associated with religious congregations and parking lots associated with street-fronting commercial uses.

Discussions with religious congregation leaders have indicated that there is a strong desire to develop affordable housing on the parking lots of sites owned by religious congregations. Program 4.B in this Housing Element would amend the Zoning Ordinance to allow housing projects on these religious congregation sites to be developed to unlimited density, no minimum parking requirements, and an additional 33 feet of building height, provided that 50% of the units are provided as affordable. However, based on discussions with affordable housing developers, it is unlikely that affordable housing projects will be built greater than 5 stories. Therefore, housing capacity of sites owned by religious congregations were analyzed assuming a height of 5 stories.

Surface parking lots in residential zones have housing potential but their potential is limited by existing residential unit caps. The Housing Element includes Program 1.C which would amend the Zoning Ordinance to eliminate the maximum unit caps within these residentially-zone surface parking lots and to create special standards for housing projects on these sites.

The capacity analysis applies the following factors to calculate realistic capacity of Category 11 and 12 sites:

- **Typical Density:** Parking lots owned by religious congregations would be developed with affordable housing projects and as such, would be afforded new development standards that would give it increased height as compared to other sites in the residential zones. However, as stated above, such projects would likely be limited by the number of stories. Affordable housing developers have indicated that they will likely build no more than 5-6 stories due to construction costs and prevailing wages requirements for projects constructed at greater heights. Therefore, the capacity analysis assumes a maximum of 5 stories for parking lots associated with religious congregations. For surface parking lots, the capacity analysis assumes removal of the unit caps and applies the density factors of the underlying zones as well as the maximum building height.
- **Realistic capacity of Site:** Application of the maximum parcel coverage permitted based on the underlying multi-unit zoning.
- **Land Use Controls and Site Improvements:** Incorporation of the Zoning Ordinance's requirements for unit size and unit mix requirements which could reduce maximum residential yield.
- **Infrastructure Availability and Environmental Constraints:** No application of environmental constraints and infrastructure constraints, per the discussion in Attachment 3.

- **Income levels:** Some religious congregational leaders have indicated that there may be a need to provide some market rate units as part of housing redevelopment to ensure revenue. Therefore, these sites assume 50% of the total unit capacity could be accommodated at affordable low-income levels consistent with Program 4.B.

With this methodology, Category 11 sites yielded an estimated housing capacity of 257 units and Category 12 sites yielded an estimated housing capacity of ~~94~~96 units.

Figure F-8 Example Capacity Calculation for Multifamily Parcel

Site Attribute	Zoning	R2
	Site Area (SF)	10,000
Typical Density	Max # Stories	5
	Density	unlimited
Realistic Capacity	Parcel Coverage (Maximum % of site area)	0.45%
	Ground Floor Parcel Coverage Floor Area (GSF)	6,750 SF
Land Use Controls	Upper Story Parcel Coverage (% of ground floor parcel coverage)	90%
	Upper Story Floor Area	$[(6,750 \text{ SF} \cdot 90) \cdot 4 \text{ stories}] = 24,300 \text{ SF}$
Capacity	Total Floor Area	31,050 SF
	Average GSF per Unit based on Unit Mix requirements	1,050
	Max # of Units	30

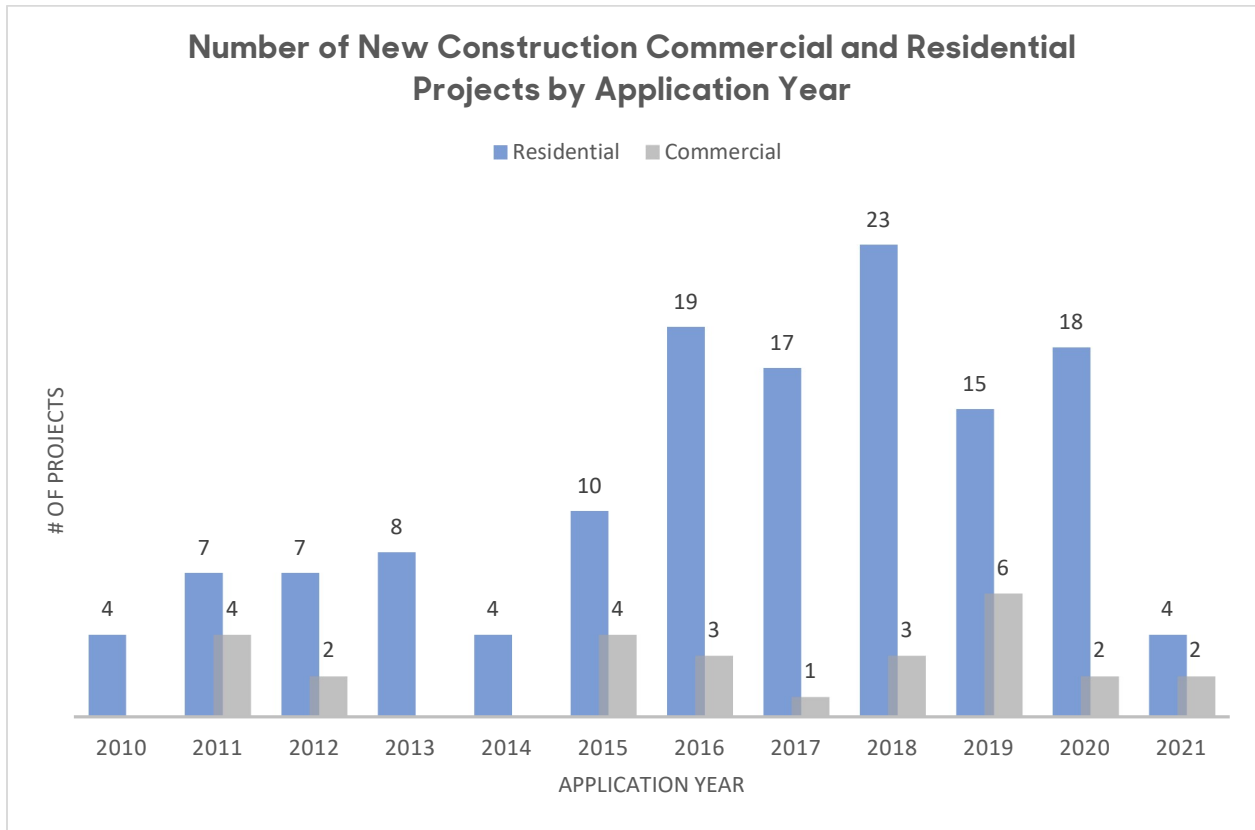
All Remaining Sites – Categories 2, 3, 5, 6, 7, 8, 9, 10

The City of Santa Monica’s General Plan and Zoning Ordinance implements a Zoning Ordinance using floor area ratios (FAR) and heights to determine maximum development. The Housing Element includes Programs 1.F and 1.J, which would amend the Downtown Community Plan and Zoning Ordinance to establish new increased FARs and heights for housing projects.

- **Assumptions of Residential Probability vs Commercial**

❖ *Development Trends* – In the past decade, development in Santa Monica has trended towards new residential development rather than new commercial development (see graphic below). This is particularly true in the Downtown district, where housing projects are incentivized with greater FARs than commercial projects. Housing is in high demand in the southern California region, particularly in Santa Monica, which has seen a significant increase in development applications for residential and mixed use projects. This trend is expected to continue to increase during the timeframe of the Housing Element. The City allows standalone, multi-unit residential development as a use permitted by-right (without discretionary approvals) in most mixed-use, commercial, and industrial zones throughout the City. These zones also allow for a broad range of other nonresidential uses. For example, a review of project applications in the City revealed that approximately 15% of projects were commercial only while the

overwhelming majority were residential or mixed-use with a large residential component. As such, the City developed assumptions for the realistic capacity for the likely mix of residential and non-residential (e.g., retail, office, hotel, employment) projects on commercially and mixed use zoned sites.



❖ Market Conditions - The Housing Element will continue to incentivize commercial projects over residential projects across the City through Program 1.J, which will rezone the mixed-use and commercial zoning districts with higher maximum allowable FAR and height for housing projects. The FARs for housing projects will be at least 75% greater than the commercial FARs. Financial feasibility testing conducted by the City's economic consultant indicates that with the new higher FARs and heights, housing projects will be more likely to occur than commercial projects. All the sites selected on the SSI will be rezoned with the new higher FARs and heights for housing projects. Therefore, it is highly likely that the sites will be redeveloped for residential rather than commercial. However, to be conservative,

❖ Availability of Regulatory Incentives - The City has also most recently adopted regulatory incentives to encourage residential development, including adopting an Emergency Interim Ordinance on March 10, 2020, allowing 100% affordable housing projects and housing projects up to Tier 2 maximums that are subject to the protections of the Housing Accountability Act to be reviewed through a by-right administrative process. Program 1.A would make this streamlining provision permanent and expand the

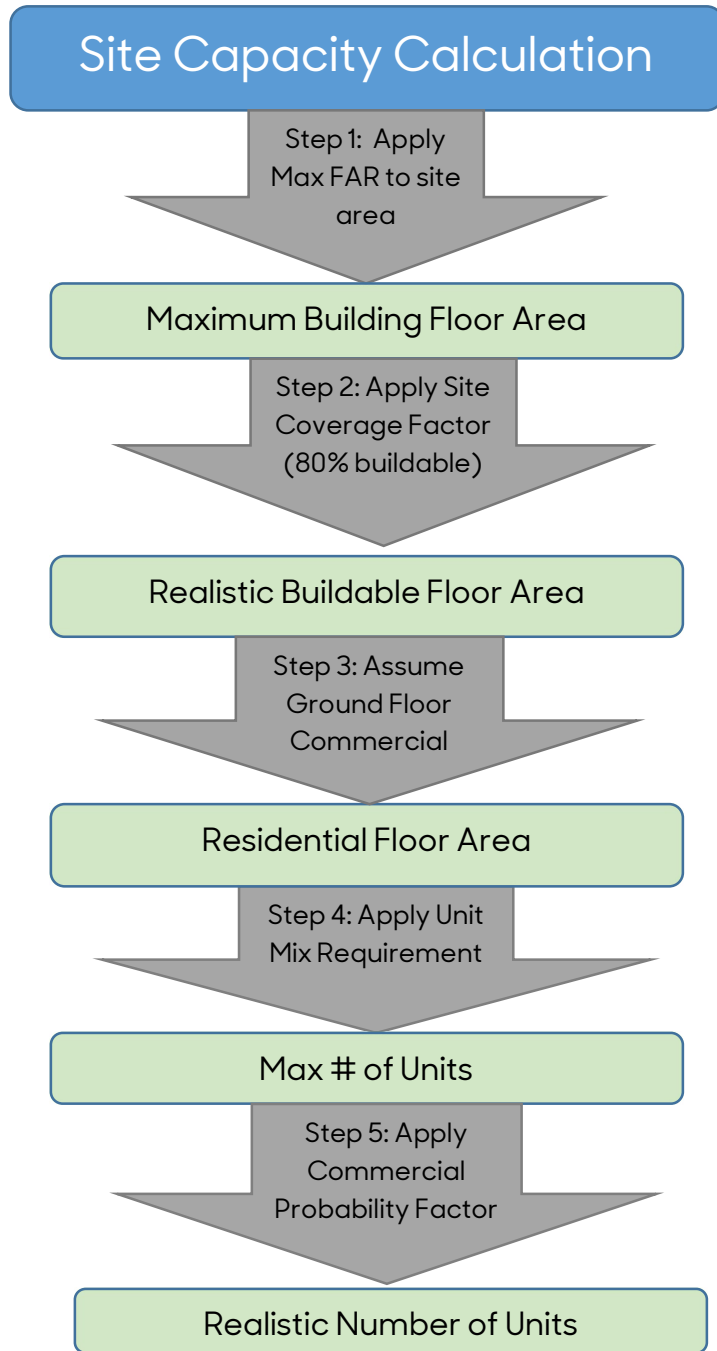
[applicability to other housing projects, including projects that are granted minor modifications.](#)

- **[Site Capacity Calculation](#)**

To assess the housing capacity of the remaining Category 2-10 sites that have been identified for the SSI, the realistic capacity of the sites was assessed by applying the new rezoned heights and FAR for housing projects as listed in Programs 1.F and 1.J. The capacity analysis applies the following factors to calculate realistic capacity of sites within Category 2, 3, 5, 6, 7, 8, 9, and 10:

- ❖ *Typical Density:* The [maximum allowable Tier 1 FARs](#) for housing project (~~for both on-site and off-site affordable housing~~) is utilized for the site capacity analysis. This assumption is supported by past production trends which demonstrate that all residential developers will utilize the maximum FAR for residential and mixed-use projects, especially given high land cost and construction cost. Attachment 1 provides a list of approved and pending projects which show that almost all developers have proposed the maximum allowable FAR. Additionally, in the past (prior to the City's 2017 adoption of the Downtown Community Plan), a couple of approved housing projects were processed as development agreements and therefore, proposed FARs exceeded the established [maximum FARs](#) in the Zoning Ordinance. [For the purposes of this SSI analysis, Tier 2 FARs and Tier 3 FARs \(which are greater than Tier 1\) are not utilized since these are considered elective and require project developers to contribute community benefits.](#)
- ❖ *Realistic capacity of Site:* The capacity analysis assumes that 80% of the site area will be developed given setback and open space requirements based on a review of past housing projects.
- ❖ *Land Use Controls and Site Improvements:* Incorporation of the Zoning Ordinance's requirements for active ground floor use (for example retail) and unit mix requirements which could reduce maximum residential yield.
- ❖ *Commercial Likelihood:* [To account for the possibility that commercial use could be built, a 15% discount factor was applied to the capacity calculation. The 15% is based on the percentage of commercial projects vs residential projects that have occurred in the past 8 years. With this discount factor, the assumed capacity on the sites in the inventory is significantly lower than the actual housing development potential that is allowed on the sites per the Zoning Code and General Plan. For example, a 0.23 acre site that is zoned MUBL \(Mixed Use Boulevard Low\) with a max FAR of 2.25, has a maximum development potential of 22 units. However, this site is a mixed use-zoned site that allows 100% commercial projects, so to account for market feasibility and the potential for commercial development on the site, the inventory only counts 19 units on the parcel.](#)

- ❖ Infrastructure Availability and Environmental Constraints: No application of environmental constraints and infrastructure constraints, per the discussion in Attachment 3.



With this methodology and under programs in this Housing Element, Category 2, 3, 5, 6, 7, 8, 9, and 10 sites yielded an estimated total housing capacity of 6,025 units Figure F-9. Example Capacity Calculation for Mixed Use and Commercial Parcel:

Site Attribute	Zoning	MUB
	Site Area (SF)	10,000
Typical Density	Tier	1
	Max Proposed FAR	2.25
	Max SF	22,500
Realistic Capacity	Building Coverage (% of Site Area)	80%
Land Use Controls	Ground Floor Area (GSF)	8,000 SF
	Ground Floor Use	Retail
	Commercial Floor Area (NSF)	6,960 SF
Capacity	Upper Floor Uses	Residential
	Residential Floor Area (NSF)	15,540 SF
	Average NSF per Unit based on Unit Mix requirements	688
	Max # of Units	22 units
Commercial Probability	15%	19 units
Max Density Capacity	Max # units/acreage of site	(22-19 units/0.23 acres) = 95-83 units/acre

The unit capacity that resulted with this calculation was spot checked against the typical densities of housing projects that have occurred in the past 10 years which is shown in the table below.

Figure F-10 Typical Densities of Housing Projects by Zoning since LUCE

City Areas	Zoning District	Housing Current Tier 1 FARs	Parcel Sizes of Housing Projects (SF)	% of Max FAR or Density ¹	Typical Densities Units/acre
Bergamot	BTV	1.75	35,000	92%	77-110
	MUC	1.50	20,000-145,000	95-100%	103-107
	CCS	1.50	==	==	==
	CAC	1.0	==	==	==
Blvd	MUBL	1.50	7,500-203,000	88-150%	58-129
	MUB	1.50	7,500	82-135%	52-197
	GC SMB	1.25	13,000	100-125%	79-108
	GC Lincoln/Pico	1.50	14,000-32,000	92-150%	63-114
	NC	1.50	15,000-30,000	100-137%	97-113
	NC (Main, Montana)	1.00	==	==	==
Industrial	IC	Not	==	==	==
Office	OC	Not	==	==	==
Hospital	HMU	1.50	==	==	==
Downtown	LT	1.50	15,000-37,000	80-100%	87-192
	NV	2.25	7,500-18,500	89-100%	116-349
	BC	2.25	15,000	189%	160

	TA	2.25	7,500 - 108,000	100-163%	161-390
	OT²	2.25	=	=	=
	WT	1.50	15,000	100%	122
Multi-family		1unit/1500sf	23,000-45,000	100%	41-80
	OF				
	OP2	1unit/2000sf	4,700-11,000	100%	22
	OP3	1unit/1500sf	7,500-18,000	100%	29
	OP4	1unit/1250sf	24,500	100%	35
	R2	2,000 (or 4 total units)*	7,500-29,000	100%	22
	R3	1,500 (or 5 total units)*	5,000-22,000	100%	29
	R4	1,250 (or 6 total units)*	19,000	200%	74

Step 56: Assessing Appropriateness of Sites to Accommodate Lower Income levels

For the City of Santa Monica, California Government Code Section 65583.2 states that a density of 30 units per acre is appropriate to enable lower income housing. In the City's mixed-use and commercial districts, the Zoning Ordinance uses FAR rather than the density factor of units per acre. Therefore, to determine how many units per acre are possible on each SSI site, the number of units possible was first calculated based on the current [Tier 1](#) FARs and new allowable FARs established in Programs 1.A and 1.J. The number of units was then translated into units/acre based on the parcel size of each site. Under current development standards and with the rezoning in Programs 1.F and 1.J, all the SSI sites that are zoned mixed-use or commercial can accommodate housing at greater densities than default density of 30 units per acre. Therefore, per HCD, all the mixed-use and commercial zoned sites are considered as having capacity for Low-Income units.

Accommodating for Very Low- and Low-Income Housing

The State uses the density allowed on a site as a "proxy" for determining whether a site can accommodate housing at lower-income levels.

- Very Low- and Low-Income.** State law establishes a "default density standard" of 30 units per acre for lower-income units in the City of Santa Monica. This means that if a site's zoning allows for a density that is greater than 30 units per acre, the zoning is considered appropriate to accommodate the RHNA for lower income households. Under current standards and with the rezoning in Programs 1.F and 1.J, all the non-vacant, commercially zoned sites in the SSI can accommodate housing at greater densities than default density of 30 units. Therefore, per HCD, these sites can be identified as lower-income sites that have the capacity to accommodate lower-income units.
- Moderate-income.** Since all the identified SSI sites that are commercially zoned can accommodate lower-income units, the City has also determined that each of these sites can accommodate moderate-income housing since units affordable to lower-income households would also be affordable to moderate-income households.

Step 6.7: Summary of Capacity to Accommodate the RHNA

Without rezoning, the sites in the inventory can accommodate 7,596 units, resulting in a shortfall in total capacity which includes a shortfall in lower income capacity. While HCD requires that only candidate sites need to be rezoned to accommodate the shortfall, the HE includes programs to rezone entire districts, rather than individual sites. This approach is conservative and allows for the potential for candidate sites to be removed or sites to be added over the Housing Element cycle. With rezoning, the sites in the inventory can accommodate 13,600 units. All of the sites are non-vacant, and almost all are consolidated sites. The City will continue to administratively process lot tie agreements as part of the plan check process. After accounting for consolidation, only 4 sites identified in the SSI accommodate less than 15 units (inclusive of lower income). These sites are vacant parcels located in the R2/R3 zones which have a density limit of 4 to 5 units.

Capacity to Accommodate the RHNA by Income Under Current Zoning

Based on current FARs and densities in the City's Zoning Ordinance, Bergamot Area Plan, and Downtown Community Plan, the sites identified for the SSI combined with anticipated ADU production has the capacity to accommodate ~~6,006~~7,596 units, a shortfall of ~~32~~15% below the City's RHNA of 8,895 units. This includes a shortfall of 1,109 units in all lower-income categories (ELI, VI, and LI) and ~~the~~1,003 units in the moderate income category.

Figure F-7.11 Summary of Capacity Analysis – Under Current Zoning Standards

	Total Capacity	Capacity for Affordable Units				
	# Units	Total Affordable Capacity	ELI	VLI	LI	Moderate
Category 1 Approved	<u>2,205</u> 1,503	<u>637</u> 416	<u>127</u> 104	<u>162</u> 104	<u>148</u> 104	<u>148</u> 104
Category 1 Pending	<u>2,168</u> 680	<u>420</u> 165	<u>24</u> 42	<u>321</u> 42	<u>41</u> 42	<u>41</u> 42
Category 4 City Sites	<u>788</u> 308	<u>647</u> 308	<u>162</u> 269	<u>162</u> 269	<u>162</u> 269	<u>162</u> -
Category 11 Religious Sites	29	0	0	0	0	0
Category 12 Parking Lots	61	0	0	0	0	0
All Remaining Categories	<u>1,950</u> 2,593	<u>1,950</u> 2,593	<u>488</u> 648	<u>488</u> 648	<u>488</u> 648	<u>488</u> 648
ADUs	<u>376</u> 352	<u>249</u> 232	<u>56</u> 53	<u>8</u> 7	<u>162</u> 151	<u>23</u> 21
Total	<u>7,596</u> 6,006	<u>4,064</u> 4,053	<u>964</u> 1,009	<u>1,247</u> 963	<u>1,146</u> 1,107	<u>700</u> 977
RHNA Targets	<u>8,895</u> 8,895	<u>6,168</u> 6,168	<u>1,397</u> 1,397	<u>1,397</u> 1,397	<u>1,672</u> 1,672	<u>1,702</u> 1,702
Shortfall	<u>(1,299)</u> (2,889)	<u>(2,104)</u> (2,115)	<u>(433)</u> (388)	<u>(150)</u> (134)	<u>(526)</u> (565)	<u>(1,003)</u> (725)
	-32 15 %					

Capacity to Accommodate the RHNA-Shortfall of Sites by Income Under Proposed Rezoning

Programs 1.F and 1.J would amend the Zoning Ordinance, LUCE, and associated specific and area plans to allow for increased FARs and heights in the mixed use and commercial districts in

the City in order to incentivize greater housing production. Additionally, Program 4.A would amend the Zoning Ordinance, LUCE, and associated specific and area plans to add multi-unit housing as a permitted use in non-residential zones where housing is currently prohibited.

Under current zoning, the City has a shortfall of 1,109 lower income units. The City-owned sites can accommodate 1,880 lower income units, sufficient to meet this shortfall. To ensure compliance with Government Code section 65583.2, subdivisions (h) and (i), the HE includes Program 1K which requires that development on City-owned sites identified in the SSI must be at minimum 50% residential uses and flexibility to have 100% residential use. ~~Furthermore, Program 1.K would implement an Adequate Sites Program which would allow all sites designated for mixed-uses (except for NC Main and NC Montana) to develop 100 percent residential use and would require residential use to occupy at least 50 percent of the floor area in a mixed-use project. Additionally, while not required to meet the shortfall of lower-income units, the Zoning Ordinance shall be amended to specify additional mixed-used zoning districts that shall be allowed 100 percent residential uses.~~

With the rezoning programs identified in this Housing Element, the sites identified for the SSI combined with anticipated ADU production has the capacity to accommodate at least ~~11,070~~ 13,600 units providing a ~~24~~ 53 percent buffer above the City’s RHNA of 8,895 units as shown in Figure F-8. The buffer accounts for the likelihood that not all identified SSI sites may be necessarily developed by a property owner for housing. The land inventory includes capacity for ~~2,444~~ 2,521 extremely low, ~~2,398~~ 2,891 very low income, ~~2,542~~ 2,703 low income, and ~~1,784~~ 1,901 moderate income units. Figure F-9 provides a summary breakdown of the SSI by zoning and income levels.

Figure F-8-12 Summary of Capacity Analysis – With New Development Standards Under HE Rezoning Programs

	Total Capacity	Capacity for Affordable Units				
	# Units	Total Affordable Capacity	ELI	VLI	LI	Moderate
Category 1 Approved	2,205 <u>1,503</u>	637 <u>416</u>	127 <u>104</u>	347 <u>104</u>	148 <u>104</u>	15 <u>104</u>
Category 1 Pending	2,168 <u>680</u>	420 <u>165</u>	24 <u>42</u>	224 <u>42</u>	41 <u>42</u>	131 <u>42</u>
Category 4 City Sites	1,880 <u>1,884</u>	1,880 <u>1,884</u>	627 <u>628</u>	627 <u>628</u>	627 <u>628</u>	- <u>-</u>
Category 11 Religious Sites	257 <u>257</u>	130 <u>129</u>	32 <u>32</u>	32 <u>32</u>	32 <u>32</u>	34 <u>32</u>
Category 12 Parking Lots	96 <u>105</u>	9 <u>53</u>	- <u>13</u>	- <u>13</u>	9 <u>13</u>	- <u>13</u>
All Remaining Categories	6,619 <u>6,289</u>	6,619 <u>6,289</u>	1,655 <u>1,572</u>	1,655 <u>1,572</u>	1,655 <u>1,572</u>	1,655 <u>1,572</u>
ADUs	376 <u>352</u>	249 <u>232</u>	56 <u>53</u>	8 <u>7</u>	162 <u>151</u>	23 <u>21</u>
Total	13,600 <u>11,070</u>	9,944 <u>9,168</u>	2,521 <u>2,444</u>	2,819 <u>2,398</u>	2,703 <u>2,542</u>	1,901 <u>1,784</u>
RHNA Targets	8,895 <u>8,895</u>	6,168 <u>6,168</u>	1,397 <u>1,397</u>	1,397 <u>1,397</u>	1,672 <u>1,672</u>	1,702 <u>1,702</u>
Buffer	+4,705 <u>+2,175</u>	+3,776 <u>+3,000</u>	+1,124 <u>+1,047</u>	+1,495 <u>+1,001</u>	+1,031 <u>+870</u>	+199 <u>+82</u>
	24 <u>53</u> %					

Figure F-8-13 Summary of SSI Sites Capacity by Zoning
(excludes Category 1 Approved/Pending Projects)

City Areas	Zoning District	# Units Capacity	Lower Income	Moderate Income	Above Moderate
Bergamot Area Plan	BTV	156	39	39	78
	CCS	25	6	6	13
	MUC	888	223	217	448
	CAC	707	707	=	=
Blvd	GC	967	254	225	488
	MUB	1,334	334	325	675
	MUBL	2,368	604	574	1,190
	NC	157	40	35	82
Downtown	NV	381	233	48	100
	BC	285	285	=	=
	LT	270	72	63	135
Industrial	IC	54	14	13	27
Office Campus	OC	59	15	13	31
Multifamily	R2	306	109	26	171
	R3	655	604	8	43
	R4	92	92	=	=
Total		8,852	3,674	1,626	3,552

City Areas	Zoning District	Land Area (sf)	% of Total Land Area	Count of Parcels
Bergamot Area Plan	BTV	38,548	0.9%	1
	CCS	11,703	0.3%	1
	MUC	359,465	8.0%	11
	CAC	410,253	9.1%	2
Blvd	GC	415,703	9.2%	44
	MUB	491,050	10.9%	29
	MUBL	969,554	21.6%	62
	NC	151,351	3.4%	20
Downtown	NV	250,989	5.6%	25
	TA	237,531	5.3%	20

-	LT	-292,933	6.5%	-31
-	BC	-80,233	1.8%	-4
-	OT	-190,963	4.2%	-1
-	WT	-30,014	0.7%	-4
Hospital	HMU	-6,242	0.14%	-1
Industrial	IC	-19,662	0.4%	-1
Multi-family	OF	68,537	1.5%	2
-	OP2	-32,299	0.7%	5
-	R2	-175,001	3.9%	-24
-	R3	-199,919	4.4%	-12
-	R4	-40,091	0.9%	-4
Office-Campus	OC	26,117	0.6%	4
Total	-	4,498,158	100.00%	308

Comparison of the RHNA with Adopted City Plan Projections

With the adoption of the LUCE in 2010, the City had originally anticipated the addition of 4,955 new housing units in the City by 2030, but that forecast was increased by 2,326 units after adoption of the Downtown Community Plan in 2017. Considering that approximately 2,200 units have been constructed since 2010 and approximately 1,000 units are under construction, the remaining growth anticipated through 2030 under current plans is 4,081 units. The 6th Cycle Housing Element RHNA of 8,895 units is more than twice than the planned amount of units anticipated under City plans and zoning.

Step 78: Assessment of Sites to Affirmatively Furthering Fair Housing

This section analyzes the distribution of sites in the inventory by fair housing metrics and provides a comparison to the distribution of existing households in the City within each census tract. A disproportionately high number of units are within the mid-City and Downtown area, which reflects the City's General Planning strategy of focusing new housing in areas served by transit, consistent with planning best practices and state guidelines for reducing greenhouse gas emission emissions. Census tracts in the mid-City and Downtown have a higher share of low-income units within it compared to other unit income categories. In contrast, a relatively low share of all units, including low-income units, are identified within the North of Montana and Northeast neighborhoods, which are discussed in Chapter 2 as being higher-resourced, whiter, and more wealthy. These areas are being underrepresented in the SSI given limited opportunity for high-density growth. Additional units are anticipated in these areas through lower-scale development such as Accessory Dwelling Units or "missing middle" housing, but are not reflected on the site inventory. The R2/R3/R4 zones also has a lower share of units allocated to it compared to its proportion of existing housing stock, but this reflects the city's focus on preserving existing housing, particularly rent-controlled housing.

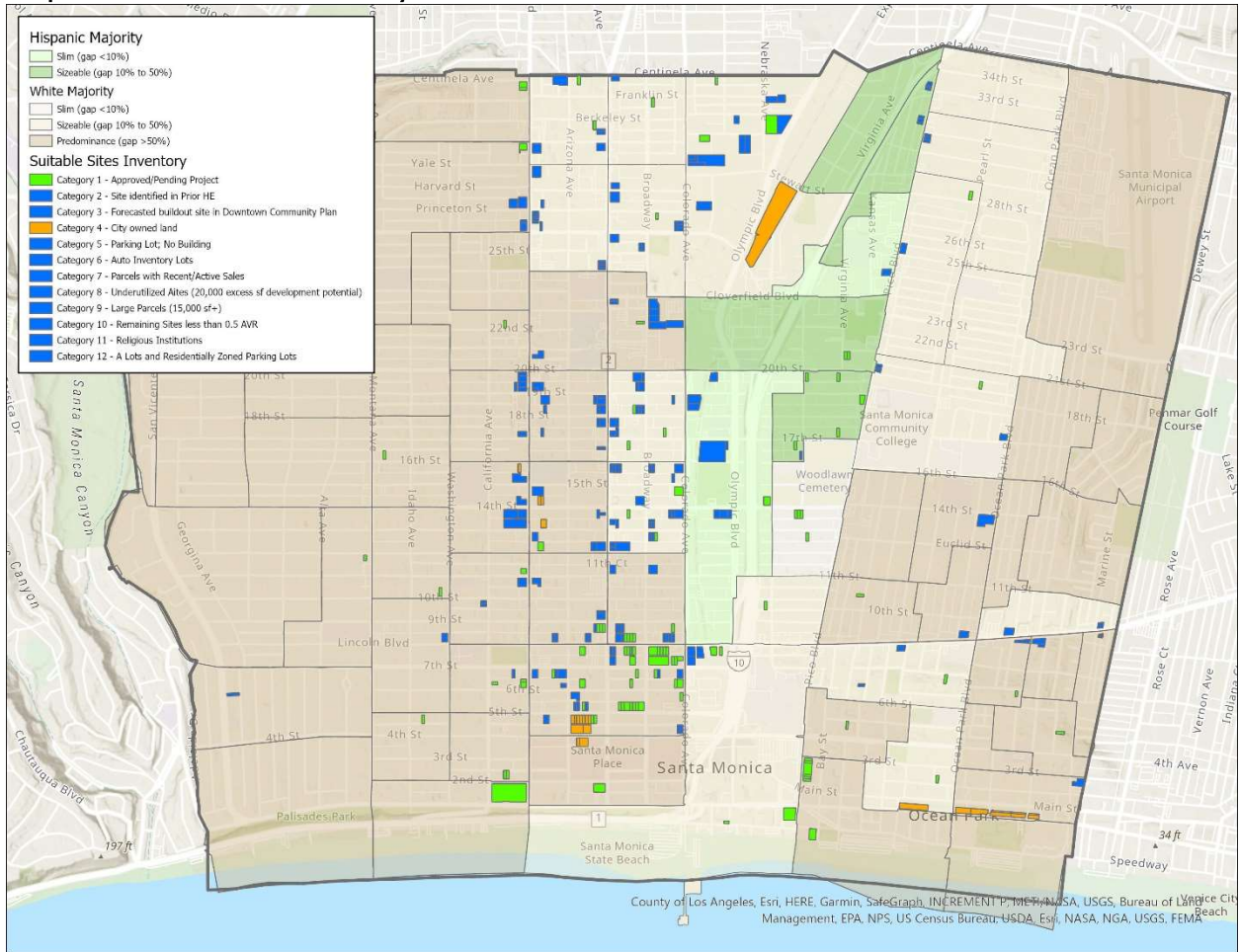
Effects of Sites on Segregation and Integration

The City's suitable sites inventory was evaluated to determine how sites planned for future development could further affect patterns of segregation and integration relative to racial concentrations and income levels. As previously discussed in Chapter 2, the City is generally more homogenous than the other nearby cities in Los Angeles. Within Santa Monica, there are more predominant populations of Hispanic/Latino residents in the Pico Neighborhood while the remaining areas of the City are predominantly White. Most of the identified sites are in the Downtown and in Mid-City, which have predominantly White households. [The table below shows that the census tracts with most of the available lower-income sites identified in the SSI are in areas with white predominance. About 11 percent of the lower-income capacity is identified in census tracts with a Hispanic/Latino majority. The distribution of low income and moderate unit capacities correspond generally to existing racial patterns.](#) Therefore, the sites would not exacerbate ongoing patterns of segregation by race in the City.

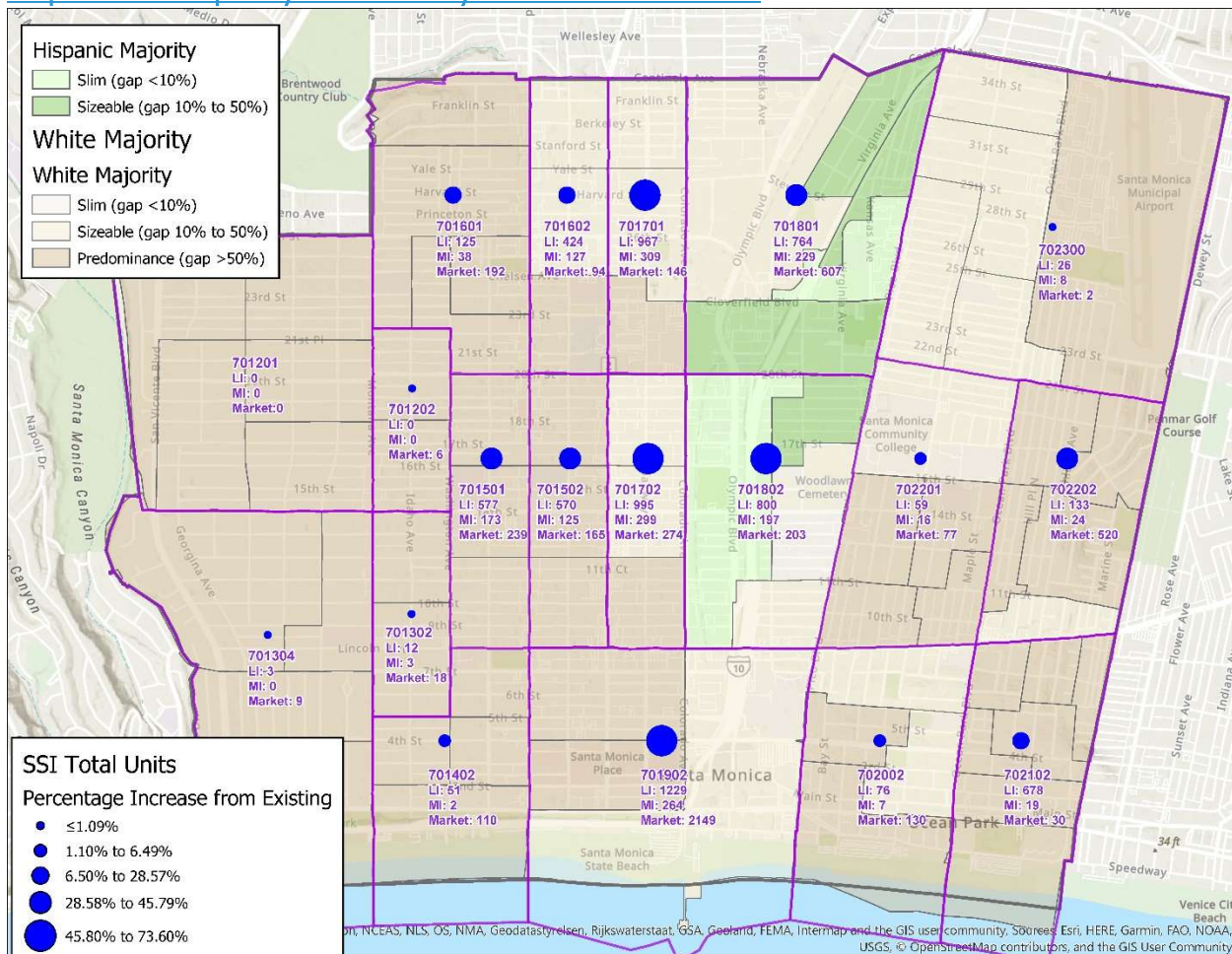
Figure F-14 Sites Distribution by Racial Predominance

Racial Predominance	White	Hispanic
Total City Existing %	78%	13%
SSI Lower Income Units	89%	11%
SSI Moderate Income Units	88%	12%
SSI Above Moderate Unit	96%	4%

Map F-2 Distribution of Sites by Racial Predominance



Map F-3 Site Capacity Increases by Racial Predominance

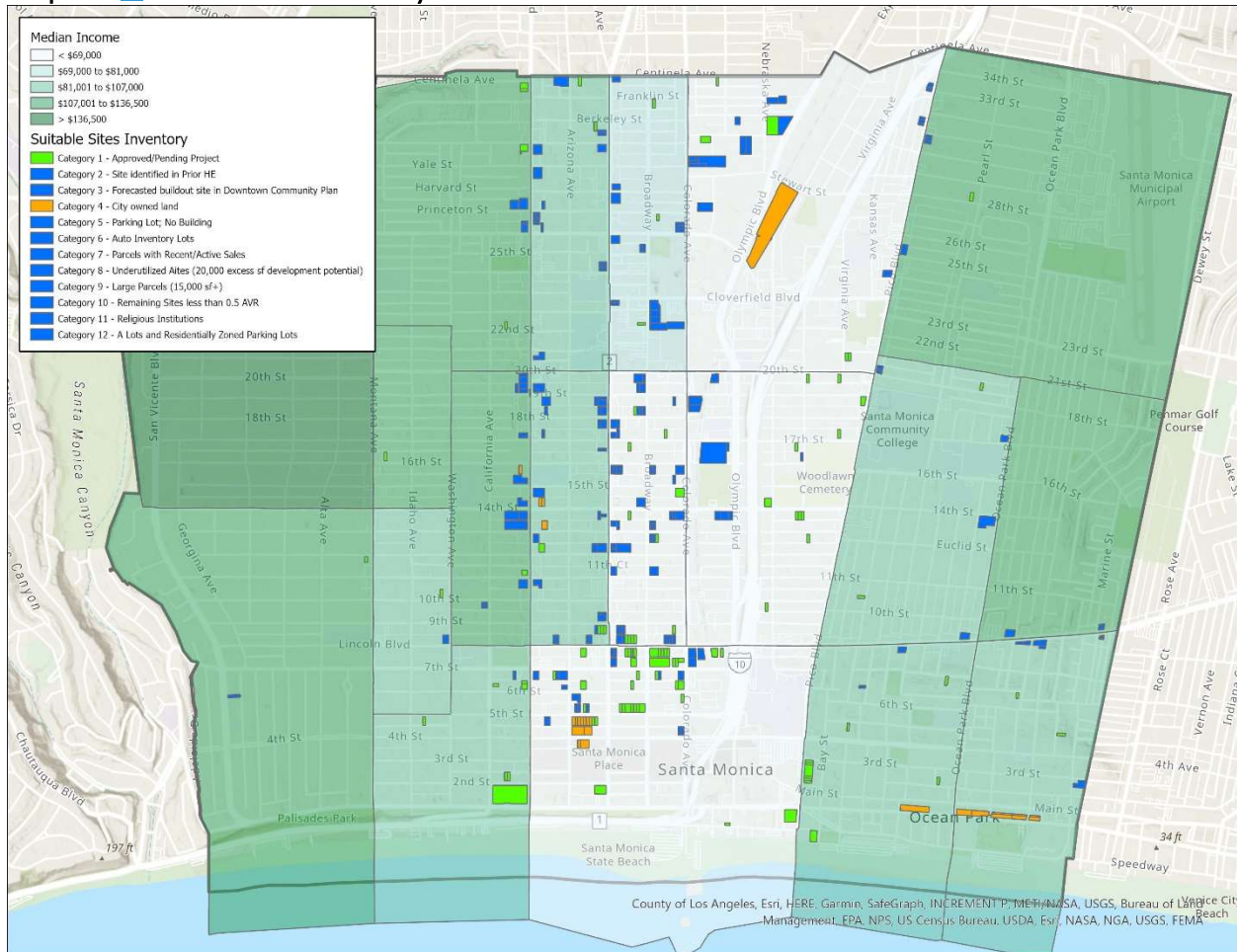


Relative to segregation based on household income, the sites are distributed across a number of census blocks with various median household income levels (Map F-3). [The census tracts with most of the available lower-income SSI sites have lower median income levels. This is mostly due to the availability of land suitable for higher density development along the I-10 freeway such as the Downtown and Bergamot Plan areas.](#) –Development on the [SSI-identified sites in the inventory](#) has the potential to add housing of all income levels, including low-income housing. There are 115 sites identified in the census tracts with more than 55% low- to moderate-income populations, which include the Downtown, Pico Neighborhood and the Bergamot Area. While development of low-income housing on these sites could moderately exacerbate ongoing patterns of segregation, it is very unlikely that all these sites would develop as low-income particularly given the higher land cost in the Downtown. Furthermore, these sites are located in areas that are the most accessible to the Metro E light-rail stations, jobs, and other resources including schools (Santa Monica College). [Therefore, while the Sites Inventory does not actively improve conditions, the sites would not exacerbate ongoing patterns of segregation by race in the City.](#)

Figure F-15 Sites Distribution by Median Income

Median Income	Less than \$69K	\$69K to \$81K	\$81K to \$107	\$107 to \$136,500	≥ \$136,500
Existing Citywide Households	21%	4%	42%	30%	3%
SSI Lower Income Units	54%	8%	26%	12%	0%
SSI Moderate Income Units	59%	11%	17%	13%	0%
SSI Above Moderate Unit	65%	3%	14%	18%	0%

Map F-34 Distribution of Sites by Median Household Income



Map F-5 Site Capacity Increases by Median Income

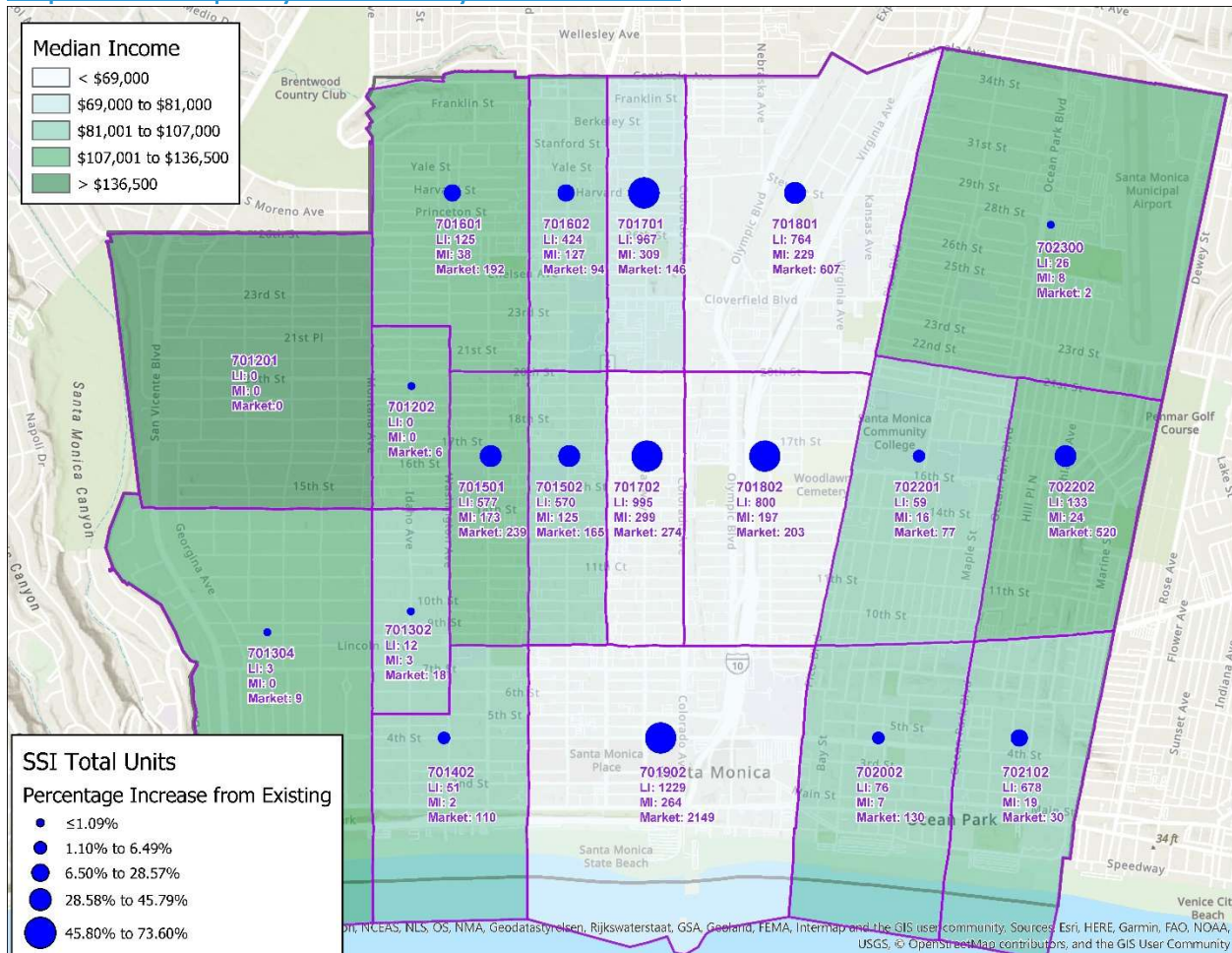
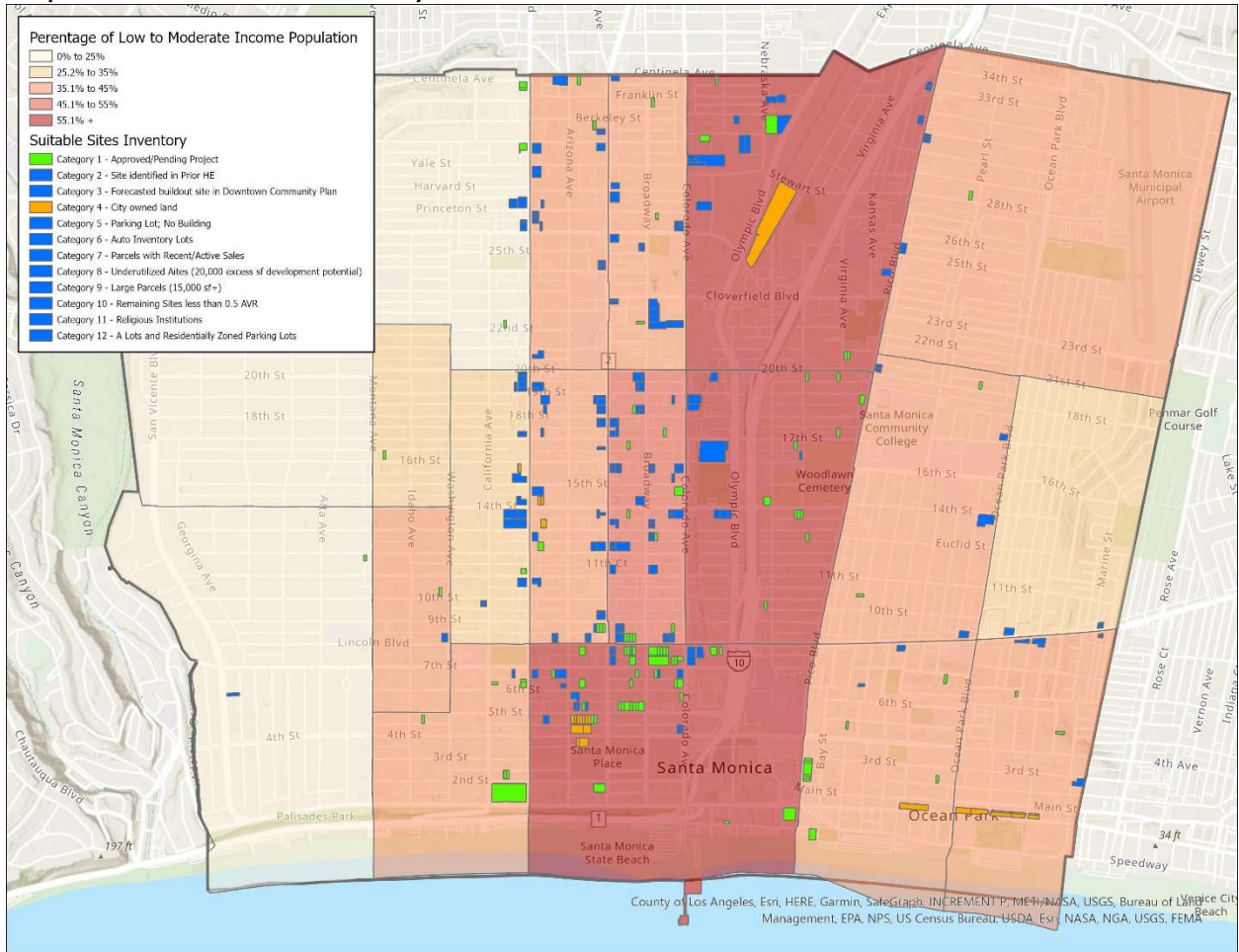


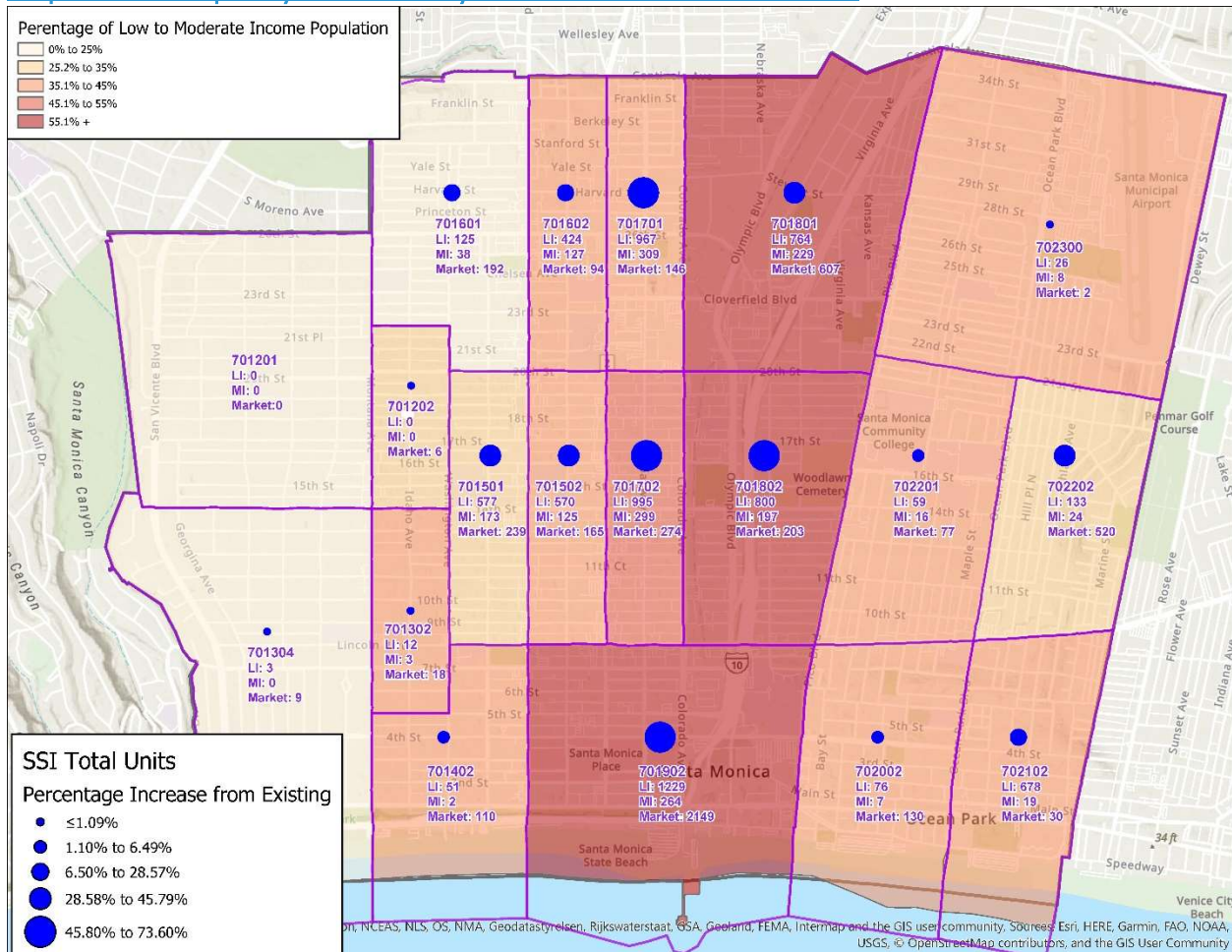
Figure F-16 Sites Distribution by Lower Moderate Income Households

Lower Moderate Income Households	0-25%	25.1-35%	35.1 to 45%	45.1 to 55%	55.1%+
Existing Citywide Households	14%	13%	52%	4%	17%
SSI Lower Income Units	2%	9%	35%	13%	41%
SSI Moderate Income Units	2%	10%	28%	16%	43%
SSI Above Moderate Unit	4%	14%	17%	6%	60%

Map F-46 Distribution of Sites by Low to Moderate Income Households



Map F-7 Site Capacity Increases by Low to Moderate Households



Effects of Sites on Displacement Potential and Disproportionate Housing Needs

Reflecting the geographic analysis above, the tracts designated as more stable or exclusive, which are primarily located in the North of Montana and Northeast neighborhoods, are underrepresented in the inventory. While not large in numbers, the sites inventory do show some unit capacity in these areas, representing a small step towards opening up these areas to new housing at all income levels and reducing gentrification and displacement pressure from other areas in the City. Additionally, the sites inventory show a greater proportion of lower income and moderate income capacity within areas that are classified as "advanced gentrification" or "at risk". This has a greater potential to protect vulnerable residents from being displaced under changing market pressures and ensure that these areas do not become exclusive. The identified sites would not exacerbate disproportionate housing needs. As described in Chapter 2, the significant contributing factors to disproportionate housing needs in the City are: displacement due to economic pressures, high housing cost, lack of affordable accessible housing, and land/zoning laws that limit density. The sites would not contribute to these factors but rather would result in improved conditions since housing development on these sites would

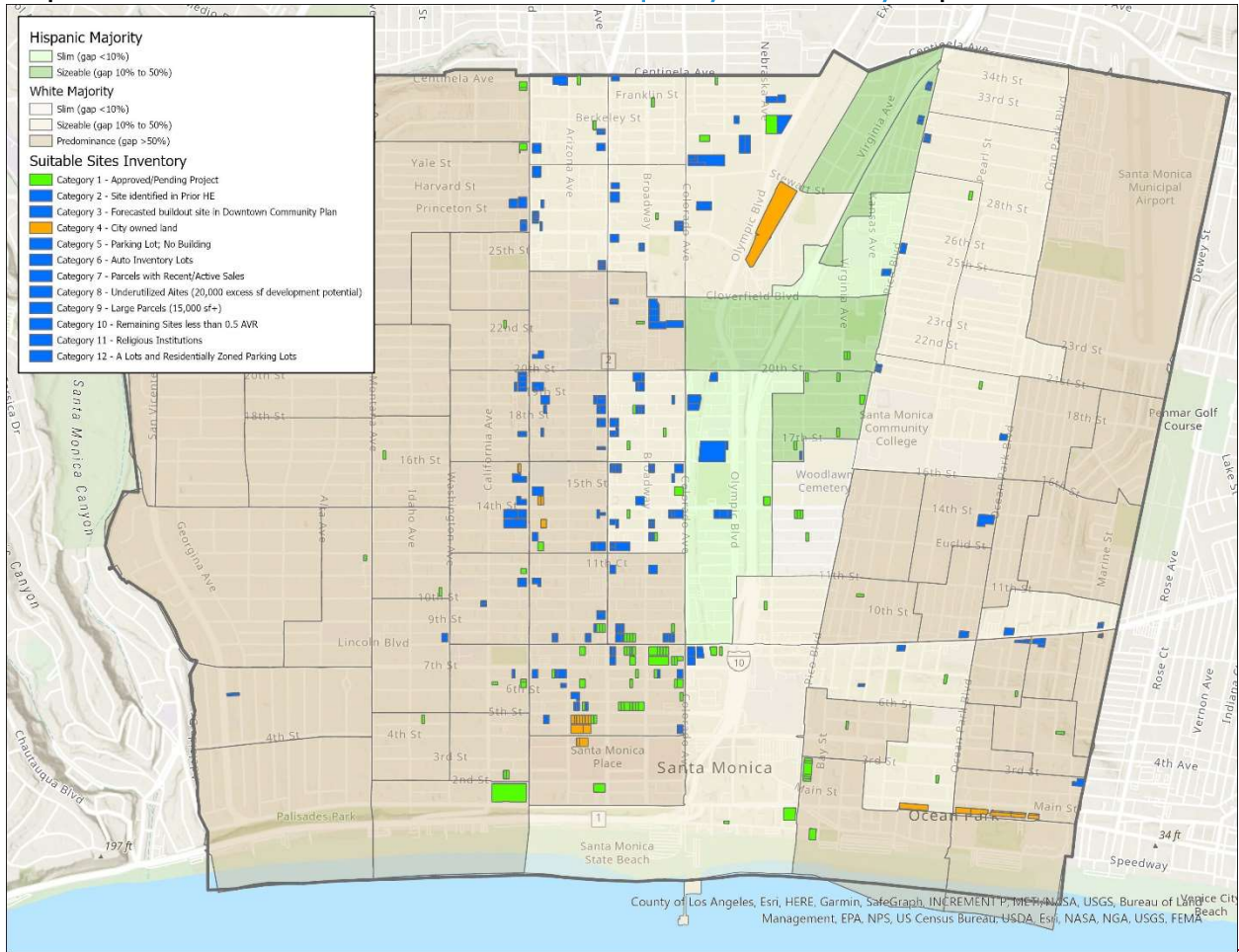
minimize displacement of existing rent controlled units,² provide new housing choice and affordability to high opportunity areas, produce new inclusionary affordable units as part of the City's Affordable Housing Production Program, and contribute to increased residential density.

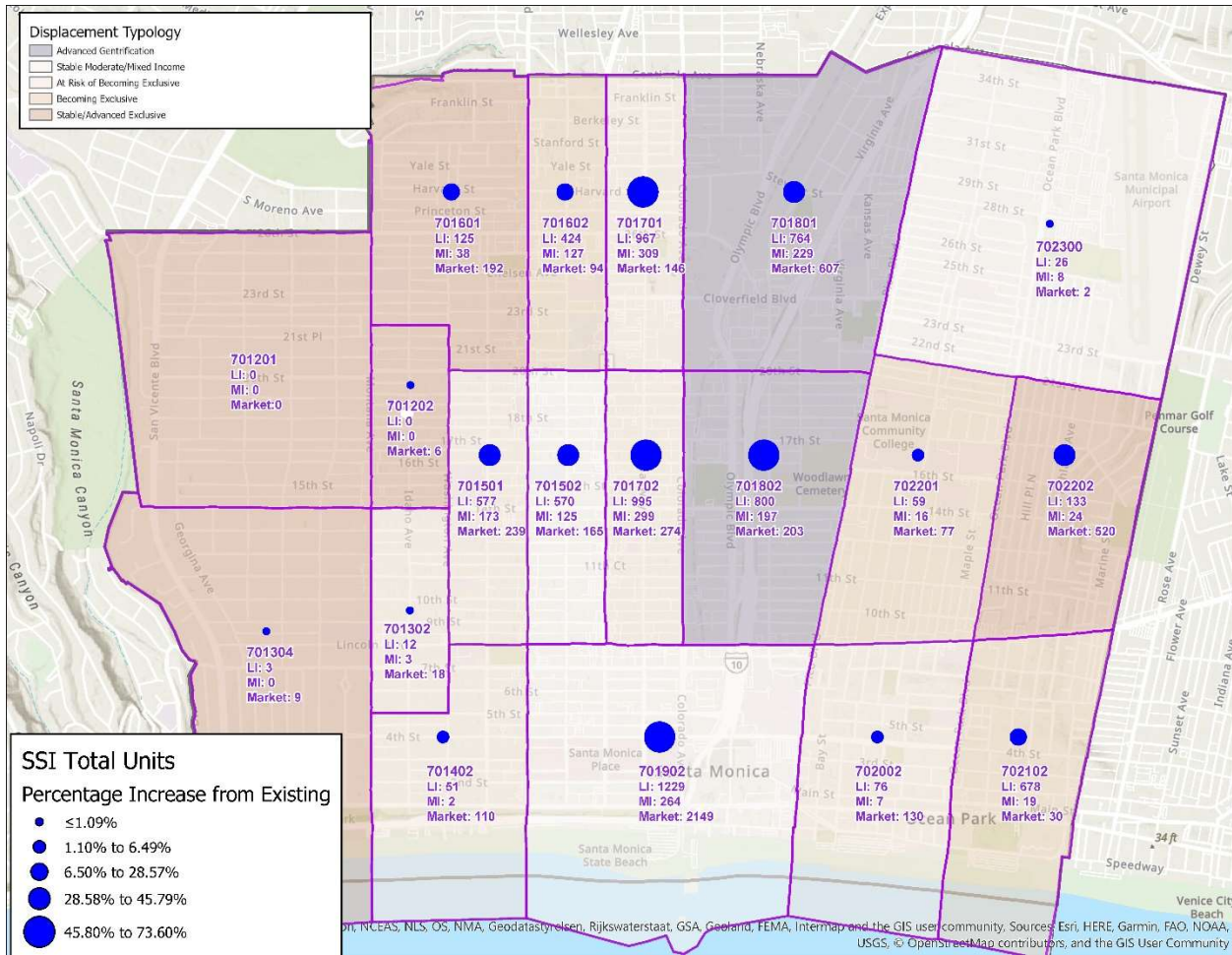
Figure F-16 Sites Distribution by Displacement Potential

<u>Displacement Typology</u>	<u>Advanced Gentrification</u>	<u>Stable Moderate</u>	<u>At Risk</u>	<u>Becoming Exclusive</u>	<u>Stable Exclusive</u>
<u>Existing Citywide Households</u>	10%	17%	35%	17%	21%
<u>SSI Lower Income Units</u>	25%	25%	31%	15%	3%
<u>SSI Moderate Income Units</u>	29%	22%	37%	9%	3%
<u>SSI Above Moderate Unit</u>	16%	48%	17%	4%	15%

² With the exception of two sites, sites that have existing residential uses included in the SSI consist of approved/pending housing projects. The other two sites were included in the SSI because of identified developer interest. All remaining sites in the inventory are developed with commercial uses or surface parking.

Map F-5.8 Distribution of Sites Relative to Sites Capacity Increases by Displacement Potential

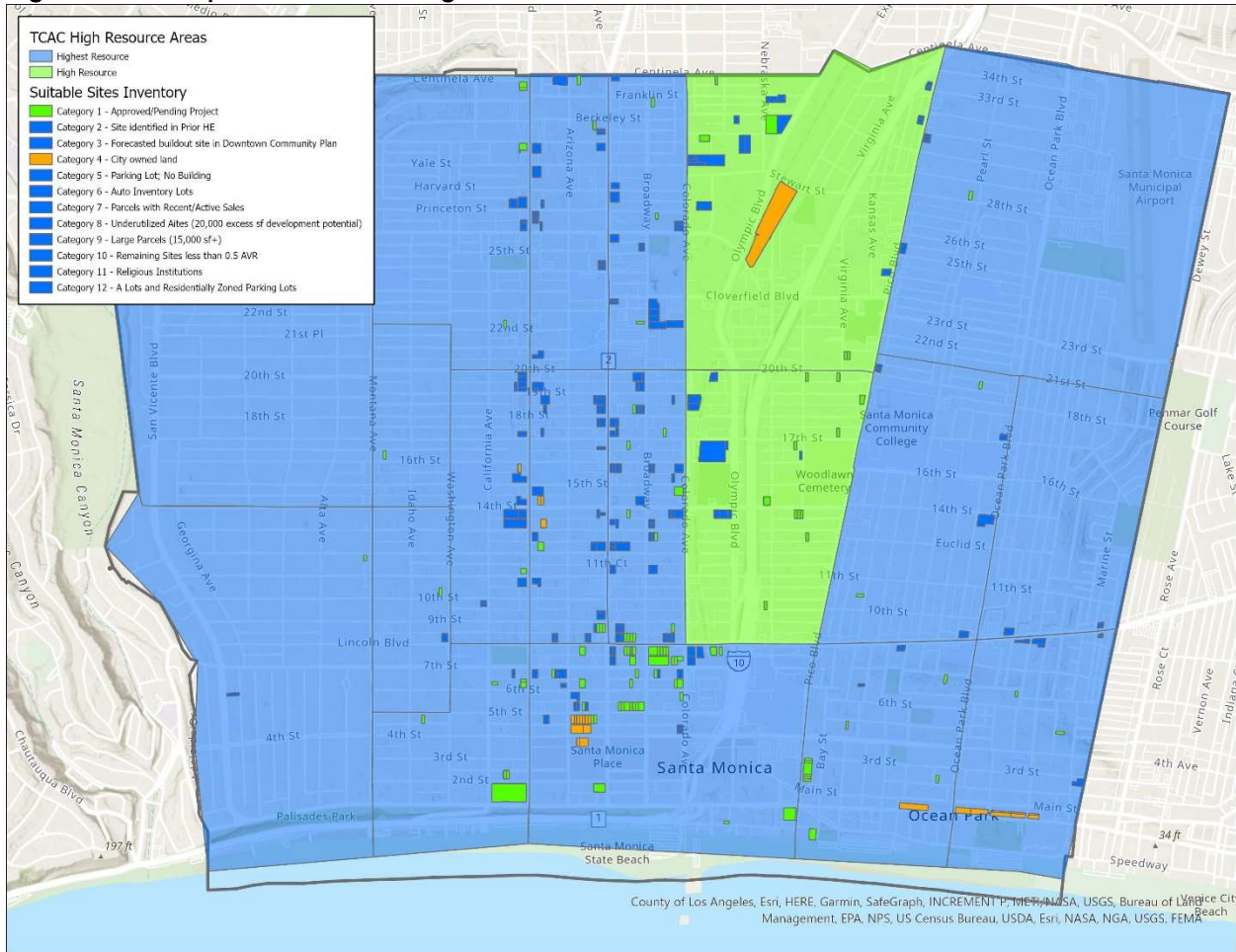




Effects of Sites on Access to Opportunity

As shown in the Figure F-9 below, the identified sites would increase housing opportunities throughout the City, furthering fair housing in areas of high resources and opportunity. The identified sites would have access to low-cost transportation, jobs, and neighborhood-serving commercial uses that serve residential. Additionally, almost all of the identified sites (with the exception of the approved/pending projects) are on properties that are developed with underutilized commercial buildings and/or parking lots and therefore, would generally, minimize displacement potential. With the proposed development standards in Program 1.J, the identified sites would all have sufficient densities to accommodate lower-income units. Additionally, the City's Affordable Housing Production Program requires housing projects to include inclusionary, affordable units, thereby expanding housing opportunities for lower-income households.

Figure F-6-9 Map of Sites within High Resource Areas



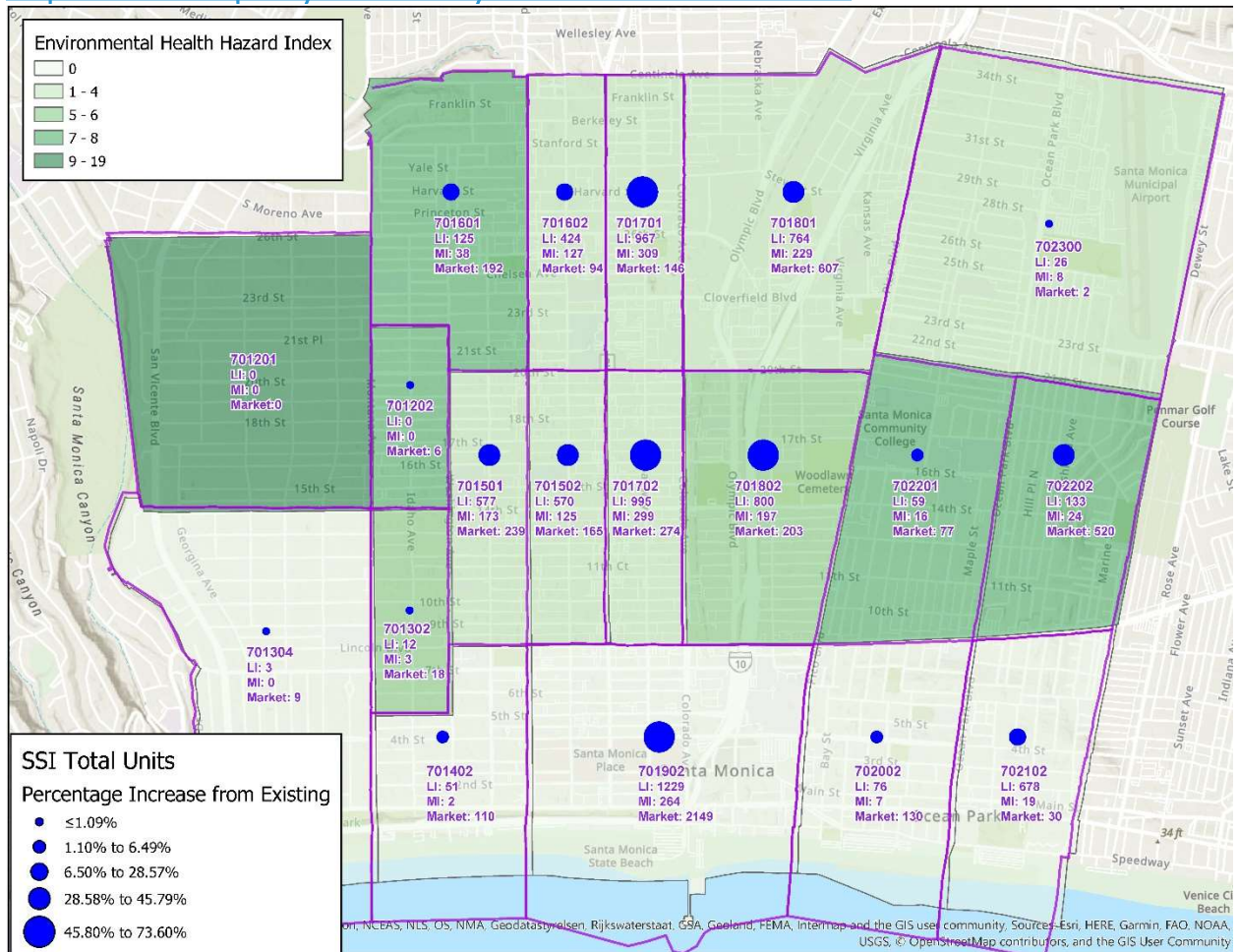
In terms of environmentally healthy areas, the census tracts that represent the North of Montana and Northeast neighborhoods generally have a higher (more healthy) environmental index than the remaining areas of the City. Similar to the discussion above, these areas are underrepresented in the sites inventory as they have the least housing capacity.

Figure F-17 Sites Distribution by Environmental Health Index

Environmental Health Index	Least Healthy → Most Healthy				
	0	1 to 4	5 to 6	7 to 8	9 to 19
Existing Citywide Households	37%	34%	10%	16%	3%
SSI Lower Income Units	27%	58%	11%	4%	0%
SSI Moderate Income Units	15%	70%	11%	4%	0%

SSI Above Moderate Unit	49%	31%	4%	16%	0%
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Map F-10 Sites Capacity Increases by Environmental Health Index



Attachment 1 – Approved and Pending Housing Projects

The table below provides a list of approved (not yet constructed) and housing projects pending review in the City of Santa Monica. All projects are located on non-vacant sites that are developed with existing buildings or surface parking lots. All housing projects with 4 or more units are required to meet the inclusionary requirements in the City’s Affordable Housing Production Program, Santa Monica Municipal Code Chapter 9.64, providing either on-site or off-site affordable housing units. These affordable housing units (Extremely Low Income, Very Low Income, Low Income, and Moderate) are required to be deed restricted for a term of no less than 55 years.

Table 1 – Approved and Pending Housing Projects as Broken Down by Affordability

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
12/7/2010	10FIM002	2 Unit Multifamily	1021	Grant Street	market rate	2	Approved	R2
6/1/2015	15ARB-0038	3-Unit Condos	610	California Ave	market rate	3	Approved	R2
5/11/2016	05TM-009	15-Unit Condominium	1211	12th St	market rate	9	Approved	R3
5/11/2016	05TM-009	15-Unit Condominium	1211	12th St	VLI	4	Approved	R3
6/1/2016	16ENT-0011	5-Unit Condos	1840	17th St	LI	1	Approved	R2
6/1/2016	16ENT-0011	5-Unit Condos	1840	17th St	market rate	4	Approved	R2
7/13/2016	16ENT-0072	3-Unit Condos	1422	20th St	market rate	3	Approved	R2
7/13/2016	16ENT-0071	3-Unit Condos	1420	20th St	market rate	3	Approved	R2
6/21/2017	16ENT-0041	3-Unit Townhomes	1121	22nd St	market rate	3	Approved	R2
6/21/2017	17ENT-0027	3-Unit Condos	1649	Centinela Ave	market rate	3	Approved	R2
10/18/2017	15ENT-0266	Mixed Use	1430-1444	Lincoln Blvd	market rate	100	Approved	MUB
10/18/2017	17ENT-0105	3-Unit Condos	1900	20th St	market rate	3	Approved	R2
11/28/2017	16ENT-0143	Mixed Use	1313-1325	6th St	market rate	64	Approved	NV
12/6/2017	16ENT-0098	Mixed Use (Upscale furniture building)	1437-1443	Lincoln Blvd	LI	6	Approved	MUB
12/6/2017	16ENT-0115	Mixed Use DRP	601-611	Wilshire Blvd	market rate	37	Approved	MUB
12/6/2017	16ENT-0115	Mixed Use DRP	601-611	Wilshire Blvd	ELI	3	Approved	MUB

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
12/6/2017	16ENT-0098	Mixed Use (Upscale furniture building)	1437-1443	Lincoln Blvd	market rate	34	Approved	MUB
1/1/2018	17ENT-0286	3-Unit Condos	2512	7th St	market rate	3	Approved	OP2
2/7/2018	16ENT-0102	Mixed Use	1318	Lincoln Blvd	market rate	39	Approved	MUB
2/7/2018	16ENT-0102	Mixed Use	1318	Lincoln Blvd	ELI	4	Approved	MUB
4/4/2018	11DEV014	Mixed-Use DRP	1650-1660	Lincoln Blvd	ELI	8	Approved	MUB
4/4/2018	11DEV014	Mixed-Use DRP	1650-1660	Lincoln Blvd	market rate	90	Approved	MUB
6/21/2018	16ADM-0050	Mixed Use	2901-2907	Santa Monica Blvd	VLI	5	Approved	MUBL
6/21/2018	16ADM-0050	Mixed Use	2901-2907	Santa Monica Blvd	LI	2	Approved	MUBL
6/21/2018	16ADM-0050	Mixed Use	2901-2907	Santa Monica Blvd	market rate	44	Approved	MUBL
7/5/2018	18ENT-0199	Mixed Use (Fritto misto)	601-609	Colorado Ave	market rate	104	Approved	TA
7/5/2018	18ENT-0199	Mixed Use (Fritto misto)	601-609	Colorado Ave	Moderate	36	Approved	TA
7/27/2018	18ENT-0077	Condos	1443	18th St	market rate	11	Approved	MUBL
8/1/2018	17ARB-0043	Apartments	1754	10th St	market rate	3	Approved	R2
10/12/2018	18ARB-0221	100% Affordable Housing	1342	Berkeley	ELI	8	Approved	R2
11/7/2018	18ENT-0005	Mixed Use (bowling alley)	216-248	Pico Blvd	VLI	9	Approved	MUBL
11/7/2018	18ENT-0005	Mixed Use (bowling alley)	216-248	Pico Blvd	market rate	93	Approved	MUBL
11/7/2018	18ENT-0005	Mixed Use (bowling alley)	216-248	Pico Blvd	LI	3	Approved	MUBL
1/31/2019	19ENT-0039	SRO Mixed Use Project	1437	5th St	LI	7	Approved	TA
1/31/2019	19ENT-0039	SRO Mixed Use Project	1437	5th St	market rate	14	Approved	TA
1/31/2019	19ENT-0039	SRO Mixed Use Project	1437	5th St	SRO	38	Approved	TA
1/31/2019	19ENT-0041	SRO Mixed Use Project with Commercial	1338-1342	5th St	SRO	80	Approved	NV
1/31/2019	19ENT-0041	SRO Mixed Use Project with Commercial	1338-1342	5th St	market rate	20	Approved	NV

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
1/31/2019	19ENT-0041	SRO Mixed Use Project with Commercial	1338-1342	5th St	LI	14	Approved	NV
1/31/2019	19ENT-0041	SRO Mixed Use Project with Commercial	1338-1342	5th St	ELI	6	Approved	NV
1/31/2019	19ENT-0039	SRO Mixed Use Project	1437	5th St	ELI	4	Approved	TA
3/6/2019	18ENT-0182	Mixed Use	1618	Stanford	market rate	43	Approved	MUC
3/6/2019	18ENT-0182	Mixed Use	1618	Stanford	ELI	4	Approved	MUC
4/18/2019	223	Auto Dealership	1802	Santa Monica Blvd	market rate	0	Approved	GC
4/18/2019	17ENT-0297	Mixed Use	1707	Cloverfield	market rate	58	Approved	BTV
4/18/2019	17ENT-0297	Mixed Use	1707	Cloverfield	ELI	5	Approved	BTV
4/23/2019	15ENT-0300	Mixed Use Project	1828	Ocean Ave	VLI	16	Approved	OF
4/23/2019	15ENT-0297	Mixed Use Project	1921	Ocean Front Walk	market rate	22	Approved	OF
4/23/2019	15ENT-0300	Mixed Use Project	1828	Ocean Ave	market rate	67	Approved	OF
5/15/2019	15ENT-0310	21-Unit Condominium/2020 Virginia	2002-2008	21st St	market rate	19	Approved	R2
6/14/2019	19ENT-0054	3-Unit Condos	1802	Delaware Ave	market rate	3	Approved	R2
7/9/2019	19ENT-0130	3-Unit Condos	122	Strand St	market rate	3	Approved	OP3
9/4/2019	17ENT-0298	Mixed Use	2906-2918	Santa Monica Blvd	market rate	42	Approved	MUBL
9/4/2019	17ENT-0298	Mixed Use	2906-2918	Santa Monica Blvd	ELI	4	Approved	MUBL
9/6/2019	19ENT-0128	Addition of 4 units	1410	5th St	market rate	4	Approved	TA
10/2/2019	19ENT-0258	3-Unit Condos	949	10th St	market rate	3	Approved	R2
10/4/2019	18ENT-0129	Mixed Use 100% affordable housing	711	Colorado Ave	ELI	17	Approved	TA
10/4/2019	18ENT-0129	Mixed Use 100% affordable housing	711	Colorado Ave	Moderate	39	Approved	TA
10/21/2019	18ENT-0211	Mixed Use	1425-1427	5th St	market rate	92	Approved	TA

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
11/7/2019	18ENT-0244	Mixed Use	3223	Wilshire Blvd	market rate	49	Approved	MUB
11/7/2019	18ENT-0244	Mixed Use	3223	Wilshire Blvd	ELI	4	Approved	MUB
11/12/2019	18ENT-0210	Mixed Use	1543-1547	7th St	Moderate	8	Approved	TA
11/12/2019	18ENT-0210	Mixed Use	1543-1547	7th St	ELI	5	Approved	TA
11/12/2019	18ENT-0210	Mixed Use	1543-1547	7th St	VLI	5	Approved	TA
11/12/2019	18ENT-0210	Mixed Use	1543-1547	7th St	LI	7	Approved	TA
11/12/2019	18ENT-0210	Mixed Use	1543-1547	7th St	market rate	75	Approved	TA
11/14/2019	186	Commercial building	3280	Lincoln Blvd	market rate	1	Approved	GC
12/4/2019	16ENT-0118	Mixed Use	3030	Nebraska Ave	ELI	9	Approved	MUC
12/4/2019	16ENT-0118	Mixed Use	3030	Nebraska Ave	market rate	174	Approved	MUC
12/9/2019	19ENT-0425	3-Unit Condos	918	5th St	market rate	3	Approved	R2
12/19/2019	19ENT-0256	Mixed Office/SFR	1348	10th St	market rate	1	Approved	GC
1/15/2020	19ENT-0267	Condos	1432	17th St	market rate	6	Approved	R2
1/30/2020	19ENT-0042	SRO Mixed Use Project	1415-1423	5th St	market rate	32	Approved	TA
1/30/2020	19ENT-0042	SRO Mixed Use Project	1415-1423	5th St	LI	14	Approved	TA
1/30/2020	19ENT-0042	SRO Mixed Use Project	1415-1423	5th St	SRO	79	Approved	TA
1/30/2020	19ENT-0042	SRO Mixed Use Project	1415-1423	5th St	ELI	9	Approved	TA
2/13/2020	18ENT-0206	SRO Project with Commercial	701	Colorado Ave	SRO	35	Approved	TA
2/13/2020	18ENT-0206	SRO Project with Commercial	701	Colorado Ave	market rate	14	Approved	TA
2/13/2020	18ENT-0206	SRO Project with Commercial	701	Colorado Ave	LI	6	Approved	TA
2/13/2020	18ENT-0206	SRO Project with Commercial	701	Colorado Ave	ELI	4	Approved	TA
3/23/2020	18ENT-0283	SRO Mixed Use Project with Commercial	1323	5th St	market rate	8	Approved	NV
3/23/2020	18ENT-0283	SRO Mixed Use Project with Commercial	1323	5th St	SRO	35	Approved	NV

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
3/23/2020	18ENT-0283	SRO Mixed Use Project with Commercial	1323	5th St	Moderate	3	Approved	NV
3/23/2020	18ENT-0283	SRO Mixed Use Project with Commercial	1323	5th St	LI	6	Approved	NV
3/23/2020	19ENT-0040	SRO Mixed Use Project with Commercial	1437	6th St	ELI	3	Approved	NV
3/23/2020	19ENT-0040	SRO Mixed Use Project with Commercial	1437	6th St	market rate	35	Approved	NV
3/23/2020	19ENT-0040	SRO Mixed Use Project with Commercial	1437	6th St	SRO	8	Approved	NV
3/23/2020	19ENT-0040	SRO Mixed Use Project with Commercial	1437	6th St	LI	6	Approved	NV
4/4/2020	20ENT-0020	100% Affordable Housing	1819	Pico Blvd	LI	47	Approved	NC
4/4/2020	20ENT-0020	100% Affordable Housing	1819	Pico Blvd	market rate	1	Approved	NC
4/14/2020	18ENT-0212	100% Affordable Housing	1514	7th St	VLI	10	Approved	TA
4/14/2020	18ENT-0212	100% Affordable Housing	1514	7th St	Moderate	16	Approved	TA
4/14/2020	18ENT-0212	100% Affordable Housing	1514	7th St	LI	14	Approved	TA
4/14/2020	18ENT-0212	100% Affordable Housing	1514	7th St	ELI	10	Approved	TA
4/14/2020	18ENT-0200	100% Affordable Housing	1238	7th St	Moderate	13	Approved	NV
4/14/2020	18ENT-0200	100% Affordable Housing	1238	7th St	LI	10	Approved	NV
4/14/2020	18ENT-0200	100% Affordable Housing	1238	7th St	VLI	7	Approved	NV
4/14/2020	18ENT-0200	100% Affordable Housing	1238	7th St	ELI	7	Approved	NV
4/15/2020	20BLD-1044	New Duplex	2409	28th St	market rate	2	Approved	R2
4/22/2020	18ENT-0229	Mixed Use (Performance Bicycles)	501	Broadway	market rate	75	Approved	TA
4/22/2020	18ENT-0229	Mixed Use (Performance Bicycles)	501	Broadway	VLI	19	Approved	TA
4/30/2020	19ENT-0085	Mixed Use	1448	7th St	Moderate	1	Approved	NV
4/30/2020	19ENT-0085	Mixed Use	1448	7th St	LI	1	Approved	NV
4/30/2020	19ENT-0085	Mixed Use	1448	7th St	market rate	6	Approved	NV
5/20/2020	20ENT-0063	3-Unit Condos	2425	20th St	market rate	3	Approved	R2

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
5/30/2020	20ENT-0045	5-Unit Condos	1949	17th St	LI	1	Approved	R2
5/30/2020	20ENT-0045	5-Unit Condos	1949	17th St	market rate	4	Approved	R2
6/15/2020	20ARB-0138	duplex	2714	Highland	market rate	2	Approved	OP2
6/17/2020	20ENT-0073	3-Unit Condos	817	16th St	market rate	3	Approved	R2
7/20/2020	20ENT-0019	3-Unit Condos adjacent to Landmark	2501	2nd St	market rate	3	Approved	OP2
8/24/2020	20ENT-0079	100% Affordable Housing	1413	Michigan Ave	VLI	57	Approved	NC
8/24/2020	20ENT-0079	100% Affordable Housing	1413	Michigan Ave	market rate	1	Approved	NC
9/13/2020	11DEV-003	Miramar Hotel Project DA	1133	Ocean Ave	market rate	60	Approved	OT - ELS
10/21/2020	20ENT-0164	Condos	1510	Franklin St	market rate	3	Approved	R2
11/16/2020	20ENT-0011	Mixed Use	1512	Euclid St	market rate	8	Approved	MUBL
11/16/2020	20ENT-0011	Mixed Use	1512	Euclid St	LI	2	Approved	MUBL
12/9/2020	20ENT-0163	Mixed Use	1427-31	Lincoln Blvd	market rate	24	Approved	LT
12/9/2020	20ENT-0163	Mixed Use	1427-31	Lincoln Blvd	VLI	1	Approved	LT
12/9/2020	20ENT-0163	Mixed Use	1427-31	Lincoln Blvd	LI	1	Approved	LT
12/9/2020	20ENT-0163	Mixed Use	1427-31	Lincoln Blvd	Moderate	3	Approved	LT
12/9/2020	20ENT-0163	Mixed Use	1427-31	Lincoln Blvd	ELI	1	Approved	LT
12/14/2020	20ENT-0280	2-Unit Condos	1514	Princeton	market rate	2	Approved	R2
12/14/2020	18ENT-0243	remodel to 5 of 6 live/work condo	1643	12th St	market rate	0	Approved	IC
12/22/2020	20ARB-0213	Triplex addition to SFR	1902	Euclid St	market rate	3	Approved	R2
1/19/2021	20ENT-0238	100% affordable housing for Miramar	1127-1129	2nd St	VLI	21	Approved	WT
1/19/2021	20ENT-0238	100% affordable housing for Miramar	1127-1129	2nd St	ELI	6	Approved	WT
1/19/2021	20ENT-0238	100% affordable housing for Miramar	1127-1129	2nd St	LI	15	Approved	WT
1/20/2021	19ENT-0235	3-Unit Condos on Landmark property	1527	17th St	market rate	3	Approved	R2

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
2/23/2021	20ENT-0293	6 unit condos	1319	Centinela Ave	market rate	6	Approved	R2
6/16/2021	20ENT-0241	Mixed Use (Von's)	710	Broadway	market rate	206	Approved	TA
6/16/2021	20ENT-0241	Mixed Use (Von's)	710	Broadway	ELI	17	Approved	TA
6/16/2021	20ENT-0241	Mixed Use (Von's)	710	Broadway	VLI	17	Approved	TA
6/16/2021	20ENT-0241	Mixed Use (Von's)	710	Broadway	LI	26	Approved	TA
6/16/2021	20ENT-0241	Mixed Use (Von's)	710	Broadway	Moderate	29	Approved	TA
2/28/2013	13DEV004	Hotel/Mixed Use DA (Ocean Avenue Project)	101-129	Santa Monica Blvd	market rate	82	Pending	OT - ELS
2/28/2013	13DEV004	Hotel/Mixed Use DA (Ocean Avenue Project)	101-129	Santa Monica Blvd	VLI	18	Pending	OT - ELS
2/11/2021	21ENT-0035	Mixed-Use	1101	Wilshire Blvd	VLI	11	Pending	MUB
2/11/2021	21ENT-0035	Mixed-Use	1101	Wilshire Blvd	market rate	82	Pending	MUB
1/8/2013	13DEV001	Mixed Use	1431	Colorado Ave	market rate	42	Pending	MUBL
1/8/2013	13DEV001	Mixed Use	1431	Colorado Ave	LI	8	Pending	MUBL
5/22/2018	18ENT-0136	Mixed Use	1437	7th St	VLI	13	Pending	NV
5/22/2018	18ENT-0136	Mixed Use	1437	7th St	market rate	52	Pending	NV
4/13/2021	21ENT-0091	Mixed Use	1524	7th St	affordable housing**	20	Pending	TA
4/13/2021	21ENT-0091	Mixed Use	1524	7th St	market rate	80	Pending	TA
8/6/2020	20ENT-0196	Apartments	1546	9th St	market rate	9	Pending	R3
8/4/2016	16ENT-0112	3-Unit Condos	1665	Appian Way	market rate	3	Pending	OF
3/31/2020	20BLD-1218	New addition of 2 units	1958	20th St	market rate	2	Pending	R2
4/13/2021	21ENT-0093	Mixed Use	3025	Olympic Blvd	market rate	307	Pending	MUC
4/13/2021	21ENT-0093	Mixed Use	3025	Olympic Blvd	affordable housing**	38	Pending	MUC
11/27/2018	18ENT-0362	Mixed Use	525	Colorado Ave	market rate	30	Pending	TA
11/27/2018	18ENT-0362	Mixed Use	525	Colorado Ave	VLI	10	Pending	TA
1/8/2013	13DEV002	Mixed Use	603	Arizona Ave	market rate	39	Pending	NV
1/8/2013	13DEV002	Mixed Use	603	Arizona Ave	VLI	8	Pending	NV

APPROVAL OR APPLICATION DATE	PROJECT ID	PROJECT DESCRIPTION	ADDRESS	STREET	AFFORDABILITY LEVEL*	UNITS	PROJECT STATUS	ZONING
10/2/2020	20ENT-0234	3-Unit Condos	734	12th St	market rate	3	Pending	NC
9/12/2019	19ENT-0340	Mixed Use Building	825	Santa Monica Blvd	market rate	41	Pending	GC
9/12/2019	19ENT-0340	Mixed Use Building	825	Santa Monica Blvd	VLI	7	Pending	GC
<p>* Affordable units are required to be deed restricted for a term of at least 55 years. **Affordability level to be determined</p>								

Table 2 – Approved and Pending Projects by Age of Building, Improvements Land Ratio (ILR), Existing Use

Consolidated Site	Project ID	Address	AIN	Zoning District	Land Area	Existing Use	Building Age	ILR
A	18ENT-0244		4266001046	MUB	6522	parking lot for Aah's	0	0.000
A	18ENT-0244	3223 WILSHIRE BLVD	4266001045	MUB	13063	one-story Aah's retail store	1955	0.108
AA		1431 LINCOLN BLVD	4282027019	LT	7512	one-story comic book store	1983	0.130
AA	20ENT-0163	1427 LINCOLN BLVD	4282027020	LT	7501	one-story comic book store	1956	0.024
AC	22ENT-0037	1527 LINCOLN BLVD	4282028019	LT	7494	former tile store; vacant retail building	1945	0.310
AC	22ENT-0037	1533 LINCOLN BLVD	4282028018	LT	7510	former tile store; vacant retail building	1952	0.429
AM			4289019022	MUBL	5601	vacant one story bowling alley	0	0.000
AM		216 PICO BLVD	4289019023	MUBL	5613	vacant one story bowling alley	1962	0.057
AM		228 PICO BLVD	4289019021	MUBL	5621	vacant one story bowling alley	0	0.000
AM		248 PICO BLVD	4289019017	MUBL	5590	vacant one story bowling alley	0	0.000
AM		254 PICO BLVD	4289019016	MUBL	5611	vacant one story bowling alley	0	0.000
AM	21ENT-0219	234 PICO BLVD	4289019019	MUBL	28008	vacant one story bowling alley	1959	0.096
AO	19ENT-0041	1342 5TH ST	4291011019	NV	7509	parking lot	0	0.000
AO	19ENT-0041	1342 5TH ST	4291011020	NV	7485	parking lot	0	0.000
AR	19ENT-0039	1445 5TH ST	4291019016	TA	7498	vacant one-story multitenant retail building	1946	0.016
AR	19ENT-0039	1445 5TH ST	4291019017	TA	7511	parking lot next to vacant retail	0	0.002
AT		(blank)	4291021009	LT	3751	parking lot	0	0.000
AT		1438 LINCOLN BLVD	4291021008	LT	3752	parking lot	0	0.000
AT		1444 LINCOLN BLVD	4291021010	LT	7491	parking lot	0	0.000
AT	15ENT-0266	1430 LINCOLN BLVD	4291021006	LT	7507	parking lot	0	0.000
AT	15ENT-0266	1432 LINCOLN BLVD	4291021007	LT	7492	parking lot	0	0.000
AU		1500 LINCOLN BLVD	4291022003	LT	7500	one-story Von's with parking lot	0	0.003
AU		1500 LINCOLN BLVD	4291022025	LT	22450	one-story Von's with parking lot	0	0.003
AU		1518 LINCOLN BLVD	4291022004	LT	7500	one-story Von's with parking lot	0	0.003
AU		1526 LINCOLN BLVD	4291022005	LT	7500	one-story Von's with parking lot	0	0.003
AU		1534 LINCOLN BLVD	4291022006	LT	7500	one-story Von's with parking lot	0	0.003
AU	20ENT-0241	710 BROADWAY	4291022026	TA	52450	one-story Von's with parking lot	1995	0.179
AX	22ENT-0011	1553 4TH ST	4291025028	TA	7474	Vacant bank site across DT station	0	0.001
AX	22ENT-0011	1555 4TH ST	4291025012	TA	7497	Vacant bank site across DT station	1973	0.013
AY	20ENT-0238	1127 2ND ST	4292021010	WT	7517	parking lot	0	0.003

<u>Consolidated Site</u>	<u>Project ID</u>	<u>Address</u>	<u>AJN</u>	<u>Zoning District</u>	<u>Land Area</u>	<u>Existing Use</u>	<u>Building Age</u>	<u>JLR</u>
AY	20ENT-0238	1129 2ND ST	4292021009	WT	7490	parking lot	0	0.003
BG	22ENT-0006	1152 21ST ST	4276007021	MUB	3491	rear parking lot for NOMA sushi and Veggie grill (2025 wilshire)	0	0.019
BG	22ENT-0006	2025 WILSHIRE BLVD	4276007027	MUB	14987	one story Veggie grill	1969	0.096
BL		1115 WILSHIRE BLVD REAR	4281020029	MUB	13949	rear parking lot	1927	0.181
BL	21ENT-0035	1101 WILSHIRE BLVD	4281020012	MUB	8559	one-story JP bar	1922	0.191
BN		1819 SANTA MONICA BLVD	4276029011	GC	14986	Honda auto inventory lot	0	0.000
BN	21ENT-0227	1350 19TH ST	4276029010	GC	7495	Honda auto inventory lot	0	0.001
BN	21ENT-0229	1342 19TH ST	4276029009	R2	8991	Honda auto inventory lot	0	0.001
BO		2911 SANTA MONICA BLVD	4267011022	MUBL	6501	one story retail building	1926	0.200
BO	16ADM-0050	1347 YALE ST	4267011021	MUBL	3266	one-story retail building	1926	0.248
BO	16ADM-0050	1349 YALE ST	4267011020	MUBL	9368	one story multitenant retail building, two story apartment building w parking lot	1923	0.111
BP		1543 LINCOLN BLVD	4282028010	LT	7497	one story vacant auto repair	1947	0.128
BP		1547 LINCOLN BLVD	4282028009	LT	7499	one story vacant auto repair	1999	0.435
BP	22ENT-0037	1537 LINCOLN BLVD	4282028011	LT	7496	one story vacant auto repair	1945	0.245
BS	15ENT-0310	2002 21ST ST	4274026001	R2	7533	one-story apartments	0	0.101
BS	15ENT-0310	2008 21ST ST	4274026003	R2	7130	one-story apartments	0	0.107
BT	19ENT-0328	1840 14TH ST	4283030018	NC	7524	100% affordable housing under construction	1962	0.258
BT	19ENT-0328	1844 14TH ST	4283030017	NC	7485	100% affordable housing under construction	1922	0.496
BT	19ENT-0328	1848 14TH ST	4283030016	NC	7525	100% affordable housing under construction	1968	0.003
BU	19ENT-0042	1415 5TH ST	4291019021	TA	7494	two story multitenant retail building	1980	0.000
BU	19ENT-0042	1423 5TH ST	4291019020	TA	7525	two story multitenant retail building	1966	0.000
BV	18ENT-0210	1543 7TH ST	4291022014	TA	7500	parking lot	1990	1.725
BV	18ENT-0210	1547 7TH ST	4291022013	TA	7500	parking lot	0	0.000
BW		1547 6TH ST	4291023011	TA	7505	one-story multi-tenant building, restaurant, office	1986	0.000
BW	18ENT-0199	609 COLORADO AVE	4291023010	TA	14982	one-story multi-tenant building, restaurant, office	1984	0.167
BX	16ENT-0115	601 WILSHIRE BLVD	4292005029	WT	10010	vacant one and two story buildings	1977	0.071
BX	16ENT-0115	611 WILSHIRE BLVD	4292005026	WT	4997	vacant one and two story buildings	1922	0.143
BY	11DEV014	1650 LINCOLN BLVD	4290002008	LT	16220	one-story retail, boxing fitness building	1954	0.000
BY	11DEV014	1660 LINCOLN BLVD	4290002006	LT	7570	one-story retail, boxing fitness building	1954	0.000
BZ	16ENT-0098	1437 LINCOLN BLVD	4282027018	LT	7485	one-story retail building	1949	0.000
BZ	16ENT-0098	1443 LINCOLN BLVD	4282027028	LT	7510	one-story retail	1959	0.000

<u>Consolidated Site</u>	<u>Project ID</u>	<u>Address</u>	<u>AIN</u>	<u>Zoning District</u>	<u>Land Area</u>	<u>Existing Use</u>	<u>Building Age</u>	<u>JLR</u>
C	22ENT-0007	2501 WILSHIRE BLVD	4276001026	MUB	14319	one-story commercial building with multiple retailers; corner parcel; with rear residential parking lot	1951	0.138
C	22ENT-0007	2515 WILSHIRE BLVD	4276001025	MUB	6164	one-story multi-tenant commercial building	1941	0.486
C	22ENT-0007	2525 WILSHIRE BLVD	4276001027	MUB	10347	one-story commercial building, Starbucks, Urgent Care, Postal Store; common ownership; corner parcel with rear residential parking	1970	0.435
CA	16ENT-0143	1313 6TH ST	4291009021	NV	15010	parking lot	0	0.000
CA	18ENT-0283	1323 5TH ST	4291010029	NV	7512	parking lot	0	0.000
CH	22ENT-0014	1902 WILSHIRE BLVD	4276013020	MUB	4989	one story retail/restaurant building (Thai dishes, salon, medical office)	1939	0.328
CH	22ENT-0014	1908 WILSHIRE BLVD	4276013030	MUB	24993	one-story retail/restaurant building (Thai dishes, salon, medical office)	1925	0.201
CI	21ENT-0228	1921 WILSHIRE BLVD	4276008014	MUB	15015	one-story retail building (GAP)	1975	0.406
CI	21ENT-0228	1933 WILSHIRE BLVD	4276008015	MUB	10520	one-story retail building (GAP)	1958	0.333
E	20ENT-0311	2906 SANTA MONICA BLVD	4267018026	MUBL	21314	vacant two story office	1969	0.792
E	20ENT-0311	2918 SANTA MONICA BLVD	4267018003	MUBL	7021	vacant parking lot	1965	0.117
P	21ENT-0226	1347 18TH ST	4276029026	GC	7512	Honda dealership with surface inventory	1969	0.001
P	21ENT-0226	1801 SANTA MONICA BLVD	4276029048	GC	14984	Honda dealership with surface inventory	1953	0.018
S		825 SANTA MONICA BLVD	4282010012	GC	7505	Toyota dealership	0	0.000
S	21ENT-0261	825 SANTA MONICA BLVD	4282010013	GC	7491	Toyota dealership	1951	0.010
S	21ENT-0261	825 SANTA MONICA BLVD	4282010014	GC	7502	Toyota dealership	1951	0.002
	05TM-009	1211 12TH ST	4282005053	R3	15008	one story apartment buildings	0	0.000
	09FIM003	1434 14TH ST	4282022027	R3	7500	(blank)	1925	0.221
	10FIM002	1021 GRANT ST	4284015017	R2	6491	(blank)	1928	0.421
	11DEV-003	1133 OCEAN AVE	4292028001	OT	190963	Miramar Hotel	1938	0.532
	13DEV001	1431 COLORADO AVE	4282034009	MUBL	22485	one-story marble store	1923	0.009
	13DEV004	129 SANTA MONICA BLVD	4291014024	BC	30000	parking lot	1871	0.019
	15ARB-0038	610 CALIFORNIA AVE	4292005022	R2	5002	(blank)	1912	0.209
	15ENT-0297		4289025005	OF	23222	vacant parking lot next to Casa del mar hotel	0	0.000
	15ENT-0300		4290020045	OF	45314	parking lot	0	0.002
	16ENT-0011	1840 17TH ST	4283032008	R2	7490	(blank)	1955	0.250
	16ENT-0041	1121 22ND ST	4276005022	R2	6114	(blank)	1924	0.029
	16ENT-0060	(blank)	4275006026	HMU	6242	parking lot owned by Saint John's	0	0.003
	16ENT-0102	1318 LINCOLN BLVD	4291008025	LT	15003	parking lot	0	0.000

<u>Consolidated Site</u>	<u>Project ID</u>	<u>Address</u>	<u>AJN</u>	<u>Zoning District</u>	<u>Land Area</u>	<u>Existing Use</u>	<u>Building Age</u>	<u>ILR</u>
	16ENT-0112	1665 APPIAN WAY	4290018018	R3	4430	residential	1914	0.375
	16ENT-0118	(blank)	4268010017	MUC	64297	one-story light industrial/creative office	0	0.002
	16ENT-0205	2102 5TH ST	4289010006	OP2	5661	(blank)	1911	0.024
	17ARB-0043	1754 10TH ST	4283018002	R2	7511	(blank)	1922	0.250
	17ENT-0027	1649 CENTINELA AVE	4268006016	R2	6313	single family dwelling	1948	0.250
	17ENT-0048	436 PIER AVE	4287027065	OP2	7480	(blank)	1911	0.250
	17ENT-0105	1900 20TH ST	4274019056	R2	7575	single family dwelling	0	0.000
	17ENT-0286		4287003017	OP2	7973	(blank)	0	0.000
	17ENT-0297	1707 CLOVERFIELD BLVD	4268014013	BTV	76562	parking lot of Extra Space sotrage	1955	0.658
	18ARB-0221	1342 BERKELEY ST	4267012009	R2	7858	Vacant lot	0	0.000
	18ENT-0077	1443 18TH ST	4275010016	MUBL	7500	Vacant lot	1957	0.004
	18ENT-0129	711 COLORADO AVE	4291022012	TA	7500	construction staging site	0	0.000
	18ENT-0136	1437 7TH ST	4291021029	NV	14991	three story office building	1983	1.223
	18ENT-0182	1618 STANFORD ST	4268002005	MUC	20016	one story office building	1950	0.201
	18ENT-0200	1238 7TH ST	4291006006	NV	7500	one-story office	1912	0.001
	18ENT-0206	1557 7TH ST	4291022021	TA	7500	one story brick office building	1959	0.028
	18ENT-0211	1427 5TH ST	4291019019	TA	15007	one-story vacant retail building	1954	0.000
	18ENT-0212	1514 7TH ST	4291023002	TA	7504	construction staging parking site	0	0.000
	18ENT-0229	501 BROADWAY	4291019027	TA	15007	one-story vacant retailer (Black tux)	0	0.000
	18ENT-0362	525 COLORADO AVE	4291024014	TA	7483	one-story creative office	1960	0.000
	19ENT-0039	1437 5TH ST	4291019018	TA	7484	parking lot	0	0.000
	19ENT-0040	1437 6TH ST	4291020016	NV	7497	one story residence	0	0.000
	19ENT-0235	1527 17TH ST	4275012020	R2	7500	single dwelling unit	1923	0.053
	19ENT-0258	949 10TH ST	4281025014	R2	7484	(blank)	1916	0.250
	19ENT-0267	1432 17TH ST	4282019007	R2	7504	(blank)	1959	0.083
	19ENT-0425	918 5TH ST	4292015004	R2	7520	(blank)	1910	0.250
	20ARB-0138	2714 HIGHLAND AVE	4287019012	OP2	4708	(blank)	1912	0.273
	20ARB-0213	1902 EUCLID ST	4283028010	R2	7499	(blank)	1940	0.228
	20BLD-1044	2409 28TH ST	4270004017	R2	9005	(blank)	1937	0.125
	20BLD-1218	1958 20TH ST	4274019001	R2	7609	(blank)	0	0.133
	20ENT-0011	1512 EUCLID ST	4282032003	MUBL	7500	vacant single family home	0	0.250

<u>Consolidated Site</u>	<u>Project ID</u>	<u>Address</u>	<u>AIN</u>	<u>Zoning District</u>	<u>Land Area</u>	<u>Existing Use</u>	<u>Building Age</u>	<u>JLR</u>
	20ENT-0019	2501 2ND ST	4287010011	OP2	6478	(blank)	0	0.077
	20ENT-0020	1819 PICO BLVD	4274017019	NC	13510	parking lot for religious institution	1950	0.383
	20ENT-0045	1949 17TH ST	4274015020	R2	7747	Vacant lot	0	0.000
	20ENT-0063	2425 20TH ST	4273019001	R2	6746	one story single family unit	1928	0.331
	20ENT-0073	817 16TH ST	4281001021	R2	7481	one story single family dwelling	0	0.403
	20ENT-0079	1413 MICHIGAN AVE	4283013024	NC	17992	Vacant lot	1905	0.069
	20ENT-0164	1510 FRANKLIN ST	4267027057	R2	8118	two story single family unit	1924	0.310
	20ENT-0234	734 12TH ST	4280025015	NC	4802	one story single family dwelling	1926	0.250
	20ENT-0280	1514 PRINCETON ST	4267022010	R2	4999	one story single family dwelling	1940	0.250
	20ENT-0293	1319 CENTINELA AVE	4267014026	R2	9274	two story single family unit	1929	0.488
	21ENT-0027	1448 7TH ST	4291020008	NV	7498	two story apartment buildings w parking lot	1952	0.067
	21ENT-0143	1546 9TH ST	4282028007	R3	7503	one story single family unit	1909	0.250
	22ENT-0002	1302 6TH ST	4291010027	NV	18521	two story office	1978	0.129
	22ENT-0012	2537 LINCOLN BLVD	4284008016	GC	19239	closed car wash	1965	0.167
	22ENT-0013	2601 LINCOLN BLVD	4285001030	MUBL	203990	one story Gelsons shopping center; multiple tenants	1956	0.349
	22ENT-0047	1333 7TH ST	4291008018	NV	7510	small site; single dental tenant; long standing owner/tenant	1978	1.333

Attachment 2 – FAR and Size of Sites for Past and Current Housing Projects

HCD states that a parcel smaller than 0.5 acre (21,780 sf) is considered inadequate to accommodate housing affordable to lower income households, unless the housing element demonstrates development of housing affordable to lower income households on these sites is realistic or feasible. The City of Santa Monica is a small, compact city with parcel sizes that range across the City. Parcels in the Bergamot Plan area, Office Campus districts, and Industrial Conservation zones are generally larger (more than 30,000 sf). On the main commercial corridors, sites range between 10,000 sf to 15,000 sf. However, in the Downtown area, parcels are as small as 7,500 sf. As shown in the Table below, past and current multifamily housing projects (including 100% affordable housing projects) on mixed use and commercially zoned sites that are 15,000 sf are common. Generally, only in the Downtown have multi-unit housing projects occurred on sites less than 7,500 sf. As shown in the table, past and current housing projects in ~~these commercial and mixed use~~ zones generally propose the maximum FAR or greater (through a development agreement). Therefore, the below development trends for housing projects demonstrate that development of housing affordable to lower income households on smaller commercial and mixed use sites within Santa Monica is typical, realistic, and feasible.

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SF)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
20ENT-0238	100% Affordable Housing	1127-1129	2nd St	WT	14.984	2.75	2.75	100%	5	=	42	42	122
18ENT-0200	100% Affordable Housing	1238	7th St	NV	7.486	3.50	3.50	100%	6	=	37	37	215
18ENT-0212	100% Affordable	1514	7th St	TA	7.493	4.00	4.00	100%	8	=	50	50	291
18ENT-0357	100% Affordable	1445-1453	10th St	MUBL	13.495	2.00	2.00	100%	4	1	39	40	129
18ENT-0105	100% Affordable	1820-1826	14th St	NC	15	1.75	1.75	100%	3	=	39	39	113
19ENT-0328	100% Affordable	1834-1848	14th St	NC	30.06	1.75	1.75	100%	4	1	72	73	106
12AA-002	100% Affordable Housing	520	Colorado Ave	TA	6.26	1.90	2.00	95%	5	=	34	34	237
18ENT-0129	100% Affordable	711	Colorado Ave	TA	7.48	4.00	4.00	100%	7	=	56	56	326
19ENT-0014	100% Affordable	2120	Lincoln Blvd	GC	14.16	2.00	2.00	100%	4	1	36	37	114
07AA-007	100% Affordable	1447	Lincoln Blvd	LI	23	1.8 (1.3 +0.5)	1.80	100%	5	=	97	97	188

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SE)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
15ENT-0306	100% Affordable	1626	Lincoln Blvd	MUB	27.808	1.78	2.75	65%	5	-	64	64	100
20ENT-0020	100% Affordable	1819	Pico Blvd	NC	21.524	1.99	2.00	100%	4	1	47	48	97
09AA-007	100% Affordable	2802	Pico Blvd	NC	16.2	1.50	1.5 (NC) + 3 units (R2)	100%	4	0	33	33	89
22ENT-0001	100% Affordable	1211-1215	19th St	MUB	7.5	2.81	2.25	125%	6	-	34	34	197
22ENT-003	100% Affordable	1333	7th St	NV	7.5	5.06	4	127%	8	-	38	38	221
21ENT-0269	100% Affordable	1634	20th	IC	19.8	3.95	2.25	176%	7	-	78	78	172
12DEV001	Market Rate	1318-1324	2nd St	BC	15	3.10	1.77 / 2.0	155%	4	45	10	55	160
17ENT-0275	Market Rate	1235	5th St	NV	7.35	3.50	3.50	100%	5	18	5	23	136
18ENT-0283	Market Rate	1323	5th St	NV	7.496	3.50	3.50	100%	6	43	9	52	302
19ENT-0041	Market Rate	1338-1342	5th St	NV	14.985	3.50	3.50	100%	6	100	20	120	349
19ENT-0042	Market Rate	1415-1423	5th St	TA	14.961	4.00	4.00	100%	8	111	23	134	390
18ENT-0211	Market Rate	1425-1427	5th St	TA	15	4.00	4.00	100%	8	92	-	92	267
19ENT-0039	Market Rate	1437	5th St	TA	7.489	4.00	4.00	100%	8	52	11	63	366
16ENT-0143	Market Rate	1313-1325	6th St	NV	15	3.10	3.50	89%	6	64	-	64	186
19ENT-0040	Market Rate	1437	6th St	NV	7.5	3.50	3.50	100%	6	43	9	52	302
18ENT-0200		1238	7th St	NV	7.486	3.50	3.50	100%	6			37	215
11DEV008	Market Rate	1317	7th St	NV	15	3.57	1.6 / 2.0 (3.75 DA)	179%	5	51	6	57	166
05AA-015	Market Rate	1427	7th St	NV	15	1.87	2.00	94%	5	43	5	48	139
18ENT-0136	Market Rate	1437	7th St	NV	14.991	NA	2.0	-	6	52	13	65	189

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SE)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
19ENT-0085 21ENT-0027	Market Rate	1448	7th St	NV	7.5	3.50	3.50	100%	5	15	5	820	46116
18ENT-0212		1514	7th St	TA	7.493	4.00	4.00	100%	8			50	291
18ENT-0210	Market Rate	1543-1547	7th St	TA	14.962	4.00	4.00	100%	8	75	25	100	291
18ENT-0206	Market Rate	701	Colorado Ave	TA	7.481	4.00	4.00	100%	8	49	10	59	344
18ENT-0357		1445-1453	10th St	MUBL	13.495	2.00	2.00	100%	4			40	129
18ENT-0105		1820-1826	14th St	NC	15	1.75	1.75	100%	3			39	113
19ENT-0328		1834-1848	14th St	NC	30.06	1.75	1.75	100%	4			73	106
14AA-001	Market Rate	1347	19th St	GC (C4)	7.5	1.00	0.80	125%	2	3	-	3	17
11DEV007	Market Rate	702	Arizona Ave	NV	15	3.00	3.0 (DA)	100%	4	40	5	45	131
13DEV-008	Market Rate	500	Broadway	TA	67.5	4.00	4.00	100%	7	249	-	249	161
18ENT-0229	Market Rate	501	Broadway	TA	14.975	4.00	4.00	100%	8	75	19	94	273
06DR-003	Market Rate	525	Broadway	TA	37.5	1.90	2.00	95%	6	115	10	125	145
20ENT-0241	Market Rate	710	Broadway	TA	108.5	2.75 / 4.0	2.75 / 4.0 (split zone)	100%	8	206	89	295	118
17ENT-0095	Market Rate	2225	Broadway	MUBL	9.7	1.75	1.75	100%	3	13	2	15	67
12AA-002		520	Colorado Ave	TA	6.26	1.90	2.00	95%	5			34	237
18ENT-0362	Market Rate	525	Colorado Ave	TA	7.5	5.4	4.00	137%	8	30	10	40	232
18ENT-0199	Market Rate	601-609	Colorado Ave	TA	22.5	4.00	4.00	100%	8	104	36	140	271
18ENT-0129		711	Colorado Ave	TA	7.48	4.00	4.00	100%	7			56	326
13DEV001	Market Rate	1431	Colorado Ave	TA	22.6	1.99	4.00	50%		42	8	50	96
07DEV-005	Market Rate	2930	Colorado Ave	MUC	148.966	2.20	2.20 (DA)	100%	5	318	38	356	104

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SE)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
17ENT-0096	Market Rate	1450	Cloverfield	MUBL	19.6	1.75	1.75	100%	3	32	3	35	78
17ENT-0297	Market Rate	1707	Cloverfield	BTV	74.065	1.85	2.00	92%	4	58	5	63	37
20ENT-0011	Market Rate	1512	Euclid St	MUBL	7.5	1.45	1.50	97%	3	8	2	10	58
16ENT-0102	Market Rate	1318	Lincoln Blvd	MUB	14.982	2.25	2.75	82%	5	39	4	43	125
20ENT-0163	Market Rate	1427-31	Lincoln Blvd	LT	15	2.25	2.25	100%	5	24	6	30	87
15ENT-0266	Market Rate	1430-1444	Lincoln Blvd	MUB	30	2.75	2.75	100%	5	100	-	100	145
16ENT-0098	Market Rate	1437-1443	Lincoln Blvd	MUB	15.044	2.25	2.75	82%	5	34	6	40	116
07AA-007		1447	Lincoln Blvd	LT	23	1.8 (1.3 +0.5)	1.80	100%	5			97	188
12DEV017	Market Rate	1560	Lincoln Blvd	MUB	37.5	2.73	2.75 (DA)	100%	5	80	20	100	116
12DEV011	Market Rate	1601	Lincoln Blvd	MUB	33.154	2.34	2.25 (DA)	104%	5	71	19	90	118
16ENT-0036	Market Rate	1613-1637	Lincoln Blvd	MUB	69.096	2.25	2.25	100%	5	176	15	191	120
15ENT-0306		1626	Lincoln Blvd	MUB	27.808	1.78	2.75	65%	5			64	100
16ENT-0058	Market Rate	1641-1645	Lincoln Blvd	MUB	20.905	2.25	2.25	100%	5	61	5	66	138
11DEV014	Market Rate	1650-1660	Lincoln Blvd	MUB	31.065	2.25	2.25 (DA)	100%	5	90	8	98	137
19ENT-0014		2120	Lincoln Blvd	GC	14.16	2.00	2.00	100%	4			37	114
16ENT-0035	Market Rate	2903-2931	Lincoln Blvd	GC	32.277	1.84	2.00	92%	4	43	4	47	63
20ENT-0079	Market Rate	1413	Michigan Ave	NC	18	2.06 (w/SDB)	1.75	118%	4	1	57	58	140
16ENT-0118	Market Rate	3030	Nebraska Ave	MUC	74.185	1.42	1.50	95%	4	174	9	183	107
15ENT-0300	Market Rate	1828	Ocean Ave	OE	45.12	1.81	2.0	91%	4	67	16	83	80

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SQ)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
15ENT-0297	Market Rate	1921	Ocean Front Walk	OE	23.258	1.7	2.0	83%	4	22	=	22	41
18ENT-0005	Market Rate	216-234	Pico Blvd	MUBL	55.689	1.75	1.75	100%	3	93	12	105	82
20ENT-0020		1819	Pico Blvd	NC	21.524	1.99	2.00	100%	4			48	97
09AA-007		2802	Pico Blvd	NC	16.2	1.50	1.5 (NC)+3 units (R2)	100%	-			33	89
08AA-002	Market Rate	519	Santa Monica Blvd	NV	14.9	1.90	2.00	95%	5	36	4	40	12 116
19ENT-0340	Market Rate	825	Santa Monica Blvd	GC	15 22.5	1.50	2.00 1.50	75 125%	3	52	4	48 56	139 108
18ENT-0038	Market Rate	2822	Santa Monica Blvd	MUBL	28.487	1.75	1.75	100%	3	46	4	50	76
16ADM-0050	Market Rate	2901-2907	Santa Monica Blvd	MUBL	19.122	1.50	1.50	100%	3	44	7	51	116
17ENT-0298	Market Rate	2906-2918	Santa Monica Blvd	MUBL	28.309	1.68	1.75	96%	3	42	4	46	71
15ENT-0313	Market Rate	3008	Santa Monica Blvd	MUBL	14.307	1.74	1.75	100%	3	22	4	26	79
18ENT-0182	Market Rate	1618	Stanford	MUC	19.969	1.70	1.70	100%	5	43	4	47	103
16ENT-0115	Market Rate	601-611	Wilshire Blvd	MUB	14.952	2.25	2.25	100%	4	37	3	40	117
06DR-020	Market Rate	2300	Wilshire Blvd	C6	40.6	1.48	1.50	99%	3	30	=	30	32
19ENT-0028	Market Rate	2729	Wilshire Blvd	MUB	7.5	1.25	1.25	100%	2	8	1	9	52
18ENT-0244	Market Rate	3223	Wilshire Blvd	MUB	19.5	2.25	2.25	100%	4	49	4	53	118
21ENT-0035	Market Rate	1101	Wilshire Blvd	MUB	22.489	3.03 (SDB)	2.25	135%	6	82	11	93	180
22ENT-0011	Market Rate	1553-1555	4th St	TA	14.997	2.87	2.25	128%	5	54	6	60	174
22ENT-002	Market Rate	1302	6th St	NV	18.4	3.50	3.5	100%	6	73	7	80	189
21ENT-0091	Market Rate	1524	7th St	TA	15	4.00	2.25	178%	8	80	20	100	290

PROJECT ID	PROJECT TYPE	ADDRESS	STREET	ZONING	SITE SIZE (SE)	FAR	FAR (ALLOWABLE)	% OF MAXIMUM FAR	STORIES	MARKET RATE UNITS	AFFORDABLE UNITS	TOTAL UNITS	UNITS/ACRE BUILT/PROPOSED
21ENT-0217	Market Rate	528	Arizona Ave	NV	18.5	3.50	3.50	100%	6	73	7	80	188
22ENT-0037	Market Rate	1527-1547	Lincoln Blvd	LT	37.455	2.25	2.25	100%	5	106	8	114	133
22ENT-0012	Market Rate	2537	Lincoln Blvd	GC	19.2	2.25	1.50	150%	4	44	5	49	111
22ENT-0013	Market Rate	2601-2645	Lincoln Blvd	MUBL	203.25	2.25	1.50	150%	5	468	53	521	112
21ENT-0226	Market Rate	1801	Santa Monica Blvd	GC	22.49	1.50	1.50	100%	3	41	=	41	79
21ENT-0227	Market Rate	1819	Santa Monica Blvd	GC	22.5	1.50	1.50	100%	3	41	=	41	79
22ENT-0005	Market Rate	1902	Wilshire Blvd	MUB	22.5	2.25	2.25	100%	5	71	=	71	137
21ENT-0228	Market Rate	1931	Wilshire Blvd	MUB	25.5	2.25	2.25	100%	5	60	=	60	102
22ENT-0006	Market Rate	2025	Wilshire Blvd	MUB	18.5	2.25	2.25	100%	4	46	=	46	108
22ENT-0007	Market Rate	2501	Wilshire Blvd	MUB	30.8	2.25	2.25	100%	4	78	=	78	110

Attachment 3 – Environmental and Infrastructure Constraints

Government Code Section 65583.2(b)(4) requires a general description of any environmental constraints to the development of housing within the jurisdiction, the documentation for which has been made available to the jurisdiction. This information need not be identified on a site-specific basis. Below is a summary of the analysis of potential environmental and infrastructure constraints:

1. Environmental Constraints

a. Fire

The City is highly urbanized and does not include any areas designated as a High or Very High Fire Hazard Severity Zone (FHSZ). The nearest wildfire zones are to the north of the City associated with the Santa Monica Mountains and as such, wildfire risk is very limited within City boundaries. The primary fire hazard risks are man-made and are most likely to occur in commercial and industrial areas where industrial chemicals are used, stored, or transported. These potential fire risks, however, are mitigated by stringent enforcement of State and Federal regulations related to hazardous materials storage and transport. Fire risks are not considered constraints to housing development since there are existing regulations and plans in place to address such risk.

b. Flooding

FEMA recently updated the City's flood maps to account for flooding due to climate change and rising ocean levels. Based on the new maps, 85 beach front properties along Pacific Coast Highway in the City are now within a FEMA defined Special Flood Hazard Area (SFHA), which is an area subject to a one percent or greater chance of flooding in any given year. To ensure compliance with FEMA, the City amended Santa Monica Municipal Code Chapter 7.68 (Floodplain Management Regulations) on March 3, 2021. The amended regulations require new construction in the special flood zones to obtain a floodplain development permit and implement safety requirements addressing flood risks. Inundation by tsunami can also affect the low-lying beach front properties of the City. In the event of a tsunami, the City has designated tsunami evacuation routes and has also adopted a Multi Hazard Functional Emergency Plan to reduce risk and prevent loss from large scale emergencies, including tsunamis. Location in a flood zone or tsunami zone are not considered constraints to housing development since there are existing regulations and plans in place to address such risk.

c. Fault Rupture and Seismic Hazards

The City of Santa Monica is located in a seismically active area. The closest known fault in the City is the Santa Monica Fault, which is comprised of various segments with several strands that cross through the northeastern portion of the City. The Santa Monica Fault zone was designated in 2018 as an active fault by the California Geological Survey (CGS). A number of SSI sites identified on the eastern end of Wilshire Boulevard and Santa Monica Boulevard are located within this fault zone. The State does not prohibit housing in an active fault zone, but instead

requires that structures built for human occupancy be assessed for potential fault rupture risks. Consistent with State requirements, the City's Building and Safety Division requires the submittal of a Fault Rupture Study to assess potential fault rupture risks and implement measures as necessary to mitigate such risks.

Additionally, the design and construction of new buildings are required to be engineered to withstand the seismic ground acceleration that may occur during an earthquake, pursuant to the Santa Monica Building Code which incorporates applicable provisions of the California Building Code (CBC). The City also requires new buildings to submit a Design-Level Geotechnical Report prior to building permit issuance in accordance with the requirements of the City's Guidelines for Geotechnical Reports. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize seismic hazards. Fault rupture risks and seismic hazards are not considered constraints to housing development since there are existing regulations and plans in place to address such risks.

d. Liquefaction

Liquefaction occurs when ground shaking transforms granular material from a solid state to a liquefied state due to earthquake. These soils may acquire a high degree of mobility and lead to structurally damaging deformations. Liquefaction begins below the water table, but after liquefaction has developed, the groundwater table will rise and cause the overlying soil to mobilize. Liquefaction typically occurs in areas where the groundwater is less than 30 feet from the surface and where the soils are composed of poorly consolidated fine to medium sand. The CGS Seismic Hazard Zone Map that covers the City of Santa Monica identifies the beach front areas and a small eastern portion of the City between Olympic Boulevard and Pearl Street as having liquefaction risk. However, according to the City's Safety Element Geologic Hazards map, the City has varying potential for liquefaction:

- Along the beach
- From the beach, inland to the southwest corner of the city to Marine Park following the lowlands along Lincoln Boulevard
- In the northern industrial corridor

Liquefaction risks are addressed through the City's building permit process. The design and construction of new buildings are required to be engineered to address potential liquefaction risks, pursuant to the Santa Monica Building Code which incorporates applicable provisions of the California Building Code (CBC). Additionally, the City requires developers of new buildings to submit a Design-Level Geotechnical Report in accordance with the requirements of the City's Guidelines for Geotechnical Reports. The Geotechnical Report is required to include a site-specific soils investigation to determine liquefaction potential on the site. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design prior to building permit issuance to minimize liquefaction risks. As such, liquefaction is not considered to be a constraint to housing development since there are existing regulations and plans in place to address this environmental concern.

e. Landslides

The main areas of landslide concern within the City are confined to the areas along Highway 1/Pacific Coast Highway (Hwy 1) below the Palisades bluffs, at the southwestern edge of the City. The City has implemented a number of projects in the past decade to reduce landslide risks and soil instability at the bluffs including the California Incline Bridge Replacement Project and the Santa Monica Palisades Bluff Stabilization Project. The geotechnical reports for these two projects were submitted to the California Coastal Commission, Caltrans, and the City of Santa Monica and each agency concluded that the planned construction improvements on the bluff would be safe and not cause or contribute to erosion or degradation of geologic stability. In addition, several slope stabilization and dewatering measures have been implemented by the City which has decreased rate of erosion and improved the stability of the bluffs. As a result of these measures, landslide risks below the bluffs are considered low.

The properties in the northern portion of the City (near the Santa Monica Mountains) and in the Bryn Mawr Avenue residential area near Marine Park are characterized by steeper slopes. The design and construction of new buildings are required to be engineered to minimize landslide risks and soil instability, pursuant to the Santa Monica Building Code which incorporates the applicable provisions of the California Building Code (CBC). The City also requires new buildings to submit a Design-Level Geotechnical Report prior to building permit issuance in accordance with the requirements of the City's Guidelines for Geotechnical Reports. All recommendations and design features in the Design-Level Geotechnical Report must be incorporated into the building design to minimize landslide and soil collapse hazards. Landslide risks are not considered to be constraints to housing development since there are existing regulations and plans in place to address such concerns.

f. Former Claypit/Landfill Areas

Beginning in the early 1900s, clay mining operations took place in the east central portion of the City (near the City Yards and the Bergamot Plan area). After clay quarries were depleted, some clay pit areas were used as municipal landfills by the City from the mid-1940s until December 1970. After the landfills closed, structures were built over the landfills and remediation efforts have taken place including the installation of methane probes at the City Yards. Future housing projects occurring in these former claypit/landfill areas would require detailed Phase I environmental Site Assessments and subsurface investigations (Phase II) as necessary to address human health hazards. Any clean up recommendations and remediation measures in Phase I and Phase II site assessments are required to be implemented under the oversight of the appropriate clean up agency (Department of Toxic Substances Control, State Water Resources Control Board, Santa Monica Fire Department, etc.). The former claypit/landfill areas are not considered to be constraints to housing development since there are existing regulations and plans in place to address such concerns on a case-by-case basis.

g. Santa Monica Airport

The Santa Monica Municipal Airport, located in the southeastern area of the City, covers approximately 215 acres of land generally bounded by Bundy Drive to the east, Santa Monica Business Park and Ocean Park Boulevard to the north, 23rd Street to the west, and Dewey Street

in the City of Los Angeles to the south. The Santa Monica Municipal Airport is a general aviation airport that primarily caters to personal aircraft and flight schools and contains a number of non-aviation uses primarily located in the area south of the runways, including the Santa Monica College Bundy Campus. This airport is currently subject to a settlement agreement with the FAA and Consent Decree that require the City to maintain airport operations through December 31, 2028, and to also Santa Monica Measure LC, which governs use of the entire airport site should the City elect to close its airport at any time after December 31, 2028, as authorized by the Consent Decree.

The Los Angeles County Airport Land Use Commission (ALUC) is responsible for airport land use compatibility planning for Los Angeles County. Local actions, including rezoning and new housing projects located within an Airport Influence Areas (AIA) must be submitted to the ALUC for review. None of the sites identified in the SSI are located in Santa Monica's AIA. The other potential environmental issue associated with the airport relates to operational noise. In general, residential uses should be sited outside of an airport's 65 dBA CNEL (decibels, Community Noise Equivalent Level) noise contour. None of the sites identified in the SSI are located within the Santa Monica Airport's 60, 65, and 70 CNEL noise contours. Therefore, the presence of the Santa Monica Airport is not considered to be a constraint to housing development.

h. Biological Resources

The City is mostly urbanized, with few areas of native wildlife habitat occurring within the City limits. The nearest wildlife habitat occurs along the coast at Santa Monica State Beach. Substantial forested open space occurs in the Santa Monica Mountains, located approximately 3.5 miles to the north. The majority of the City of Santa Monica has been developed, paved, or landscaped, and is generally devoid of large expanses of habitat that support sensitive species. No major regional wildlife migration corridors are known to exist within the City limits. No native riparian habitat, blueline streams, wetlands, or sensitive natural communities are located in the City limits. The beach areas of the City do provide foraging and roosting opportunities for several special status species (e.g., least terns, Snowy plovers). The City is not recognized as an existing or proposed Significant Ecological Area (SEA) that links wildlife populations. Biological resources are not considered to be constraints to housing development.

2. Infrastructure Constraints

As an urbanized community with well established residential neighborhoods and commercial districts, Santa Monica has a comprehensive backbone infrastructure which includes existing sewer and water lines, and storm drains. [Based on existing and planned capacity, the City has sufficient infrastructure \(water, sewer, and storm drain\) capacity to accommodate the RHNA at all income levels.](#)

a. Sewer System

The City's sewer system consists of approximately 210 miles of sewer pipes ranging in size from 6 to 36 inches in diameter. Sewer lines are composed of vitrified clay pipes, plastic pipes, or reinforced concrete pipes. Sewer pipes have a flow capacity based on the diameter of the pipe

and the slope of the pipeline. Increased wastewater flows from construction of up to 8,895 units in the next 8 years under the RHNA is projected to result in impacts to existing sewer pipes, incrementally triggering the need for expansion or replacement of individual sewer line segments. The City's Public Works Department anticipates that an increase in the Capital Facilities Fee would be necessary to finance the capital improvements necessary to accommodate the increase in housing. While an increase in sewage capacity will be required to serve future housing development, the City will be increasing the Capital Facilities Fee to implement improvements as necessary to serve future housing development. The City does not budget or pay for improvements that are necessary to support individual private development projects, which includes affordable housing projects. If it is shown that infrastructure capacity will be exceeded by a project, private developers are generally responsible for the cost of upsizing the mains needed to support the demand generated by the project. Housing projects would not be constrained by sewer capacity issues.

b. Water System

The City of Santa Monica Water Resources Division is a retail water agency providing water service throughout the City, including single- and multi-unit residential, commercial, and industrial customers, and landscape and fire protection supply. The City distributes water to approximately 18,000 customer accounts through a 140-mile network of water lines ranging from 4 to 36 inches in diameter. New housing would be required to comply with the City's Water Neutrality Ordinance, which requires an offset of new water demand (50% offset of new water demand for 100% affordable housing projects). Nevertheless, water demand from construction of new housing is expected to increase, which could trigger the need for additional water distribution pumps if there is insufficient water pressure. While an increase in water system capacity will be required to serve future housing development, the City will be increasing the Capital Facilities Fee to implement improvements as necessary to serve future housing development. The City does not budget or pay for improvements that are necessary to support individual private development projects, which includes affordable housing projects. If it is shown that infrastructure capacity will be exceeded by a project, private developers are generally responsible for the cost of upsizing the mains needed to support the demand generated by the project. Housing projects would not be constrained by water system capacity issues.

c. Water Supply

The City water supply consists of local groundwater, imported water from Metropolitan Water District of Southern California (MWD), and urban treated runoff water from the Santa Monica Urban Runoff Recycling Facility (SMURRF). The City's primary sources of water supply include groundwater drawn from the Santa Monica Groundwater Basin (SMGB) and imported water supplies provided by the Metropolitan Water District of Southern California (MWD). The City prepared a 2020 Urban Water Management Plan (UWMP) which is slated for adoption in June 2021. The UWMP indicates that sufficient water supply exists to serve the forecasted planned housing in the Housing Element Update. Therefore, water supply is not considered a constraint to housing development.

d. Storm Drains

The overall drainage pattern of the City of Santa Monica is to the southwest. An underground storm drain system intercepts surface runoff through a series of catch basins, connector pipes and mainlines and carries the majority of the storm water to the Santa Monica Bay portion of the Pacific Ocean. The storm drain system is comprised principally of pipes and channels owned by two separate entities: the City of Santa Monica and the County of Los Angeles. Additionally, a few drainage facilities within the right-of-way of Interstate 10 are under Caltrans jurisdiction.

The storm drain pipes/channels in the city range from 16 inches to 11 feet in diameter. The conduits are mainly constructed of reinforced concrete pipe (RCP) or reinforced concrete (RC). A few of the structures are brick arch drains, or corrugated metal pipes (CMP). Approximately 75 miles of storm drain pipes are within the city. Of the approximately 1,900 catch basins collecting runoff into the storm drain system, about 1,050 are owned and maintained by the County; 70 by the City of Santa Monica, and 100 by Caltrans.

The City has constructed an Urban Runoff Recycling Facility (SMURRF) to treat the dry weather storm drain discharges from excess irrigation, spills, construction sites, pool draining, car washing and other activities that would otherwise drain into the Santa Monica Bay and recycle it for irrigation and dual plumbed building purposes.

All projects on sites over 15,000 sf would be subject to the City's Runoff Conservation and Sustainable Management Ordinance requirements. This would include preparation and implementation of a Runoff Mitigation Plan to minimize polluted runoff in accordance with the City's Ordinance. In addition, the projects would be required to store and use (for non-potable purposes), infiltrate, or evapotranspire project-generated runoff during a 0.75-inch storm event, or alternatively, pay the City an urban runoff-reduction fee. Therefore, storm drains do not pose a constraint to housing development.

Attachment 4 – Letter of Intent from SMMUSD



SANTA MONICA-MALIBU UNIFIED SCHOOL DISTRICT

CAREY UPTON
CHIEF OPERATIONS OFFICER

310-450-8338 x79383
cupton@smmusd.org

June 10, 2021

David Martin
Director of Planning
City of Santa Monica
1685 Main Street
Santa Monica, CA 90401

Subject: SMMUSD Property at 1651 16th Street

Dear David,

Thank you for the opportunity to speak on April 21, 2021 regarding the City of Santa Monica's 6th Cycle Housing Element Update. The Santa Monica-Malibu Unified School District (SMMUSD) understands that the City of Santa Monica has a State-mandated obligation to plan for 8,895 new residential units within the next 8 years from 2021-2029. SMMUSD is aware that housing opportunities in Santa Monica are extremely limited when it comes to the housing needs of our workforce. We are also aware that there are housing needs that exist within Santa Monica above and beyond the needs of SMMUSD's workforce.

The SMMUSD has recently purchased the office building located at 1717 4th Street, adjacent to Santa Monica High School. The District plans to relocate our headquarters to this building from the current office located at 1651 16th Street. This move will provide SMMUSD with the ability to meet our educational goals and improve the administrative operations of the District.

Given the housing needs mentioned above, if the 1651 16th Street site owned by SMMUSD were to be rezoned to permit increased housing development, the SMMUSD would consider exploring housing options on all or a portion of the site. We are committed to ensuring the well-being of the SMMUSD workforce, and with the Housing Element Update, the SMMUSD foresees a potential opportunity to support its workforce.

Thank you,

Carey Upton
Chief Operations Officer, SMMUSD

Attachment 5 – Suitable Sites Inventory Table

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
3223 WILSHIRE BLVD	90403	4266001046	Mixed Use Boulevard	MUB	0.15	parking lot for Aah's
No Address		4268010017	Mixed Use Creative	MUC	1.48	one-story light industrial/creative office
2207 BROADWAY		4275006026	Healthcare Mixed Use	HMU	0.14	parking lot owned by Saint John's
No Address		4287003017	Low Density Housing	OP2	0.18	(blank)
No Address	90405	4289019022	Mixed Use Boulevard Low	MUBL	0.13	vacant bowling alley
No Address	90405	4289025005	Oceanfront	OF	0.53	vacant parking lot next to Casa del mar hotel
No Address		4290020045	Oceanfront	OF	1.04	parking lot
No Address		4291021009	Downtown Core	LT	0.09	parking lot
1021 GRANT ST	90405-1411	4284015017	Low Density Housing	R2	0.15	(blank)
1101 WILSHIRE BLVD	90401-2011	4281020012	Mixed Use Boulevard	MUB	0.2	one-story JP bar
1121 22ND ST	90403-5721	4276005022	Low Density Housing	R2	0.14	(blank)
1127 2ND ST	90403-5003	4292021010	Downtown Core	WT	0.17	parking lot
1129 2ND ST	90403-5003	4292021009	Downtown Core	WT	0.17	parking lot
1133 OCEAN AVE	90403-3503	4292028001	Downtown Core	OT	4.38	Miramar Hotel
1211 12TH ST	90403	4282005053	Medium Density Housing	R3	0.34	(blank)
1238 7TH ST	90401-1606	4291006006	Downtown Core	NV	0.17	one-story office
129 SANTA MONICA BLVD	90401-2201	4291014024	Downtown Core	BC	0.69	parking lot
1313 6TH ST	90401-1603	4291009021	Downtown Core	NV	0.34	parking lot
1318 LINCOLN BLVD	90401-1706	4291008025	Downtown Core	LT	0.34	parking lot
1319 CENTINELA AVE	90404-2602	4267014026	Low Density Housing	R2	0.21	(blank)
1323 5TH ST	90401	4291010029	Downtown Core	NV	0.17	parking lot
1342 5TH ST	90401	4291011019	Downtown Core	NV	0.17	parking lot
1342 5TH ST	90401-1415	4291011020	Downtown Core	NV	0.17	parking lot
1342 BERKELEY ST	90404-2504	4267012009	Low Density Housing	R2	0.18	(blank)
1347 YALE ST	90404-2411	4267011021	Mixed Use Boulevard Low	MUBL	0.07	one-story retail building
1413 MICHIGAN AVE	90404-4303	4283013024	Neighborhood Commercial	NC	0.41	Vacant lot
1415 5TH ST	90401-2401	4291019021	Downtown Core	TA	0.17	two-story multitenant retail building
1423 5TH ST	90401-2401	4291019020	Downtown Core	TA	0.17	two-story multitenant retail building
1427 5TH ST	90401-2401	4291019019	Downtown Core	TA	0.34	one-story vacant retail building
1427 LINCOLN BLVD	90401-2770	4282027020	Downtown Core	LT	0.17	one-story comic book store
1430 LINCOLN BLVD	90401-2733	4291021006	Downtown Core	LT	0.17	parking lot
1431 COLORADO AVE	90404-3314	4282034009	Mixed Use Boulevard Low	MUBL	0.52	one-story marble store
1431 LINCOLN BLVD	90401-2732	4282027019	Downtown Core	LT	0.17	one-story comic book store
1432 17TH ST	90404-2802	4282019007	Low Density Housing	R2	0.17	(blank)
1432 LINCOLN BLVD	90401-2733	4291021007	Downtown Core	LT	0.17	parking lot
1434 14TH ST	90404-2704	4282022027	Medium Density Housing	R3	0.17	(blank)
1437 5TH ST	90401-2401	4291019018	Downtown Core	TA	0.17	parking lot
1437 6TH ST	90401-2509	4291020016	Downtown Core	NV	0.17	one-story residence
1437 7TH ST	90401-2633	4291021029	Downtown Core	NV	0.34	office

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacaney
1437 LINCOLN BLVD	90401-2732	4282027018	Downtown Core	LT	0.17	one-story retail building
1438 LINCOLN BLVD	90401-2733	4291021008	Downtown Core	LT	0.09	parking lot
1443 18TH ST	90404-2803	4275010016	Mixed Use Boulevard Low	MUBL	0.17	Vacant lot
1443 LINCOLN BLVD	90401-2732	4282027028	Downtown Core	LT	0.17	one-story retail
1444 LINCOLN BLVD	90401-2733	4291021010	Downtown Core	LT	0.17	parking lot
1445 5TH ST	90401	4291019017	Downtown Core	TA	0.17	parking lot behind black tux
1445 5TH ST	90401-2401	4291019016	Downtown Core	TA	0.17	vacant one-story building
1448 7TH ST	90401-2659	4291020008	Downtown Core	NV	0.17	residential
1500 LINCOLN BLVD	90401	4291022003	Downtown Core	LT	0.17	Ven's
1500 LINCOLN BLVD	90401-2735	4291022025	Downtown Core	LT	0.52	Ven's
1510 FRANKLIN ST	90404-3208	4267027057	Low Density Housing	R2	0.19	(blank)
1512 EUCLID ST	90404-3307	4282032003	Mixed Use Boulevard Low	MUBL	0.17	vacant single family home
1514 7TH ST	90401-2606	4291023002	Downtown Core	TA	0.17	construction staging site
1514 PRINCETON ST	90404-3510	4267022010	Low Density Housing	R2	0.11	single family dwelling
1518 LINCOLN BLVD	90401-2735	4291022004	Downtown Core	LT	0.17	Ven's
1526 LINCOLN BLVD	90401-2735	4291022005	Downtown Core	LT	0.17	Ven's
1527 17TH ST	90404-3401	4275012020	Low Density Housing	R2	0.17	single dwelling unit
1534 LINCOLN BLVD	90401-2735	4291022006	Downtown Core	LT	0.17	Ven's
1543 7TH ST	90401-2644	4291022014	Downtown Core	TA	0.17	parking lot
1546 9TH ST	90401-2709	4282028007	Medium Density Housing	R3	0.17	(blank)
1547 6TH ST	90401-2505	4291023011	Downtown Core	TA	0.17	one-story multi-tenant building, restaurant, office
1547 7TH ST	90401-2605	4291022013	Downtown Core	TA	0.17	parking lot
1618 STANFORD ST	90404-4121	4268002005	Mixed Use Creative	MUC	0.46	one-story office
1649 CENTINELA AVE	90404-4201	4268006016	Low Density Housing	R2	0.14	single family dwelling
1650 LINCOLN BLVD	90404-3712	4290002008	Downtown Core	LT	0.37	one-story retail, boxing fitness building
1660 LINCOLN BLVD	90404-3712	4290002006	Downtown Core	LT	0.17	one-story retail, boxing fitness building
1665 APPIAN WAY	90401-3258	4290018018	Medium Density Housing	R3	0.1	residential
1754 10TH ST	90404-4346	4283018002	Low Density Housing	R2	0.17	(blank)
1819 PICO BLVD	90405-1626	4274017019	Neighborhood Commercial	NC	0.31	parking lot for religious institution
1840 14TH ST	90404-4606	4283030018	Neighborhood Commercial	NC	0.17	100% affordable housing under construction
1840 17TH ST	90404-4412	4283032008	Low Density Housing	R2	0.17	(blank)
1844 14TH ST	90404-4606	4283030017	Neighborhood Commercial	NC	0.17	100% affordable housing under construction
1848 14TH ST	90404-4606	4283030016	Neighborhood Commercial	NC	0.17	100% affordable housing under construction
1900 20TH ST	90404	4274019056	Low Density Housing	R2	0.17	single family dwelling
1902 EUCLID ST	90404-4610	4283028010	Low Density Housing	R2	0.17	(blank)
1949 17TH ST	90404-4701	4274015020	Low Density Housing	R2	0.18	Vacant lot
1958 20TH ST	90404-4718	4274019001	Low Density Housing	R2	0.17	(blank)
2002 21ST ST	90404-4874	4274026001	Low Density Housing	R2	0.17	one-story apartments
2008 21ST ST	90404-4875	4274026003	Low Density Housing	R2	0.16	one-story apartments
2102 5TH ST	90405-1204	4289010006	Low Density Housing	OP2	0.13	(blank)
216 PICO BLVD	90405-1078	4289019023	Mixed Use Boulevard Low	MUBL	0.13	vacant bowling alley

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
228 PICO BLVD	90405	4289019021	Mixed Use Boulevard Low	MUBL	0.13	vacant bowling alley
234 PICO BLVD	90405-1020	4289019019	Mixed Use Boulevard Low	MUBL	0.64	vacant bowling alley
2409 28TH ST	90405-1926	4270004017	Low Density Housing	R2	0.21	(blank)
2425 20TH ST	90405-2703	4273019001	Low Density Housing	R2	0.15	(blank)
248 PICO BLVD	90405-1020	4289019017	Mixed Use Boulevard Low	MUBL	0.13	vacant bowling alley
2501 2ND ST	90405-3513	4287010011	Low Density Housing	OP2	0.15	(blank)
254 PICO BLVD	90405	4289019016	Mixed Use Boulevard Low	MUBL	0.13	vacant bowling alley
2714 HIGHLAND AVE	90405-4408	4287019012	Low Density Housing	OP2	0.11	(blank)
2906 SANTA MONICA BLVD	90404-2449	4267018026	Mixed Use Boulevard Low	MUBL	0.49	vacant two-story office
2918 SANTA MONICA BLVD	90404-2437	4267018003	Mixed Use Boulevard Low	MUBL	0.16	vacant parking lot
2923 WILSHIRE BLVD	90403-4903	4266009020	Mixed Use Boulevard	MUB	0.37	parking lot
3223 WILSHIRE BLVD	90403-2332	4266001045	Mixed Use Boulevard	MUB	0.3	one-story Aah's retail store
436 PIER AVE	90405-5510	4287027065	Low Density Housing	OP2	0.17	(blank)
501 BROADWAY	90401-2405	4291019027	Downtown Core	TA	0.34	one-story vacant retailer (Black tux)
525 COLORADO AVE	90401-2407	4291024014	Downtown Core	TA	0.17	one-story creative office
601 WILSHIRE BLVD	90401-1501	4292005029	Downtown Core	WT	0.23	vacant one and two-story buildings
609 COLORADO AVE	90401-2507	4291023010	Downtown Core	TA	0.34	one-story multi-tenant building, restaurant, office
610 CALIFORNIA AVE	90403-3912	4292005022	Low Density Housing	R2	0.11	(blank)
611 WILSHIRE BLVD	90401-1501	4292005026	Downtown Core	WT	0.11	vacant one and two-story buildings
710 BROADWAY	90401-2605	4291022026	Downtown Core	TA	1.2	Ven's
711 COLORADO AVE	90401-2609	4291022012	Downtown Core	TA	0.17	construction staging site
734 12TH ST	90402-2912	4280025015	Neighborhood Commercial	NC	0.11	single dwelling unit
817 16TH ST	90403-1803	4281001021	Low Density Housing	R2	0.17	single dwelling unit
825 SANTA MONICA BLVD	90401	4282010012	General Commercial	GC	0.17	Toyota dealership
825 SANTA MONICA BLVD	90401-2702	4282010013	General Commercial	GC	0.17	Toyota dealership
825 SANTA MONICA BLVD	90401-2702	4282010014	General Commercial	GC	0.17	Toyota dealership
918 5TH ST	90403-2610	4292015004	Low Density Housing	R2	0.17	(blank)
949 10TH ST	90403-2901	4281025014	Low Density Housing	R2	0.17	(blank)
1244 7TH ST	90401-1648	4291006007	Downtown Core	NV	0.17	Office building
1301 4TH ST	90401-1301	4291011909	Downtown Core	BC	0.74	Bank of America; Chase bank; parking lot
1301 WILSHIRE BLVD	90403-5410	4281012022	Mixed Use Boulevard	MUB	1.38	Ven's
1311 5TH ST	90401-1414	4291010019	Downtown Core	NV	0.17	one-story retail building
1313 5TH ST	90401-1414	4291010020	Downtown Core	NV	0.17	one-story retail building
1317 WILSHIRE BLVD	90403-5410	4281012025	Mixed Use Boulevard	MUB	0.52	Rite Aid
1327 5TH ST	90401-1414	4291010017	Downtown Core	NV	0.17	one-story retail building
1353 OLYMPIC BLVD	90404-3725	4283008001	Mixed Use Boulevard Low	MUBL	0.23	Synder Diamond
1401 WILSHIRE BLVD	90403-5412	4281011028	Mixed Use Boulevard	MUB	0.49	one-story US Bank Building
1407 7TH ST	90401-2603	4291021027	Downtown Core	NV	0.34	one-story retail
1501 WILSHIRE BLVD	90403-5505	4281005026	Mixed Use Boulevard	MUB	0.75	One-story vacant retail formerly Santa Monica Town Car
1519 COLORADO AVE	90404-3316	4282035010	Mixed Use Boulevard Low	MUBL	0.52	Creative Office
1654 14TH ST	90404-3702	4283008004	Mixed Use Boulevard Low	MUBL	0.34	Synder Diamond

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacaney
1660 14TH ST	90404-3702	4283008018	Mixed Use Boulevard Low	MUBL	0.49	Synder Diamond
2225 COLORADO AVE	90404-3505	4275016021	Mixed Use Boulevard Low	MUBL	0.83	one-story R&D (Kite Pharma) building
2723 LINCOLN BLVD	90405-4621	4285001032	Mixed Use Boulevard Low	MUBL	0.47	34 Degrees North Fitness
2848 COLORADO AVE	90404-3637	4268002012	Mixed Use Creative	MUC	0.27	one-story light industrial
2878 COLORADO AVE	90404-3637	4268002011	Mixed Use Creative	MUC	0.41	one-story light industrial
2902 COLORADO AVE	90404-3650	4268002013	Mixed Use Creative	MUC	1.89	one-story light industrial
2912 COLORADO AVE	90404-3642	4268002003	Mixed Use Creative	MUC	0.22	one-story light industrial
3025 OLYMPIC BLVD	90404	4268010018	Mixed Use Creative	MUC	1.25	one-story creative office/light industrial building
625 ARIZONA AVE	90401-1609	4291006027	Downtown Core	NV	0.52	Office building
626 WILSHIRE BLVD	90401-1502	4291006001	Downtown Core	NV	0.34	711 strip mall
631 COLORADO AVE	90401-2507	4291023009	Downtown Core	TA	0.34	one-story Bay Films building
1237 LINCOLN BLVD	90401-1703	4282009027	Downtown Core	LT	0.17	Motel
1243 LINCOLN BLVD	90401-1703	4282009014	Downtown Core	LT	0.17	Motel
1410 LINCOLN BLVD	90401-2733	4291021002	Downtown Core	LT	0.17	parking lot
1527 LINCOLN BLVD	90401-2734	4282028019	Downtown Core	LT	0.17	former tile store; vacant retail building
1533 LINCOLN BLVD	90401-2734	4282028018	Downtown Core	LT	0.17	former tile store; vacant retail building
1537 LINCOLN BLVD	90401-2734	4282028011	Downtown Core	LT	0.17	auto repair
1543 LINCOLN BLVD	90401-2734	4282028010	Downtown Core	LT	0.17	auto repair
1553 4TH ST	90019-3469	4291025028	Downtown Core	TA	0.17	Vacant bank site across DT station
1555 4TH ST	90401-2310	4291025012	Downtown Core	TA	0.17	Vacant bank site across DT station
603 ARIZONA AVE	90401-1609	4291006029	Downtown Core	NV	0.17	one-story office building
700 COLORADO AVE	90401-2610	4290001016	Downtown Core	TA	0.46	One-story vacant warehouse
718 COLORADO AVE	90401-2610	4290001023	Downtown Core	LT	0.5	former Fisher lumber site vacant
718 SANTA MONICA BLVD	90401-2602	4291021001	Downtown Core	LT	0.17	commercial building; balloon place and common ownership
2525 MICHIGAN AVE	90404	4268013919	Bergamot Transit Village	CAC	9.41	Bergamot Arts Center
2525 MICHIGAN AVE	90404	4268014900	Bergamot Transit Village	CAC	0.01	Bergamot Arts Center
1146 16 th STREET	90404	4281005900	Low Density Residential	R2	0.17	Public parking lot 8 behind café zella
1211 14 th ST	90404-1806	4282003901	Medium Density Housing	R3	0.17	public parking lot 12 behind Petco
1217 EUCLID ST	90401-2734	4282004900	Medium Density Housing	R3	0.34	public parking lot 7 behind LaMonarca Bakery
No Address	90401-2735	4288009900	High Density Housing	R4	0.29	City parking lot on main
No Address	90401-2734	4288009901	High Density Housing	R4	0.11	City parking lot on main
No Address	90404-3303	4288010900	High Density Housing	R4	0.38	City parking lot on main
No Address	90404-3304	4288010901	High Density Housing	R4	0.15	City parking lot on main
No Address	90401-2644	4288011900	Medium Density Housing	R3	0.53	City parking lot on main
No Address	90401-2734	4288011901	Medium Density Housing	R3	0.2	City parking lot on main
No Address	90404-3303	4288012902	Medium Density Housing	R3	0.62	City parking lot on main
No Address	90401-2709	4288013905	Medium Density Housing	R3	0.6	City parking lot on main
No Address	90404-3507	4288015901	Medium Density Housing	R3	1.15	City parking lot on main
1217 14TH ST	90401-2505	4282003900	Medium Density Housing	R3	0.17	public parking lot 12 behind petco
1318 4TH ST	90401-2605	4291012900	Downtown Core	BC	0.52	Parking Structure 3
1320 4TH STREET	90019-3469	4291012901	Downtown Core	BC	0.17	Parking Structure 3

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
1324 5TH ST	90401-2310	4291011900	Downtown Core	NV	0.21	Bank of America; Chase bank; parking lot
1324 5TH ST	90403-5507	4291011901	Downtown Core	NV	0.14	Bank of America; Chase bank; parking lot
1324 5TH ST	90404-3810	4291011902	Downtown Core	NV	0.17	Bank of America; Chase bank; parking lot
1324 5TH ST	90404-4121	4291011903	Downtown Core	NV	0.17	Bank of America; Chase bank; parking lot
1324 5TH ST	90404-1807	4291011904	Downtown Core	NV	0.17	Bank of America; Chase bank; parking lot
1326 5TH ST	90404-1807	4291011905	Downtown Core	NV	0.17	Bank of America; Chase bank; parking lot
1333 4TH ST	90404-3712	4291011910	Downtown Core	BC	0.46	Bank of America; Chase bank; parking lot
1334 5TH ST	90404-3818	4291011908	Downtown Core	NV	0.17	Bank of America; Chase bank; parking lot
2624 WILSHIRE BLVD	90404-4201	4267007003	Mixed Use Boulevard	MUB	0.1	New Balance store parking lot
26TH STRET AND OLYMPIC BLVD	90404-3712	4268001038	Bergamot Transit Village	BTV	0.88	Lionsgate parking lot
1455 19 th ST	90404-3702	4275009012	Mixed Use Boulevard Low	MUBL	0.17	parking lot for one-story building with iron gym and creative office tenants
1522 BROADWAY	90404-3712	4282035002	Mixed Use Boulevard Low	MUBL	0.17	parking lot for automotive service center building 1522-1530 Broadway
1625 17 th STREET	90401-3258	4283010001	Mixed Use Boulevard Low	MUBL	0.17	parking lot with vacant office building
1214 SANTA MONICA BLVD	90403-5509	4282023022	General Commercial	GC	0.06	parking lot for vacant auto repair
1218 SANTA MONICA BLVD	90405-4901	4282023021	General Commercial	GC	0.17	parking lot for vacant auto repair
1348 14TH ST	90404-1907	4282015011	General Commercial	GC	0.17	parking lot for truxtons
1421 LINCOLN BLVD	90404-4105	4282027021	Downtown Core	LT	0.17	parking lot for CVS pharmacy
1453 25TH ST	90404-1906	4275001013	Mixed Use Boulevard Low	MUBL	0.16	parking lot for Helen's cycles
1541 15TH ST	90404-4163	4282035014	Mixed Use Boulevard Low	MUBL	0.17	parking lot for SM Conservatory
1547 26TH ST	90404-1907	4267022018	Office Campus	OC	0.19	one-story commercial building parking lot
1716 BERKELEY ST	90404-4116	4268009019	Bergamot Transit Village	GCS	0.27	parking lot serving underparked industrial uses
2306 SANTA MONICA BLVD	90404-4346	4275005002	Mixed Use Boulevard Low	MUBL	0.16	parking lot for 2300 santa monica (cynergy)
2439 SANTA MONICA BLVD	90404	4276022001	Mixed Use Boulevard Low	MUBL	0.12	Parking lot for laundromat
2447 SANTA MONICA BLVD	90404	4276022004	Mixed Use Boulevard Low	MUBL	0.12	Parking lot for auto repair
2615 COLORADO AVE	90404-2809	4267022015	Office Campus	OC	0.14	one-story commercial building parking lot
2616 WILSHIRE BLVD	90405-1626	4267007002	Mixed Use Boulevard	MUB	0.1	New Balance store parking lot
3101 LINCOLN BLVD	90404-1938	4285036002	General Commercial	GC	0.11	parking lot for georges burgers
3125 PICO BLVD	90404-4210	4274034023	Neighborhood Commercial	NC	0.11	parking for Valentines restaurant
907 SANTA MONICA BLVD	90405	4282011033	General Commercial	GC	0.06	Small parking lot for Tuesday Morning
No Address	90404-4606	4282032002	Mixed Use Boulevard Low	MUBL	0.17	Ford auto storage lot
1222 BROADWAY	90404-4412	4282033018	Mixed Use Boulevard Low	MUBL	0.11	Ford auto storage lot
No Address	90404-4606	4282033020	Mixed Use Boulevard Low	MUBL	0.11	Ford auto storage lot
1201 SANTA MONICA BLVD	90404-4606	4282014026	General Commercial	GC	0.52	BMW auto storage
1222 BROADWAY	90404	4282032001	Mixed Use Boulevard Low	MUBL	0.17	Ford auto storage lot
1308 SANTA MONICA BLVD	90403-5605	4282022024	General Commercial	GC	0.22	offsite auto storage lot for Subaru
1310 BROADWAY	90404-4610	4282033019	Mixed Use Boulevard Low	MUBL	0.11	Ford auto storage lot
1335 LINCOLN BLVD	90403-5606	4282010019	Downtown Core	LT	0.17	Toyota service repair lot
1337 12TH ST	90403-5605	4282014016	General Commercial	GC	0.34	BMW auto storage
1339 LINCOLN BLVD	90403-5606	4282010018	Downtown Core	LT	0.17	Toyota auto storage—service center lot
1347 18TH ST	90405-1109	4276029026	General Commercial	GC	0.17	Honda auto storage

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
1348 18TH ST	90403-5605	4276030010	General Commercial	GC	0.17	Honda auto storage
1350 19TH ST	90404-2811	4276029010	General Commercial	GC	0.17	Honda auto storage
1411 17TH ST	90403-5605	4275011023	General Commercial	GC	0.17	off-site parking lot for auto storage
1415 12TH ST	90404-4701	4282023025	General Commercial	GC	0.86	offsite overflow Ford service & repair auto storage lot
1415 EUCLID ST	90404-4718	4282022023	General Commercial	GC	0.17	offsite auto storage lot for Subaru
1418 16TH ST	90404-4874	4282020004	General Commercial	GC	0.17	Lexus parking lot—used car lot/service lot
1447 18TH ST	90404-4875	4275010015	Mixed Use Boulevard Low	MUBL	0.17	parking lot for Herman's auto repair
1530 SANTA MONICA BLVD	90405	4282020001	General Commercial	GC	0.17	Lexus parking lot—used car lot/service lot
1530 SANTA MONICA BLVD	90405-1716	4282020002	General Commercial	GC	0.17	Lexus parking lot—used car lot/service lot
1544 14TH ST	90405-1716	4282033010	Mixed Use Boulevard Low	MUBL	0.17	Paint and body shop auto storage (see 1538 14th st)
1807 BROADWAY	90403-5608	4275010013	Mixed Use Boulevard Low	MUBL	0.17	parking lot for Herman's auto repair
1819 SANTA MONICA BLVD	90405-1204	4276029011	General Commercial	GC	0.34	auto inventory lot
2700 LINCOLN BLVD	90404-2914	4287017043	General Commercial	GC	0.13	parking lot for Big Q's auto repair—common ownership to 3 adjacent parcels
3204 LINCOLN BLVD	90404-3505	4287032015	General Commercial	GC	0.05	auto repair shop parking lot
3204 LINCOLN BLVD	90404-2914	4287032016	General Commercial	GC	0.03	auto repair shop parking lot
832 SANTA MONICA BLVD		4282027003	General Commercial	GC	0.17	Toyota auto storage
1302 6TH ST	90404-2008	4291010027	Downtown Core	NV	0.43	two-story office
1450 20TH ST	90404-2916	4275009009	Mixed Use Boulevard Low	MUBL	0.52	Part of Big Jos burgers
1457 19TH ST	90404-2008	4275009011	Mixed Use Boulevard Low	MUBL	0.34	one-story iron gym and creative office with parking lot (common ownership)
1619 1/2 SANTA MONICA BLVD	90405-2530	4282018010	General Commercial	GC	0.07	car sales lot; recently sold
1619 SANTA MONICA BLVD	90405-1020	4282018012	General Commercial	GC	0.1	car sales lot; recently sold
1634 20TH ST	90405-1926	4275025002	Industrial Conservation	IG	0.45	two-story office building
1703 OCEAN PARK BLVD	90405-1826	4273023032	Neighborhood Commercial	NC	0.32	one-story Burger restaurant and laundrymat
1801 SANTA MONICA BLVD	90405-2703	4276029048	General Commercial	GC	0.34	Honda dealership with surface inventory
1901 WILSHIRE BLVD	90404-2038	4276008010	Mixed Use Boulevard	MUB	0.24	one-story vacant House of Billiards building
1902 WILSHIRE BLVD	90404-2039	4276013020	Mixed Use Boulevard	MUB	0.11	one-story retail/restaurant building (Thai dishes, salon, medical office)
1908 WILSHIRE BLVD	90404-2038	4276013030	Mixed Use Boulevard	MUB	0.57	one-story retail/restaurant building (Thai dishes, salon, medical office)
1925 BROADWAY	90404-2039	4275009010	Mixed Use Boulevard Low	MUBL	0.17	parking lot for Big Jos burger
2316 LINCOLN BLVD	90403-5823	4289001007	General Commercial	GC	0.32	one-story retail (recliner sales) building
2510 PICO BLVD	90405-1020	4270001023	Neighborhood Commercial	NC	0.42	car wash
2537 LINCOLN BLVD	90405-3513	4284008016	General Commercial	GC	0.44	closed car wash
2720 LINCOLN BLVD	90405-1829	4287017044	General Commercial	GC	0.18	Big Q's auto repair
3018 PICO BLVD	90404-2012	4270006041	Neighborhood Commercial	NC	0.14	one-story retail building
3024 PICO BLVD	90405-3803	4270006042	Neighborhood Commercial	NC	0.13	apartment building
3026 PICO BLVD	90405	4270006043	Neighborhood Commercial	NC	0.13	two-story commercial retail building
3113 PICO BLVD	90404-3518	4274034027	Neighborhood Commercial	NC	0.06	single tenant restaurant
3307 PICO BLVD	90403-4622	4274036002	Neighborhood Commercial	NC	0.12	one-story retail
3311 PICO BLVD	90404-3518	4274036003	Neighborhood Commercial	NC	0.06	one-story retail
3317 PICO BLVD	90404-3518	4274036027	Neighborhood Commercial	NC	0.16	auto repair shop
1810 COLORADO BLVD	90403-4622	4275022016	Mixed Use Boulevard Low	MUBL	0.56	industrial concrete yard Bourgeot Bros
1020 WILSHIRE BLVD	90403-4623	4282007025	Mixed Use Boulevard	MUB	0.4	one-story Belcampo restaurant building

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
1025 WILSHIRE BLVD	90403-4623	4281027033	Mixed Use Boulevard	MUB	0.52	one-story El Cholo restaurant
1100 SANTA MONICA BLVD	90403-4623	4282024026	General Commercial	GC	0.34	Toyota pre-owned center
1102 BROADWAY	90403-4623	4282031032	Mixed Use Boulevard Low	MUBL	0.52	small one-story office tenants; appears mostly vacant
1224 5TH ST	90403	4291004016	Downtown Core	NV	0.34	one-story office building
1234 WILSHIRE BLVD	90403-4706	4282005001	Mixed Use Boulevard	MUB	0.34	one-story Ulta building
1323 COLORADO AVE	90403-4705	4282033011	Mixed Use Boulevard Low	MUBL	0.52	autobody shop
1411 LINCOLN BLVD	90405-4408	4282027029	Downtown Core	LT	0.34	CVS pharmacy
1420 WILSHIRE BLVD	90405-4622	4282003001	Mixed Use Boulevard	MUB	0.69	one-story Audio and Video center and Bank of America
1453 14TH ST	90405-4621	4282021013	Mixed Use Boulevard Low	MUBL	0.52	one-story building with 3 tenants, Paint lab and small creative office
1518 7TH ST	90404-2408	4291023003	Downtown Core	TA	0.17	two-story residential
1612 19TH ST	90404-2410	4275022017	Mixed Use Boulevard Low	MUBL	0.78	industrial concrete yard Bourgeot Bros
1624 LINCOLN BLVD	90403-4802	4290001012	Downtown Core	LT	0.51	car wash
1651 16 th ST	90404	4283010900	Mixed Use Boulevard Low	MUBL	3.7	Vacant SMMUSD headquarters
1701 WILSHIRE BLVD	90404-3637	4276010035	Mixed Use Boulevard	MUB	0.31	one-story Mens Warehouse
1907 WILSHIRE BLVD	90404-3637	4276008023	Mixed Use Boulevard	MUB	0.34	one-story restaurant (Chandi)
1921 WILSHIRE BLVD	90404-3650	4276008014	Mixed Use Boulevard	MUB	0.34	one-story retail building (GAP)
2020 WILSHIRE BLVD	90404-2449	4276014025	Mixed Use Boulevard	MUB	0.45	one-story restaurant and nightclub (Opaque Restaurant and Senator Jones club)
2202 BROADWAY	90404-3642	4275016007	Mixed Use Boulevard Low	MUBL	0.83	one-story Ferguson plumbing and lighting
2218 BROADWAY	90403-4904	4275016005	Mixed Use Boulevard Low	MUBL	0.45	one-story Ferguson plumbing and lighting
2230 BROADWAY	90404-2437	4275016024	Mixed Use Boulevard Low	MUBL	0.5	creative office building
2308 BROADWAY	90403-4903	4275016028	Mixed Use Boulevard Low	MUBL	0.64	creative office building
2411 PICO BLVD	90404-2413	4274006023	Mixed Use Boulevard Low	MUBL	0.41	auto repair shop
2520 SANTA MONICA BLVD	90404-2555	4275001024	Mixed Use Boulevard Low	MUBL	0.48	one-story Goodwill building
2601 WILSHIRE BLVD	90404-2534	4266016054	Mixed Use Boulevard	MUB	0.35	76 gas station
2711 WILSHIRE BLVD	90405-2048	4266016100	Mixed Use Boulevard	MUB	0.66	Chase bank building with rear parking
2730 SANTA MONICA BLVD	90405	4267020026	Mixed Use Boulevard Low	MUBL	0.66	one-story AAA building
2802 SANTA MONICA BLVD	90405-2004	4267019028	Mixed Use Boulevard Low	MUBL	0.33	one-story roque and mark office building
2828 WILSHIRE BLVD	90405	4267005009	Mixed Use Boulevard	MUB	0.67	one-story commercial building, Vitamin Store and Kimuya restaurant
2914 WILSHIRE BLVD	90405-5743	4267004015	Mixed Use Boulevard	MUB	0.59	one-story LA mattress store
2933 SANTA MONICA BLVD	90405-2005	4267011025	Mixed Use Boulevard Low	MUBL	0.44	one-story Wine Expo
1724 STANFORD ST	90404-4212	4268003003	Mixed Use Creative	MUC	0.72	one-story light industrial
1740 STANFORD ST	90405-2005	4268003002	Mixed Use Creative	MUC	0.67	one-story creative office
1832 FRANKLIN ST	90405	4268011006	Mixed Use Creative	MUC	0.41	one-story creative office
2800 LINCOLN BLVD		4287017045	General Commercial	GC	0.49	car wash on Lincoln
3122 NEBRASKA AVE	90405-5739	4268011004	Mixed Use Creative	MUC	0.46	one-story light industrial
901 SANTA MONICA BLVD	90403-2332	4282011034	General Commercial	GC	0.34	one-story Tuesday Morning store
1200 SANTA MONICA	90404	4282023023	General Commercial	GC	0.11	Parking lot
1323 SANTA MONICA BLVD	90404-2606	4282015013	General Commercial	GC	0.11	one-story Truxton restaurant
1414 18TH ST	90405-2115	4275011002	General Commercial	GC	0.17	parking for Honda service repair
1449 18TH ST	90405-2115	4275010014	Mixed Use Boulevard Low	MUBL	0.17	parking lot for Herman's auto repair
1457 25TH ST	90405-2115	4275001012	Mixed Use Boulevard Low	MUBL	0.16	one-story Helen's cycle

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacancy
1520 BROADWAY	90405-5510	4282035001	Mixed Use Boulevard Low	MUBL	0.17	one-story auto-parts building
1530 SANTA MONICA BLVD	90401-2405	4282020003	General Commercial	GC	0.17	Lexus auto storage
1538 14TH ST	90401-1408	4282033009	Mixed Use Boulevard Low	MUBL	0.17	Paint and body shop
1710 SANTA MONICA BLVD	90401-2407	4275011025	General Commercial	GC	0.23	two-story vacant building
1719 SANTA MONICA BLVD	90401-1501	4276030011	General Commercial	GC	0.34	Honda dealership with surface inventory
1726 SANTA MONICA BLVD	90401-1609	4275011001	General Commercial	GC	0.34	one-story vacant Honda service center
1933 WILSHIRE BLVD	90403-3912	4276008015	Mixed Use Boulevard	MUB	0.24	one-story retail building (GAP)
2008 PICO BLVD	90401-1501	4273003002	Neighborhood Commercial	NC	0.06	one-story campos taco with lot
2008 PICO BLVD	90401-1609	4273003001	Neighborhood Commercial	NC	0.11	one-story campos taco with lot
2010 PICO BLVD	90401-1502	4273003003	Neighborhood Commercial	NC	0.15	one-story campos taco with lot
2312 SANTA MONICA BLVD	90401-2507	4275005020	Mixed Use Boulevard Low	MUBL	0.13	one-story retail store—cynergy cycle
2439 SANTA MONICA BLVD	90401-2610	4276022002	Mixed Use Boulevard Low	MUBL	0.12	4-adjacent parcels—common ownership
2445 SANTA MONICA BLVD	90401-2605	4276022003	Mixed Use Boulevard Low	MUBL	0.12	4-adjacent parcels—common ownership
2601 COLORADO AVE	90401-2609	4267022017	Office Campus	OC	0.14	one-story office building
2615 COLORADO AVE	90401-2610	4267022016	Office Campus	OC	0.14	one-story vacant office building
2615 WILSHIRE BLVD	90401-2602	4266016055	Mixed Use Boulevard	MUB	0.13	one-story bar Sonny Meleans
2624 WILSHIRE BLVD	90402-2912	4267007004	Mixed Use Boulevard	MUB	0.1	one-story restaurant
2628 WILSHIRE BLVD	90405-4512	4267007005	Mixed Use Boulevard	MUB	0.1	one-story mathnasium and salon
2636 WILSHIRE BLVD	90403-1803	4267007006	Mixed Use Boulevard	MUB	0.13	one-story mathnasium and salon
3011 SANTA MONICA BLVD	90401	4267012003	Mixed Use Boulevard Low	MUBL	0.16	small one-story dentist
3017 SANTA MONICA BLVD	90401-2702	4267012004	Mixed Use Boulevard Low	MUBL	0.17	two-story office
3101 LINCOLN BLVD	90401-2702	4285036001	General Commercial	GC	0.11	one-story Georges burgers restaurant
3115 PICO BLVD	90401	4274034031	Neighborhood Commercial	NC	0.17	Valentino's restaurant
3204 LINCOLN BLVD	90401-2704	4287032014	General Commercial	GC	0.05	auto-repair shop
3232 SANTA MONICA BLVD	90401-2704	4267015027	Mixed Use Boulevard Low	MUBL	0.32	one-story keyboard store
911 SANTA MONICA	90401	4282011015	General Commercial	GC	0.11	Part of Tuesday Morning site
801 WASHINGTON AVE	90403-4013	4281033024	Low Density Housing	R2	0.52	parking lot for Saint Pauls Lutheran Church
929 CALIFORNIA AVE	90403-4108	4281029011	Low Density Housing	R2	0.98	Vintage Church trinity house parking lot
925 CALIFORNIA AVE	90403-4108	4281029012	Low Density Housing	R2	0.12	Vintage Church trinity house parking lot
1140 7TH ST	90403-5204	4292005007	Low Density Housing	R2	0.11	St Monica Church parking lot
1257 CENTINELA AVE	90404-1611	4267001016	Low Density Housing	R2	0.34	Church of Jesus Christ parking lot
1343 OCEAN PARK BLVD	90405-4719	4284025028	Medium Density Housing	R3	0.17	Mt Olive Church with large parking
3114 3RD ST	90405-5412	4287038027	Low Density Housing	OP2	1.18	St Clement Church parking
(blank)		4287017018	Low Density Housing	OP2	0.13	parking lot for car wash on lincoln
(blank)		4276012027	Low Density Housing	R2	0.13	large parking lot for multi-tenant retail
(blank)		4282010011	Medium Density Housing	R3	0.5	parking lot for Toyota
1418 9TH ST	90401	4282027004	Medium Density Housing	R3	0.17	Parking lot for Toyota
1424 9TH ST	90401	4282027005	Medium Density Housing	R3	0.17	Parking lot for Toyota
528 SAN VICENTE BLVD	90402-1803	4293004010	Low Density Housing	R2	0.16	vacant lot
1135 PRINCETON ST	90403-4703	4266016045	Low Density Housing	R2	0.15	Chase Bank parking lot
1122 14TH ST	90403-5409	4281012024	Low Density Housing	R2	0.17	Rite aid parking lot off Wilshire

Site Address / Intersection	5-Digit ZIP Code	Assessor Parcel Number	General Plan Designation (Current)	Zoning Designation (Current)	Parcel Size (Acres)	Existing Use / Vacaney
1143 19TH ST	90403-5601	4276008009	Low Density Housing	R2	0.17	parking lot
1215 17TH ST	90404-1203	4276011018	Low Density Housing	R2	0.17	guest parking for dealership lot
1223 18TH ST	90404-1205	4276012018	Low Density Housing	R2	0.17	large parking lot for multi-tenant retail
1215 26TH ST	90404-1403	4267007030	Low Density Housing	R2	0.52	parking lot for New-balance store
1219 PRINCETON ST	90404-1412	4267006012	Low Density Housing	R2	0.21	parking lot for multi-tenant retail
1342 19TH ST	90404-1941	4276029009	Low Density Housing	R2	0.86	parking lot for dealership
1544 19TH ST	90404-3406	4275013010	Low Density Housing	R2	0.14	parking lot for one-story office
1847 16TH ST	90404-4403	4283032024	Low Density Housing	R2	0.25	vacant lot
621 PACIFIC ST	90405-2411	4289005013	Low Density Housing	OP2	0.17	vacant lot

Category	Consolidated Site	Address	Parcel No.	Zoning District	Land Area	Existing Use	Building Age	ILR	Optional Information
1	A	3223 WILSHIRE BLVD	4266001046	MUB	6,522	parking lot for Aah's		0.00	approved project - part of 3223 wilshire
1	A	3223 WILSHIRE BLVD	4266001045	MUB	13,063	one-story Aah's retail store	1955	0.11	approved 54 unit project
1	AA	1431 LINCOLN BLVD	4282027019	LT	7,512	one-story comic book store	1983	0.13	approved 100 unit project (1427-1431 Lincoln)
1	AA	1427 LINCOLN BLVD	4282027020	LT	7,501	one-story comic book store	1956	0.02	approved 100 unit project (1427-1431 Lincoln)
1	AC	1527 LINCOLN BLVD	4282028019	LT	7,494	former tile store; vacant retail building	1945	0.31	common ownership; in Downtown; single tenant building
1	AC	1533 LINCOLN BLVD	4282028018	LT	7,510	former tile store; vacant retail building	1952	0.43	common ownership; in Downtown; single tenant building
1	AM	3RD STREET/PICO BLVD	4289019022	MUBL	5,601	vacant one story bowling alley		0.00	SB330 application; 199 units/ 19 affordable
1	AM	216 PICO BLVD	4289019023	MUBL	5,613	vacant one story bowling alley	1962	0.06	SB330 application; 199 units/ 19 affordable
1	AM	228 PICO BLVD	4289019021	MUBL	5,621	vacant one story bowling alley		0.00	SB330 application; 199 units/ 19 affordable
1	AM	248 PICO BLVD	4289019017	MUBL	5,590	vacant one story bowling alley		0.00	SB330 application; 199 units/ 19 affordable
1	AM	254 PICO BLVD	4289019016	MUBL	5,611	vacant one story bowling alley		0.00	SB330 application; 199 units/ 19 affordable
1	AM	234 PICO BLVD	4289019019	MUBL	28,008	vacant one story bowling alley	1959	0.10	SB330 application; 199 units/ 19 affordable
1	AO	1342 5TH ST	4291011019	NV	7,509	parking lot		0.00	approved 120 unit w SRO project (1338-1342 5th St)
1	AO	1342 5TH ST	4291011020	NV	7,485	parking lot		0.00	approved 120 unit w SRO project (1338-1342 5th St)
1	AR	1445 5TH ST	4291019016	TA	7,498	vacant one-story multitenant retail building	1946	0.02	approved project w SRO 1437-1445 project (63 units)
1	AR	1445 5TH ST	4291019017	TA	7,511	parking lot next to vacant retail		0.00	approved project w SRO 1437-1445 project (63 units)
1	AT	LINCOLN BLVD/SANTA MONICA BLVD	4291021009	LT	3,751	parking lot		0.00	approved 100 unit project (1430-1444 Lincoln)
1	AT	1438 LINCOLN BLVD	4291021008	LT	3,752	parking lot		0.00	approved 100 unit project (1430-1444 Lincoln)
1	AT	1444 LINCOLN BLVD	4291021010	LT	7,491	parking lot		0.00	approved 100 unit project (1430-1444 Lincoln)
1	AT	1430 LINCOLN BLVD	4291021006	LT	7,507	parking lot		0.00	approved 100 unit project (1430-1444 Lincoln)
1	AT	1432 LINCOLN BLVD	4291021007	LT	7,492	parking lot		0.00	approved 100 unit project (1430-1444 Lincoln)
1	AU	1500 LINCOLN BLVD	4291022003	LT	7,500	one-story Von's with parking lot		0.00	approved 300 unit project (710 Broadway)
1	AU	1500 LINCOLN BLVD	4291022025	LT	22,450	one-story Von's with parking lot		0.00	approved 300 unit project (710 Broadway)
1	AU	1518 LINCOLN BLVD	4291022004	LT	7,500	one-story Von's with parking lot		0.00	approved 300 unit project (710 Broadway)
1	AU	1526 LINCOLN BLVD	4291022005	LT	7,500	one-story Von's with parking lot		0.00	approved 300 unit project (710 Broadway)
1	AU	1534 LINCOLN BLVD	4291022006	LT	7,500	one-story Von's with parking lot		0.00	approved 300 unit project (710 Broadway)

Category	Consolidated Site	Address	Parcel No.	Zoning District	Land Area	Existing Use	Building Age	ILR	Optional Information
1	AU	710 BROADWAY	4291022026	TA	52,450	one-story Von's with parking lot	1995	0.18	approved 300 unit project (710 Broadway)
1	AX	1553 4TH ST	4291025028	TA	7,474	Vacant bank site across DT station		0.00	common ownership; vacant building in DT
1	AX	1555 4TH ST	4291025012	TA	7,497	Vacant bank site across DT station	1973	0.01	common ownership; vacant building in DT
1	AY	1127 2ND ST	4292021010	WT	7,517	parking lot		0.00	approved 100% affordable housing - 42 units
1	AY	1129 2ND ST	4292021009	WT	7,490	parking lot		0.00	approved 100% affordable housing - 42 units
1	BG	1152 21ST ST	4276007021	MUB	3,491	rear parking lot for NOMA sushi and Veggie grill (2025 wilshire)		0.02	SB330 application; 46 units w/ offsite affordable at 1211-1215 19th
1	BG	2025 WILSHIRE BLVD	4276007027	MUB	14,987	one story Veggie grill	1969	0.10	SB330 application; 46 units w/ offsite affordable at 1211-1215 19th
1	BL	1115 WILSHIRE BLVD REAR	4281020029	MUB	13,949	rear parking lot	1927	0.18	(blank)
1	BL	1101 WILSHIRE BLVD	4281020012	MUB	8,559	one-story JP bar	1922	0.19	SB330 application; pending project (93 units)
1	BN	1819 SANTA MONICA BLVD	4276029011	GC	14,986	Honda auto inventory lot		0.00	SB330 application; 41 units w/ 7 affordable
1	BN	1350 19TH ST	4276029010	GC	7,495	Honda auto inventory lot		0.00	SB330 application; 41 units w/ 7 affordable
1	BN	1342 19TH ST	4276029009	R2	8,991	Honda auto inventory lot		0.00	SB330 application; 41 units w/ 7 affordable
1	BO	2911 SANTA MONICA BLVD	4267011022	MUBL	6,501	one story retail building	1926	0.20	approved 53 unit project (2901-2907 Santa Monica project)
1	BO	1347 YALE ST	4267011021	MUBL	3,266	one-story retail building	1926	0.25	approved 53 unit project (2901-2907 Santa Monica project)
1	BO	1349 YALE ST	4267011020	MUBL	9,368	one story multitenant retail building, two story apartment building w parking lot	1923	0.11	approved 53 unit project (2901-2907 Santa Monica project)
1	BP	1543 LINCOLN BLVD	4282028010	LT	7,497	one story vacant auto repair	1947	0.13	SB330 application; 114 units w/ offsite affordable at 1333 7th
1	BP	1547 LINCOLN BLVD	4282028009	LT	7,499	one story vacant auto repair	1999	0.43	SB330 application; 114 units w/ offsite affordable at 1333 7th
1	BP	1537 LINCOLN BLVD	4282028011	LT	7,496	one story vacant auto repair	1945	0.25	SB330 application; 114 units w/ offsite affordable at 1333 7th
1	BS	2002 21ST ST	4274026001	R2	7,533	one-story apartments	1949	0.10	approved Park Virginia Townhomes 19 units
1	BS	2008 21ST ST	4274026003	R2	7,130	one-story apartments	1953	0.11	approved Park Virginia Townhomes 19 units
1	BT	1840 14TH ST	4283030018	NC	7,524	100% affordable housing under construction	1962	0.26	approved affordable housing project 73 units
1	BT	1844 14TH ST	4283030017	NC	7,485	100% affordable housing under construction	1922	0.50	approved affordable housing project 73 units
1	BT	1848 14TH ST	4283030016	NC	7,525	100% affordable housing under construction	1968	0.00	approved affordable housing project 73 units
1	BU	1415 5TH ST	4291019021	TA	7,494	two story multitenant retail building	1980	0.00	approved 111 unit project (1415-1423 5th St)
1	BU	1423 5TH ST	4291019020	TA	7,525	two story multitenant retail building	1966	0.00	approved 111 unit project (1415-1423 5th St)
1	BV	1543 7TH ST	4291022014	TA	7,500	parking lot	1990	1.73	approved 100 unit project (1543-1547 7th St)
1	BV	1547 7TH ST	4291022013	TA	7,500	parking lot		0.00	approved 100 unit project (1543-1547 7th St)
1	BW	1547 6TH ST	4291023011	TA	7,505	one-story multi-tenant building, restaurant, office	1986	0.00	approved 140 unit project (part of 609 Colorado project)
1	BW	609 COLORADO AVE	4291023010	TA	14,982	one-story multi-tenant building, restaurant, office	1984	0.17	approved 140 unit project (part of 609 Colorado project)
1	BX	601 WILSHIRE BLVD	4292005029	WT	10,010	vacant one and two story buildings	1977	0.07	approved 40 units w/ 3 affordable (601-611 Wilshire)
1	BX	611 WILSHIRE BLVD	4292005026	WT	4,997	vacant one and two story buildings	1922	0.14	approved 40 units w/ 3 affordable (601-611 Wilshire)
1	BY	1650 LINCOLN BLVD	4290002008	LT	16,220	one-story retail, boxing fitness building	1954	0.00	approved 98 Units (1650-1660 Lincoln)
1	BY	1660 LINCOLN BLVD	4290002006	LT	7,570	one-story retail, boxing fitness building	1954	0.00	approved 98 Units (1650-1660 Lincoln)
1	BZ	1437 LINCOLN BLVD	4282027018	LT	7,485	one-story retail building	1949	0.00	approved 40 unit project (1437-1443 Lincoln)
1	BZ	1443 LINCOLN BLVD	4282027028	LT	7,510	one-story retail	1959	0.00	approved 40 unit project (1437-1443 Lincoln)
1	C	2501 WILSHIRE BLVD	4276001026	MUB	14,319	one-story commercial building with multiple retailers; corner parcel; with rear residential parking lot	1951	0.14	SB330 application; 78 units w/ offsite affordable at 1215 19th
1	C	2515 WILSHIRE BLVD	4276001025	MUB	6,164	one-story multi-tenant commercial building	1941	0.49	SB330 application; 78 units w/ offsite affordable at 1215 19th

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1	C	2525 WILSHIRE BLVD	4276001027	MUB	10,347	one-story commercial building, Starbucks, Urgent Care, Postal Store; common ownership; corner parcel with rear residential parking	1970	0.44	SB330 application; 78 units w/ offsite affordable at 1215 19th
1	CA	1313 6TH ST	4291009021	NV	15,010	parking lot		0.00	approved 64 unit project (1313-1325 6th St)
1	CA	1323 5TH ST	4291010029	NV	7,512	parking lot		0.00	approved 43 unit project
1	CH	1902 WILSHIRE BLVD	4276013020	MUB	4,989	one story retail/restaurant building (Thai dishes, salon, medical office)	1939	0.33	SB330 application; 71 units w/ offsite affordable in rear
1	CH	1908 WILSHIRE BLVD	4276013030	MUB	24,993	one-story retail/restaurant building (Thai dishes, salon, medical office)	1925	0.20	SB330 application; 34 affordable units; lot has been split with 100% affordable in rear
1	CI	1921 WILSHIRE BLVD	4276008014	MUB	15,015	one-story retail building (GAP)	1975	0.41	SB330 application; 60 units w/ 9 affordable
1	CI	1933 WILSHIRE BLVD	4276008015	MUB	10,520	one-story retail building (GAP)	1958	0.33	SB330 application; 60 units w/ 9 affordable
1	E	2906 SANTA MONICA BLVD	4267018026	MUBL	21,314	vacant two story office	1969	0.79	approved 46 unit project (2906-2918 Santa Monica Blvd)
1	E	2918 SANTA MONICA BLVD	4267018003	MUBL	7,021	vacant parking lot	1965	0.12	approved 46 unit project (2906-2918 Santa Monica Blvd)
1	P	1347 18TH ST	4276029026	GC	7,512	Honda dealership with surface inventory	1969	0.00	SB330 application; 41 units w/ 7 affordable
1	P	1801 SANTA MONICA BLVD	4276029048	GC	14,984	Honda dealership with surface inventory	1953	0.02	SB330 application; 41 units w/ 7 affordable
1	S	825 SANTA MONICA BLVD	4282010012	GC	7,505	Toyota dealership		0.00	pending project 48 units (825 Santa Monica)
1	S	825 SANTA MONICA BLVD	4282010013	GC	7,491	Toyota dealership	1951	0.01	pending project 48 units (825 Santa Monica)
1	S	825 SANTA MONICA BLVD	4282010014	GC	7,502	Toyota dealership	1951	0.00	pending project 48 units (825 Santa Monica)
1		1211 12TH ST	4282005053	R3	15,008	one story apartment buildings		0.00	approved 13 units
1		1434 14TH ST	4282022027	R3	7,500		1925	0.22	approved 6 unit condos
1		1021 GRANT ST	4284015017	R2	6,491		1928	0.42	approved 2 units
1		1133 OCEAN AVE	4292028001	OT	190,963	Miramar Hotel	1938	0.53	approved Miramar Project - 60 condo units
1		1431 COLORADO AVE	4282034009	MUBL	22,485	one-story marble store	1923	0.01	pending 50 unit project
1		129 SANTA MONICA BLVD	4291014024	BC	30,000	parking lot	1871	0.02	pending Ocean Avenue project - 100 units
1		610 CALIFORNIA AVE	4292005022	R2	5,002		1912	0.21	approved 3 condo units
1		OCEAN FRONT WALK/BAY STREET	4289025005	OF	23,222	vacant parking lot next to Casa del mar hotel		0.00	approved with 1828 ocean ave; formerly 1921 OFW (22 units)
1		OCEAN FRONT WALK/PICO BLVD	4290020045	OF	45,314	parking lot		0.00	approved 83 unit project
1		1840 17TH ST	4283032008	R2	7,490		1955	0.25	5 unit condos
1		1121 22ND ST	4276005022	R2	6,114		1924	0.03	approved 3 townhomes
1		SANTA MONICA BLVD/23RD STREET	4275006026	HMU	6,242	parking lot owned by Saint John's		0.00	pending Providence Saint John's Master Plan - 10 Units
1		1318 LINCOLN BLVD	4291008025	LT	15,003	parking lot		0.00	approved 43 unit project
1		1665 APPIAN WAY	4290018018	R3	4,430	residential	1914	0.37	pending 3 Unit townhome project
1			4268010017	MUC	64,297	one-story light industrial/creative office		0.00	approved 183 unit project - WS project
1		2102 5TH ST	4289010006	OP2	5,661		1911	0.02	3 unit condos
1		1754 10TH ST	4283018002	R2	7,511		1922	0.25	approved 3 apartment units
1		1649 CENTINELA AVE	4268006016	R2	6,313	single family dwelling	1948	0.25	approved 3 condo units
1		436 PIER AVE	4287027065	OP2	7,480		1911	0.25	3 unit condos
1		1900 20TH ST	4274019056	R2	7,575	single family dwelling		0.00	approved 3 condo units

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1			4287003017	OP2	7,973			0.00	3 unit condos
1		1707 CLOVERFIELD BLVD	4268014013	BTV	76,562	parking lot of Extra Space sotrage	1955	0.66	approved 63 units w/ 5 affordable
1		1342 BERKELEY ST	4267012009	R2	7,858	Vacant lot		0.00	100% affordable housing project w/ 8 units
1		1443 18TH ST	4275010016	MUBL	7,500	Vacant lot	1957	0.00	approved 11 condo units
1		711 COLORADO AVE	4291022012	TA	7,500	construction staging site		0.00	approved 100% affordable housing
1		1437 7TH ST	4291021029	NV	14,991	three story office building	1983	1.22	approved 65 unit project
1		1618 STANFORD ST	4268002005	MUC	20,016	one story office building	1950	0.20	approved 47 unit project
1		1238 7TH ST	4291006006	NV	7,500	one-story office	1912	0.00	approved 37 unit project
1		1557 7TH ST	4291022021	TA	7,500	one story brick office building	1959	0.03	approved AA project for 59 unit project
1		1427 5TH ST	4291019019	TA	15,007	one-story vacant retail building	1954	0.00	approved 92 unit project
1		1514 7TH ST	4291023002	TA	7,504	construction staging parking site		0.00	approved 100% affordable housing - 50 units
1		501 BROADWAY	4291019027	TA	15,007	one-story vacant retailer (Black tux)		0.00	approved 94 unit project
1		525 COLORADO AVE	4291024014	TA	7,483	one-story creative office	1960	0.00	approved 40 unit project
1		1437 5TH ST	4291019018	TA	7,484	parking lot		0.00	approved 52 unit project
1		1437 6TH ST	4291020016	NV	7,497	one story residence		0.00	approved 51 unit project
1		1527 17TH ST	4275012020	R2	7,500	single dwelling unit	1923	0.05	approved 3 condo units addition
1		949 10TH ST	4281025014	R2	7,484		1916	0.25	approved 3 condo units
1		1432 17TH ST	4282019007	R2	7,504		1959	0.08	approved 6 unit condos
1		918 5TH ST	4292015004	R2	7,520		1910	0.25	approved 3 condo units
1		2714 HIGHLAND AVE	4287019012	OP2	4,708		1912	0.27	approved duplex
1		1902 EUCLID ST	4283028010	R2	7,499		1940	0.23	approved triplex addition
1		2409 28TH ST	4270004017	R2	9,005		1937	0.13	approved duplex
1		1958 20TH ST	4274019001	R2	7,609			0.13	approved addition of 2 units
1		1512 EUCLID ST	4282032003	MUBL	7,500	vacant single family home		0.25	pending 10 unit project
1		2501 2ND ST	4287010011	OP2	6,478			0.08	approved 3 unit condos addition
1		1819 PICO BLVD	4274017019	NC	13,510	parking lot for religious institution	1950	0.38	approved 100% affordable housing 48 units
1		1949 17TH ST	4274015020	R2	7,747	Vacant lot		0.00	approved 5 condo units
1		2425 20TH ST	4273019001	R2	6,746	one story single family unit	1928	0.33	approved 3 condo units
1		817 16TH ST	4281001021	R2	7,481	one story single family dwelling		0.40	approved 3 condo units
1		1413 MICHIGAN AVE	4283013024	NC	17,992	Vacant lot	1905	0.07	approved 100% affordable housing (58 units)
1		1510 FRANKLIN ST	4267027057	R2	8,118	two story single family unit	1924	0.31	approved 3 unit condos
1		734 12TH ST	4280025015	NC	4,802	one story single family dwelling	1926	0.25	approved 3 condo units
1		1514 PRINCETON ST	4267022010	R2	4,999	one story single family dwelling	1940	0.25	approved 2 condo units
1		1319 CENTINELA AVE	4267014026	R2	9,274	two story single family unit	1929	0.49	approved 6 unit condos
1		1448 7TH ST	4291020008	NV	7,498	two story apartment buildings w parking lot	1952	0.07	approved 8 unit project
1		1518 7TH ST	4291030003	NV	7,489	two story residential	1957	0.72	Pending 100 unit project
1		1546 9TH ST	4282028007	R3	7,503	one story single family unit	1909	0.25	pending 9 unit apartments
1		1302 6TH ST	4291010027	NV	18,521	two story office	1978	0.13	SB330 application; 80 units w/ offsite at 1333 7th
1		2537 LINCOLN BLVD	4284008016	GC	19,239	closed car wash	1965	0.17	SB330 application; 49 units w/ 5 affordable
1		2601 LINCOLN BLVD	4285001030	MUBL	203,990	one story Gelsons shopping center; multiple tenants	1956	0.35	SB330 application; 521 units w/ 53 affordable
1		1333 7TH ST	4291008018	NV	7,510	small site; single dental tenant; long standing owner/tenant	1978	1.33	SB330 application; 100% affordable receiver site of 38 units

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1		1407 7TH ST	4291021027	NV	15,000	One story retail building	1923	0.128	pending project 60 units with 3KSF
2	AH	1353 OLYMPIC BLVD	4283008001	MUBL	10,144	Synder Diamond parking lot		0.02	expressed past interest; prominent corner
2	AH	1654 14TH ST	4283008004	MUBL	15,011	Synder Diamond	1975	0.31	expressed past interest; prominent corner
2	AH	1660 14TH ST	4283008018	MUBL	21,369	Synder Diamond	1925	1.17	expressed past interest; prominent corner
2	AN	1311 5TH ST	4291010019	NV	7,498	parking lot for retail building	1939	0.68	low scale old building Downtown; common ownership
2	AN	1313 5TH ST	4291010020	NV	7,510	one-story retail building		0.02	low scale old building Downtown; common ownership
2	BI	1519 COLORADO AVE	4282035010	MUBL	22,498	one-story creative office	1957	0.48	high potential with across st access to expo; adjacent parcel at 1544 16th St is parking lot with common ownership
2	CC	1317 WILSHIRE BLVD	4281012025	MUB	22,535	Rite Aid	1940	0.15	high potential with parking lot; underutilized site; single tenant
2	G	2848 COLORADO AVE	4268002012	MUC	11,927	one-story light industrial	1952	0.13	prior residential project withdrawn due to DA process
2	G	2878 COLORADO AVE	4268002011	MUC	18,020	one-story light industrial	1959	0.24	prior residential project withdrawn due to DA process
2	G	2902 COLORADO AVE	4268002013	MUC	82,310	one-story light industrial	1938	0.23	prior residential project withdrawn due to DA process
2	G	2912 COLORADO AVE	4268002003	MUC	9,597	one-story light industrial	1963	0.86	prior residential project withdrawn due to DA process
1	H	3025 OLYMPIC BLVD	4268010018	MUC	54,556	one-story creative office/light industrial building		0.00	adjacent to approved development; owned by known residential developer; pending application for residential 345 units
2		1244 7TH ST	4291006007	NV	7,500	Office building with dental tenants		0.83	low scale office Downtown with parking in rear; adjacent to approved residential project on same size lot
2		1301 WILSHIRE BLVD	4281012022	MUB	60,051	Von's	1966	0.15	high potential parking; has expressed interest in past; single tenant
2		1327 5TH ST	4291010017	NV	7,497	one-story retail building	1930	0.62	low scale retail Downtown across 4th/5th Arizona; owned by housing provider; adjacent to approved residential project on same size lot
2		1401 WILSHIRE BLVD	4281011028	MUB	21,271	one-story US Bank Building with rear parking lot	1931	0.45	adjacent parking lot; not on HRI; one story single tenant bank with high potential
2		1501 WILSHIRE BLVD	4281005026	MUB	32,561	One story vacant retail formerly Santa Monica Town Car with large rear parking lot	1932	0.35	underutilized parking lot; fronting Wilshire Blvd with access; vacant building
2		2723 LINCOLN BLVD	4285001032	MUBL	20,599	34 Degrees North Fitness and one-story auto repair	1955	0.41	lots of parking; single story
2		625 ARIZONA AVE	4291006027	NV	22,500	one-story office building	1938	0.54	low scale office Downtown; corner lot; prior development inquiry
2		626 WILSHIRE BLVD	4291006001	NV	15,000	711 strip mall	1959	0.09	High; location on corner; with parking lot
2		2225 COLORADO AVE	4275016021	MUBL	35,990	one-story R&D (Kite Pharma) building with parking lot	1972	1.02	one-story R&D underdeveloped; kitepharma looking for new space
2		631 COLORADO AVE	4291023009	TA	14,982	one-story Bay Films building	1937	0.36	low scale office Downtown; previous inquiries about redevelopment opportunities; access to Expo makes it high potential; demolition permit for existing building applied for
3	AS	1410 LINCOLN BLVD	4291021002	LT	7,508	parking lot		0.01	common ownership to 720 Santa Monica Blvd; owned by commercial investment company
3	AS	718 SANTA MONICA BLVD	4291021001	LT	7,497	commercial building; balloon place and common ownership	1924	0.52	low scale building at edge of DT; in proximity to other residential development; common ownership; owned by commercial investment firm
3	R	1237 LINCOLN BLVD	4282009027	LT	7,514	Motel	1907	0.13	old motel; tenant does not appear to have longevity
3	R	1243 LINCOLN BLVD	4282009014	LT	7,502	Motel	1949	0.48	old motel; tenant does not appear to have longevity
3		700 COLORADO AVE	4290001016	TA	20,139	One-story warehouse building	1962	0.48	Recently for sale; vacant building; large site in downtown
3		718 COLORADO AVE	4290001023	LT	21,881	former Fisher lumber site vacant	1965	0.08	vacant building; site for sale
3		1640 5TH ST	4290011017	TA	21,973	Three story office building	1976	0.82	Comma building; developer has expressed past interest in development

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4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288009900	R4	12,477	City parking lot on main south of Ashland		0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288010900	R4	16,469	City parking lot on main		0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288011900	R3	23,118	City parking lot on main		0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288012902	R3	26,951	City parking lot on main		0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288013905	R3	26,348	City parking lot on main		0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288014901	R3	40,256	City parking lot on main (approximately 11.8 Ksf) rest is affordable housing	1947	0.00	city owned parking lot - no leases with outside parties
4	AL	MAIN STREET B/T OCEAN PARK BLVD AND ASHLAND AVE	4288015901	R3	50,158	City parking lot on main		0.00	city owned parking lot - no leases with outside parties
4	AP	1301 4TH ST	4291011909	BC	32,245	Bank of America; Chase bank; parking lot	1959	0.00	4th/Arizona withdrawn project
4	AP	1324 5TH ST	4291011900	NV	8,977	Bank of America; Chase bank; parking lot	1980	0.00	4th/Arizona withdrawn project
4	AP	1324 5TH ST	4291011901	NV	5,989	Bank of America; Chase bank; parking lot	1980	0.00	4th/Arizona withdrawn project
4	AP	1324 5TH ST	4291011902	NV	7,520	Bank of America; Chase bank; parking lot	1980	0.00	4th/Arizona withdrawn project
4	AP	1324 5TH ST	4291011903	NV	7,480	Bank of America; Chase bank; parking lot	1980	0.00	4th/Arizona withdrawn project
4	AP	1324 5TH ST	4291011904	NV	7,520	Bank of America; Chase bank; parking lot	2013	0.00	4th/Arizona withdrawn project
4	AP	1326 5TH ST	4291011905	NV	7,481	Bank of America; Chase bank; parking lot	2013	0.00	4th/Arizona withdrawn project
4	AP	1333 4TH ST	4291011910	BC	20,244	Bank of America; Chase bank; parking lot	1961	0.00	4th/Arizona withdrawn project
4	AP	1334 5TH ST	4291011908	NV	7,508	Bank of America; Chase bank; parking lot	2013	0.00	4th/Arizona withdrawn project
4	AQ	1318 4TH ST	4291012900	BC	22,484	Parking Structure 3		0.00	RFP for affordable housing issued
4	AQ	1320 4TH STREET	4291012901	BC	7,504	Parking Structure 3		0.00	RFP for affordable housing issued
4	BQ	1217 14TH ST	4282003901	R3	7,510	public parking lot 12 behind petco		0.00	city owned parking lot - no leases with outside parties
4	BQ	1217 14TH ST	4282003900	R3	7,497	public parking lot 12 behind petco		0.00	city owned parking lot - no leases with outside parties
4	I	26TH STREET/OLYMPIC BLVD	4268014900	CAC	540	Bergamot Arts Center		0.00	existing Bergamot Arts Center; lease agreement with arts uses; must replace groundfloor arts uses
4	I	26TH STREET/OLYMPIC BLVD	4268013919	CAC	409,713	Bergamot Arts Center		0.00	existing Bergamot Arts Center; lease agreement with arts uses; must replace groundfloor arts uses
4		1146 16TH STREET	4281005900	R2	7,499	public parking lot 8 behind Café Zella (city owned)		0.00	city owned parking lot - no leases with outside parties
4		1217 EUCLID STREET	4282004900	R3	14,994	public parking lot 7 behind LaMonarca Bakery		0.00	city owned parking lot - no leases with outside parties
5	AB	1421 LINCOLN BLVD	4282027021	LT	7,516	parking lot for CVS pharmacy		0.00	common ownership to adjacent parcel
5	AG		4282035002	MUBL	7,482	parking lot for automotive service center building 1522-1530 Broadway		0.02	common ownership with adjacent parcel
5	AJ	3101 LINCOLN BLVD	4285036002	GC	4,820	parking lot for georges burgers		0.00	single tenant; underutilized parcel with common ownership
5	B		4267007003	MUB	4,394	New Balance store parking lot		0.00	past interest in development; common ownership with adjacent parcels
5	B	2616 WILSHIRE BLVD	4267007002	MUB	4,393	New Balance store parking lot		0.00	past interest in development; common ownership with adjacent parcels
5	BR	907 SANTA MONICA BLVD	4282011033	GC	2,494	small private parking lot for auto repair and Tuesday morning		0.00	common ownership- could be developed with Tuesday Morning site
5	CJ	1453 25TH ST	4275001013	MUBL	7,002	parking lot for Helen's cycles		0.00	common ownership see 1457 25th

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5	F	1547 26TH ST	4267022018	OC	8,107	parking lot for one story vacant commercial office building		0.00	common ownership - see 2601 Colorado
5	F	2615 COLORADO AVE	4267022015	OC	5,966	parking lot for one story vacant commercial office building		0.02	common ownership to 3 other parcels - see 2601 Colorado
5	K	3125 PICO BLVD	4274034023	NC	5,005	parking for closed Valentinos restaurant		0.00	common ownership with adjacent parcel; vacant building
5	M	2306 SANTA MONICA BLVD	4275005002	MUBL	7,002	parking lot for 2300 santa monica (cynergy)		0.00	common ownership with adjacent parcel; single tenant
5	N		4275009012	MUBL	7,500	parking lot for one-story to two story building with iron gym and creative office tenants		0.01	recently sold building; location on Broadway near other residential uses make it likely it will turn over; common ownership (see 1457 19th street)
5	O		4276022001	MUBL	5,229	parking lot for laundromat		0.01	common ownership with 3 adjacent parcels; corner lot
5	O		4276022004	MUBL	5,196	parking lot for auto repair		0.09	common ownership with 3 adjacent parcels; corner lot
5	U	1348 14TH ST	4282015011	GC	7,515	parking lot for Truxtons restaurant and Bar		0.01	common ownership w/ adjacent parcels (1327-1333 Santa Monica Blvd)
5	Y	1214 SANTA MONICA BLVD	4282023022	GC	2,509	parking lot with vacant auto repair	1975	0.05	common ownership w/ adjacent parcel; underutilized; one story autorepair
5	Y	1218 SANTA MONICA BLVD	4282023021	GC	7,504	parking lot with vacant auto repair	1925	0.11	common ownership w/ adjacent parcel; underutilized; one story autorepair
5			4268001038	BTV	38,548	Lionsgate parking lot		0.00	SCAG Helpr tool classifies this as a vacant site; owned by separate owner than Lionsgate parcel; used as Lionsgate parking
5			4283010001	MUBL	7,495	parking lot for one story vacant office building		0.00	could be developed with adjacent vacant parcel on corner
5		1541 15TH ST	4282035014	MUBL	7,510	parking lot for SM Conservatory		0.00	property owner expressed interest in 100% affordable
5		1716 BERKELEY ST	4268009019	CCS	11,703	parking lot serving underparked industrial uses		0.05	underutilized lot; medium size could be developed for affordable housing; owned by housing provider
6	AD	12TH STREET AND BROADWAY	4282032002	MUBL	7,487	Ford auto storage parking lot		0.00	common ownership with adjacent parcel; southwest corner
6	AD	1222 BROADWAY	4282032001	MUBL	7,487	Ford auto storage parking lot	1956	0.02	common ownership with adjacent parcel; southwest corner
6	AE	1544 14TH ST	4282033010	MUBL	7,484	Paint and body shop auto storage (see 1538 14th st)	1957	0.04	common ownership with adjacent parcel used as parking lot; one story service bays
6	AF	12TH STREET AND BROADWAY	4282033018	MUBL	4,986	Ford auto storage parking lot		0.08	common ownership with adjacent parcel; southeast corner
6	AF	12TH STREET AND BROADWAY	4282033020	MUBL	4,992	Ford auto storage parking lot		0.06	common ownership with adjacent parcel; southeast corner
6	AF	1310 BROADWAY	4282033019	MUBL	4,987	Ford auto storage parking lot		0.07	common ownership with adjacent parcel; southeast corner
6	AK	2700 LINCOLN BLVD	4287017043	GC	5,609	parking lot for Big Q's auto repair - common ownership to 3 adjacent parcels	1946	0.00	for sale property; advertised for redevelopment potential; common ownership to adjacent parcel
6	AZ	3204 LINCOLN BLVD	4287032015	GC	2,014	auto repair shop parking lot		0.00	adjacent common ownership (see 3204 lincoln); one story auto with parking lot
6	AZ	3204 LINCOLN BLVD	4287032016	GC	1,521	auto repair shop parking lot	1973	0.00	adjacent common ownership (see 3204 lincoln); one story auto with parking lot
6	BB	1348 18TH ST	4276030010	GC	7,506	Honda auto storage	1977	0.00	common ownership with adjacent 2 parcels used also as parking; comprises one of many surface lots for Honda
6	BF	832 SANTA MONICA BLVD	4282027003	GC	7,493	Toyota auto storage	1958	0.02	common ownership with adjacent 888 SM Blvd and R2 parcels (1418-1424 9th); offsite lot - main dealership across the street on Lincoln
6	BK	1411 17TH ST	4275011023	GC	7,500	off-site parking lot for auto storage	1921	0.25	for sale property; no common ownership but adjacent to vacant two story auto showroom building at 1710 Santa Monica
6	CB	1447 18TH ST	4275010015	MUBL	7,500	parking lot for Herman's auto repair		0.26	large site; auto storage; 3 adjacent parcels with common ownership (see 1449 18th)
6	CB	1807 BROADWAY	4275010013	MUBL	7,500	parking lot for Herman's auto repair		0.01	large site; auto storage; 3 adjacent parcels with common ownership (see 1449 18th)
6	T	1201 SANTA MONICA BLVD	4282014026	GC	22,473	BMW auto storage	1969	0.08	common ownership with adjacent parcel - large separate inventory lot; main dealership is across alley at 1187 Santa Monica Blvd
6	T	1337 12TH ST	4282014016	GC	14,994	BMW auto storage	1964	0.02	common ownership with adjacent parcel - large separate inventory lot; main dealership is across alley at 1187 Santa Monica Blvd
6	W	1418 16TH ST	4282020004	GC	7,494	Lexus parking lot - used car lot/service lot	1964	0.00	lot is used to sell used cars; Main Lexus dealership is at 1501 Santa Monica Blvd; dealership may consolidate its operations

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6	W	1530 SANTA MONICA BLVD	4282020001	GC	7,510	Lexus parking lot - used car lot/service lot	1952	0.00	lot is used to sell used cars; Main Lexus dealership is at 1501 Santa Monica Blvd; dealership may consolidate its operations
6	W	1530 SANTA MONICA BLVD	4282020002	GC	7,497	Lexus parking lot - used car lot/service lot	1952	0.00	lot is used to sell used cars; Main Lexus dealership is at 1501 Santa Monica Blvd; dealership may consolidate its operations
6	X	1308 SANTA MONICA BLVD	4282022024	GC	9,711	offsite auto storage lot for Suburu	1924	0.02	in 2020 was used for Mercedes Benz; currently used for Suburu; main dealership is at 1229 Santa Monica
6	X	1415 EUCLID ST	4282022023	GC	7,499	offsite auto storage lot for Suburu	1921	0.00	in 2020 was used for Mercedes Benz; currently used for Suburu; main dealership is at 1309 Santa Monica
6	Z	1335 LINCOLN BLVD	4282010019	LT	7,482	Toyota service repair lot		0.02	common ownership with adjacent parcel
6	Z	1339 LINCOLN BLVD	4282010018	LT	7,509	Toyota auto storage - service center lot	1913	0.03	common ownership with adjacent parcel
6		1415 12TH ST	4282023025	GC	37,478	offsite overflow Ford service & repair auto storage lot	1965	0.13	off-site overflow service and lot for Ford; large parcel; mostly surface parking with service bays; owned by Real estate developer
7	AI	1901 WILSHIRE BLVD	4276008010	MUB	10,498	one-story vacant House of Billiards building	1938	0.33	vacant space; corner parcel; for sale with 1141 19th St
7	AK	2720 LINCOLN BLVD	4287017044	GC	8,022	one story Big Q's auto repair	1969	0.21	active sales; advertised for redevelopment; Common ownership to 3 adjacent parcels - see 2700 Lincoln
7	BC	3307 PICO BLVD	4274036002	NC	5,015	one story retail building	1938	0.48	5000 sf small parcel size; adjacent properties 3311, 3317 Pico also being sold concurrently
7	BC	3311 PICO BLVD	4274036003	NC	2,502	one story retail building	1948	0.58	small parcel size; adjacent sites 3307, 3317 Pico being sold concurrently
7	BC	3317 PICO BLVD	4274036027	NC	6,777	one-story auto repair shop	1974	0.16	small parcel size; adjacent parcels 3307, 3311 Pico being sold concurrently
7	BD	3018 PICO BLVD	4270006041	NC	5,958	one-story retail building	1950	0.68	all 3 adjacent parcels for sale (3018-3030 Pico)
7	BD	3024 PICO BLVD	4270006042	NC	5,775	two-story apartment building	1957	0.89	all 3 adjacent parcels for sale (3018-3030 Pico)
7	BD	3026 PICO BLVD	4270006043	NC	5,579	two story commercial retail building	1955	0.88	all 3 adjacent parcels for sale (3018-3030 Pico)
7	BE	1450 20TH ST	4275009009	MUBL	22,500	Part of Big Jos burgers		0.54	for sale property; with adjacent parcels; large underutilized site
7	BE	1925 BROADWAY	4275009010	MUBL	7,500	parking lot for Big Jos burger	1957	0.42	for sale property; very underutilized site with single story tenant and large lot; advertised for redevelopment opportunity
7	N	1457 19TH ST	4275009011	MUBL	15,000	one story iron gym and creative office with parking lot (common ownership)	1948	0.28	recently sold building; location on Broadway near other residential uses make it likely it will turn over; common ownership (see 1457 19th street)
7	V	1619 1/2 SANTA MONICA BLVD	4282018010	GC	3,212	vacant car sales lot; recently sold	1960	0.26	common ownership with adjacent parcel; recently sold
7	V	1619 SANTA MONICA BLVD	4282018012	GC	4,282	vacant car sales lot; recently sold	1977	0.26	common ownership with adjacent parcel; recently sold
7		1634 20TH ST	4275025002	IC	19,662	two-story office building	1925	0.05	older building; In IC north of Olympic Boulevard adjacent to bike path; proximity to existing residential; for sale; with preassessment for affordable housing already done
7		1703 OCEAN PARK BLVD	4273023032	NC	14,021	one-story Burger restaurant and laundrymat	1974	0.85	one-story multitenant retail building with large parking; corner large parcel; recently sold
7		2316 LINCOLN BLVD	4289001007	GC	14,104	one-story retail (recliner sales) building	1953	0.14	on Lincoln Boulevard with high development potential; larger parcel on corner
7		2510 PICO BLVD	4270001023	NC	18,171	car wash	1960	0.28	large parcel with access from side street; new owner indicate future residential development interest
8	AB	1411 LINCOLN BLVD	4282027029	LT	14,994	CVS pharmacy	1948	0.34	in DT; adjacent parcel is parking lot
8	AE	1323 COLORADO AVE	4282033011	MUBL	22,495	Paint and body shop	1952	0.09	location is ideal as it is located across from park; common ownership with adjacent parcels; one story service bays
8	AV	1719 WILSHIRE BLVD	4276010037	MUB	18,769	one story Enterprise car rental		0.13	one story with parking lot; common ownership with adjacent parcel at 1723 Wilshire; large site
8	AW	2202 BROADWAY	4275016007	MUBL	35,989	one-story Ferguson plumbing and lighting	1950	0.28	one story single tenant light industrial; common ownership with adjacent parcel
8	AW	2218 BROADWAY	4275016005	MUBL	19,800	one-story Ferguson plumbing and lighting	1947	0.54	proximity to redeveloping residential parcels across; large sized lot
8	BF	888 SANTA MONICA BLVD	4282027032	GC	15,005	Toyota auto storage		0.57	common ownership with adjacent parcel
8	CD	2711 WILSHIRE BLVD	4266016100	MUB	28,663	Chase bank building with rear parking	1977	0.32	sheer size of lot may make this property desirable for redevelopment; adjacent rear parking lot see 1135 Princeton

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8	L	2601 WILSHIRE BLVD	4266016054	MUB	15,365	76 gas station		0.00	large size parcel; corner; access to alley; gas station may make it undesirable to sell; common ownership with Sonny Mclean
8		1020 WILSHIRE BLVD	4282007025	MUB	17,502	one-story Belcampo restaurant building	1960	0.46	single tenant; low scale; next to Apartments.com; large parcel; could be developed with 1018 Wilshire but no common ownership
8		1025 WILSHIRE BLVD	4281027033	MUB	22,517	one-story El Cholo restaurant	1932	0.15	large parcel small restaurant; lots of parking
8		1100 SANTA MONICA BLVD	4282024026	GC	14,992	Toyota preowned center	1942	0.26	large parcel; corner
8		1102 BROADWAY	4282031032	MUBL	22,486	small one story office tenants; appears mostly vacant	1975	0.45	large parcel on corner; includes parking
8		1224 5TH ST	4291004016	NV	14,986	one story office building	1962	0.20	doublewide lot
8		1234 WILSHIRE BLVD	4282005001	MUB	14,993	one-story Ulta building	1946	0.37	large lot; low scale; single tenant; corner parcel
8		1420 WILSHIRE BLVD	4282003001	MUB	29,976	one-story Audio and Video center and Bank of America	1953	0.67	corner parcel; two tenants; rear adjacent parking parcel owned by Bank of America
8		1453 14TH ST	4282021013	MUBL	22,518	one-story building with 3 tenants, Paint lab and small creative office	1925	0.43	low scale building; new development adjacent to north
8		1624 LINCOLN BLVD	4290001012	LT	22,288	car wash	1972	0.09	next to affordable housing; part of development trends occurring on Lincoln
8		1701 WILSHIRE BLVD	4276010035	MUB	13,497	one-story vacant Mens Warehouse	1961	0.49	single tenant is bankrupt; vacant building; alley access; corner
8		1907 WILSHIRE BLVD	4276008023	MUB	15,009	one-story restaurant (Chandi)	1966	0.31	prospective owners with interest to redevelop; single tenant; one story
8		2020 WILSHIRE BLVD	4276014025	MUB	19,574	one-story restaurant and nightclub (Opaque Restaurant and Senator Jones club)	1955	0.10	rear parcel is R2 parking lot; low scale; few tenants; could be developed in conjunction with 2030 Wilshire but no common ownership
8		2230 BROADWAY	4275016024	MUBL	21,600	one story creative office building	1948	0.41	vacant space; large parcel; single story
8		2308 BROADWAY	4275016028	MUBL	27,773	one story creative office building	1948	0.35	large lot; proximity to redeveloping residential across
8		2411 PICO BLVD	4274006023	MUBL	17,664	one story auto repair shop	1966	0.14	large one story auto repair with parking; adjacent to residential; large parcel; single tenant
8		2520 SANTA MONICA BLVD	4275001024	MUBL	20,962	one-story Goodwill building	1962	1.17	large parcel on corner; single tenant
8		2730 SANTA MONICA BLVD	4267020026	MUBL	28,573	one-story AAA building	1965	0.33	access to side street; large parcel; underutilized with access to transit
8		2802 SANTA MONICA BLVD	4267019028	MUBL	14,451	one-story office (roque and mark) building	1965	0.43	two frontages with rear parking; doublelot on corner; access to alley; single tenant
8		2828 WILSHIRE BLVD	4267005009	MUB	29,264	one-story commercial building, Vitamin Store and vacant restaurant space	1949	0.25	big parcel; two frontages
8		2914 WILSHIRE BLVD	4267004015	MUB	25,528	two-story LA mattress store with office	1949	0.66	one story retail with office above; multiple tenants; rear parking; larger parcel
8		2933 SANTA MONICA BLVD	4267011025	MUBL	19,147	one story Wine Expo	1948	0.18	two frontages; single tenant
8		1651 16TH ST	4283010900	MUBL	161,263	vacant SMMUSD headquarters building	1976	0.00	SMMUSD indicated interest in redeveloping for worker housing
9	BA	2800 LINCOLN BLVD	4287017045	GC	21,519	one story car wash	1961	0.19	large parcel decent size; single tenant; common ownership with parcel 4287017018
9	BR	901 SANTA MONICA BLVD	4282011034	GC	15,006	one-story Tuesday Morning store	1976	0.17	large parcel; corner parcel; single tenant
9	CX	1832 FRANKLIN ST	4268011006	MUC	17,921	one story creative office	1951	0.12	owner inquiry on site history; demolition of existing building applied for recently; new ownership in LLC
9	CX	3122 NEBRASKA AVE	4268011004	MUC	20,010	one story light industrial	1950	0.32	large parcel; recently acquired with adjacent parcels with LLC
9		1724 STANFORD ST	4268003003	MUC	31,503	one story light industrial	1927	0.01	appears to be Volkswagen off site storage lot and service bays
9		1740 STANFORD ST	4268003002	MUC	29,308	one story creative office	1957	0.22	large parcel; acquired into LLC; ownership by developer
10	AE	1538 14TH ST	4282033009	MUBL	7,485	Paint and body shop	1955	0.00	common ownership with adjacent parcel; one story service bays
10	AG	1520 BROADWAY	4282035001	MUBL	7,510	one-story auto parts building	1976	0.49	common ownership with adjacent parking lot parcel; building seems to be used only for storage; corner parcel with alley access
10	AJ	3101 LINCOLN BLVD	4285036001	GC	4,749	one-story Georges burgers restaurant	1968	0.49	large parcel on corner; single tenant; common ownership with parking lot parcel

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10	AV	1723 WILSHIRE BLVD	4276010025	MUB	7,500	parking lot for Enterprise Rental	1976	0.06	recently sold with 1719 Wilshire; enterprise rental
10	AZ	3204 LINCOLN BLVD	4287032014	GC	1,988	one story auto repair shops	1960	0.15	adjacent common ownership (see 3204 lincoln); one story auto with parking lot
10	BB	1719 SANTA MONICA BLVD	4276030011	GC	14,986	Honda dealership with surface inventory	1977	0.07	common ownership with adjacent 2 parcels (1344-1348 18th St); main dealership at 1337 Euclid/1301 Santa Monica Blvd
10	BJ	2624 WILSHIRE BLVD	4267007004	MUB	4,405	one-story restaurant	1932	0.15	common ownership to adjacent 2 parcels
10	BJ	2628 WILSHIRE BLVD	4267007005	MUB	4,404	one-story mathnasium and salon	1959	0.29	common ownership to adjacent 2 parcels
10	BJ	2636 WILSHIRE BLVD	4267007006	MUB	5,481	one-story mathnasium and salon	1949	0.28	common ownership to adjacent 2 parcels
10	BK	1710 SANTA MONICA BLVD	4275011025	GC	10,000	two-story vacant building	1946	0.49	vacant auto showroom with parking lot; recently sold
10	BR	911 SANTA MONICA BLVD	4282011015	GC	5,004	part of Tuesday morning site	1963	0.25	common ownership to Tuesday morning parking lot site
10	CB	1449 18TH ST	4275010014	MUBL	7,500	parking lot for Herman's auto repair		0.00	large site; auto storage; 3 adjacent parcels with common ownership (see 1449 18th)
10	CJ	1457 25TH ST	4275001012	MUBL	7,002	one-story Helen's cycle	1963	0.40	one story; single tenant; with rear parking lot
10	D	3011 SANTA MONICA BLVD	4267012003	MUBL	7,187	small one story dentist	1953	0.16	common ownership with adjacent parcel developed with old office
10	D	3017 SANTA MONICA BLVD	4267012004	MUBL	7,214	two story office	1969	0.15	common ownership with adjacent parcel
10	F	2601 COLORADO AVE	4267022017	OC	6,066	one story vacant commercial building	1946	0.33	currently vacant; common ownership to 3 other adjacent parcels (see 2601 Colorado)
10	F	2615 COLORADO AVE	4267022016	OC	5,977	one-story vacant commercial building		0.35	vacant building, for lease; common ownership to 3 other parcels (see 2601 Colorado)
10	J	2008 PICO BLVD	4273003002	NC	2,497	one-story campos taco with lot		0.00	large lot with parking; common ownership; single tenant
10	J	2008 PICO BLVD	4273003001	NC	4,722	one-story campos taco with lot	1948	0.15	large lot with parking; common ownership; single tenant
10	J	2010 PICO BLVD	4273003003	NC	6,491	one-story campos taco with lot	1949	0.13	large lot with parking; common ownership; single tenant
10	K	3115 PICO BLVD	4274034031	NC	7,502	closed Valentino's restaurant	1945	0.32	common ownership with adjacent parcel; vacant building
10	L	2615 WILSHIRE BLVD	4266016055	MUB	5,508	one story bar Sonny Mcleans	1940	0.30	sonny mcleans; common ownership with adjacent 76 station
10	M	2312 SANTA MONICA BLVD	4275005020	MUBL	5,553	one-story retail store - cynergy cycle	1940	0.40	common ownership with adjacent parcel; single tenant
10	O	2439 SANTA MONICA BLVD	4276022002	MUBL	5,195	one story laundromat	1948	0.32	common ownership with 3 adjacent parcels; corner lot
10	O	2445 SANTA MONICA BLVD	4276022003	MUBL	5,207	one story auto repair	1946	0.28	common ownership with 3 adjacent parcels; corner lot
10	Q	1414 18TH ST	4275011002	GC	7,500	parking for vacant Honda service repair		0.27	formerly the Honda service center at 1726 Santa Monica Blvd which has since left; large site in combination with adjacent parcel
10	Q	1726 SANTA MONICA BLVD	4275011001	GC	15,000	two-story vacant Honda service center	1976	0.28	vacant; common ownership with 3 adjacent parcels
10	U	1323 SANTA MONICA BLVD	4282015013	GC	4,998	one-story Truxton restaurant and Bar	1923	0.10	common ownership with rear and adjacent parking parcel; two tenants on-site; corner parcel
10	W	1530 SANTA MONICA BLVD	4282020003	GC	7,509	Lexus auto storage	1952	0.00	auto storage for service center
10	Y	1200 SANTA MONICA BLVD	4282023023	GC	4,978	parking lot with vacant auto repair	1962	0.03	common ownership w/ adjacent parcel; underutilized; one story autorepair
10		3232 SANTA MONICA BLVD	4267015027	MUBL	13,878	one story retail building (keyboard store)	1968	0.42	single tenant; large parcel; corner lot;
11		1140 7TH ST	4292005007	R2	7,497	St Monica Church parking lot			DA indicates that affordable housing shall be constructed as priority
11		1257 CENTINELA AVE	4267001016	R2	42,631	Church of Jesus Christ parking lot	1948		large parking lot
11		1343 OCEAN PARK BLVD	4284025028	R3	25,777	Mt Olive Church with large parking	1962		has express interest; half of site is parking lot
11		3114 3RD ST	4287038027	OP2	22,603	St Clement Church parking	1956		large separate parking

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11		801 WASHINGTON AVE	4281033024	R2	15,012	parking lot for Saint Pauls Lutheran Church			(blank)
11	BH	925 CALIFORNIA AVE	4281029012	R2	4,993	Vintage Church trinity house parking lot	1967		double lot
11	BH	929 CALIFORNIA AVE	4281029011	R2	5,017	Vintage Church trinity house parking lot	1967		double lot
12	CN		4276012027	R2	22,500	large parking lot for Rite Aid off Pico			existing parking lot in rear of retail diagonal across from Rite Aid; large size lot
12	S		4282010011	R3	7,493	parking lot for Toyota			A-Lot; parking in rear of 825 SMB project
12	BA		4287017018	OP2	5,659	parking lot for car wash on lincoln	1961		common ownership to vacant car wash fronting Lincoln but zoned OP2
12	CC	1122 14TH ST	4281012024	R2	37,532	Rite aid parking lot off Wilshire			common ownership to Rite Aid fronting Wilshire
12	CD	1135 PRINCETON ST	4266016045	R2	21,913	Chase Bank parking lot			common ownership to Chase bank; large parcel
12	AI	1143 19TH ST	4276008009	R2	7,192	parking lot			for sale; with 1901 Wilshire; common ownership
12	B	1215 26TH ST	4267007030	R2	6,377	parking lot for New balance store			A-Lot; parking lot for New balance; common ownership
12	CM	1219 PRINCETON ST	4267006012	R2	6,983	parking lot for multi tenant retail			A-Lot; common ownership to front wilshire parcel; Pacific Dining Car vacant restaurant
12	CN	1223 18TH ST	4276012018	R2	7,486	large parking lot for Rite Aid off Pico			existing parking in rear of retail; large adjacent common ownership in front but riteaid may not leave
12	Q	1418 18TH ST	4275011003	R2	7,500	parking structure for former Honda service center			service center appears to have moved; common ownership with adjacent two parcel
12	BF	1418 9TH ST	4282027004	R3	7,492	Toyota parking lot	1925		A-Lot; common ownership to 2 other parcels
12		1424 9TH ST	4282027005	R3	7,503	CVS parking lot			A-Lot
12		1847 16TH ST	4283032024	R2	6,040	vacant lot			undeveloped; no structures
12		528 SAN VICENTE BLVD	4293004010	R2	11,074	vacant lot			undeveloped; no structures
12		621 PACIFIC ST	4289005013	OP2	5,865	vacant lot			undeveloped; no structures