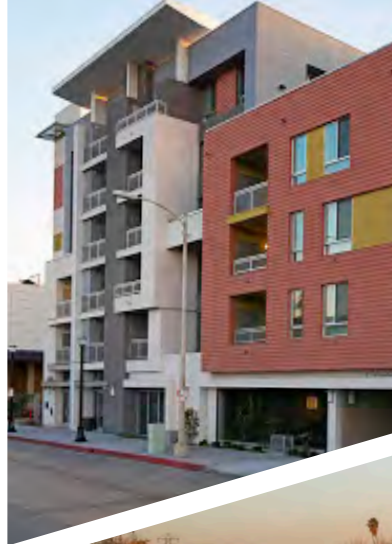




# City of Downey 2021-2029 Housing Element

ADOPTED | OCTOBER 11, 2022



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# downey general plan housing element

## TABLE OF CONTENTS

	Page
<b>Chapter 1. Introduction.....</b>	<b>1-1</b>
Regulatory Framework.....	1-2
Scope and Content of the Housing Element .....	1-2
Relationship to Other General Plan Element .....	1-3
Public Participation.....	1-4
Affirmatively Furthering Fair Housing (AFFH) .....	1-12
Acronyms.....	1-15
<b>Chapter 2. Community Profile/Housing Needs Assessment .....</b>	<b>2-1</b>
Population and Employment Trends.....	2-1
Household Characteristics.....	2-4
Housing Stock Characteristics .....	2-7
Special Housing Needs .....	2-9
Energy Conservation Opportunities .....	2-13
At-Risk Housing Analysis.....	2-14
Projected Housing Needs (RHNA) .....	2-15
<b>Chapter 3. Constraints on Housing Production .....</b>	<b>3-1</b>
Non-Governmental Constraints .....	3-1
Governmental Constraints .....	3-5
Affirmatively Furthering Fair Housing .....	3-27
Environmental Constraints.....	3-65
<b>Chapter 4. Housing Resources .....</b>	<b>4-1</b>
Housing in Downey.....	4-1
Regional Housing Needs Assessment.....	4-3
Approved and Proposed Projects.....	4-3
Residential Sites Inventory .....	4-4
Sites to Be Rezoned .....	4-27
Financial and Administrative Resources.....	4-45

**Chapter 5. 2014-2019 Housing Element Program Accomplishments ..... 5-1**  
 Quantified Objectives ..... 5-8

**Chapter 6. Housing Plan ..... 6-1**  
 Goal and Policies ..... 6-2  
 Implementing Programs ..... 6-4  
 Summary of Quantified Objectives ..... 6-30

**Appendix A. Public Outreach**  
 Summary, Community Workshop #1  
 Summary, Community Workshop #1  
 Summary, Community Survey  
 Outreach List  
 HCD Findings Letter November 10, 2021 and Summary of City Edits/Response to HCD Findings  
 HCD Findings Letter February 18, 2022 and Summary of City Edits/Response to HCD Findings

**Appendix B. Sites Inventory Table**



# downey general plan

# housing element

## CHAPTER 1. INTRODUCTION

This Housing Element provides the City of Downey with a coordinated and comprehensive strategy for promoting the production of safe, decent, and affordable housing for all community residents. The onset of the 2021-2029 Housing Element is occurring during a challenging time for housing locally and across the State. The dire housing situation in California has resulted in:

- **Rapidly rising home values which favors existing homeowners but worsens the housing cost burden for new buyers.**
- **Falling homeownership rates particularly among younger age groups and for many Black and Latino households.**
- **Decreases in rental affordability as rent increases outpace incomes.**
- **Skyrocketing homelessness in major urban areas has created an environmental and public health disaster.**

Local factors have also impacted housing development. In Downey, lack of undeveloped land, high land prices, open space deficits, and productive industrial uses that are incompatible with residential neighborhoods have limited opportunities for new residential development. Nonetheless, the City is fully committed to doing its part to address the State’s housing crisis and will continue to make every effort to increase housing capacity and supply in Downey. The City continues to plan for future growth—specifically new residential development—through major planning efforts, like the Downtown Downey Specific Plan.

With this Element, the City is implementing a plan that embraces new opportunities, supports housing development, and provides diverse housing options. Realizing that new housing opportunities for all income levels is difficult to achieve, the City will follow adoption of the Housing Element with a comprehensive General Plan land use update that rethinks residential development opportunities throughout the City. Moving forward, the City will provide for a diversity of housing in expanded geographic locations throughout the City but also by using creative solutions to support housing development throughout the community.

## Regulatory Framework

The Housing Element is a mandatory General Plan element. It identifies ways in which the housing needs of existing and future residents can be met. State law requires that all cities adopt a Housing Element and describes in detail the necessary contents of the Housing Element. California planning law provides more detailed requirements for the Housing Element than for any other General Plan element. This Housing Element responds to those requirements and responds specifically to conditions and policy directives unique to Downey.

The California Legislature has identified the attainment of a decent home and suitable living environment for every Californian as the state's main housing goal. Recognizing the important part that local planning programs play in pursuit of this goal, the Legislature has mandated that all cities and counties prepare a Housing Element as part of their comprehensive General Plans. Section 65581 of the California Government Code reflects the legislative intent for mandating that each city and county prepare a Housing Element:

1. To ensure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goal
2. To ensure that counties and cities will prepare and implement housing elements which, along with federal and state programs, will move toward attainment of the state housing goals
3. To recognize that each locality is best capable of determining what efforts are required by it to contribute to the attainment of the state housing goal, provided such a determination is compatible with the state housing goal and regional housing needs
4. To ensure that each local government cooperates with other local governments to address regional housing needs

## Scope and Content of the Housing Element

The Housing Element covers the planning period of October 15, 2021 through October 15, 2029 and identifies strategies and programs to: 1) encourage the development of a variety of housing opportunities; 2) provide housing opportunities for persons of lower and moderate incomes; 3) preserve the quality of the existing housing stock in Downey; 4) minimize governmental constraints; and 5) promote equal housing opportunities for all residents.

Toward these ends, the Housing Element consists of:

- An introduction of the scope and purpose of the Housing Element
- An analysis of the City's demographic and housing characteristics and trends
- A review of potential market, governmental, and environmental constraints to meeting the City's identified housing needs
- An evaluation of land, administrative, and financial resources available to address the housing goals
- A review of past accomplishments under the previous Housing Element
- A Housing Plan to address the identified housing needs, including housing goals, policies, and programs

The Housing Element is also closely related to the Zoning Regulations and assesses multiple ordinances and Zoning Regulations sections that pertain to housing for compliance with State law. As new ordinances are considered, the City will review the Housing Element to ensure compliance with housing policies.

## Relationship to Other General Plan Elements

State law requires that the General Plan and all individual elements collectively form an "integrated, internally consistent, and compatible statement of policies." The goals, policies, and programs of this Housing Element are consistent with the goals, policies, and programs contained in other elements of the Downey General Plan.

Development policies contained in the Land Use Element—which establishes the location, type, density, and distribution of local land uses, including housing—most directly relate to the Housing Element. When any element of the General Plan is amended, the City will review the Housing Element and if necessary, prepare an amendment to ensure continued consistency among elements. State law requires that upon revisions to the Housing Element, the Safety and Conservation Elements include an analysis and policies regarding flood hazard and management information.

Several new laws trigger additional General Plan update requirements upon revision of the Housing Element.

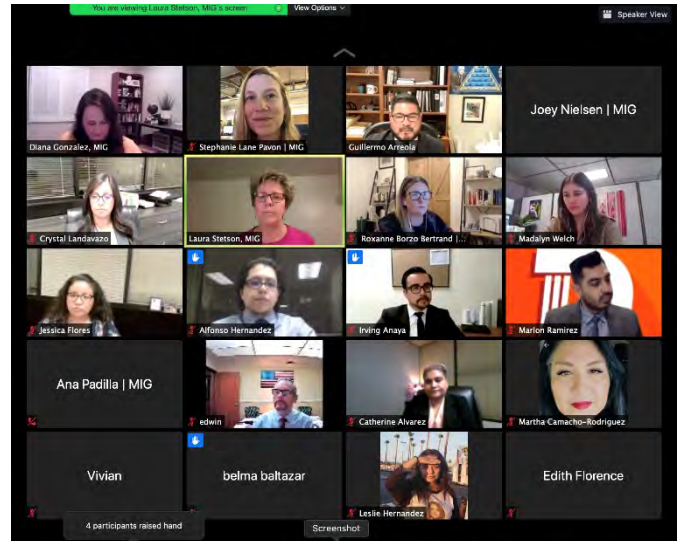
- SB 244 requires that before the due date for adoption of the next Housing Element after January 1, 2012, the General Plan Land Use Element must be updated to identify and describe disadvantaged unincorporated communities (DUC) that exists within the city's sphere of influence (SOI). Disadvantaged communities both within the City and its SOI have been identified and policy has been prepared to address environmental justice issues.
- SB 379 requires that, upon the next revision of a Local Hazard Mitigation Plan (LHMP) on or after 1/1/2017, or on or before 1/1/2022, if a jurisdiction has not adopted a LHMP, the Safety Element (and other elements as needed) must be updated to address climate resiliency.
- SB 1241 and SB 1000 require the General Plan Safety Element, upon the next revision of the Housing Element on or after January 1, 2014, to be reviewed and updated as necessary to address the risk of fire and flooding.
- SB 1000 also requires local jurisdictions to add an Environmental Justice element or policies to their General Plans and is required in General Plans when two or more elements are updated beginning January 1, 2018.

The City will follow adoption of the Housing Element that will include a comprehensive General Plan land use update and updates to all required parts of the Plan. As such, information on flood hazard, flood management, fire hazards, disadvantaged communities, and environmental justice issues will be updated.

## Public Participation

The Housing Element must reflect the values and preferences of the Downey community; therefore, public participation plays a role in the development of this Element. Section 65583(c)(6)(B) of the Government Code states: “The local government shall make diligent effort to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort.” This process not only includes residents of the community, but also coordinates participation among local agencies and housing groups, community organizations, and housing sponsors.

Community outreach for the Housing Element update included two workshops, a community survey, and a webpage for the Housing Element Update were initiated. Outreach for the sixth cycle Housing Element was challenging because much of the update process occurred during the COVID-19 pandemic. Restrictions on public gatherings prevented the city from holding traditional public workshops. Instead, the city utilized online engagement tools, including an online survey, social media posts and online documents to provide opportunities for the community to share their feedback. Following guidance from public health agencies regarding public gatherings and COVID-19, all workshops and meetings were held virtually using online video conferencing (Zoom). The workshop, surveys, and all outreach material was accessible to both English and Spanish speakers.



Many of these themes and comments that have emerged from the outreach efforts have been incorporated in the Housing Plan through programs that promote ADU development, includes actions to review and revise key parts of the City’s development standards. The comments also support the City’s approach to the sites inventory which expands opportunities for multi-family housing, including affordable housing, in more locations throughout the City. Concerns about housing cost and aid to struggling residents has been taken into consideration through the various programs that include emergency mortgage and rent assistance and a housing rebate and grant program to address code enforcement issues and programs that aim to increase affordable housing development through regulatory incentives.

### Community Workshop #1

On December 17, 2020, the City conducted a community workshop to gather input from key local stakeholders, housing advocates, and residents. The meeting included a PowerPoint presentation about the intent of the Housing Element update and Regional Housing Needs Assessment (RHNA), opportunities to meet local housing needs, and creative approaches to address the City’s constraints to housing production, which was







followed by a facilitated discussion regarding housing issues. The workshop had 58 attendees. To ensure that the housing concerns of low- and moderate-income and special needs residents were addressed, the City notified agencies and organizations that serve these communities in Downey and surrounding areas. The list of agencies and organizations invited to the workshop are listed in Appendix A and included over 100 groups and agencies working with special needs groups, civic and religious groups and housing developers and local businesses. Outreach for the workshop was conducted in English and Spanish using flyers, social media posts, direct mail to a stakeholder list and to an email list with over 20,000 contacts from the City’s Park and Recreation Department. Press releases/notification of the workshop were sent to local media outlets and the Downey Chamber of Commerce members. Information was posted on the General Plan/Housing Element website. The community workshops had dedicated Spanish

breakout rooms where the presentation and discussion were conducted in Spanish. A summary of the workshop is provided in Appendix A.

Community input included:

- The need for more affordable, multi-family housing
- Consider residents first, especially most vulnerable
- Housing near transit and transit-oriented development
- Revisit City zoning code and land use planning policies
- Less restrictive development standards
- Supporting Accessory Dwelling Unit (ADU) and tiny house development
- Address climate change issues and resilience
- Parking, safety, and traffic concerns
- Potential negative effects of freeway expansion on Downey neighborhoods

### Housing Element Survey

The City of Downey developed a community survey to gather feedback for the 2021-2029 Housing Element Update from Downey residents, workers, property owners and others interested in housing issues in the city. The survey was posted on the City of Downey’s website, from December 18, 2020 to January 29, 2021, and available in both English and Spanish. Weekly social media posts encouraged the Downey community to participate. The survey received a total of 991 responses; 54 surveys (5.4%) were completed using the Spanish language version of the survey.



Approximately two-thirds of respondents (62.0%) were homeowners, and one-third (33.2%) renters. Nearly five percent (4.8%) lived with friends and family and/or did not have a permanent home.

Survey findings included:

- Half of respondents said they commuted more than ten miles to work.
- More than half said they lived in Downey due to close distance to family and friends (55.2%) and the schools (54.2%).
- One in four respondents (27.5%) said they struggled to pay their rent or mortgage since the coronavirus outbreak.
- Some of the most important housing challenges to respondents included ensuring that children who grow up in Downey can afford to live in the City on their own; encouraging rehabilitation of existing housing in older neighborhoods; supporting homeowners at risk of mortgage default to keep their homes; and targeting efforts to address long-term inequities in the housing market, including discrimination in renting.
- Respondents considered acknowledging the traffic impacts of new housing development, balancing development across the City, and looking at transit-oriented development opportunities as the most important approaches for deciding where to allow new housing in Downey.
- Locating new housing along major corridors, within existing commercial shopping centers, or in hotels or motels that can be converted to housing were considered more favorable locations by more respondents than increasing the number of housing units in single family neighborhoods.

See Appendix C for a survey summary.

## Community Workshop #2

On June 14, 2021, the City conducted a community workshop to gather feedback on the Public Review Draft Housing Element from key local stakeholders, housing advocates, and residents. The meeting included a PowerPoint presentation presenting key portions of the 2021-2029 Housing Element, including site suggestions and programs the City will undertake to address housing issues in Downey and to meet State law housing requirements. The workshop had 58 attendees and included a dedicated Spanish breakout room where the presentation was conducted in Spanish, however there were no attendees who chose to participate in Spanish. Both English and Spanish versions of the presentations were recorded and posted to the City’s website for residents not able to make the meeting. To ensure that the housing concerns of low- and moderate-income and special needs residents were addressed, the City notified agencies and organizations that serve these communities in Downey and surrounding areas. The list of agencies and organizations invited to the workshop are listed in Appendix. Outreach for the workshop was conducted in English and Spanish using flyers, social media posts, and direct mail to a stakeholder list.

The image shows a flyer for the City of Downey Housing Element Community Workshop held on June 14, 2021, from 6:00 - 8:00 pm. The flyer is titled "SHARE YOUR THOUGHTS Draft 2021-2029 Housing Element" and features a logo of two people holding hands. Below the flyer is a grid of comments/questions and recommendations.

Comments/Questions							
Expand zoning to multifamily housing	Residents want to stay in Downey but not many places for rent	Will the City focus on transit-oriented developments along Green Line?	How does the Housing Element account for increasing traffic impacts?	Concern about general traffic conditions in City	Concerns about growing homelessness due to rent burden	How does zoning need to develop affordable units?	Can sites with older buildings/businesses be considered for new housing?
Access to parking is not as important for younger residents	Does this plan address parking requirements?	Increasing densities may be a challenge in some areas	How can community benefit an increase in students, burdens to schools?	This plan creates capacity for Downey to grow by 6500 units	Support housing inside and hold on renter homeowners	Will traditional housing include more security/police presence?	Consider that we are building for the future address growing crime impact
Parking conflicts - having a parking requirement for new housing is needed	Not complying with state law may have negative financial impacts	The main issue is that there are not enough places for people to live in	How does the Housing Element measure units and tenants?	Concerns about parking for future development	Lack of parking causes overflow into other neighborhoods	More advertising about meetings	Support TOD, mixed use, affordable housing with longer term-term residents
Families need space and parking	Transitional housing - should help not hurt residents	How do you define affordable housing? paying 30% of income	New housing is vital to our community	Young people cannot afford to stay in Downey in region	Transitional housing a part of the 6,500?	Impact of parking and traffic around transit	Implications for young people to afford to live in Downey
What can the City do to support multi-household households?	How does the plan take into account the implications to traffic, parking?	New housing opportunities near Green Line track	Units on LA County owned and owned toward Downey's BRTA	High density housing may not be suitable for quality of life, no residential uses to allow to reduce density			

Recommendations					
Reduce/Remove Parking Requirements	Focus multifamily housing in areas with lower impacts	Use more county land to build affordable housing	Make sure that new residents have the same access to quality living environments as established residents do	Consider joint parking opportunities among developments	Create communities with green space, access to transit, new schools for additional students
Ensure long term affordability covenants on housing	Address the climate crisis - reducing driving by placing housing near transit and bike infrastructure	Encourage development along transit corridors	More outreach and advertising for community meetings/input	Be future oriented so kids can stay here into adulthood if they choose	Seek input from under-represented people for broad community input
Look to neighboring cities for ideas	Consider how zoning might lead to more development of affordable units	Don't make parking mandatory	Support young working families	Have a tiny home village for unhoused community members	Study traffic and parking patterns as these are impacted by new housing and businesses

Below is a summary of themes from the workshop, and screenshots of the notes taken during the meeting.

Key themes emerged during the discussion, including:

- Expand availability of affordable, multi-family housing
- Encourage development near transit corridors
- Parking, traffic, and overcrowding concerns
- Having a future orientation to support young people growing up in Downey and young families who want to stay in the City
- Balancing the needs of long-time homeowners and renters
- More support needed for lower income, rent-burdened households
- Address growing climate impacts

When asked about how the City might encourage more housing development in Downey, recommendations from the group included:

- Reduce or remove parking requirements
- Support pooled parking opportunities for developments
- Encourage development along transit corridors and expanding bike infrastructure
- Support tiny home development to help alleviate homelessness
- Explore how rezoning might encourage more affordable developments
- Ensure long-term affordability covenants on housing
- Focus new multi-family developments in areas with lower impacts
- Seek more input from under-represented groups

Further opportunity for public participation will be provided at Planning Commission and City Council adoption hearings expected to occur Fall 2021.

### **ULI- LA Office Hours**

The Los Angeles chapter of the Urban Land Institute (ULI-LA) offered the City the opportunity to conduct meaningful outreach to the development community around the policy and zoning changes proposed in the Housing Element. The ULI-LA for “office hours” allowed city staff to interact with ULI volunteers who have expertise on various aspects of housing development — including economics and market analysis, development of market-rate and affordable housing, entitlements and land use consulting, architecture, and design — and answer questions. These sessions were intended to fill a critical gap in public-private sector interaction around housing policy, by allowing cities to receive customized, one-on-one feedback on key issues from expert practitioners in a neutral advisory setting.

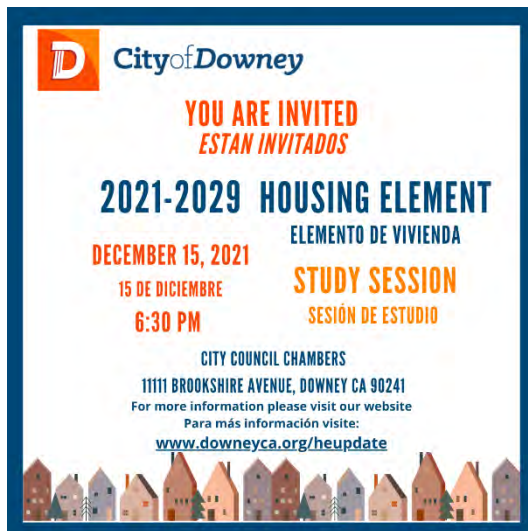
The City used the ULI Office hours to seek guidance from the development community to fully assess constraints and viability of potential inventory sites by establishing a review process with the ULI group. The City held four virtual meetings with a subcommittee of the ULI group made up of a variety of large-scale housing developers who specialize in market rate and affordable housing developments. Regarding the viability of potential sites that were reviewed, feedback from the group focused significantly on the surrounding uses. The ULI group was interested in the proximity to grocery stores, shopping centers, existing multi-family housing development; these factors increased the "attractive" nature of the sites and viability for development, in addition to the proposed re-zoning and increased density on the potential inventory sites

After a series of meetings, several of the suggestions from the ULI panel have been folded into an action item in the Housing Plan. Program 1.3 includes an action item to review and, if needed, revise residential developments standards with a focus on minimum lot area requirements and building height limits in the R-3 zoning district and minimum unit sizes for all residential development.

### City Council Subcommittee on Affordable Housing

On July 19, 2021, the Affordable Housing City Council Subcommittee held a special meeting to discuss the Housing Element update process and discuss the potential for adoption of an inclusionary housing requirements. The public was invited to the meeting and the agenda was posted prior to the meeting on the City's website, City Hall, the Downey Library, and Barbara J. Riley Center (community center). No public comments were received.

### Planning Commission Study Session



On December 15, 2021, the City held a study session with the City of Downey Planning Commission to discuss the Housing Element update and the proposed revisions to the Housing Element prior to resubmittal of the revised Draft Housing Element to HCD. The study session was advertised on the City's social media platforms (Facebook, Instagram, Nextdoor and Twitter), in the Downey Patriot and Downey Latino local newspapers, and on the City's website. To ensure that the housing concerns of low- and moderate-income and special needs residents were addressed, the City notified agencies and organizations that serve these communities in Downey and surrounding areas. The list of agencies and organizations invited to the study session are listed in Appendix. To increase participation from the Downey

community, the City sent email notifications to the stakeholders list, participants of previous workshops, multi-family property owners, the Clergy Council, rent control advocates, and a park and recreation contact list with over 20,000 residents.

The meeting included a PowerPoint presentation presenting the Housing Element updated process, public outreach efforts, key portions of the 2021-2029 Housing Element, and proposed revisions to the Draft Housing Element. No public comments were received.

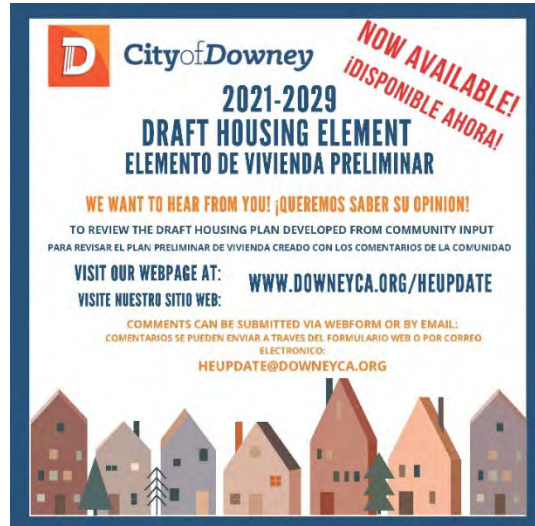
### Public Review Draft Housing Elements

On September 1, 2021, the City released the Public Review Draft to gather input from the community. The community was notified of the opportunity to comment on the Draft through posts on the City's dedicated Housing Element webpage and via social media. The list of agencies and organizations invited to comment on the Draft Housing Element are listed in Appendix A and included over 100 groups and agencies working with special needs groups, civic and religious groups and housing developers and local businesses. Outreach for the workshop was conducted in English and Spanish using flyers, social media posts, direct mail to a stakeholder list.



The following actions were undertaken to advertise the Draft Housing Element for public review:

- The Draft Housing Element was posted on the City’s dedicated Housing Element website. Comments were submitted through a dedicated form available on the website and through email or written correspondence sent directly to the City
- Email notices in the form of a digital flyer were distributed to
  - A comprehensive list of stakeholders such as agencies and organizations that serve the Downey community and surrounding areas and many which serve special needs and lower-income communities (see list in Appendix A)
  - Previous workshop participants and individuals expressing interest in the Housing Element update process
  - The City’s City Council housing issue contact list
  - Local clergy contacts
  - Multi-family property owners
- The Parks and Recreation Department sent emails (email blast) to all residents in their email distribution list (with over 20,000 contacts).
- The Draft Housing Element was also advertised in the City’s social media platform such as Facebook and Instagram in both English and Spanish.
- The Downey Police Department posted digital flyers (English and Spanish) on the Nextdoor, a neighborhood-level communications app, and sent to Neighborhood Watch groups
- The flyer notices were published in the Downey Patriot newspaper.



General comments received as of September 14, 2021 include:

- Reluctance to add additional housing capacity in the City due to traffic concerns
- Limiting new multi-family developments to main corridors to limit neighborhood impacts from new development and to not rezone single-family neighborhood
- Concerns about government-subsidized housing
- The need to better utilize freeway right of way for other land use, commercial centers for mixed-use development, additional security in underground parking areas, and traffic concerns
- The desire to keep the market rate under control by banning short term rentals unless they are owner-occupied more than 85 percent of the year.
- The expensive housing market in Downey and the desire for a more robust housing policy to address the lack of affordable housing for current and future residents.
- The need for housing types beyond single-family, the needs for housing affordable to “middle class individuals and families” such as condos and duplexes, and the addition of multifamily housing in areas with “dying businesses” such as the Stonewood Mall.



In December, 2021, a revised draft of the Housing Element was resubmitted to HCD (Department of Housing and Community Development) with revisions which addressed HCD's findings letter from November 10, 2021. The letter identified findings related to the need for additional analysis in various parts of the Element. The HCD findings letter and a table summarizing HCD findings and the City's responses/revisions to each comment is included in Appendix A. For 13 days prior to submittal, the Element revisions were made available to the public for comment and input and stakeholders were directly notified about the revised Element 10 days prior to resubmittal.

The following actions were undertaken to advertise the Revised Draft Housing Element for public review:

- The Revised Draft Housing Element was posted on the City's dedicated Housing Element website and hard copies were displayed at the City's Barbara J. Riley Community & Senior Center and at the public counter in Downey City Hall. Comments were submitted through a daily-monitored email (heupdate@downeyca.org) or written correspondence sent directly to the City.
- Email notices in the form of a digital flyer were distributed to
  - A comprehensive list of stakeholders such as agencies and organizations that serve the Downey community and surrounding areas and many which serve special needs and lower-income communities (see list in Appendix A)
  - Previous workshop participants and individuals expressing interest in the Housing Element update process
  - The City's City Council housing issue contact list
  - Local clergy contacts
  - Multi-family property owners
  - Downey Police Department's Neighborhood Watch groups
- The Parks and Recreation Department sent emails (email blast) to all residents in their email distribution list (with over 20,000 contacts).
- The Draft Housing Element was also advertised in the City's social media platform such as Facebook and Instagram in both English and Spanish.

The following comments were received:

- Our Future Los Angeles, a countywide coalition of advocates and labor leaders in Los Angeles County. Submitted a comment letter that requested the City add more protection for tenants, adopt a rent Stabilization Ordinance, prioritize rezoning in high resource areas, and prioritize affordable housing through mechanisms such as an inclusionary housing ordinance. The letter also expressed that the City has overestimated ADU production. In the revised Draft Housing Element, resubmitted to HCD for a second round of review, ADU estimates have been scaled back. The City is also moving forward with exploratory action that evaluates the adoption of an inclusionary housing ordinance through meetings with the City Council Affordable Housing Subcommittee. The 2021-2029 Housing Element includes a strategy to increase housing

opportunities in all parts of the City through a rezoning program that not only increase capacity in higher density and mixed-use areas, also along the City's major commercial corridors and commercial centers through a residential overlay zone that will allow high-density housing development at a minimum density of 30 units per acre. The strategy adds residential capacity to non-residential areas and will address disproportionate need without the risk of displacement of residents and improves fair housing and equal opportunity conditions.

- An additional public comment was received and included a request for a specific property to be included in the Residential Overlay described in Chapter 4. The site is included in the residential overlay but not included as an identified site in this Housing Element due to the combination of site size (under half an acre) and existing use (commercial property with two residential units). Nevertheless, interest in the Residential Overlay will be taken into consideration during the subsequent the General Plan and Zoning update and this property may be included as a site in subsequent edits of this Housing Element.

The revised Housing Element was adopted by the City on February 8, 2022.

In August 2022, a revised version of the Adopted Housing Element was resubmitted to HCD (Department of Housing and Community Development) with revisions which addressed HCD's findings letter from February 18, 2022. The letter identified findings related to the need for additional analysis in various parts of the Element. The HCD findings letter and a table summarizing HCD findings and the City's responses/revisions to each comment is included in Appendix A. For 7 days prior to submittal, the Element revisions were made available to the public for comment and input and stakeholders were directly notified about the revised Element. In October 2022 additional comments were received through phone calls with HCD resulting in additional revisions.

The following actions were undertaken to advertise the Revised Draft Housing Element for public review:

- The Revised Draft Housing Element was posted on the City's dedicated Housing Element website and hard copies were displayed at the City's Barbara J. Riley Community & Senior Center and at the public counter in Downey City Hall. Comments were submitted through a daily-monitored email ([heupdate@downeyca.org](mailto:heupdate@downeyca.org)) or written correspondence sent directly to the City.
- Email notices in the form of a digital flyer were distributed to
  - A comprehensive list of stakeholders such as agencies and organizations that serve the Downey community and surrounding areas and many which serve special needs and lower-income communities (see list in Appendix A)
  - Previous workshop participants and individuals expressing interest in the Housing Element update process
  - The City's City Council housing issue contact list
  - Local clergy contacts
  - Multi-family property owners
  - Downey Police Department's Neighborhood Watch groups
- The Draft Housing Element was also advertised in the City's social media platform such as Facebook and Instagram in both English and Spanish.

The following comments were received:

- One property owner included in the Residential Overlay expressed interest in adding residential units to his property.

On October 11, 2022, the City re adopted the 6<sup>th</sup> Cycle Housing Element. The Housing Element was available for review for 14 days prior to the adoption hearing.

### **Affirmatively Furthering Fair Housing (AFFH)**

State law requires that the preparation, adoption, and implementation of a housing element includes a diligent effort to include public participation from all economic segments of the community. A diligent effort means going beyond simply giving the public an opportunity to provide input and should be proactively and broadly conducted through a variety of methods to assure access and participation. As part of the Housing Element update, the City of Downey proactively engaged the community through a variety of avenues including digital/social media outreach, a community survey, community workshops, and direct email to stakeholder groups. To ensure all residents regardless of language spoken were included, all meetings, advertisements, flyers, and surveys were available in Spanish.

The results of the workshop and survey findings relevant to the AFFH analysis include the following issues – which are discussed in more detail under the AFFH section in Chapter 3 and in the Housing Plan (Chapter 6, specifically Program 5.2):

- Housing Cost is an issue to many residents:
  - One in four respondents (27.5%) said they struggled to pay their rent or mortgage since the coronavirus outbreak.
  - Some of the most important housing challenges to respondents included ensuring that children who grow up in Downey can afford to live in the City on their own; encouraging rehabilitation of existing housing in older neighborhoods; supporting homeowners at risk of mortgage default to keep their homes; and targeting efforts to address long-term inequities in the housing market, including discrimination in renting.
- Residents expressed an interest in expanding the availability of affordable, multi-family housing and support for lower income, rent burdened households:
  - Residents would like to see new housing in areas with the least impact on traffic and that new housing should be spread evenly across all parts of the City.
  - Residents support tiny home development to help alleviate homelessness
  - Residents support exploring how rezoning might encourage more affordable developments
  - Residents would like that the City ensure long-term affordability covenants on housing

During the preparation of the housing element the City did a diligent effort to include public participation from all economic segments of the community. Through direct contact via email and through electronic means such as websites and social media sites, the City proactively and broadly conducted through a variety of methods to assure access and participation. Outreach for the workshop was conducted in English and Spanish using flyers, social media posts, direct mail to a stakeholder list and to an email list with over 20,000 contacts from the City's Park and Recreation Department. Press releases/notification of the workshop were sent to local media outlets and the Downey Chamber of Commerce members. Information was posted on the General Plan/Housing Element website. To ensure that the housing concerns of low- and moderate-income and special needs residents were addressed, the City notified agencies and organizations that serve these communities in Downey and surrounding



areas. The list of agencies and organizations invited to the workshop are listed in Appendix A and included over 100 groups and agencies working with special needs groups, civic and religious groups and housing developers and local businesses. Making the outreach process and material accessible to Spanish speakers was a priority. Outreach for the workshops and the survey was conducted in English and Spanish. The community workshops had dedicated Spanish breakout rooms where the presentation and discussion were conducted in Spanish.

To affirmatively further fair housing:

- *Outreach plans should consider geographic barriers to participation and should plan to hold in-person meetings in various locations to ensure residents from across the jurisdiction can participate.*
  - The Draft Housing Element was drafted during 2020 and 2021 and Covid-19 pandemic public gathering limitations were still in place. As a result, the outreach meetings were conducted through teleconferencing.
- *Meetings should be held outside of work hours, including on evenings and weekends, to facilitate participation.*
  - Both public workshops were conducted in the evening. The survey was available from December 18, 2020 to January 29, 2021 which allowed for access during a variety of days and times.
- *Drafts of the housing element should be made available to the public for review and comment with ample time before submission to the Department of Housing and Community Development (HCD) for review.*
  - The City released the Public Review Draft to gather input from the community for two weeks prior its submittal to HCD. The Draft continued to be made available to the public for input during the 60-day period that the Element was under review by HCD. The Public review draft was distributed to agencies and organizations that serve these communities in Downey and surrounding areas. The community was notified of the opportunity to comment on the Draft through posts on the City's dedicated Housing Element webpage and via social media. A revised HCD Revisions Draft was also made available to the public for 13 days prior to resubmittal and stakeholders were directly notified about the revised Element 10 days prior to resubmittal. Changes in statutory deadlines (AB 1379) necessitated that the City resubmit the revised Housing Element following a seven- day public review period.
- *In-person and electronic options for participation should also be made available.*
  - The Draft Housing Element was drafted during 2020 and 2021 and Covid-19 pandemic public gathering limitations were still in place. As a result, the outreach meetings were conducted through teleconferencing. Electronic options were provided to the community to provide input on the Draft Housing Element and participation in the survey.

The City will continue to employ a wide variety of media and methods to notify the public of important housing decisions and opportunities to provide input. A new program is the Housing Plan details the actions the City will take to achieve this include:

- Expanding outreach to non-profit developers, area service providers, and community-based organizations.

- Partnering with local community-based organizations to hold community meetings to gain input from Downey residents about housing needs, issues, and ideas to support the development of more affordable housing in the City.
- Recruiting residents from underserved neighborhoods to participate on committees to address homelessness and affordable housing needs.

The City considered and incorporated the major themes identified during the public outreach program not only on its approach to meeting its identified housing need (expanding housing opportunities for all economic segments of the community), but in including programs and actions that address housing needs of Downey residents most particular related to the cost and affordability of housing – which was the major theme that emerged. The City’s rezoning program to address the 6<sup>th</sup> cycle RHNA reflects a significant expansion in housing opportunities in non-residential areas of the City. The City’s strategy addresses constraints to development of housing by increasing residential densities, making residential a by-right use along the indicated areas of the City’s corridors, and by streamlining multi-family projects by removing discretionary review through the Site Plan Review process.

## Acronyms

This element includes use of many acronyms to identify agencies, housing programs, funding sources, and planning terms. The most used acronyms (and their definitions) are included below.

### **AFFH - Affirmatively Furthering Fair Housing**

Refers to the 1968 Fair Housing Act's obligation for state and local governments to improve and achieve more meaningful outcomes from fair housing policies, so that every American has the right to fair housing, regardless of their race, color, national origin, religion, sex, disability, or familial status.

### **AI - Analysis of Impediments**

A review of impediments or barriers that affect the rights of fair housing choice. It covers public and private policies, practices, and procedures affecting housing choice. The AI serves as the basis for fair housing planning, provides essential information to policymakers, administrative staff, housing providers, lenders, and fair housing advocates, and assists in building public support for fair housing efforts.

### **AMI - Area Median Income**

The Area Median Income (AMI) is the midpoint of a region's income distribution – half of families in a region earn more than the median and half earn less than the median. Related to housing policy, the U.S. Department of Housing and Urban Development (HUD) and California Housing and Community Development Department both define and release income thresholds every year, by household size, that determines eligibility for affordable housing.

### **CDBG - Community Development Block Grant**

A grant program administered by the U.S. Department of Housing and Urban Development (HUD) that provides federal grants directly to larger urban cities and counties for activities that benefit low- and moderate-income individuals, eliminate blight, or address a serious and immediate threat to public health and welfare. States distribute CDBG funds to smaller cities and towns. Grant amounts are determined by a formula based upon need.

### **CEQA - California Environmental Quality Act**

A state law requiring state and local agencies to assess the environmental impacts of public or private projects they undertake or permit. Agencies must mitigate adverse impacts of the project to the extent feasible. If a proposed activity has the potential for a significant adverse environmental impact, an Environmental Impact Report (EIR) must be prepared and certified as legally adequate by the public agency before acting on the proposed project.

### **CHAS - Comprehensive Housing Affordability Strategy**

A plan prepared by state or local agencies as a prerequisite for receiving assistance under certain U.S. Department of Housing and Urban Development (HUD) programs.

### **HCD - California Department of Housing and Community Development**

A state agency that administers state housing programs. HCD also administers the federal HOME and CDBG programs on behalf of jurisdictions that are not directly assisted by HUD.

### **HUD - U.S. Department of Housing and Urban Development**

A federal, cabinet-level department responsible for overseeing, implementing, and administering U.S. government housing and urban development programs.

**RHNA - Regional Housing Needs Assessment**

A determination by a council of governments (COG) (or by the California Department of Housing and Community Development [HCD]) of the existing and projected need for housing within a region. The RHNA numerically allocates the future housing need by household income group for each locality within the region. This housing allocation must be reflected in the locality's housing element of the general plan.

**SCAG - Southern California Association of Governments**

SCAG is a Joint Powers Authority under California state law, established as an association of local governments and agencies that voluntarily convene as a forum to address regional issues. Under federal law, SCAG is designated as a Metropolitan Planning Organization (MPO) and under state law as a Regional Transportation Planning Agency and a Council of Governments. The SCAG region encompasses six counties (Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura) and 191 cities in an area covering more than 38,000 square miles.



# downey general plan housing element

## CHAPTER 2. COMMUNITY PROFILE/HOUSING NEEDS ASSESSMENT

To best understand the types of housing that will be needed to meet future demand, Housing Element law (California Government Code Section 65583(a)(1) and 65583(a)(2)) requires that this Housing Element assess population demographics and economic characteristics. Characteristics such as age, ethnicity, and employment influence the type and cost of housing needed or in high demand. Tracking demographic changes can also help City leaders better respond to or anticipate changing housing demand. This chapter also details the housing stock characteristics of Downey to identify how well the current housing stock meets the needs of current and future city residents. The identified demographic patterns and trends will serve as the basis for crafting the City’s housing policies and programs. This chapter uses data from various sources and with differing methodologies and timeframes. Totals may vary between data sources, but the intent of including the data is to show overall proportions, trends, and change over time.

### Population and Employment Trends

#### Current Population and Population Growth

Between 2010 and 2020, as reported by the U.S. Census, the population of Downey grew approximately 0.9 percent, from 111,922 to 112,901 residents. Compared with the County of Los Angeles as a whole, the 0.9 percent increase is one-third. The Southern California Association of Governments (SCAG) growth forecasts predict a steady increase in population through 2045. From 2020 to 2045, SCAG projects that the City’s population will grow by 5.6 percent, while countywide population is expected to increase by 15.6 percent. The projected growth largely is tied to anticipated increases in housing production, which has not been a factor for the last decade, hence the small percentage increase in Downey.

**Table 2.1: Population Growth and Projected Growth**

	2010	2020	2045	% Change 2010-2020	% Change 2020-2045
<b>Downey</b>	111,922	112,901	119,200	0.9%	5.6%
<b>Los Angeles County</b>	9,830,420	10,098,052	11,677,000	2.7%	15.6%

Source: US Census Bureau 2010, 2018 ACS 5-year, SCAG Growth Forecast

In addition to population projections, several other demographic characteristics and trends define housing needs. Among these characteristics are age composition, racial and ethnic composition, and employment.

**Table 2.2: Age, Race and Ethnicity, and Employment**

Demographic Profile	2010 Total Population (Percent of Total)	2018 Total Population (Percent of Total)
<b>Age</b>		
0-19	32,234 (28.8%)	30,108 (26.7%)
20-44	41,411 (37.0%)	41,834 (37.1%)
45-64	26,861 (24.0%)	27,992 (24.8%)
65+	11,416 (10.2%)	12,967 (11.5%)
Median Age	34.9	35.6
<b>Race/Ethnicity</b>		
White (non-Hispanic)	19,675 (17.7%)	16,294 (14.4%)
Hispanic	77,098 (69.5%)	83,416 (73.9%)
Black	3,815 (3.4%)	3,420 (3.0%)
American Indian and Alaska Native	162 (0.2%)	127 (0.1%)
Asian/Pacific Islander	8,888 (8.0%)	8,333 (7.4%)
Other	1,283 (1.2%)	1,311 (1.2%)
<b>Employment by Industry</b>		
Educational services, and health care and social assistance	11,704 (23.3%)	10,408 (18.3%)
Retail trade	6,648 (13.3%)	6,571 (11.5%)
Manufacturing	6,431 (12.8%)	7,061 (12.4%)
Professional, scientific, and management, and administrative and waste management services	4,330 (8.6%)	5,987 (10.5%)
Construction	2,877 (5.7%)	3,861 (6.8%)
Arts, entertainment, and recreation, and accommodation and food services	3,511 (7.0%)	5,669 (10.0%)
Finance and insurance, and real estate and rental and leasing	3,207 (6.4%)	3,340 (5.9%)
Other services, except public administration	1,916 (3.8%)	3,061 (5.4%)
Transportation and warehousing, and utilities	3,366 (6.7%)	5,027 (8.8%)
Public Administration	3,354 (6.7%)	2,609 (4.6%)
Wholesale Trade	1,994 (4.0%)	1,868 (3.3%)
Information	472 (0.9%)	1,327 (2.3%)
Agriculture, forestry, fishing and hunting, and mining	334 (0.7%)	141 (0.2%)
<i>Source: US Census Bureau 2010, 2018 ACS 5-year</i>		

## Age

Population age distribution serves as an important indicator of housing needs because housing needs and preferences change as individuals or households grow older. Young families tend to focus more on cost and the ability to become first-time homebuyers. As adults spend more time in the workforce and form families, they may seek larger homes and opportunities to build equity through home ownership. Seniors may eventually choose to trade down from their larger homes that they once needed for children to smaller and more affordable homes.

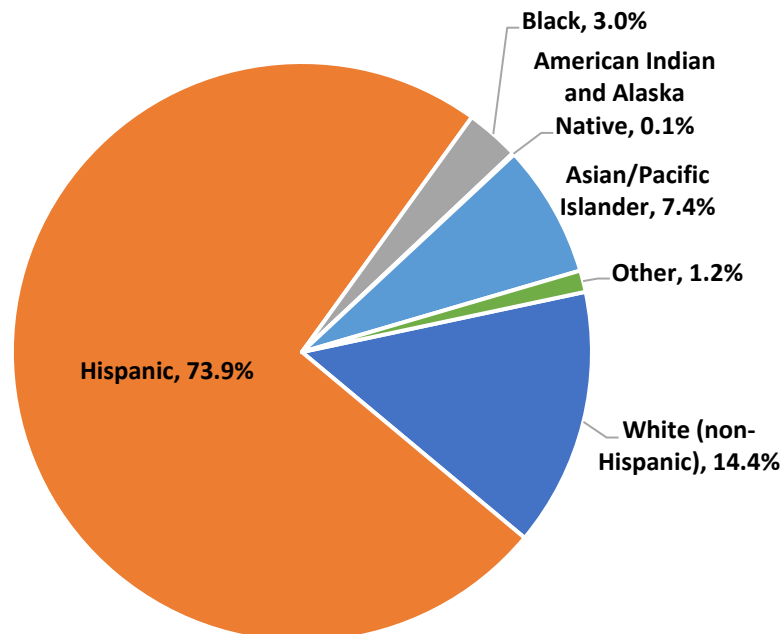
**Table 2.2** shows the age distribution of Downey residents. In 2020, the 20- to 44-year-old age group constituted the largest age group at approximately 37.1 percent, followed by the 0 to 19 age group at

26.7 percent. While they make up the smallest group (11.5 percent in 2018), compared with 2010, the 65 and older age group experienced the greatest relative change, with an increase of 13.6 percent. The median age in the City is 35.6 years. Compared with the County (36.2 years) and the State (36.3 years), the City's population is younger. The large proportion of working adults and school-age children and the small senior population means that demand will likely continue to grow for larger units for families.

## Race and Ethnicity

Along with an aging population, Downey is becoming more diverse racially and ethnically. **Figure 2.1** shows the racial/ethnic distribution of the population in the City of Downey. Hispanic residents make up most of the City's population. Compared with the County of Los Angeles, the City has a higher percentage of Hispanic residents and a lower percentage of white, non-Hispanic residents. Since 2010, the proportion of all non-Hispanic race/ethnic groups have decreased.

**Figure 2.1: Race/Ethnicity**



Source: US Census Bureau 2018 ACS 5-year Estimates

## Employment

Residents in Downey are primarily employed in educational services, health care and social assistance, manufacturing, and retail trade. Major employers in the City include Kaiser Permanente with 4,500 employees, Stonewood Center with 2,100 employees, Downey Unified School District with 1,851 employees, and Rancho Los Amigos National Rehabilitation Center with 1,410 employees.

Employment characteristics are important as they have a direct relationship with income. In Downey, the industries in which most residents work vary as to whether they pay below or above the median income. Workers in manufacturing earn a median income that is 17.5 percent greater than the median income of all Downey residents. Those employed in educational services, health care and social

assistance fields earn a median income that is 6.5 percent greater than the median income in Downey. However, the median income earned by retail trade employees is 27.7 percent lower than the median income for Downey residents.

## Household Characteristics

Household characteristics can impact the type of housing needed. (The U.S. Census has different definitions for “household” and for “family”: a household is the total number of related and unrelated person living together in one unit, while a family is the number of related persons living together in one unit.) For instance, single-person households often occupy smaller apartments or condominiums, such as one-bedroom units. Couples often prefer larger homes, and particularly single-family homes if they have children. As the baby boom generation continues to age, there has been an increased demand from empty nesters and retirees to downsize to more affordable units that are easier to maintain. These patterns underscore the need for housing opportunities for people of all ages and income.

Characteristics for Downey households are summarized in **Table 2.3**. As defined above, the term “household” refers to the occupants of a housing unit, rather than the housing stock itself. The number of households has decreased by 921 households (or 2.7 percent) since 2010. The tenure distribution is nearly split equally. Owner-occupied households constitute 50.6 percent of all households in 2020, while households that are renter occupied constitute 49.4 percent of all households. Different housing arrangements have different housing needs, and this distribution indicates that addressing issue and needs for renters and owners equally is important.

**Table 2.3: Household Characteristics by Tenure**

Household Characteristic	Owner Households	Renter Households	All Households
Number of Households	16,800 (50.6%)	16,387 (49.4%)	33,187
Median Household Income	\$92,179	\$ 54,770	\$71,948
Household Income Categories	-	-	-
Extremely Low Income (0-30% AMI)	1,235 (7.6%)	3,290 (19.8%)	4,525 (13.8%)
Very Low Income (30-50% AMI)	1,810 (11.2%)	3,240 (19.5%)	5,050 (15.4%)
Low Income (50-80% AMI)	2,895 (17.9%)	4,320 (26.0%)	7,215 (22.0%)
Moderate Income (80-100% AMI)	2,025 (12.5%)	2,545 (15.3%)	4,570 (13.9%)
Above Moderate Income (100% + AMI)	8,210 (50.7%)	3,220 (19.4%)	11,430 (34.9%)
Total number of projected Extremely Low-Income Households (RHNA)	N/A	N/A	1,039*
<b>Overpayment</b>			
All Households Overpaying for Housing	5,860 (36.2%)	8,480 (51.0%)	14,340 (43.7%)
Lower Income Households Overpaying for Housing	3,600 (60.6%)	7,870 (72.5%)	11,475 (68.3%)

*Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. Therefore, the City’s very low-income RHNA of 2,079 units can be split into 1,039 extremely low-income and 1,040 very low-income units.*  
*Source: US Census Bureau 2018 5-year, U.S. HUD Comprehensive Housing Affordability Strategy (CHAS) 2012-2016, Regional Housing Needs Allocation 2021-2029*

## Income

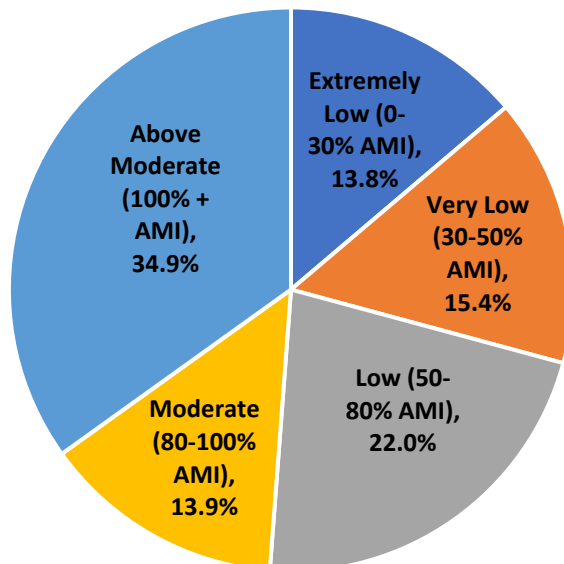
According to U.S. Census 2018 5-year estimates, the median household income for Downey was \$71,948; compared with the County of Los Angeles median household income of \$64,251, the median income in Downey was 12 percent higher. Median household income differs by tenure; while renter-occupied median household income in 2020 was \$54,770, the owner-occupied median household income was almost twice that at \$92,179.

Census data estimates that in Downey, 9.9 percent of residents live in poverty, as defined by federal guidelines. This proportion is lower than the County of Los Angeles, where 16 percent of residents live in poverty. The proportion of residents living in poverty varies by race/ethnicity, disability status, and household type. The proportion of persons or households in Downey living in poverty is much higher for Black residents, of which 21.2 percent live in poverty, and Native Hawaiian and Other Pacific Islander residents, of which 65.2 percent live in poverty. Additionally, 13.8 percent of residents with a disability and 16.7 percent of female-headed households live in poverty.

For housing planning and funding purposes, the State Department of Housing and Community Development (HCD) uses five income categories to evaluate housing need based on the Area Median Income (AMI) for the County:

- Extremely Low-Income Households earn 0-30% of AMI
- Very Low-Income Households earn 30-50% of AMI
- Low-Income Households earn 50-80% of AMI
- Moderate-Income Households earn 80- 120% of AMI (federal data uses 100%)
- Above Moderate-Income Households earn over 120% of AMI (federal data uses 100%+)

**Figure 2.2: Household Income Distribution**



Source: U.S. Housing and Urban Development Comprehensive Housing Affordability Strategy (CHAS) 2012-2016

Comprehensive Housing Affordability Strategy (CHAS) data provide special Census tabulations (developed for HUD) and calculate household income adjusted for family size and tenure. As shown in



**Figure 2.2**, in Downey, Above Moderate-Income households represent the largest share of all households and Low-Income households the second largest category. According to the 2016 CHAS, 13.8 percent of all households were classified as Extremely Low Income (0-30 percent of AMI), 15.4 percent were classified as Very Low Income (31-50 percent of AMI), 22 percent were classified as Low Income (51-80% AMI), and 13.9 percent were classified as Moderate Income (80-100 percent AMI). Income differs by tenure. Tenure and income are closely tied as **Table 2.3** above shows that more renter households are in the lower income categories (0-80 percent AMI) compared with owner households.

### Extremely Low-Income Households

Extremely low-income (ELI) is defined as households with income less than 30 percent of area median income. An estimate of the number of ELI households is provided in in Table 2.3: Household Characteristics by Tenure. Using Comprehensive Housing Affordability Strategy (CHAS) data Table 2.3 shows that 13.8 percent of the City's total households (4,525 households) were classified as extremely low income (0-30 percent of AMI). Households with extremely low-income have a variety of housing situations and needs. For example, most families and individuals receiving public assistance, such as social security insurance (SSI) or disability insurance are considered extremely low-income households. To calculate the projected housing needs, the City assumed 50 percent of its very low-income regional housing need are extremely low-income households. As a result, from the very low-income need of 2,079 units, the City has a projected need of 1,039 units for extremely low-income households. Many extremely low-income households will be seeking rental housing and most likely facing an overpayment, overcrowding or substandard housing condition. Table 2.3 shows that while 43.7 percent of households overpay for housing in Downey, 68.3 percent of lower income households overpay for housing. The situation is more dire for extremely low-income households as HUD data shows that 83.9 percent of these households overpay for housing.

Some extremely low-income households could be with mental or other disabilities and special needs. To address the range of needs, the City will employ a detailed housing strategy including changing the City's land use policy to include Low-Barrier Navigation Centers as a by right use in areas zoned for mixed-use and non-residential zones permitting multifamily uses, pursuant to AB 101. State law requires cities to allow transitional and supportive housing as a residential use and allowed by right in all zones that allow similar residential uses. The City will also expand housing opportunities to meet the needs of special needs residents—including seniors, residents with disabilities and developmental disabilities, large families, extremely low-income households, and those experiencing homelessness—by giving priority to development projects that include a component for special needs groups in addition to other lower-income households. Incentives available to senior housing to all special needs housing types, including reduced parking standards and unit sizes, increased height allowances, and maximum lot coverage. The City will continue working toward providing additional regulatory incentives and concessions to projects targeted for special needs groups.

### Housing Overpayment

State and federal standards specify that households spending more than 30 percent of gross annual income on housing experience a housing cost burden. Housing cost burdens occur when housing costs increase faster than household income. When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care. In the event of unexpected circumstances such as loss of employment or health problems, lower-income households with a housing cost burden are more likely to become homeless or double up with other households. In

Downey, 43.7 percent of households are overpaying for housing. Overpayment varies by tenure and income. For owner-occupied households, 36.2 percent are overpaying for housing, compared with more than half (51 percent) of renter-occupied households. A greater proportion of lower-income households overpay for housing (68.3 percent) compared to all households (43.7 percent). Lower-income renter households have the highest proportion of households overpaying at 72.5 percent.

## Housing Stock Characteristics

This section describes housing characteristics and trends to provide a basis for assessing the match between the demand and supply of available housing in Downey. These include housing growth, housing characteristics, age and condition of housing, housing prices and rents, and homeownership rates.

### Housing Stock

In 2020, there were 35,838 housing units in Downey (see **Table 2.4**). Compared to 2010, the housing stock increased by 237 units. Most of the housing stock consists of single-family homes (61.5 percent), with 37.5 percent being multi-family units. Single-family homes also represent most of the housing stock increase from 2010, with 90.7 percent of new units being single-family. Mobile homes make up just 1 percent of the housing stock. Census data indicate that 0.6 percent of owner units and 2.1 percent of rental units are vacant.

**Table 2.4: Housing Stock Characteristics by Tenure**

Housing Characteristic	All Households		
Single-Family Detached	20,448 (57.1%)		
Single-Family Attached	1,583 (4.4%)		
Multi-Family Units	13,439 (37.5%)		
Mobile home, other units	368 (1.0%)		
Total units	35,838 (100.0%)		
Average or median Household Size	3.29 persons per household		
Units Needing Replacement/Rehabilitation*	25		
-	<b>Owner Households</b>	<b>Renter Households</b>	<b>All Households</b>
Total Housing units	16,800 (50.6%)	16,387 (49.4%)	35,838** (100.0%)
Vacancy Rate	0.6%	2.1%	3.7%
Overcrowded Units	1,105 (6.6%)	2,795 (17.1%)	3,900 (11.8%)
Housing Cost	\$620,000 median sales price	\$1,376 median gross rent	N/A

*Note: 2020 CA DOF E-5 Population and Housing Estimates did not include a breakdown of data by tenure. Total housing units is from the US Census Bureau 2018 5-year data.*

*\* These units, for example, may be suffering from neglect and building that appears structurally unsound and maintenance is non-existent. This does not include homes or structures that need more traditional rehabilitation such as repairs to maintain a safe and healthy living environment.*

*\*\*Housing units by tenure reflect only occupied units while the total housing units includes unoccupied units*

*Source: 2020 CA DOF E-5 Population and Housing Estimates, US Census Bureau 2018 5-year, CoreLogic May 2020; City of Downey 2020.*

## Overcrowding

In response to a mismatch between household income and housing costs in a community, some households may not be able to buy or rent housing that provides a reasonable level of privacy and space. According to both California and federal standards, a housing unit is considered overcrowded if it is occupied by more than one person per room (excluding kitchens, bathrooms, and halls). In Downey, 11.8 percent of housing units are overcrowded. Overcrowding is more prevalent in rental units (17.1 percent) than owner-occupied units (6.6 percent).

## Housing Condition

The condition of housing stock can be an indicator of potential rehabilitation needs. Based upon observations and experiences of the Code Enforcement Division, the City estimates that in 2020, fewer than 25 housing units were in severe need of replacement or substantial rehabilitation due to housing conditions. These units, for example, may be suffering from neglect and building that appears structurally unsound and maintenance is non-existent. This does not include homes or structures that need more traditional rehabilitation such as repairs to maintain a safe and healthy living environment. The City's Housing Rehabilitation and Assistance program provide grant assistance of up to \$35,000 to very low-income households to address code enforcement violations and health and safety concerns, and to complete exterior painting. Grants can also be used to complete exterior and interior home repairs and make architectural modifications to achieve ADA compliance or reasonable accommodation for residents with disabilities. The program also provides refunds of 50 or 80 percent to low-income homeowners who have completed property, structural, and energy and/or water conservation improvements. Disabled households with needed accessibility modifications to their homes can also be assisted by the program. The City's code enforcement program refers property owners with compliance needs to housing staff for rehabilitation assistance.

## Housing Cost

The cost of housing in a community is directly correlated to the number of housing problems and affordability issues. High housing costs can price low-income families out of the market, cause extreme cost burdens, or force households into overcrowded or substandard conditions. The Downey median home price in 2020, based information provided by CoreLogic, was \$620,000. This was 8.5 percent higher than the median price in 2019. The median home price in Los Angeles County as a whole in 2020 was \$620,000, the same as in Downey. Home prices in Downey differ by geography; in the 90240 and 90241 ZIP codes, the median home prices were \$708,000 and \$698,000, respectively, while the median home price was \$595,000 in the 90242 ZIP code.

According to the 2020 Census, 49.4 percent of Downey households live in rental housing. Recent census data show that the median rent in Downey among all apartment units in 2019 was \$1,462 per month. Median rent for a one-bedroom unit was \$1,185 per month, and \$1,589 for a two-bedroom apartment. Data from real estate website Zumper shows a much higher rental cost. As of March 2021, the average rent for a one-bedroom apartment was \$1,510, and the average rent for a two-bedroom apartment was \$1,995.

**Table 2.5** shows that the HUD-determined fair market rents for Los Angeles County fall within the range of the rents within Downey. Therefore, the rental rates in Downey generally align with the HUD-defined fair market rents.

**Table 2.5: Fair Market Rents in Los Angeles County**

Year	Efficiency	One-Bedroom	Two-Bedroom	Three-Bedroom	Four-Bedroom
FY 2020 FMR	\$1,279	\$1,517	\$1,956	\$2,614	\$2,857

Source: FY2020 Fair Market Rents. U.S Department of Housing and Urban Development (HUD)

## Special Housing Needs

Housing element law requires local governments to include an analysis of housing needs for residents in specific special needs groups and to address resources available to address these needs. Special needs households include people with disabilities, seniors, large families, single-parent households, farmworkers, and people experiencing homelessness. **Table 2.6** summarizes special needs population in Downey and is followed by a more detailed discussion of each.

**Table 2.6: Special Needs Groups**

Special Needs Category	Count	Percent
Persons with Disabilities	9,606 persons	8.5% of residents
Persons with Developmental Disabilities	1,138 persons	1.0% of residents
Elderly (65+ years)	12,967 persons 6,413 households	11.5% of residents 19.3% of households
Large Households (5+ members)	6,260 households	18.9% of households
Farmworkers	234 persons	0.4% of labor force
Female Headed Households	6,832 households	20.6% of households
People Experiencing Homelessness	258 persons	0.5% of Los Angeles County Homeless Count

Source: US Census Bureau 2018 5-year, 2020 Los Angeles Homeless Services Authority Greater Los Angeles Homeless Count, CA Department of Developmental Services

## Persons with Disabilities, Inclusive of Developmental Disabilities

Disabled residents face housing access and safety challenges. Disabled people, in most cases, are of limited incomes and often receive Social Security income only. As such, much of their monthly income is often devoted to housing costs. In addition, disabled persons may face difficulty finding accessible housing (housing that is made accessible to people with disabilities through the positioning of appliances and fixtures, the heights of installations and cabinets, layout of unit to facilitate wheelchair movement, etc.) because of the limited number of such units.

In Downey, 9,606 residents (8.5 percent) are living with a disability. Among the disability types tallied (a resident can have more than one disability type) the most prevalent were ambulatory (serious difficulty walking or climbing stairs) and independent living difficulties (difficulty doing errands alone such as visiting a doctor’s office or shopping). One quarter of residents with a disability indicated an ambulatory difficulty and 21 percent indicated an independent living difficulty. These disability types indicate the need for accessible housing and housing in a group setting with supportive services. The remaining disabilities tallied include cognitive difficulties (18 percent), self-care difficulties (14 percent), hearing difficulties (12 percent), and vision difficulties (11 percent).

As age increases, so does the percentage of each age group that has disability; for residents who are 75 years and over, more than half (55.3 percent) have a disability, which is 28.2 percent of the total number

of residents with a disability. The 65 to 74 years age group constitutes the second-highest number of disabilities, with 1,855, although this is only 24 percent of the age group (19.3 percent of all people with disabilities). Disability and poverty are closely tied due to employment limitations. For residents with disabilities, 13.8 percent live in poverty, compared to the 9.6 percent of residents without a disability who live in poverty.

The State Department of Developmental Services (DDS) currently provides community-based services to persons with developmental disabilities and their families through a statewide system of 21 regional centers. The Eastern Los Angeles Regional Center serves residents in Downey. The center is a private, non-profit community agency that contracts with local service providers to offer a wide range of services to individuals with developmental disabilities and their families. In Downey, 1,138 persons are reported as consumers of the services provided at the local Regional Center. The largest age group of consumers are those ages 0 to 17, comprising 54.2 percent of the total consumers, followed by those ages 18 and older at 45.8 percent of the total consumers.

Issues related to affordability and design significantly limit the supply of housing available to households of persons with disabilities. The most obvious housing need for persons with disabilities is housing that is adapted to their needs. Location of housing is also an important factor for many persons with disabilities, as they often rely upon public transportation to travel to necessary services and shops. “Barrier free” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group. The City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint. Cities and counties are required to consider requests for accommodations related to housing for people with disabilities and provide the accommodation when it is determined to be “reasonable” based on fair housing laws and case law interpreting the statutes. The City is in the process of creating a reasonable accommodation ordinance, to be completed in early 2022. The City complies with the Federal Americans with Disabilities Act (ADA) and the most recent California Building Code regulations. In addition, the City administers the Housing Rebate and Grant Program that provides financial assistance to disabled households to perform modifications such as those described above.

### **Elderly (65+ years)**

Many senior-headed households have special needs due to their relatively low incomes, disabilities or limitations, and dependency needs. Specifically, many people aged 65 years and older live alone and may have difficulty maintaining their homes, are usually retired and living on a limited income, and are more likely to have high health care costs and rely on public transportation, especially those with disabilities. The limited income of many elderly persons often makes it difficult for them to find affordable housing.

In Downey, 12,967 residents are 65 years and older, representing 11.5 percent of the population. The City has 6,413 senior households, of which 26.3 percent were renters and 73.7 percent were homeowners. For residents 65 years and older, 9.4 percent live in poverty, which is slightly lower than the 9.9 percent poverty rate for the County as a whole.

The City has worked with developers in the past to provide affordable rental housing specifically for seniors. In 1999 a 31-unit senior housing complex, Heritage Courts Senior Apartments was developed that is 100 percent affordable and limited to residents 65 or older. Within the complex there are 12 one-



bedroom units and 19 two-bedroom units. The City will continue to work with developers to provide affordable housing opportunities for senior residents and will continue to offer funding for home modifications through the Housing Rebate and Grant Program. The Barbara J. Riley Community and Senior Center offers programs and services for residents ages 50 and up. The Congregate Meal Program at the Senior Center is administered by Human Services Association of Bell Gardens. The Senior Center also provides a variety of resources and referrals and has a Senior Wellness Check Program. The City's Parks and Recreation staff conducts daily phone call wellness checks with Downey seniors that are registered in its Senior Congregate Meal Program. These checks provide a safe and convenient way to check on the wellbeing of senior residents. The checks also serve as a social opportunity for seniors and help promote mental wellbeing as well. In addition to the daily phone call checks, City staff will conduct an on-site visit check if a senior cannot be reached over a 12-hour period. Staff will also contact the Downey Police Department if they cannot contact a senior either by phone or in-person.

### **Large Households (5+ members)**

Large households, defined by HCD as households containing five or more persons, have special housing needs due to the limited availability of adequately sized, affordable housing units. Larger units can be very expensive; as such, large households are often forced to reside in smaller, less expensive units or double-up with other families or extended family to save on housing costs, both of which may result in unit overcrowding. In Downey, 6,260 households are considered large households, or 18.9 percent of all households. There are 3,765 owner-occupied large households, or 60.1 percent of all large households, and 2,495 renter-occupied households, or 39.9 percent of all large households.

The 2018 ACS estimated that 16,906 housing units in Downey have three or more bedrooms. Of these units, 80 percent (13,578) were owner units and 20 percent (3,328) were renter-occupied. Four- or more bedroom units represented only 13 percent of all occupied housing units in the City. While it appears that there are enough units to accommodate the number of large households, it is likely that some of these large units are not occupied by large households. 2018 ACS data shows that the median household income in Downey was \$71,948 and although five-, six, and seven-persons households had incomes above this (\$102,417, \$74,271, and \$90,114 respectively), due to household size they may still struggle with housing affordability. In 2019 seven percent of large families (household data not available) were living in poverty, the same proportion for all families living in Downey.

### **Farmworkers**

A farmworker or agricultural worker is someone employed for labor in agriculture. Due to the high cost of housing and low wages, a significant number of migrant farm workers have difficulty finding affordable, safe, and sanitary housing. In Downey, where there are no agricultural uses, only 234 residents, or 0.4 percent of the workforce are farmworkers. According to the Local Profile data compiled by SCAG, 174 residents are employed full-time in the industries of farming, fishing or forestry, representing less than one percent of the City's labor force (0.32 percent) employed in these agricultural industries.

Los Angeles County has seen a significant decrease in agricultural workers. State EDD data (CA Employment Development Department, Industry Employment & Labor Force data for the Los Angeles-Long Beach-Glendale, March 2020) shows that between 2000 and 2020, the number of farmworkers countywide decreased by 43 percent, from 7,700 to 4,400 farmworkers.

In 2017, the Census of Agriculture from the US Department of Agriculture (USDA) documented that out of California's approximate 377,500 agricultural workers, less than one percent (3,266) are located within Los Angeles County. In Southern California, agricultural workers are primarily located in San Diego, Riverside and Santa Barbara Counties. The 2017 U.S. Census of Agriculture also reported that of the 3,266 farmworkers in Los Angeles County, 1,749 (54 percent) worked 150 days or more, and 1,517 (46 percent) worked less than 150 days. No local data on permanent and seasonal workers is available.

Agricultural practices no longer account for a significant sector of Los Angeles County's economy, and as more agricultural land is converted for nonagricultural uses, this sector will continue to decline. Maps from the State of California Department of Conservation Farmland Mapping and Monitoring Program show no farmland in the City as Downey and most of the Los Angeles basin, is classified as "Urban and Built-Up Land". Opportunities for agricultural uses within Downey are very limited. Agricultural uses are allowed in the Open Space and Public zoning districts but as an urbanized community agricultural uses are limited to smaller commercial nurseries. This is also the case in the surrounding communities. Since the persons employed in agriculture is extremely limited, the housing needs of this group are addressed under the City's overall programs for affordability.

### **Female-Headed Households**

Single-parent households require special consideration and assistance because of the greater need for day care, health care, and other services. In 2018, Downey had 6,832 (20.6 percent) female headed households; most female-headed households are renters (61.2 percent). Currently, there are 4,336 single parent headed households. Female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services. The relatively low incomes earned by female-headed households, combined with the increased need for supportive services, severely limit the housing options available to them. Of the 4,336 single parent headed households, in Downey, most (3,043) are female-headed households with children under 18 years of age (representing 45 percent of all female-headed households and 9 percent of all households in Downey). The City's 2014 Housing Element indicated that in 2010 (based on 2006-2010 ACS data) there were 6,418 female-headed households in the City of Downey, of which 3,286 had children under the age of 18. Compared with 2010 data, there has been an increase of six percent in the proportion of female-headed households in the City. Female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services which severely limit the housing options available to them. A larger proportion of female-headed households live in poverty (16.7 percent) compared with all City households (9.9 percent). Lower-income single-parent households can benefit from County programs that provide direct rental assistance and in general, programs that will facilitate the development of affordable housing.

People Experiencing Homelessness

Population estimates for people experiencing homelessness are very difficult to make. Census information is often unreliable due to the difficulty of efficiently counting a population without permanent residences. Given this impediment, local estimates of the homeless and anecdotal information are often where population numbers of the homeless come from. In 2020, the Los Angeles Homeless Services Authority (LAHSA) Greater Los Angeles Homeless Count identified 258 persons experiencing homelessness in Downey, or 0.5 percent of the total number of homeless individuals in Los Angeles County. Of the 258 homeless individuals, 27 were sheltered and 231 unsheltered.

In Downey, homeless resources include the TLC Family Resource Center, which provides, food, clothing, health services, and other homeless support, and Angel Step Inn, an emergency shelter for victims of domestic violence. The Restorative Care Village at Rancho Los Amigos National Rehabilitation Center is under construction and will include 22,000 square feet and include 150 skilled nursing beds, 80 residential treatments beds, and 50 beds in a Recuperative Care Center (RCC) will offer interim housing and includes on-site administrative staff support, health oversight, case management, and linkage to permanent supportive housing. Also on the Rancho Los Amigos site and currently under development is the 100-bed Veteran Commons mixed-use development, which will combine supportive and affordable housing for chronically homeless veterans and veteran families by providing a Workforce Development Hub to serve both the residents and the community at-large with job search assistance, employment training, and skill building services. In 2018, the City adopted a *Plan to Prevent and Combat Homelessness*, which outline the City's priorities as it continues to address issues related to homelessness. The City's goals for addressing homelessness are as follows:

- **Goal 1:** Ensure City staff are equipped to address the intersection of homelessness and their departments through training on proper engagement techniques and available services.
- **Goal 2:** Encourage the accessibility of supportive and affordable housing in the City.
- **Goal 3:** Engage Downey residents and businesses around homelessness, services, and housing.
- **Goal 4:** Increase the amount of homeless services offered in the region.
- **Goal 5:** Mobilize faith communities towards activities aligned with long-term solutions to Homelessness.
- **Goal 6:** Sustained commitment to ending homelessness from the Downey City Council.
- **Goal 7:** Prevent Downey residents from becoming homeless.

Other homeless shelters in the area include the Salvation Army Bell Shelter in the City of Bell and At the Fountain Transitional Living in the City of Bellflower.

## Energy Conservation Opportunities

Energy-related housing costs can directly impact the affordability of housing. While State building code standards contain mandatory energy efficiency requirements for new development, the City and utility providers are also important resources to encourage and facilitate energy conservation and to help residents minimize energy-related expenses. Policies addressing climate change and energy conservation are integrated into the Downey General Plan. Primary avenues to address climate change include lowering of transportation emissions through increased bicycle and pedestrian travel, improved land use decisions that places complementary uses in proximity to each other, reducing energy-related emissions by decreasing energy consumption of City operations, reducing water consumption, and incentivizing the use of renewable energy for citizens.

The Housing Rehabilitation Program assists Downey low- to moderate- income property owners with grants for necessary home repairs that include updates for energy and water conservation. Southern California Edison offers various energy conservation programs. The Energy Savings Assistance Program helps income-qualified customers with free appliances and installation of energy-efficient refrigerators, air conditioners and more, as well as home efficiency solutions like weatherization. The Home Energy Efficiency Rebate Program offers financial incentives for installing approved energy upgrades. The Multifamily Energy Efficiency Rebate Program offers property owners and managers incentives on a broad list of energy efficiency improvements in lighting, HVAC, insulation, and window categories. These improvements are to be used to retrofit existing multifamily properties of two or more units.

Additionally, the Southern California Gas Company offers various rebate programs for energy-efficient appliances and makes energy efficient kits available to residents at no cost. The Southern California Gas Company also offers no-cost weatherization and furnace repair or replacement services for qualified limited-income customers.

## At-Risk Housing Analyses

State housing law requires an inventory and analysis of government-assisted dwelling units eligible for conversion from lower income housing to market rate housing during the next ten years (2021-2031). Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions. Based on City records and information from the California Housing Partnership Corporation and the SCAG Pre-Certified Local Housing Data (2020), in the next 10 years there are no assisted housing developments in Downey at risk of losing affordability. **Table 2.7** below displays affordable housing developments in Downey, including total affordable units and earliest conversion dates. The earliest conversion date among these units is 2039.

Consistent with Government Code Section 65863.11, the State maintains a list of “Entities Interested in Participating in California’s First Right of Refusal Program” at <https://www.hcd.ca.gov/policy-research/docs/HPD-00-01.xlsx>. This list includes various entities working in Los Angeles County and several entities interested in properties located in any county. If a development becomes at risk of conversion to market-rate housing, the City will maintain contact with local organizations and housing providers who may have an interest in acquiring at-risk units and will assist other organizations in applying for funding to acquire at-risk units.

**Table 2.7: Affordable Housing Developments**

Project Name	Tenure	Tenant Type	Total Units	# of Affordable Units	Funding Program	Earliest Conversion Date
Downey: The View	Rental	Family	50	49	TCAC, HUD Sec. 236 Program, Tax Exempt Bonds	2068
Heritage Court Apartments	Rental	Senior	31	29	HOME (City of Downey)	2039
Birchcrest Apartments	Rental	Family	64	62	HUD Sec. 236	2055
Clark Manor	Rental	Family	41	41	HOME	11 units restricted, 2048
ADCO Apartments	Rental	Family	8	8	HOME	2059
Elm Vista	Townhome, Owner Occupied	Family	6	6	HOME	2062
Total			200	195		

Source: California Housing Partnership (CHPC), 2020; City of Downey, 2020; SCAG Pre-Certified Local Housing Data, 2020

## Projected Housing Need (RHNA)

Housing-element law requires a quantification of each jurisdiction’s share of the regional housing need as established in the Regional Housing Needs Assessment (RHNA) plan prepared by the jurisdiction’s council of governments. The California Department of Housing and Community Development (HCD), in conjunction with the SCAG, determine a projected housing need for the region covered by SCAG, including the counties of Riverside, San Bernardino, Los Angeles, Orange, Ventura and Imperial. This share, the RHNA, is 1,341,827 new housing units for the 2021-2029 planning period throughout the SCAG region. SCAG has, in turn, allocated this share among its constituent jurisdictions, distributing to each its own RHNA divided along income levels. The City of Downey has a RHNA of 6,525 housing units to accommodate in the housing element period. The income distribution is as shown in **Table 2.8**.

**Table 2.8: Regional Housing Needs Allocation 2021-2029**

Income Group	% of County AMI	# Housing Units Allocated	% Total Allocation
Very Low <sup>1</sup>	0-50%	2,079	32%
Low	>50-80%	946	14%
Moderate	>80-120%	915	14%
Above Moderate	120%+	2,585	40%
Total	---	<b>6,525</b>	<b>100%</b>

Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. Therefore, the City’s very low-income RHNA of 2,079 units can be split into 1,039 extremely low-income and 1,040 very low-income units.



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# downey general plan

# housing element

## CHAPTER 3. CONSTRAINTS ON HOUSING PRODUCTION

This section examines potential constraints on housing development in Downey. Government policies and regulations, the housing market, and other non-governmental limitations all impact the price and availability of housing and the provision of affordable housing. Some of the key factors constraining housing production include land availability, the economics of development, residential development standards and fees, and environmental factors like flooding or proximity to pollution sources, all of which can impact the cost and amount of housing produced.

State law requires that Housing Elements identify and analyze potential and actual governmental and non-governmental constraints to the production, maintenance, and improvement of housing for all persons of all income levels and disabilities. This constraints analysis must also demonstrate efforts by the local jurisdiction to remove governmental constraints that hinder achievement of its housing goals.

### Non-Governmental Constraints

The availability and cost of housing is strongly influenced by market factors over which local government has little or no control. The primary non-governmental constraints to the development of new housing are land and financing availability, construction costs, and environmental constraints. State law requires that the housing element generally assess these constraints, which can inform actions that local governments might take to offset the effects.

#### Development Costs

##### *Land Availability and Cost*

The price of land and cost of holding land throughout the development process are key components of the total cost of housing. These costs can account for as much as half of the final sales prices of new homes in small developments or in areas where land is scarce. The very limited amount of vacant residential land available in Downey creates a significant constraint to the development of new housing. Land costs in Downey's single-family residential neighborhoods range from \$850,000 to \$1.65 million for approximately 0.5-acre properties.<sup>1</sup> The diminishing supply of land available for residential construction, combined with increasing demand for such development, has served to keep the cost of land high and

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<sup>1</sup> A review of available properties posted on Zillow and comparable sites in August 2020 show only two available vacant sites for sale. Land costs are estimated from this sample. See Downey CA Land, Zillow, Accessed August 2020, <https://www.zillow.com/downey-ca/land/>; Downey, CA Land for Sale, Landwatch, Accessed August 2020, <https://www.landwatch.com/California/land-for-sale/Downey>

rising across Southern California. In addition to demand, other variables affecting the cost of land are the size of lots, location and amenities, the availability and proximity of public services, and the financing arrangement between the buyer and seller.

The time needed to hold land for development can also increase the overall cost of a project due to the interest which accrues on acquisition and development loans, the preparation of the site for construction, and government processing times for applications for entitlements and permits.

Underdevelopment of properties, particularly on those zoned as R-3 multifamily, adds an additional constraint to the development of new housing. Even with an allowable 24 units per acre as permitted by the Downey Municipal Code, removing existing uses and redeveloping a property can be difficult. The market value of land and the costs of new construction may limit what a property owner may earn from developing a property at higher densities. Chapter 4, Housing Resources, includes an analysis and discussion of vacant and underutilized residentially zoned parcels that can accommodate new housing.

### *Construction Costs*

Construction cost is determined primarily by the cost of labor and materials. These are the most significant cost components of developing residential units, and they have grown dramatically in recent years. According to data from the California Construction Cost Index, hard construction costs in California grew by 44 percent between 2014 and 2018, or an additional \$80 per square foot.<sup>2</sup>

Construction costs are estimated to account for upwards of 60 percent of the production cost of a new home, especially for multi-unit residential buildings which often require the use of more expensive materials, like steel, and need additional amenities such as parking structures.<sup>3</sup> Variations in the quality of materials, type of amenities, labor costs, and the quality of building materials could result in higher or lower construction costs for a new home. Prefabricated factory-built housing, with variation on the quality of materials and amenities, may also affect the final construction cost per square foot of a housing project.

The price paid for material and labor at any one time will reflect short-term considerations of supply and demand. Future costs are difficult to predict given the cyclical fluctuations in demand and supply that in large part are created by fluctuations in the state and national economies. Such policies unilaterally impact construction in a region and therefore do not deter housing construction in any specific community. An indicator of construction costs is Building Valuation Data compiled by the International Code Council (ICC). The unit costs compiled by the ICC include structural, electrical, plumbing, and mechanical work, in addition to interior finish and normal site preparation. The data are national and do not consider regional differences, nor do the data include the price of the land upon which the buildings are built. The 2020 national averages for costs per square foot of apartment units and single-family homes are as follows:

- Type I or II, Multi-Family: \$129.23 to \$167.27 per square foot
- Type V (Wood Frame), Multi-Family: \$112.76 to \$147.50 per square foot
- Type V (Wood Frame), One- and Two-Family Dwelling: \$122.46 to \$141.72 per square

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<sup>2</sup> Hayley Raetz, Teddy Forscher, Elizabeth Kneebone and Carolina Reid, The Hard Costs of Construction: Recent Trends in Labor and Materials Costs for Apartment Buildings in California, The Turner Center for Housing Innovation, University of California Berkeley, March 2020, p.8, [http://turnercenter.berkeley.edu/uploads/Hard\\_Construction\\_Costs\\_March\\_2020.pdf](http://turnercenter.berkeley.edu/uploads/Hard_Construction_Costs_March_2020.pdf)

<sup>3</sup> Ibid., Raetz et al, p.4.

### Availability of Financing

The availability of capital to finance new residential development is another significant factor that can impact both the cost and supply of housing. Two types of capital are involved in the housing market: 1) capital used by developers for initial site preparation and construction, and 2) capital for financing the purchase of units by homeowners and investors. Interest rates substantially impact home construction, purchase, and improvement costs. A fluctuation in rates of just a few percentage points can make a dramatic difference in the annual income needed to qualify for a loan.

In general, since the mid-2010s, financing for new residential development has been available at reasonable rates. However, economic fluctuations due to COVID-19 beginning in March of 2020 caused caution among lenders and may have lasting effects through this Housing Element planning period. And while interest rates are low as of 2021, lenders are considering applicants much more closely than in the past, leading to credit tightening despite affordable interest rates.

The availability of financing in a community also depends on the type of lending institutions active in the community, lending practices, the rates and fees charged, laws and regulations governing financial institutions, and whether there is equal access to those institutions. The City of Downey's analysis of Home Mortgage Disclosure Act (HMDA) data on the disposition of residential loan applications in the City provides a snapshot of the availability of financing to Downey residents as of 2021.

In 2017, 3,445 households in Downey filed housing loan applications. **Table 3.1** below shows the rate of approvals among home loan applications where a decision was rendered by a lending institution. Approval rates were lowest for home improvement loans (71.31 percent), or nearly 12 percentage points lower than the average approval rate for all loan applications in Downey in 2017 (83.12 percent).

Home improvement approval rates were also found to be lower during an assessment in the last housing cycle. The City continues to provide additional financial assistance to households that do not qualify for a traditional home improvement loan for rehabilitation and repair work.

**Table 3.1: Home Loan Application Activity in Downey, 2017**

Type	Number of Loan Applications <sup>1</sup>	Share of Loan Applications	Number Approved	Approval Rate
Home Purchase	925	33.44%	847	91.57%
Home Improvement	244	8.82%	174	71.31%
Refinancing	1,597	57.74%	1,278	80.03%
<b>Total</b>	<b>2,766</b>	<b>100.00%</b>	<b>2,299</b>	<b>83.12%</b>

Source: City of Downey; 2017 Financial Institutions Examination Council – 2017 HMDA Database

<sup>1</sup> Total does not include applications which were withdrawn or closed prior to a decision.

Approval rates during this period were highest for applicants from high-income households, where 82.3 percent of all loans were approved. Low-income households experienced an overall loan approval rate in 2017 of 78.3 percent, and middle-income households had an overall loan approval rate of 76.5 percent. Loan approval rates were generally highest for white applicants and lowest for Black applicants. Most Downey loan applicants were people from Latino/Hispanic backgrounds.

## **Government Code 65583(a)(6) Development Analysis**

Government Code section 65583(a)(6) requires an analysis of requests to develop housing at densities below those anticipated in sites inventory and the length of time between receiving approval for housing development and submittal of an application for building permit. The analysis must also look at local efforts to remove nongovernmental constraints that create a gap in the jurisdiction's ability to meet RHNA by income category.

### ***Requests for Lower Development Densities***

The City of Downey works with developers to help move housing projects forward and does not discourage a developer who may pursue a lower density than the maximum allowed. The City has seen a pattern of developments proposing lower densities among developers who work in the local area and the same formula and site plan for most standard sized lots. Similar site and floor plans are utilized throughout the City with different architectural styles at each site. This pattern allows developers to save cost because they can work from a base template instead of starting from scratch on every project. When a project is proposed at densities lower than what is indicated in the Housing Element, the City encourages the applicant to use the density bonus provisions to incorporate affordable housing and to achieve a higher number of units. With recent legislation and the larger RHNA for the 6<sup>th</sup> planning period, City staff has initiated conversations with applicants to encourage use of density bonuses and concessions available for affordable housing projects that can reduce some development standards. What the City is finding is that although density bonuses and concessions are appealing, most developers who commonly work in the City are hesitant to be the first; they want to see other developments that have utilized the incentives before they try an affordable product. To show prospective developers the potential advantages of using the state's density bonus provisions, a detailed list of completed density bonus projects in Downey and in neighboring cities and a list of available concessions will be compiled and shared with all new applicants inquiring about or submitting plans for multi-family developments (Program 1.5). As part of housing element implementation, the City will be establishing minimum densities for development of multifamily uses along commercial corridors and at underdeveloped commercial centers. The minimum densities will ensure that new developments in this area are consistent with the density assumptions in this Housing Element.

### ***Building Permit Timeframe***

In Downey, the length of time between receiving approval for housing development and submittal of an application for a building permit is typically 60 days or less for single-family developments, and six to nine months for larger developments, depending on project complexity. For example, a multi-family residential project with complex grading and drainage plans may take longer to obtain permits. Also, developers may struggle with feasibility analyses, financing, or negotiations with design professionals, factors which are beyond the City's control.

### ***Local Efforts to Remove Non-Governmental Constraints***

This development analysis must also look at local efforts to remove non-governmental constraints that create a gap in the jurisdiction's ability to meet RHNA by income category. In most parts of California, the primary non-governmental constraint is the overall cost of affordable housing development (high land and development costs). In general, constructing affordable housing, especially for low- and very low-income households, is not profitable to housing developers. Therefore, deed-restricted affordable units require subsidy beyond available density or financial incentives. This places the construction burden on non-profits and similar grant-funded housing developers and may result in affordable



projects that are not always dispersed throughout the region but are concentrated in limited areas with lower development costs.

While the City can offer developer incentives such as expedited permit processing or fee deferrals, it cannot afford to fully mitigate the high cost of development for affordable housing developments and does not have programs to assist in financing private projects. Downey has offered to cover the cost of installation of utility connections for new, large housing developments. However, the City's ability to provide such assistance is limited. The City will continue to facilitate housing development through program actions related to providing development assistance—including continued streamlining and processing efficiencies such as creating an option for electronic plan check. As part of the State's Building Homes and Jobs Act (SB2, 2017) the City was awarded a grant to implement an online permitting and licensing program. The upgrades will expedite permit processing and reduce unnecessary delays.

## Governmental Constraints

Although local governments have little influence on such market factors as interest rates and availability of funding for development, their policies and regulations can affect both the amount of residential development that occurs and the affordability of housing. Since governmental actions can constrain development and affordability of housing—largely due to zoning regulations, fees, and delays in permit processes—State law requires the Housing Element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing.”

Governmental constraints are policies, development regulations, standards, requirements, or other actions imposed by various levels of government upon land and housing ownership and development. Land use controls, building codes, processing procedures, and development fees are all factors that may hamper the maintenance, improvement, and/or development of housing in Downey. State and federal regulations such as those related to environmental protection, building codes, and other topics have significant and often adverse impacts on housing costs and availability, although they are important to ensure provision of well-constructed, safe units. While constraints exist at all levels of government, this section emphasizes policies and regulations that can be mitigated by the City of Downey.

## Land Use Controls

Housing supply and cost are greatly affected by the amount of land designated for residential use and the densities at which development is permitted. In Downey, more than half of the City is designated for residential uses. Single-family residential neighborhoods are by far the most common residential use, accounting for more than half of all land area.

The Land Use Element of the City of Downey's Vision 2025 General Plan sets forth policies for guiding local development. These policies, together with existing zoning regulations, establish the amount and distribution of land to be allocated for different uses within the City. **Table 3.2** summarizes the General Plan land use designations and zoning districts that allow residential development either by right or through discretionary review processes.

**Table 3.2: Residential General Plan Land Use Designations and Zoning Districts**

General Plan Land Use Designations	Density	Corresponding Zoning Districts
Low Density Residential	1 to 8.9 units per acre, based on lot size <sup>1</sup>	R-1, Single Family Residential
Low/Medium Density Residential	9 to 17 units per acre	R-2, Two Family Residential
Medium Density Residential	18 to 24 units per acre	R-3, Medium Density Multiple-Family Residential; R-3-O, Multiple-Family Residential Ownership Zone
Mixed Use	Maximum of 24 units per acre	M-U, Mixed Use

Notes:

1. The city has five R-1 variations based upon lot size: R-1 5,000, R-1 6,000, R-1 7,500, R-1 8,500, and R-1 10,000.

Source: City of Downey, Vision 2025 General Plan, 2005

The Downey Vision 2025 General Plan Final EIR (2005) estimates a total residential “build out” of 36,915 units on all vacant and developed residential land, which was 2,156 units above the City’s existing housing stock at the time. Most residential land in Downey is already developed, but some parcels are underutilized, meaning the developed densities are below the maximums allowed by the Zoning Code. Most new housing units are likely to come from these underutilized residential properties as they are redeveloped with higher density developments. The increasing ease with which Accessory Dwelling Units (ADUs) can be constructed due to changes in State law will affect residential yield, particularly given the substantial land area in Downey occupied by single-family homes.

Aside from the three residential zones in the City that accommodate residential development (R-1, R-2, and R-3 zones), the City has also identified opportunities in which commercial properties can be “recycled” for residential purposes. In 2010, the Downey City Council adopted the *Downtown Downey Specific Plan*, identifying it as a “residential development opportunity area” for the development of mixed-use, multi-family housing. The *Downtown Downey Specific Plan* was initiated by the City to guide growth and residential development in the downtown area, encourage economic revitalization, and create a vibrant center of activity for the City. The Specific Plan includes objectives to focus growth in Downtown by allowing and promoting higher density residential and mixed-use development and to develop residential uses for all income levels. It establishes 131 acres as five unique land use districts, four of which allow mixed-use and residential development by right and permit residential development at the following densities:

1. Downtown Core – 20 to 40 dwelling units per acre
2. Downtown Residential – 8 to 40 dwelling units per acre
3. Firestone Boulevard Gateway – 40 to 75 dwelling units per acre
4. Paramount Boulevard Professional – 20 to 40 dwelling units per acre

**Table 3.3** presents the development standards for the *Downtown Downey Specific Plan* area.

**Table 3.3: Downtown Downey Specific Plan Regulations**

Design Standards and Guidelines	Downtown Core	Downtown Residential	Firestone Boulevard Gateway	Paramount Boulevard Professional	Civic Center
Minimum Lot Size	2,500 SF	5,000 SF	20,000 SF	10,000 SF	*
Maximum Lot Coverage	80%-100% Commercial and Mixed-Use/ 60% if Residential Only	Lot Coverage Varies	100%	80% Commercial and Mixed-Use/ 60% if Residential Only	*
Maximum Floor Area Ratio (FAR)	1.5 FAR	1.5 FAR	3.0 FAR	2.0 FAR	*
Maximum Height Limit (See Section 3.6.2, Exhibit 3.2)	3 stories/ 45 ft	4 stories/50 ft	6 stories/75 ft	4 stories/50 ft	*
Minimum/Maximum Density	20-40 du/ac	8-40 du/ac	40-75 du/ac	20-40 du/ac	*
Minimum Unit Sizes	One bedroom - 600 square feet Two bedroom – 750 square feet Three bedroom – 1,000 square feet				*
Parking	<ul style="list-style-type: none"> <li>• Single Family Units: Per City Standards</li> <li>• Multifamily Residential               <ul style="list-style-type: none"> <li>○ Ownership: 1.7 spaces per dwelling unit</li> <li>○ Rental: 1.5 spaces per dwelling unit</li> <li>○ Guests utilize off-site (public) parking</li> </ul> </li> </ul>				

Source: Downtown Downey Specific Plan, adopted September 2010.

The City adopted a density bonus ordinance in 2008 as part of its comprehensive update to the Zoning Code. While consistent with Government Code 65915 at the time of adoption, the State Legislature has passed numerous changes to the density bonus requirements. **Chapter 6: Housing Plan** includes programmatic actions to ensure the City’s density bonus ordinance is consistent with the most current State laws.

**Table 3.4** summarizes the housing types permitted by zone. Each use is designated by a letter denoting whether the use is allowed (A) or conditionally permitted (CUP).

**Table 3.4: Zoning Districts and Permitted Land Uses**

Land Uses	R-1	R-2	R-3	R-3-O	Mixed Use	Notes
Single-family Dwelling	A					
Duplex Dwelling		A	A	A		Site Review for R-3 and R-3-O
Multi-Family Dwelling			A	A	A	
Housing for Agricultural Employees						
Accessory Dwelling Units	A	A	A	A		Subject to Section 9414
Mobile/Manufactured Home	CUP	CUP	CUP	CUP		
Emergency Shelter, ≤30 residents						
Emergency Shelter, >30 residents						
Transitional/Supportive Housing	A	A	A	A	A	Subject to Section 9430.06
Single Room Occupancy			CUP			Subject to Section 9430.06
Residential care, ≤ 6 clients	A	A	A	A	A	
Residential care, > 6 clients	CUP	CUP	CUP	CUP	CUP	
Senior Housing Development			A	A	CUP	Subject to Section 9418

Source: City of Downey Municipal Code, 2020

***Residential Development Standards***

The City's current residential development standards are typical for those cities immediately surrounding Downey, many of which developed and matured along the same timeline. Permitted densities, yard setback requirements, and other standards regulating residential development in the City are in concert with those being used by surrounding jurisdictions and to a great extent throughout the suburbs of Los Angeles and Orange Counties.

The Downey Zoning Code limits all single-family residential building heights of 28 feet and no more than two stories. Multi-family building heights are limited to 35 feet or three stories, whichever is less. The Zoning Code offers a height and/or density bonus for projects with affordable units. The application of these incentives, particularly in multiple-family residential zone districts (R-2 and R-3 zones), has resulted in the redevelopment of parcels that were previously underdeveloped with new, larger residential projects. Typical redevelopment includes demolition of current structures and the construction of new units to the allowed maximum density (24 du/acre), usually consisting of multi-family dwellings with units located over ground-floor garages.

The 35-foot height limit for multi-family projects in the R-3 zone is not a constraint for development. The minimum building code story height of seven feet allows for a comfortable development of three stories, which can accommodate the subfloors depths and roof pitch. The typical building type seen in the City of Downey is a townhouse design with a ground floor garage, usually incorporating a lower ceiling height, and two habitable floors above with ceiling heights of at least 9 feet. The 35-foot building height could easily accommodate an apartment or condominium development with three floors of habitable space. Higher building heights are available for projects within the Downtown Downey Specific Plan (DDSP) areas (45 to 75 feet) and several projects have been built at the established heights. The Downey View project is a 50 unit, six-story, 74-foot-tall building located within DDSP District 5. Heritage Court is a 31-unit, four-story, 38-foot-tall building located within DDSP District 2. As part of the City's Housing Element implementation (Program 1.3), the City is increasing allowable density in the R-3 zone to allow up to 40 units per acre and in the process of adjusting development standards, accordingly,

including building heights. Program 1.3 also includes an action item to review and revise residential developments standards including building height limits in the R-3 zoning district.

The City completed a comprehensive update to the residential development standards in May of 2021. The adopted residential development standards place slightly greater restrictions on the permitted sizes of houses in R-1 zone districts, including more restrictive setback requirements. These standards aim to limit the size of single-family homes and discourage over-sized homes considered incompatible with homes in existing single-family neighborhoods (“anti-mansionization”). For properties in the R-3 zoning district, the development standards are unchanged (setback, height, and parking requirements). Current residential development standards for multi-family are similar to those of surrounding jurisdictions and do not appear to constrain development, as evidenced by prior projects that involved private redevelopment activity. The regulations also provide incentives and concessions, including higher building heights, for density bonuses to facilitate construction of affordable units. To encourage multi-family unit development, the City will review and, if necessary, revise the lot area per dwelling unit requirement to a simple maximum density standard for a more flexible yield. The City will also review and potentially revise height limits in the R-3 zoning district and evaluate the continued need for minimum unit sizes for residential development or the need for height limit differentiation in different parts of the R-3 zone. The current residential development standards for single-family development are shown in **Table 3.5** and development standards for multi-family development are summarized in **Table 3.6**.

To increase transparency and certainty in the development application process as required by law, the City has a variety of tools available for developers. The City’s Community Development Department home page has links to the City’s online land use plans (General Plan, Specific Plans, and Zoning Ordinance) as well as helpful information related to current planning efforts such as new developments standards, the update to the General Plan Housing Element, and the Rancho Los Amigos South Campus Specific Plan adoption. Direct links are also provided below:

- General Plan and land use map: [www.downeyca.org/our-city/departments/community-development/planning/general-plan-map](http://www.downeyca.org/our-city/departments/community-development/planning/general-plan-map)
- Housing Element Update: [www.downeyca.org/our-city/departments/community-development/planning/housing-element-update](http://www.downeyca.org/our-city/departments/community-development/planning/housing-element-update)
- Zoning Ordinance: [www.downeyca.org/our-city/departments/city-clerk/downey-municipal-code](http://www.downeyca.org/our-city/departments/city-clerk/downey-municipal-code)
- Specific Plan documents: [www.downeyca.org/our-city/departments/community-development/planning/special-zoning](http://www.downeyca.org/our-city/departments/community-development/planning/special-zoning)
- New Rancho Los Amigos South Campus Specific Plan: <https://www.downeyca.org/our-city/departments/community-development/planning/rancho-south-campus>
- New single-family residential development standards: [www.downeyca.org/our-city/departments/community-development/planning/development-standards](http://www.downeyca.org/our-city/departments/community-development/planning/development-standards)
- FAQ on the entitlement process: <https://www.downeyca.org/our-city/departments/community-development/planning/entitlement-processes>

**Table 3.5: Single-Family Development Standards, Revised May 2021**

Development Standard	Zone				
	R-1 – 5,000	R-1 – 6,000	R-1 – 7,500	R-1 – 8,500	R-1 – 10,000
Lot area - minimum (square feet)	5,000	6,000	7,500	8,500	10,000
Lot width - minimum (feet)	50	50	60	65	70
Lot depth - minimum (feet) interior lots	<p>Lot depths shall be within ten percent (10%) the average depth of the two (2) abutting R-1 lots on both sides of the subject lot located on the same side of the street.</p> <p>Corner lots shall be within ten percent (10%) the average depth of the adjoining two R-1 lots along the common front yard frontage.</p>				
corner lots					
Floor area ratio – maximum (a)	.45	.45	.45	.45	.45
Lot coverage – maximum	45%	45%	45%	45%	45%
Building height - maximum (feet)(b) main building	28	28	28	28	28
accessory building	12	12	12	12	12
Front setback (1 <sup>st</sup> floor) – minimum (feet)(c,d)	20	20	20	20	20
2 <sup>nd</sup> floor front setback – minimum (feet)	<p>At the 2nd story façade facing a front yard, the maximum width of the 2nd floor façade aligned with the 1st floor façade directly below shall be no greater than forty (40) percent of the entirety of the 1st floor façade facing a front yard. Any additional portions of a 2nd floor facing a front yard shall be setback a minimum of five (5) feet from the 1st floor façade.</p>				
Rear setback - minimum (feet)(d)	20	20	20	20	20
Side setback (1st floor) - minimum (feet)(e,f)	<p>Ten percent (10%) lot width, but not less than five feet (5') and not to exceed fourteen feet (14')</p>				
2nd floor side setback - minimum (feet)	<p>At the 2nd story façade facing a side yard, the maximum width of the 2nd floor façade aligned with the 1st floor façade directly below shall be no greater than forty (40) percent of the entirety of the 1st floor façade facing a side yard. Any additional portions of a 2nd floor facing a side yard shall be setback a minimum of five (5) feet from the 1st floor façade.</p>				
Street side setback (1st floor) - minimum (feet) d.	10	10	10	10	10
2nd floor street side setback - minimum (feet)	<p>At the 2nd story façade facing a street side yard, the maximum width of the 2nd floor façade aligned with the 1st floor façade directly below shall be no greater than forty (40) percent of the entirety of the 1st floor façade facing a street side yard. Any additional portions of a 2nd floor facing a street side yard shall be setback a minimum of five (5) feet from the 1st floor façade.</p>				
Dwelling unit size - minimum (square feet)(g)					
one (1) bedroom	700	700	700	700	700
two (2) bedroom	850	850	850	850	850
three (3) bedroom	1,100	1,100	1,100	1,100	1,100
four (4) bedroom	1,300	1,300	1,300	1,300	1,300
more than four (4) bedrooms	1,500	1,500	1,500	1,500	1,500



**Table 3.5: Single-Family Development Standards, Revised May 2021**

Development Standard	Zone				
	R-1 – 5,000	R-1 – 6,000	R-1 – 7,500	R-1 – 8,500	R-1 – 10,000
Building separation - minimum (feet)(h)					
wall to wall	5	5	5	5	5
eave to eave	3	3	3	3	3
Walkway width – maximum (feet)	6	6	6	6	6
Parking for Single Family Dwellings	<ul style="list-style-type: none"> <li>• 2.0 enclosed covered spaces within a garage for dwelling units with less than 3,375 square feet of habitable space</li> <li>• 3.0 enclosed covered spaces within a garage for dwelling units equal to or above 3,375 square feet and equal to or below 4,500 square feet of habitable space</li> <li>• 4.0 covered spaces within a garage for dwelling units with greater than 4,500 square feet of habitable space</li> </ul>				

Source: City of Downey Municipal Code, 2021

Notes:

(a) Single-family dwelling units in the R-1 Zone are eligible for a 0.05 FAR bonus for providing renewable energy sources, for a maximum FAR of 0.50, in accordance with the provisions of Section 9312.08(B)(2).

(b) Porch features, such as but not limited to entry porches, covered patios, and porte-cocheres, must have a top-of-plate height equal to or less than the first floor top-of-plate height of the main structure, not to exceed twelve feet (12'). Top-of-peak height must be equal to or less than the top-of-peak height of the main structure, not to exceed sixteen feet (16'). Slope and pitch must be equal to main structure.

(c) Unless the property is identified on the prevailing setback map, as adopted by the Commission, in which case the greater of the two setbacks shall apply.

(d) Garage setbacks are subject to Sections 9710 and 9534.22.

(e) Any decimal fraction shall be rounded up to the nearest inch.

(f) 1st floor side yard setbacks may be reduced subject to Section 9534.

(g) Exclusive of porches, balconies, garages, or other such accessory structures or architectural features.

(h) Building separation for rear detached garages is also subject to back up triangle requirements located in Section 9710.

**Table 3.6: Multi-Family Development Standards**

Development Standard	Zone		
	R-2	R-3	R-3-O
Lot area - minimum (square feet)	5,000	10,000	10,000
Lot area per dwelling unit - minimum (square feet)	2,500	1,980 1,815 (for lots greater than 15,000 square feet)	1,980 1,815 (for lots greater than 15,000 square feet)
Lot width - minimum (feet)	50	100	100
Lot depth - minimum (feet)	Lots shall conform to the average depth of adjacent lots		
Lot coverage - maximum (percent)	50	50	50
Building height - maximum (feet)			
main building	30 feet or two stories, whichever is less	35 feet or three stories, whichever is less (a)	35 feet or three stories, whichever is less (a)
accessory building	12 feet	12 feet	12 feet
Yard setbacks - minimum (feet) front			
front	20	15	15
rear	20	see note (b)	see note (b)
Yard setbacks (side) minimum (feet)			
interior (c)	5	5 (c)	5 (c)
street	10	7.5	7.5
Dwelling unit size - minimum (square feet)(d),(e)			
studio units	--	500	500
one (1) bedroom	700	600	600
two (2) bedroom	850	800	800
three (3) bedroom	1,100	1,000	1,000
four (4) bedroom	1,300	1,300	1,300
Building separation - minimum (feet)	10	10	10
Main building and detached garage separation - minimum (feet)	5	5	5
Usable open space area per dwelling unit – minimum (square feet)	--	200	200

**Table 3.6: Multi-Family Development Standards**

Development Standard	Zone		
	R-2	R-3	R-3-O
Parking for Multi-Family Dwellings	<ul style="list-style-type: none"> <li>• Apartments, condominiums, duplexes, lofts, townhouses, and other multi-family dwelling units: 2.0 covered spaces within a garage; plus 0.5 guest parking space per unit</li> <li>• Senior citizen housing development: 1 per dwelling unit, plus 0.25 per unit for guest parking</li> <li>• Affordable housing projects: consistent with State law</li> </ul>		

Source: City of Downey Municipal Code, 2020

Notes:

(a) When abutting R-1 or R -2 zoned properties, the variable height requirement shall apply in accordance with Section 9534.24.

(b) When the rear yard abuts an R-1 Zone, the following minimum setbacks are required: twenty (20) feet for a one (1) story building, thirty (30) feet for a two (2) story building, and forty-six (46) feet for a three (3) story building. When the rear yard area abuts a fully dedicated public alley, the following minimum setbacks are required: no setback required for a one (1) story building, ten (10) feet for a two (2) story building, and twenty-six feet for a three (3) story building. When the rear yard area abuts another R-3 Zone the following minimum setbacks are required: ten (10) feet for a one (1) story building, fifteen (15) feet for a two (2) story building, and twenty (20) feet for a three (3) story building.

(c) When abutting the R-1 Zone, the minimum setback shall be ten (10) feet.

(d) Exclusive of porches, balconies, garages, or other such accessory structures or architectural features.

(e) Each additional bedroom over four (4) shall be a minimum of one hundred thirty (130) square feet.

### *Parking for Multi-Family Developments*

Adequate parking for residential projects contributes to the value of a project, the safety of residents, and its appearance. However, excessive parking standards can pose a significant constraint to the development of housing because it reduces the land and financing availability for project amenities or additional units. The City’s parking requirements are based on unit type and size as specified in Tables 3.3, 3.5 and 3.6. Parking standards in Downey are not considered a significant constraint to housing development. The City’s parking standards are typical for suburban communities and reductions for affordable and senior housing are provided for by State law. Developers of affordable and senior housing who are eligible for a density bonus pursuant to Government Code Section 65919-65918 and projects development under the streamlined provisions of SB 35 are eligible to use parking standards established by State law. The 50-unit Downey View affordable housing development requested and was granted an increase in the proportion of compact parking spaces. A current project under review has requested a concession to allow a maximum of two spaces per unit (no guest parking) and a reduction in the required dimensions of parking spaces.

The Downtown Downey Specific Plan parking requirements are based on the benefits of shared (joint use) parking and the existing surplus of parking available within the Specific Plan area. The Downtown Downey Specific Plan provides for lower parking standards for multi-family housing, 1.7 spaces per ownership unit and 1.5 spaces per rental unit. As guest parking is accommodated through available public parking. Parking requirements in Downey are reasonable because the standards for multi-family developments are equal to or less than requirements for smaller, single-family dwellings (2 spaces per unit). As part of Housing Element implementation, the City will create a new zone and development standards to implement the General Plan Mixed-Use designation and adopt standards that allow for a minimum density of at least 30 units per acre, including parking (Program 1.3).

### *On- and Off-Site Improvement Requirements*

Site improvements and property dedications are important components of new development and contribute to the creation of quality housing, providing requisite infrastructure and property enhancements. Housing construction in Downey is subject to a variety of site improvement and building

code requirements. Developers are generally responsible for covering the full cost of water, sewer, road, and drainage improvements to serve their projects.

On-site improvements typically include private or shared driveways, parking areas, drainage, sections of underground pipe, urban runoff water quality controls, and amenities such as landscaping, fencing, open space, and park facilities. Off-site improvements typically include:

- Sections of roadway, medians, bridges, sidewalks, and bicycle lanes
- Water and sewer systems connections
- Public facilities for fire, school, and recreation, or fair-share fees based on nexus studies

On- and off-site improvement requirements for residential development in Downey are imposed on a case-by-case basis. In general, full street width dedication is required and construction of sidewalks where widening is needed. The typical residential street in Downey has a 60-foot width, which includes 36 feet from curb-to-curb and a 12-foot-wide parkway/sidewalk on each side of the street. Project applicants are required to cover all public right-of-way improvements per City standards. On- and off-site improvements have not been determined to be a constraint to the development of affordable housing, as they are uniformly applied and necessary to meet public health and safety requirements and provide public benefit.

In May 2021, the City adopted subdivision standards for single family R-1 zones, and it includes standards for minimum lot dimensions; lot placement and orientation; private roads; parking; and landscaping. R-2 and R-3 standards have not been changed.

### *Locally Adopted Ordinances*

State law requires that cities include an analysis of any locally adopted ordinance that directly impacts the cost and supply of residential development, such as inclusionary housing ordinances and short-term rental ordinances. The City of Downey has neither of these ordinances nor any other ordinance, including those applicable to the division of land, that restrict residential development or the use of residential properties. In 2021, the City initiated an inclusionary housing feasibility study and, if shown to be appropriate for Downey, will consider adopting an inclusionary housing ordinance and program during the planning period. As the City studies its viability, it will also determine what constraints such an ordinance might have on residential development in the City.

### **Codes and Enforcement**

In addition to land use controls, local building codes also affect the cost of housing. Downey has adopted the 2019 edition of the California Building Code, based upon the 2018 International Building Code (IBC), which establishes minimum construction standards. As required of all jurisdictions in California, Downey has adopted the 2019 California Green Building Code established construction standards necessary to protect public health, safety, and welfare. Provisions in the California Building Code include measures to ensure barrier-free design in all buildings, facilities, site work, and other developments to which this code applies and to ensure that they are accessible to and usable by and/or for persons with disabilities.

The City has adopted local amendments to the Building Code. Many are technical in nature and relate to structural seismic resistance, seismic design provisions, and the quality of materials used during construction.

### **Code Enforcement**

The City enforces code compliance to promote property maintenance in accordance with the City Zoning and Building ordinances and State and County Health Codes. The Code Enforcement Division is responsible for code enforcement activities in the City, and compiles statistics on the number and type of code complaints it receives. According to the Code Enforcement Division, 5,768 code enforcement cases were filed in 2020, related to building regulations and health and safety.

Code enforcement cases typically involve required maintenance of a property or illegal construction within the City's residential zoning districts. Residents are encouraged to apply for rehabilitation assistance when applicable, and they may be eligible for a grant up to \$35,000 to be used for exterior painting, the correction of code enforcement violations, accessibility improvements for the physically disabled, and to fix health and safety concerns. Some mandatory improvements residents may be asked to address are items such as the installation of smoke and carbon monoxide detectors, security locks on all doors and windows, attic insulation, and lead-based paint removal.

According to the Chief Code Enforcement Officer, investigations of property maintenance complaints usually involve overgrown and un-kept landscaping, peeling paint, broken windows and screens, deteriorated roofs and other property deficiencies that indicate prolonged deferred maintenance. The illegal conversion of garages to living quarters, on the other hand, can indicate the presence of overcrowding due to a lack of affordable housing in the community. Although there are other categories of code enforcement complaints received by the Code Enforcement Division, these two types of complaints are the most common that relate to housing condition and affordability.

Article VIII, Chapter 7 (Abandoned and Vacant Property Registration and Maintenance) of the Downey Municipal Code, requires registration of unoccupied properties to guard against blight and protect investments of surrounding property and business owners. These regulations also help guard against deterioration of vacant residential properties, thus helping to protect the existing housing stock.

### **Zoning for a Variety of Housing Types**

Housing Element law requires jurisdictions to identify available sites in appropriately zoned districts with development standards that encourage the development of a variety of housing types for all income levels. These include multi-family rental housing, factory-built housing, mobile homes, emergency shelters, and transitional housing. The following paragraphs describe how the City makes provisions for these types of housing.

#### **Multi-Family Rental Housing**

Multi-family housing represents 42 percent of all housing units in the City. Downey's zoning code allows multi-family units as permitted uses in the R-2 (as duplexes), R-3, R-3-O, and Mixed-Use zones. The City has also identified the *Downtown Downey Specific Plan* area as an opportunity area for the development of multi-family housing.

The number of multi-family units has increased in recent years as underdeveloped multi-family zoned lots with only one unit have been redeveloped at higher densities. Examples of recent multi-family development on parcels where a single unit existed include:

- 8139 4th Street– 4-unit development
- 8117 2nd Street– 6-unit apartment complex

- 9553 Firestone Blvd– 24-unit condominium development
- 8104 Stewart and Gray Rd– 7-unit townhome development
- 10734 Paramount Blvd (multiple addresses)– 117-unit townhome development
- 7940 Telegraph Rd– 39-unit townhome development

In 2015, the first new multi-family residential project was developed within the *Downtown Downey Specific Plan* area. The 50-unit project, named Downey View, is deed restricted for very low (five units) and low income (45 units) households. The Specific Plan area offers significant opportunities to accommodate the City’s RHNA allocation, given allowed densities and the sites available.

Many lots zoned for multi-family use are occupied by single-family homes throughout the City. Downey continues to encourage the redevelopment of such properties through development incentives such as density bonuses, shared parking and parking reductions, development standard modifications, and fee modifications.

### *Mobile Homes/Manufactured Housing*

State law requires that mobile and manufactured homes be allowed in residential zones. These units cannot be regulated by any planning fees or review processes not applicable to conventional single-family dwellings. However, the architectural design of manufactured or mobile homes can be regulated by the City. Under the City’s zoning regulations, manufactured housing (listed in the zoning code as prefabricated housing) is a permitted use in all residential zones. Mobile home developments (mobile home parks) are permitted with a CUP in all residential zones. Data available from the Department of Homeland Security and verified by the City show there were 189 mobile homes in Downey in four Mobile Home Parks in 2018 (see **Table 3.7** below).<sup>4</sup>

**Table 3.7: Downey Mobile Home Parks**

Name	Address	Number of Units
ACE Trailer Park	12265 Woodruff Avenue Downey, CA 90241	70
Orange Grove Mobile Home Park	13331 Lakewood Boulevard Downey, CA 90242	48
SUN Trailer Park	12532 Lakewood Boulevard Downey, CA 90242	30
Tri-City Mobile Lodge	13441 Lakewood Boulevard Downey, CA 90242	41
<b>Total:</b>		<b>189</b>

Source: DHS, 2018; Downey Planning Division, 2020

### *Accessory Dwelling Units*

Accessory dwelling units (ADUs) can be a unique source of affordable housing since they are smaller than primary units and do not have direct land acquisition costs. ADU development expands housing opportunities for very low, low, and moderate-income households by increasing the number of rental units available within existing neighborhoods. SCAG 2020 affordability estimates show that about 69 percent of ADUs would be affordable to lower income households. Consistent with the Government

<sup>4</sup> Homeland Infrastructure Foundation Level Data, Mobile Home Parks, Downey, CA, 2018, accessed August 2020 from: <https://hifld-geoplatform.opendata.arcgis.com/datasets/mobile-home-parks/data>



Code Section 65852.2, Downey permits ADUs by right in single-family residential zones [R-1] and are subject to all development standards of the underlying zoning district with a few minor exceptions. The City will continue to promote ADUs as a key strategy to accommodate both the low and moderate income RHNA allocations.

The City last updated its ADU ordinance in 2018, expanding the areas citywide where ADUs are permitted. The State Legislature has passed numerous changes to the ADU requirements to promote their development, including additional regulations that became effective after the City's 2018 ADU ordinance update. These include allowing ADUs to be built concurrently with a single-family home, expanding areas where ADUs can be built to include all zoning districts that allow single-family uses, modifying fees from utilities such as special districts and water corporations, reducing parking requirements, and eliminating owner-occupancy restrictions at least through 2025. The Housing Plan commits the City to adopting an updated ADU ordinance to fully comply with all current ADU regulations set forth in the Government Code.

### *Emergency Shelters*

SB 2 (Housing for the Homeless) of 2008 requires that jurisdictions, within one year of the 4th cycle Housing Element adoption, amend the zoning ordinance to identify a zone or zones where year-round emergency shelters for the homeless would be permitted by right without discretionary review. As a result of SB 2, Government Code Section 65583(a)(4) allows limited flexibility for local governments to apply written, objective development and management standards.

In 2013, Downey passed an ordinance amending the zoning code to allow emergency shelters (with up to 30 occupants) and transitional living facilities in the Hospital-Medical Arts (H-M) zone by right without any other discretionary permit required. Emergency shelters with more than 30 occupants require a CUP in the H-M Zone.

In addition to the development standards of the zone in which they are located, emergency shelters for homeless persons are subject to and comply with standards and regulations including the following key provisions:

- **Capacity:** A single emergency shelter for thirty (30) occupants, or a combination of multiple shelters with a combined capacity not to exceed thirty (30) occupants, shall be allowed as a permitted use, consistent with Section 65583(a)(4)(A) of the Government Code. Any emergency shelter with a capacity greater than thirty (30) occupants shall also be subject to the approval of a conditional use permit, as set forth in Section 9824 of this Code.
- **Hours of Operation:** The facility shall operate on a first-come, first-serve basis with clients only permitted on-site and admitted to the facility between 6:00 p.m. and 7:00 a.m. during Pacific Daylight Time, and 5:00 p.m. and 7:00 a.m. during Pacific Standard Time. Clients must vacate the facility by 8:00 a.m. and have no guaranteed bed for the next night. A curfew of 10:00 p.m. (or earlier) shall be established and strictly enforced and clients shall not be admitted after the curfew.
- **Separation:** To avoid over-concentration of emergency shelter facilities, a minimum distance of five hundred (500) feet shall be maintained from any other emergency shelter, as measured from the property line.
- **Staffing:** A minimum of one (1) staff member per fifteen (15) beds shall be awake and on duty when the facility is open. Facility staff shall be trained in operating procedures, safety plans, and assisting clients. The facility shall not employ staff who have been convicted of a felony or who

are required to register as a sex registrant under Penal Code Section 290.

- Parking: 1 uncovered space per 4 beds plus 1 uncovered space per staff member.

The City may regulate proximity to other emergency shelters, if emergency shelters are not required to be more than 300 feet apart. No other separation requirements are permitted. Program 3.5 is included in the Housing Plan (Chapter 6) and includes an action item to bring the City's emergency shelter ordinance into compliance with State law.

Two clusters of land are zoned H-M, which promotes medical offices and other medical-related uses. One cluster of approximately 37 acres in the Downtown/Brookshire Avenue area includes the Downey Regional Medical Center and PIH Health Downey Hospital, Downey Community Health Center, Brookshire Manor senior community, and the Family Support Center. A second smaller cluster of nine acres near the Downey Landing commercial development includes several assisted living and nursing home facilities. As of early 2021, no properties are available in these two areas to accommodate shelters for the 231 unsheltered homeless persons identified in the City during the 2020 Los Angeles County Point-In-Time Homeless Count. The City will be amending its Zoning Code to allow for development in the M-2 zone instead of the H-M Zone.

There are 295 acres of land zoned M-2 (General Manufacturing). The M-2 zone was chosen over the M-1 zone due to the availability of land but both zones have similar uses and are in the same areas of the City. Uses in the M-2 zone are not as intensive as the zone's name suggest. Most uses are most closely related to light manufacturing or commercial manufacturing. Many of the uses are larger business park-style buildings some of a more commercial nature. The zone is large enough to accommodate 8 shelters needed for the 231 unsheltered persons identified in the 2020 Greater Los Angeles Homeless Count. The location of the zone is conducive to transit and pedestrian access as it is near major roadways such as Lakewood and Firestone Boulevards, Imperial Highway, Woodruff Avenue, and Stewart and Gray Road. The zone is also close to I-605 and I-105 freeways as well as the Norwalk and Lakewood Boulevard rail stations for the Metro Green line. Metro bus and Downey Link bus stops (the City's public transit system) are also accessible from all locations in the zone.

AB 101 from the 2019 legislative session requires that Low-Barrier Navigation Centers be allowed as a by-right use in mixed use and nonresidential zones that permit (by-right or conditionally) multi-family uses. Low Barrier Navigation centers currently are not addressed in the zoning code. The City is creating a new Rancho Los Amigos South Campus Specific Plan, which will allow for emergency shelters in three of four districts, and will include Low Barrier Navigation Centers in a manner that meets the requirements of AB 101.

### *Transitional Housing and Supportive Housing*

Pursuant to State law, Downey permits transitional or supportive housing (with six or fewer residents) in all residential zones, as well as in the H-M zone. In Downey, transitional and supportive housing are considered single-family or multi-family uses and thus are held to the same underlying zoning standards as other residential uses in the same residential zoning district.

Effective January 1, 2019, AB 2162 (Supportive Housing Streamlining Act) requires supportive housing to be considered a use by-right in zones where multi-family and mixed-uses are permitted, including nonresidential zones permitting multi-family uses if the proposed housing development meets specified criteria. The law prohibits local governments from imposing any minimum parking requirement for units occupied by supportive housing residents if the development is located within one-half mile of a public

transit stop. AB 2162 also requires local entities to streamline the approval of housing projects containing a minimum amount of supportive housing (at least 25 percent of units or 12 units, whichever is greater) by providing a ministerial approval process, removing the requirement for CEQA analysis, and removing the requirement for a CUP or other similar discretionary entitlements.

Downey is open to a ministerial review process for supportive housing. The City believes that this use would be appropriate in the Rancho Los Amigos South Campus Specific Plan area. The new Rancho Los Amigos South Campus Specific Plan (currently under development) will allow for transitional and supportive housing in a manner that meets the requirements of AB 2162.

### *Single Room Occupancy (SRO) Housing*

Single-room occupancy hotels and/or boarding homes are collectively referred to as SROs. SRO units are one-room units intended for occupancy by a single individual. An SRO is distinct from a studio or efficiency unit in that a studio is a one-room unit that must contain a kitchen and bathroom. Although SRO units are not required to have a kitchen or bathroom, many SROs have one or the other. Downey's zoning code lists SRO housing in the Hospital Medical Arts (H-M) Zone as a permitted use and as a conditionally permitted use in the R-3 residential zone.

### *Employee Housing*

In accordance with State Employee Housing Act (Sections 17021.5 and 17021.6 of the Health and Safety Code), employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone and employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone. According to State law (Sections 17021.5 of the Health and Safety Code), employee housing shall not be included within the definition of a boarding house, rooming house, hotel, dormitory, or other similar term that implies that the employee housing is a business run for profit or differs in any other way from a family dwelling. No conditional use permit, zoning variance, or other zoning clearance shall be required of employee housing that serves six or fewer employees that is not required of a family dwelling of the same type in the same zone. Use of a family dwelling for purposes of employee housing serving six or fewer persons shall not constitute a change of occupancy for purposes of Part 1.5 (commencing with Section 17910) or local building codes.

Employee housing is not addressed in the City's zoning regulations and as an urbanized community, there is no land within Downey designated for agricultural use and no zone allows agricultural uses. To comply with the State Employee Housing Act (Section 17000 of the Health and Safety Code), Program 1.3 in the Housing Plan requires the Zoning Code to be updated to define Employee Housing and address State requirements for allowing Employee Housing for six or fewer employees.

### *Housing for Persons with Disabilities*

Housing element law requires that in addition to the needs analysis for people with disabilities, the housing element must analyze potential governmental constraints to the development, improvement, and maintenance of housing for people with disabilities, demonstrate local efforts to remove any such constraints, and provide for reasonable accommodations for persons with disabilities through programs that remove constraints.

### *Zoning and Land Use*

Under the California State Lanterman Developmental Disabilities Services Act (Lanterman Act), small state-licensed residential care facilities for six or fewer persons must be permitted in all zones that allow single- or multi-family uses, subject to the same permit processing requirements and development standards; Downey is compliant with the Lanterman Act. As previously indicated, the Downey Municipal Code permits residential care facilities, including facilities for the disabled (with six or fewer residents), by right in all zones that allow residential uses. For group homes with seven or more residents, the City requires approval of a CUP in all residential zones. There are no facility concentration or distance requirements or similar limitations for either type of residential care facility. The applicable development standards are no more restrictive than standards that apply to other residential uses of the same type permitted in the same zone. The CUP requirement for facilities with 7 or more residents is also not an impediment. City records show that applications for group homes for 7+ persons are not common. CUP findings for approval are as follows:

1. That the requested Conditional Use Permit will not adversely affect the intent and purpose of this article or the City's General Plan or the public convenience or general welfare of persons residing or working in the neighborhood thereof;
2. That the requested use will not adversely affect the adjoining land uses and the growth and development of the area in which it is proposed to be located;
3. That the size and shape of the site proposed for the use is adequate to allow the full development of the proposed use in a manner not detrimental to the particular area; and
4. That the traffic generated by the proposed use will not impose an undue burden upon the streets and highways in the area.

### *Definition of Family*

The City of Downey zoning code defines a "family" as "two (2) or more persons bearing the generic character of, and living together as, a relatively permanent single bona fide housekeeping unit in a domestic relationship based upon birth, marriage, or other domestic bond of social, economic, and psychological commitment to each other, as distinguished from a group occupying a boarding house, club, dormitory, fraternity, lodging house, motel, rehabilitation center, rest home, or sorority."

### *Reasonable Accommodation*

Physical disabilities can hinder access to housing units of traditional design and limit one's ability to thrive. According to U.S. Census American Community Survey data, nearly 5,000 people in Downey have an ambulatory disability, and approximately 4,100 people have difficulty living independently. Nearly one in four seniors in Downey, or 23.1 percent of residents over the age of 65, have an ambulatory disability, while 19.6 percent of seniors cannot live independently.

Both the Federal Fair Housing Act and the California Fair Employment and Housing Act direct local governments to make reasonable accommodation (i.e., modifications or exceptions) in their zoning laws and other land use regulations to allow disabled persons an equal opportunity to use and enjoy a dwelling. For example, it may be a reasonable accommodation to waive a setback requirement so that elevated ramping can be constructed to provide access to a dwelling unit for a resident who has mobility impairments. Whether a modification is reasonable depends on the circumstances and must be decided on a case-by-case basis. The City is in the process of creating a reasonable accommodation ordinance, to be completed by the end 2021.

Housing opportunities for the physically disabled are maximized through the provision of affordable, barrier-free housing. Special modifications include units with access ramps, wider doorways, assist bars in bathrooms, lower cabinets, and elevators. The City complies with the Federal Americans with Disabilities Act (ADA) and the most recent California Building Code regulations. In addition, the City administers the Housing Rebate and Grant Program that provides financial assistance to disabled households to perform modifications such as those described above.

### Fees and Exactions

Housing construction imposes certain short- and long-term costs upon local government, such as the cost of providing planning services and inspections. As a result, the City relies upon various planning and development fees to recoup costs and ensure that essential services and infrastructure are available when needed. The total fees vary from project to project based on type, existing infrastructure, and the cost of mitigating environmental impacts. Fees are usually collected upon filing of an application for development projects that require discretionary approval or at the time building permits are issued. Fees which are typically charged for a standard residential development are summarized in **Table 3.8**.

**Table 3.8: Fees Charged for Residential Development, FY2020-2021**

Fee Type	Fee
<b>Planning and Application Fees</b>	
Zone Variance	\$3,409
Zone Variance (R-1 Zone Only)	\$1,065
Conditional Use Permits	\$3,196
General Plan Amendment	\$6,392
Zone Change Code Amendment	\$6,392
Site Plan Review	\$3,196
Planned Unit Development	\$5,327
Specific Plan	Direct Cost + 10%
<b>Subdivision</b>	
Certificate of Compliance	\$1,065
Lot Line Adjustment/Lot Merger	\$1,065
Parcel Map	\$4,261
Tract Map	\$5,327
<b>Environmental</b>	
CEQA - Negative Declaration	\$1,811
CEQA - Mitigated Negative Declaration	Direct Cost + 10%
Environmental Impact Report	Direct Cost + 10%
County Clerk Recording Fee	Direct Cost

Notes: Appeal fees are charged for appeals of discretionary entitlements  
 Source: City of Downey Planning Division, adopted June 2020

Impact fees are also charged to cover the cost of providing municipal services or mitigating project impacts.

Fees collected from residential developers include school fees (\$3.79 per square foot) and an Art in Public Places fee, which applies to developments of more than four units at a value of one percent of the total project valuation up to a maximum fee of \$150,000. A parkland dedication fee is also required for each residential unit built and is adjusted annually for the Consumer Price Index. The current rate is \$500 per newly built single-family dwelling unit and \$380 per unit for multi-family dwellings. Two additional development impact fees include the Records Management Fee (0.2 percent of building permit valuation) and General Plan Revision Fee (0.2 percent of building permit valuation).

Residents are charged fees for refuse collection for single-family residences and pay a utility user's tax on electric, gas, and telephone. No utility tax is charged for water use.

As a means of assessing the costs that contribute to development in Downey, the City has updated and calculated the total Building, Planning, and Engineering fees associated with single-family and multi-family development prototypes. **Table 3.9** presents the development fees for two recent developments in Downey, a 2,333 square-foot single-family unit and for a 916 square-foot multiple-family unit. For a single-family residential unit, development fees total approximately \$18,803. For a multiple-family unit, fees total approximately \$6,945. The most expensive fees are school fees, building permit fees, and for larger residential buildings, the Art in Public Places fee.

**Table 3.9: Development and Impact Fees Per Unit**

Permit Fees	Single Family Unit (a)	Multi-Family (per unit) (b)
Building Permit	\$3,487	\$1,149
Plan Check Fee	\$2,964	\$977
Disabled Access Plan Check Fee	N/A	\$107
Fire Plan Check Fee	\$137	\$35
Energy Conservation Plan Check Fee	\$326	\$107
Electrical permit	\$220	\$207
Mechanical permit	\$380	\$291
Mechanical Plan Check Fee	N/A	\$146
Plumbing permit	\$499	\$372
School Fee <sup>(c)</sup>	\$8,842	\$2,621
Parkland Dedication Fee	\$500	\$380
Art in Public Places Fee <sup>(d)</sup>	N/A	N/A
Deputy Inspector Registration	\$86	\$21
General Plan Revision	\$653	\$233
Plans Archival/Record Management	\$653	\$233
Strong Motion-State Quake Tax	\$42	\$61
Green Building Standards	\$14	\$5
<b>TOTAL</b>	<b>\$18,803</b>	<b>\$6,945</b>

Notes:

(a) Calculations based on a single-family unit 2,333 sq. ft. of living area with 535 sq. ft. garage space, with building valuation per unit of \$326,619.



(b) Calculations based on one unit of a multi-family four-unit development with 3,664 sq. ft. of total living area with attached 1,379 sq. ft. carport. Total building valuation is \$465,855.

(c) School fees are calculated as \$3.79 per residential square foot.

(d) Art in Public Places fee is calculated as one percent of valuation on residential buildings of more than four units with total building valuation of \$500,000 or more.

Source: City of Downey, 2020

Development fees make up approximately six percent of the median home purchase price.<sup>5</sup> Because many of these fees are determined by square footage, valuation, and factors such as the number of bedrooms, bathrooms, outlets, etc., it is difficult to accurately determine the average and actual fees charged to a developer for every residential development.

The City of Downey completed a fee analysis in 2018, which found that the City was recovering about half (54 percent) of all fee-related costs annually related to Building, Planning, Engineering and Fire services divisions, with Building and Planning related services making up the bulk of under-recovery of costs. Given that cost recovery percentages for these departments were well under the typical range seen in other jurisdictions, the study suggested the City consider adopting and implementing a Cost Recovery Policy, including a mechanism to annually update fees.<sup>6</sup>

To assist developers and property owners during the permitting process, the Building and Safety Division has developed a fee schedule and valuation table that can be used to estimate the costs associated with a proposed project. The fee schedule is available on the City's website at [www.downeyca.org/our-city/departments/community-development/building-safety-division/fee-schedule](http://www.downeyca.org/our-city/departments/community-development/building-safety-division/fee-schedule).

### Local Processing and Permit Procedures

Processing and permit procedures may pose a considerable constraint to the production and improvement of housing. Common constraints include lengthy processing time, unclear permitting procedures, layered reviews, multiple discretionary review requirements, and costly conditions of approval. These constraints increase the final cost of housing, uncertainty in the development of the project, and overall financial risk assumed by the developer. As part of an SB2 Planning Grants funded effort, the City has made improvements to its Land Management Permitting System (Accela) including software updates, which will allow the City to implement industry standard best practices such as simultaneously processing various development permits, and electronic plan submittal. Implementing these changes will reduce the review period and permit issuance period for infill projects. Implementation is expected by late 2021.

Downey's development review process is designed to accommodate housing development applications of various levels of complexity and requiring different entitlements. Processing times vary with the complexity of the project. The tables below outline the typical timelines for various residential projects. **Table 3.10** focuses more specifically on the individual entitlement approvals that may be required, providing estimated processing timelines for each as well as identifying the approving body. **Table 3.11**

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<sup>5</sup> Sarah Mawhorter, David Garcia, and Hayley Raetz, *It All Adds Up: The Cost of Housing Development Fees in Seven California Cities*, Turner Center for Housing Innovation, University of California Berkeley, March 2018, pp.20-21, accessed from [http://turnercenter.berkeley.edu/uploads/Development\\_Fees\\_Report\\_Final\\_2.pdf](http://turnercenter.berkeley.edu/uploads/Development_Fees_Report_Final_2.pdf)

<sup>6</sup> Matrix Consulting Group, Cost of Services (User Fee) Study, Final Report: City of Downey, California, April 2018, pp. 3-5.

generally identifies the typical approvals required for single-family and multi-family projects, along with the estimated processing times of the planning and building departments.

Single-family dwelling unit applications typically take up to 60 days for a single unit on one lot. Multi-family development applications take six to nine months. Time increases due to complexity and the need for any General Plan amendments and more complex CEQA review, such as an EIR.

**Table 3.10: Timelines for Permit Procedures\***

Type of Approval, Permit, or Review	Typical Processing Time (SF)	Typical Processing Time (MF)
Ministerial Review	60 days	90 days
Condition Use Permit	90 days (CUP is common for a large residential care facility in the R-1 zone)	Not common for multiple family projects
Zoning Amendment (Zone Change)	3-6 months	6-9 months
General Plan Amendment	6-9 months	6-9 months
Site Plan Review	No SPR required for SF	6-9 months
Tract Maps	3-6 months	4-6 months
Parcel Map	3-6 months	6-9 months
Initial Environmental Study	Not common for SF	6-9 months
Environmental Impact Report	Not common for SF	6-9 months

\*These time periods begin when a complete application is submitted and are extended when additional information is requested by the City. The timeframes below are target issuance date—when the applicant can expect a decision on their application.

Source: City of Downey, 2020

**Table 3.11: Typical Processing Procedures by Project Type**

	Single Family Unit	Subdivision	Multi-family < 20 units	Multi-family > 20 units
Typical Approval Requirements	Bldg. Plan Check Review	Tent. Tract/Parcel Map	Site Plan Review	Site Plan Review
	Permitting	Planning Commission	Planning Commission	Planning Commission
	Inspections	City Council	Plan Check	Plan Check
		Final Map	Permitting	Permitting
		Plan Check	Inspection	Inspection
		Permitting		
		Inspection		
Est. Total Processing Time	Planning = 30 days Plan Check = 10-14 days	Planning = 3-6 months if no accompanying rezone or plan amendment application. Plan Check = 30-60 days	Planning = 3-6 mos. Plan Check = 60-90 days	Planning = 6-9 mos. Plan Check = 60-90 days

Note: Processing times may vary by sq. ft., building type, design, complexity, and volume of workload; inspection times not included

Source: City of Downey, 2020

### *Streamlining*

In response to State law, California cities are required to improve the efficiency of permit and review processes by providing “one-stop processing.” The City of Downey has fully implemented the provisions of the Permit Streamlining Act, which limits processing times for entitlements to a 30-day review period and 60 days for a hearing. Periodic surveys conducted by City staff show that local processing times are comparable to those experienced in neighboring communities.

To encourage and facilitate the development of a variety of housing types, City staff continues to monitor permit processing times to ensure the fastest possible turnaround for applications. The City diligently complies with all applicable streamlining policies and practices. Downey has modified its application packet to simplify and streamline the development application process and works with developers to ensure efficient case processing. In 2018, the City digitized resources, including archived building permits and planning entitlements, to further streamline permit processing and reduce the amount of time it takes to conduct property research. Upgrades were also made to the City's permitting software to ensure accurate information and speedier service. This includes zoning, general plan, land use, property owner information, prior planning cases, county assessor maps, and digital aerial photographs for each parcel.

Downey's comprehensive zoning map and General Plan land use map have also been digitized using enhanced geographic information system technology. The City is working to establish electronic plan check for 2021 for a more streamlined plan check review. Also, the City is committed to updating ADU standards and permit streamlining to comply with recent State legislation.

### *SB 35 Approval Process*

SB 35 requires cities and counties to streamline review and approval of eligible affordable housing projects by providing a ministerial approval process, exempting such projects from environmental review under the California Environmental Quality Act (CEQA). When the State determines that jurisdictions have insufficient progress toward their lower-income RHNA (very low and low income), these jurisdictions are subject to the streamlined ministerial approval process (SB 35 [Chapter 366, Statutes of 2017] streamlining) for proposed developments with at least 50 percent affordability. If the jurisdiction also has insufficient progress toward its above-moderate-income RHNA, then the jurisdiction is subject to the more inclusive streamlining for developments with at least 10 percent affordability. SB 35 will automatically sunset on January 1, 2026.

As of July 17, 2020, HCD determined that Downey is subject to SB 35 streamlining for proposed developments with 50 percent or greater affordability. As of early 2021, the City received one inquiry for SB 35 streamlining on an affordable housing project, but it did not qualify, so an SB 35 application for this development was not submitted. To accommodate any future SB 35 applications or inquiries, the Housing Plan includes a program to create and make available to interested parties an informational packet that explains the SB 35 streamlining provisions in Downey and provides SB 35 eligibility information.

### *Ministerial Review*

Many minor permits are issued requiring only “over-the-counter” approval, such as for residential room additions and residential rehabilitation permits (plumbing, electrical, roofing). In addition, the City allows the issuance of separate grading and foundation permits prior to the issuance of the building

permits. Plans can be submitted to plan check prior to the Planning Commission and City Council final approval of the project with the submittal of a hold harmless agreement.

For single-family and two-family residence developments, no discretionary review process is required, and the proposed residential building application can proceed directly to plan check (assuming the proposed residence meets all the zoning requirements). The City Planner reviews all appeals of staff decisions regarding R-1 Zone development plan checks.

### *Discretionary Review*

Discretionary permits (such as variances, CUPs, and tentative maps) typically require three to six months to review and process for a public hearing, and processing time varies with the type of environmental review required. The Planning Commission remains the only entity in the discretionary review process, except when the processing involves a legislative action, or unless a Planning Commission decision is appealed. In these cases, approval by the City Council is required.

For multi-family projects, applications are subject Site Plan Review process, typically a six-to-nine-month process from the time an application is filed and building permits are issued for the project.

### *Site Plan Review*

There is no design review requirement for single-family or multi-family residential projects in the City. However, a Site Plan Review is required for projects within the R-3 zone. This process reviews all site improvements, parking, landscaping, open space, and amenities, as well as architectural design of the housing development. The application is reviewed for compliance with development standards as well as architectural style and massing. The Downey Municipal Code (Section 9820.08) requires the following findings be made in a positive manner to support approval of the application.

- That the site plan is consistent with the goals and policies embodied in the General Plan and other applicable plans and policies adopted by the Council;
- That the proposed development is in accordance with the purposes and objectives of the zone in which the site is located;
- That the proposed development's site plan and its design features, including architecture and landscaping, will integrate harmoniously and enhance the character and design of the site, the immediate neighborhood, and the surrounding areas of the City;
- That the site plan and location of the buildings, parking areas, signs, landscaping, luminaries, and other site features indicate that proper consideration has been given to both the functional aspects of the site development, such as automobile and pedestrian circulation, and the visual effects of the development from the view of the public streets;
- That the proposed development will improve the community appearance by preventing extremes of dissimilarity or monotony in new construction or in alterations of facilities;
- That the site plan and design considerations shall tend to upgrade property in the immediate neighborhood and surrounding areas with an accompanying betterment of conditions affecting the public health, safety, comfort, and welfare; and
- That the proposed development's site plan and its design features will include graffiti-resistant features and materials in accordance with the requirements of Section 4960 of Chapter 10 of Article IV of the zoning code.

The findings are objective and during the public hearing there is clear explanation that a project cannot be denied if it is compliant with development standards and positive findings can be made for the

development. Recommendations to the applicant may be given on the night of the hearing where the hearing may be continued to a date certain once the applicant works with Planning staff. In an effort to further streamline and encourage appropriate development, the proposed rezoning will include an update to development standards for multi-family projects that will not require the Site Plan Review process and allow for this review to be completed administratively without discretionary approval (Program 1.3). In addition, Program 3.3 is included and indicates that the City will adopt objective design standards to ensure that the City can provide local guidance on design and standards for by-right projects as allowed by State law.

### *Environmental Review*

State regulations require environmental review of discretionary project proposals (e.g., subdivision maps, precise plans, use permits, etc.). The timeframes associated with environmental review are regulated by CEQA. In compliance with the Permit Streamlining Act, City staff ensures that non-legislative proposals are heard at the Planning Commission within 60 days of receipt of an application being deemed complete.

## **Affirmatively Furthering Fair Housing**

In January 2017, Assembly Bill 686 (AB 686) introduced an obligation to affirmatively further fair housing (AFFH) into California state law. AB 686 defined “affirmatively further fair housing” to mean “taking meaningful actions, in addition to combat discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity” for persons of color, persons with disabilities, and other protected classes. The Bill added an assessment of fair housing to the Housing Element which includes the following components: a summary of fair housing issues and assessment of the City’s fair housing enforcement and outreach capacity; an analysis of segregation patterns and disparities in access to opportunities, an assessment of contributing factors, and an identification of fair housing goals and actions. The primary data source for the AFFH analysis is the City of Downey 2020-2024 Analysis of Impediments to Fair Housing Choice (AI) and the State of California Department of Housing and Community Development (HCD) AFFH Data Viewer.

### *Fair Housing Enforcement and Capacity*

The City prepared an Analysis of Impediments to Fair Housing Choice Plan (AI) FY 2020-2024 to accompany the City of Downey’s 2020-2024 Consolidated Plan, as required by the U.S. Department of Housing and Urban Development (HUD) under federal Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) program statutes. The 2020-2024 AI contains the following information about fair housing enforcement and capacity.

The City of Downey contracts with the Fair Housing Foundation (FHF), a nonprofit organization dedicated to affirmatively furthering fair housing choice through the provision of education and direct client services. To promote awareness of fair housing laws, FHF implements targeted outreach and education programs for Downey residents for housing consumers including homeowners, prospective homebuyers, and tenants, as well as housing providers such as sellers, owners, real estate professionals, brokers, landlords, and property management firms. Using available data to analyze current discrimination trends, FHF disseminates brochures that promote awareness of specific fair housing issues to ensure that all persons can secure safe and decent housing that they desire and can afford, without regard to their race, color, religion, gender, sexual orientation, national origin, familial status, marital status, disability, ancestry, age, source of income, or other characteristics protected by laws. Direct client services range from providing advice concerning general housing issues to performing

investigations and advising residents of their rights and remedies under the law in cases where evidence sustains the allegations of discrimination.

According to the 2021-2024 AI, during the most recently completed fiscal year covering July 1, 2018, to June 30, 2019, FHF provided direct client services to 264 Downey residents, landlords, property owners, real estate professionals, and property seekers. Among the direct clients served, 80 percent were in-place tenants of rental housing, comprising the largest segment of Downey residents requesting assistance from FHF.

General housing services provided by FHF involve the provision of advice to landlords, property owners, and tenants requesting advice on their rights and responsibilities under federal and State law. Most of the general housing services provided by FHF for Downey residents are by phone to FHF's toll-free hotline. Residents may speak with a trained staff member with expertise in the resolution of many common landlord-tenant disputes. Residents may also request to meet with FHF staff at their Long Beach or Orange County offices. During FY 2018-2019, FHF received 304 landlord and tenant inquiries (not all of which required direct services) from Downey residents, of which 201 (61 percent) were resolved by FHF by phone or correspondence without referral to another agency. In most cases, residents were informed of the law, civil code, and available remedies for their question or issue.

Each of the Downey residents receiving fair housing services from FHF during FY 2018-2019 originated from a general housing inquiry. The initial screening process for each of the 304 general housing inquiries resulted in the referral of 14 inquiries to the FHF Discrimination Department for further investigation and analysis. Of the 14 fair housing inquiries during 2018-2019, 10 were counseled and resolved by FHF after review of available facts and four inquiries required a case to be opened because information gathered through the screening and counseling phase substantiated possible discrimination. Each of the four cases that were opened involved in-place tenants of rental housing and none involved residents seeking a rental opportunity. One case involved alleged discrimination based on mental disability, one based on physical disability, one based on familial status, and one based on race.

### *Segregation and Opportunity Patterns and Trends*

The AFFH analysis must address areas of ongoing and concentrated segregation and integration and compare concentrations of protected characteristics and incomes. The following information discusses the levels of segregation and integration for race and ethnicity, income, familial status, persons with disabilities.

#### *Race/Ethnicity*

The ethnic and racial composition of a region is useful in analyzing housing demand and any related fair housing concerns as it tends to demonstrate a relationship with other characteristics such as household size, locational preferences, and mobility. Hispanic residents make up most of the City's population (74 percent). The AFFH Data Viewer provides a measurement of the predominant racial/ethnic group for each census tract and the extent of the group's prominence. This is measured as predominant (> 50 percent), sizeable (10-50 percent), and slim (< 10 percent). The entire city of Downey shows a Hispanic majority with a prominence value of 40 percent or greater. Only one other racial group in the City has a prominence value. Black residents have a prominence value of 3 percent, which is considered slim. Compared with the County of Los Angeles, the City has a higher percentage of Hispanic residents and a lower percentage of white, non-Hispanic residents. Since 2010, the proportion of all non-Hispanic race/ethnic groups have decreased. **Figure 3.1** shows the distribution of non-white



residents in Downey by Census block groups. Every block group in the City has a non-White population over 60 percent and there are no concentrations of non-White population.

A commonly used measure of segregation is the dissimilarity index which represents the extent to which the distribution of any two groups (frequently racial or ethnic groups) differs across census tracts or block groups. The values of the dissimilarity index range from 0 to 100, with a value of zero representing perfect integration between the racial groups in question, and a value of 100 representing perfect segregation between the racial groups.” (AFFH - T). The City of Downey’s Racial/Ethnic Dissimilarity Index presented in the 2020 AI compares extremely favorably to the Los Angeles/Orange County metro region in terms of absolute values, meaning that Downey is significantly more integrated than the region overall. However, an examination of overall trends reveals that the City is trending in the direction of more, not less, segregation at a rate that is significantly higher than that of the region overall. With respect to non-white residents, the level of segregation from whites, as measured by the Dissimilarity Index, has increased by over 55 percent since 1990. By contrast, although Downey is less segregated than the region according to the Dissimilarity Index, the regional level of non-white/white segregation has only increased by slightly under three percent during the same period. This trend is even more pronounced for Hispanic residents, as well as Asian and Pacific Islander residents, as they have experienced increased segregation by around 51 and 85 percent respectively, compared to five percent and nine percent respectively in the region. Black residents have experienced a decrease in their score with respect to White residents, as their score has decreased by around three percent in the jurisdiction. This is similar to what the region experienced as the region saw a decrease of about five percent.

To assist in this analysis of integration and segregation, the Department of Housing and Community Development (HCD) and the California Tax Credit Allocation Committee (CTCAC) created Opportunity Maps to identify resources levels across the state. These opportunity maps are made from composite scores of three different domains (economic, environmental, and education) made up of a set of indicators. The opportunity maps include a measure or “filter” to identify areas with poverty and racial segregation (Census tracts with at least 30 percent of the population under the federal poverty line and a location quotient higher than 1.25 for Blacks, Hispanics, Asians, or all people of color in comparison to the County). According to the California Fair Housing Task Force’s 2021 opportunity maps, there are no census tracts or areas of high racial segregation and poverty in Downey. Regionally, areas with high segregation and poverty are located in cities west of Downey and in the south-central area of the City of Los Angeles. These include the cities of Cudahy, Bell Gardens, Maywood, Lynwood, and Huntington Park, and the South Los Angeles community (HCD AFFH Data Viewer).

#### *Persons with Disabilities*

Disabled residents face housing access and safety challenges. Disabled people, in most cases, are of limited incomes and often receive Social Security income only. As such, much of their monthly income is often devoted to housing costs. In addition, disabled persons may face difficulty finding accessible housing because of the limited number of such units. In Downey, 9,567 residents (8.5 percent) are living with a disability, of which 1,138 or 1.0 percent of residents are living with a developmental disability.

**Figure 3.2** shows the population of persons with a disability by Census tract. At a regional level, Downey is similar to the rest of the county in that almost all the census tracts have less than 10 percent of their population living with a disability. However, the map reveals there are slightly more disabled residents in two tracts (10 to 20 percent of residents). One tract is located north of Firestone Boulevard between Paramount and Lakewood Boulevard and includes the Civic Center. The second tract is in the area northeast of Lakewood Boulevard and Florence Avenue.

### *Familial Status*

Single-parent households require special consideration and assistance because of the greater need for day care, health care, and other services. In particular, female-headed households with children tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services. In Downey, 6,832 (20.6 percent) of households are female headed; most female-headed households are renters (61.2 percent). A larger proportion of female-headed households live in poverty (16.7 percent) compared with all City households (9.9 percent).

**Figures 3.3** and **3.4** show the percent of children in married-couple households in the region and the percent of children in female-headed households (no spouse/partner) by Census tract. Several areas in Downey, north of Firestone Boulevard, show a concentration of children living in married couple households (more than 80 percent of children). **Figure 3.4** shows that all tracts in the City have less than 40 percent of children living in female-headed households. While there is no major concentration of children living in female-headed households, areas of the City south of Firestone Boulevard have a slightly higher proportion (20 to 40 percent) of children living in female-headed households.

### *Income Level*

According to U.S. Census 2018 5-year estimates, the median household income for Downey was \$71,948; compared with the County of Los Angeles median household income of \$64,251, the median income in Downey was 12 percent higher. Median household income differs by tenure; while renter-occupied median household income in 2020 was \$54,770, the owner-occupied median household income was almost twice that at \$92,179. Census data also estimates that in Downey, 9.9 percent of residents live in poverty, as defined by federal guidelines.

**Figure 3.5** shows median household income by Census block group and **Figure 3.6** shows poverty status by Census tract. In Downey, the highest median household incomes are located north of Firestone Boulevard. The lowest incomes are in areas of the city north and south of Florence Avenue and in the southwest corner of the City in and around the Rancho Los Amigos National Rehabilitation Center and Medical Center. Downey has a lower proportion of residents living in poverty compared with the surrounding region. In all areas of the City the percent of residents with incomes under the poverty level is less than 20 percent. Areas of the City between Paramount and Lakewood Boulevards and the area in and around Downey Landing have a slightly higher percentage of residents with incomes under the poverty level (10 to 20 percent). There is no major concentration of residents living in poverty in Downey.

Identifying low or moderate-income (LMI) geographic areas and individuals is important to overcome patterns of segregation. HUD defines an LMI area as a Census tract or block group where over 51 percent of the population is LMI (based on HUD income definition of up to 80 percent of the AMI). **Figure 3.5** shows the Lower and Moderate Income (LMI) areas in Downey by Census block group. At the County level, the latest iteration of this data from the 2011-2015 American Community Survey (ACS) shows 5,526,154 low- and moderate-income residents in Los Angeles County against a population of 9,863,025. This yields a low- and moderate-income percentage of 56.03 percent countywide. In other words, 56.3 percent of people living in Los Angeles County are members of households earning less than 80 percent of Area Median Income. Though significant, this percentage is similar to the broader geographical region. Neighboring Orange County's percentage was 49.26; San Bernardino, 43.79; and San Diego, 47.70. Much of Los Angeles County has high proportions of LMI areas particularly in

Southeast and Central Los Angeles and the San Gabriel Valley. Downey has a similar low- and moderate-income percentage of 50.76 percent. LMI areas are located in most areas of the City.

The City is located in a transitional area in Los Angeles County. The areas to the west of Downey have historically been lower income areas (with more racial/ethnic diversity). The areas east of Downey have historically had higher incomes and less diversity. Downey's location in the middle of this area explains the mix of higher incomes, LMI populations, and the City's racial/ethnic diversity as compared to its neighbors to the east and west.

In Downey, local and regional data for segregation and integration by income show that:

- The highest median household incomes are located north of Florence Avenue that borders I-5 and the City of Pico Rivera.
- Downey has a low- and moderate-income percentage of 50.76 percent, similar to countywide percentage and higher than surrounding counties.
- A concentration of lower-income households exists in the areas of the City south of Firestone Boulevard. These areas also have a higher proportion of renters and households experiencing housing cost burdens.

### *Racially/Ethnically Concentrated Areas of Poverty (R/ECAP)*

The U.S. Department of Housing and Urban Development (HUD) defines a Racially or Ethnically Concentrated Area of Poverty (R/ECAP) as a census tract where: (1) the non-white population comprises 50 percent or more of the total population and (2), the percentage of individuals living in households with incomes below the poverty rate is either (a) 40 percent or above or (b) three times the average poverty rate for the metropolitan area, whichever is lower. The AI does not address R/ECAPs due to their absence within City boundaries which is confirmed by data in the HCD AFFH Data Viewer.

In Los Angeles County, there are R/ECAPs concentrated around the central parts of the City of Los Angeles, with a few scattered in San Fernando, San Gabriel, and Antelope Valleys. While there are no R/ECAPs in the City, Figure 3.1 shows that most of the City's block groups show a non-white population that is 60 percent or greater and is predominantly composed of a Hispanic population. As mentioned earlier, Hispanics have a prominence value of 40 percent or greater in the City, however, the areas where the prominence value exceeds 50 percent are largely located south of Firestone Boulevard. These areas coincide with LMI areas, lower median income areas and renters.

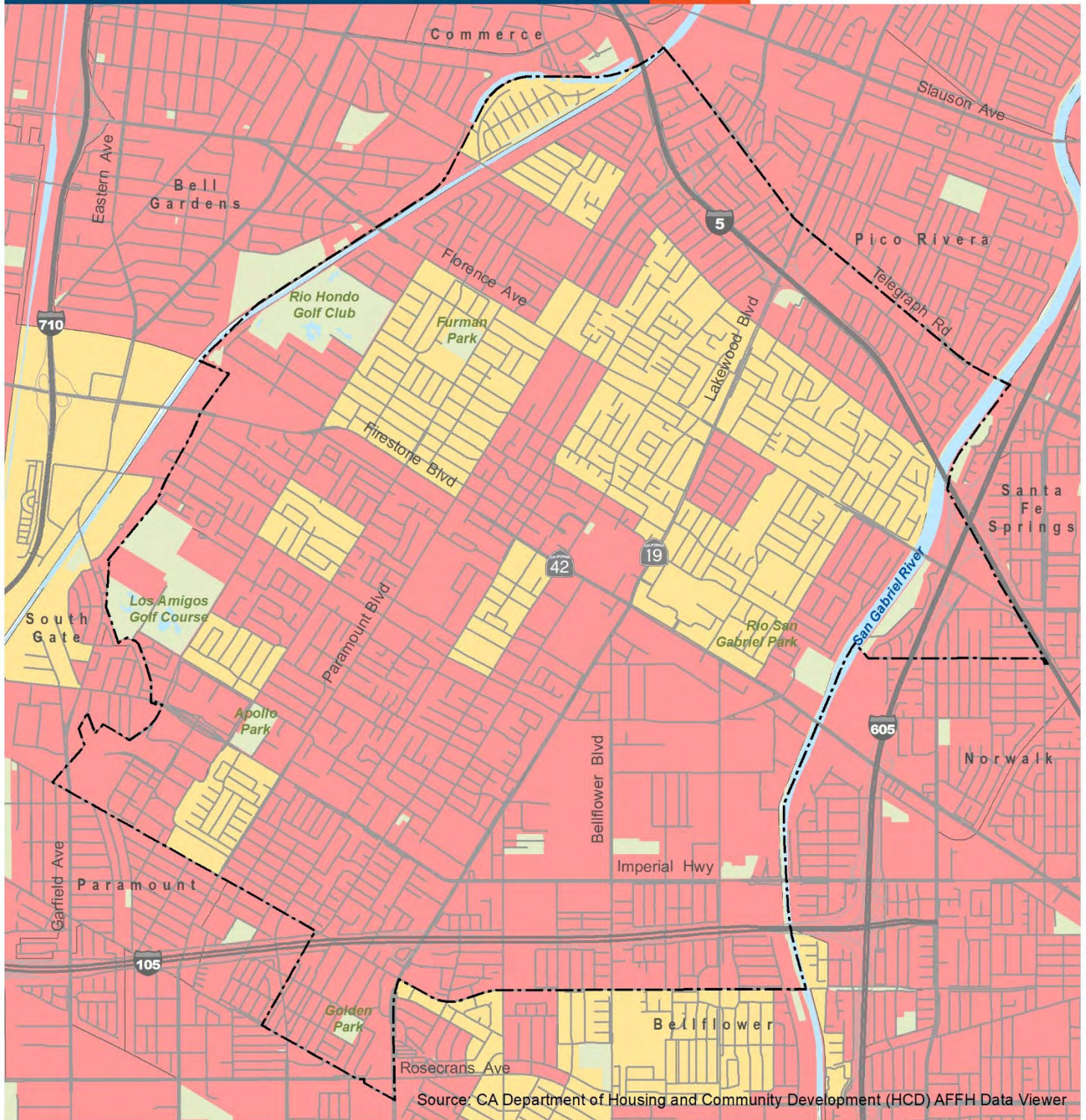
### *Racially/Ethnically Concentrated Areas of Affluence*

Racially or Ethnically Concentrated Areas of Affluence (RCAAs), they are generally understood to be neighborhoods in which there are both high concentrations of non-Hispanic White households and high household income rates. As mentioned previously, there are no concentrations of non-Hispanic White residents in Downey. The City has a similar racial demographic makeup as the surrounding region. Downey is in an area of the County with no concentrations of non-Hispanic White residents. In Downey, the highest median household incomes are located north of Firestone Boulevard. These areas do not have any concentration of non-Hispanic White residents.

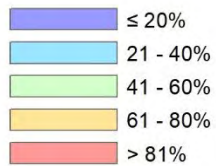
Compared with Los Angeles County, the City has a higher percentage of Hispanic residents and a lower percentage of white, non-Hispanic residents. As a result, Downey has fewer concentrations of White residents. A regional comparison shows that Downey has fewer areas with predominantly White residents compared with the surrounding area and the County. There is no Census tract with predominance values for the White population.



# Figure 3.1: Racial Demographics (2018)



### Percent of Total Non-White Population

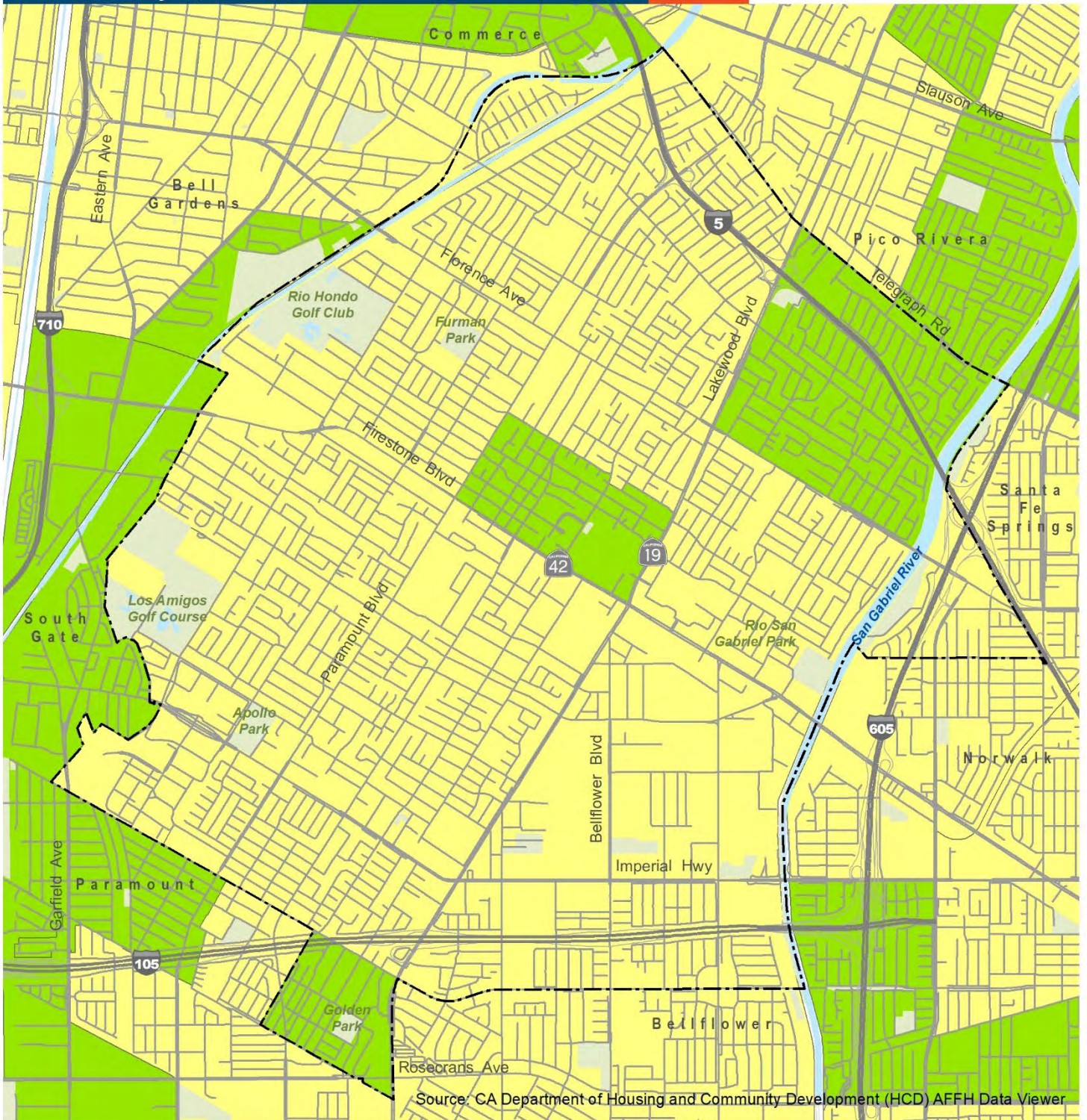


### Base Map Features





# Figure 3.2: Population with a Disability (2019)



**Percent of Population with a Disability**

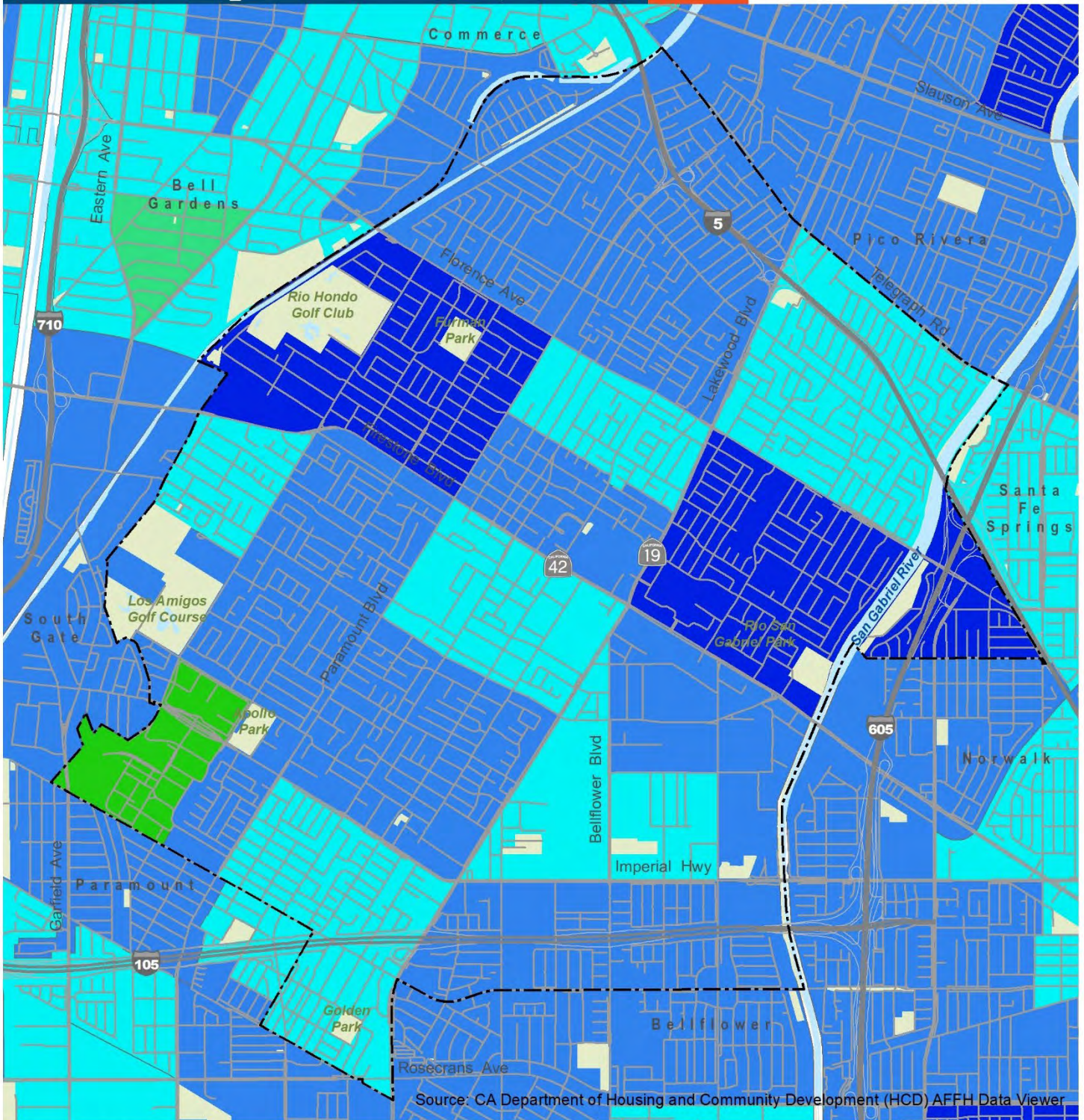
- < 10%
- 10% - 20%
- 20% - 30%
- 30% - 40%
- > 40%

**Base Map Features**

- City Boundary
- Water
- Open Space



# Figure 3.3: Percent of Children in Married-Couple Households (2019)



**Percent of Children in Married-Couple Households (2019)**

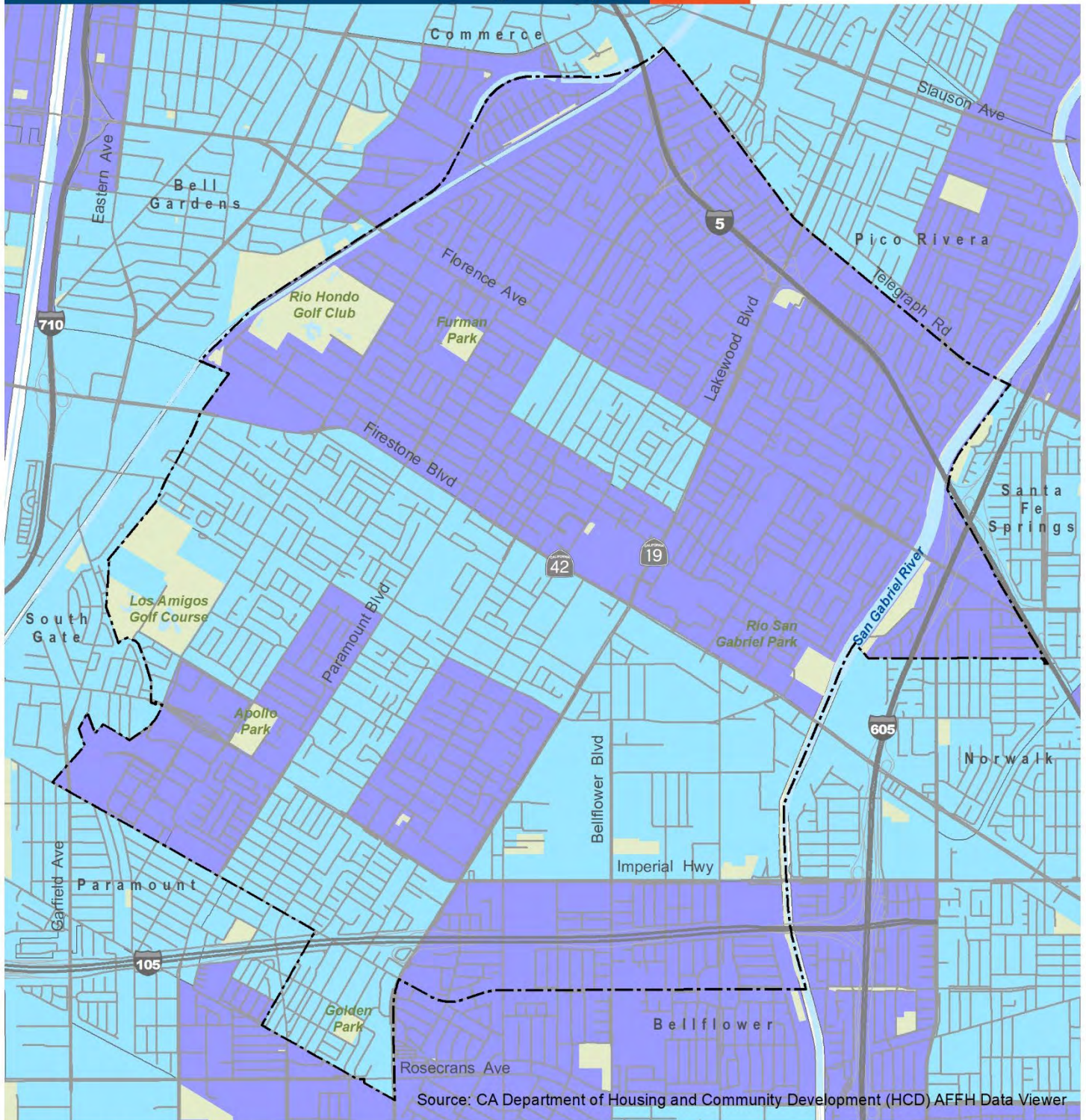
- < 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 80%

**Base Map Features**

- City Boundary
- Water
- Open Space



# Figure 3.4: Percent of Children in Female-Headed Households (2019)



**Percent of Children in Female-Headed Households (2019)**

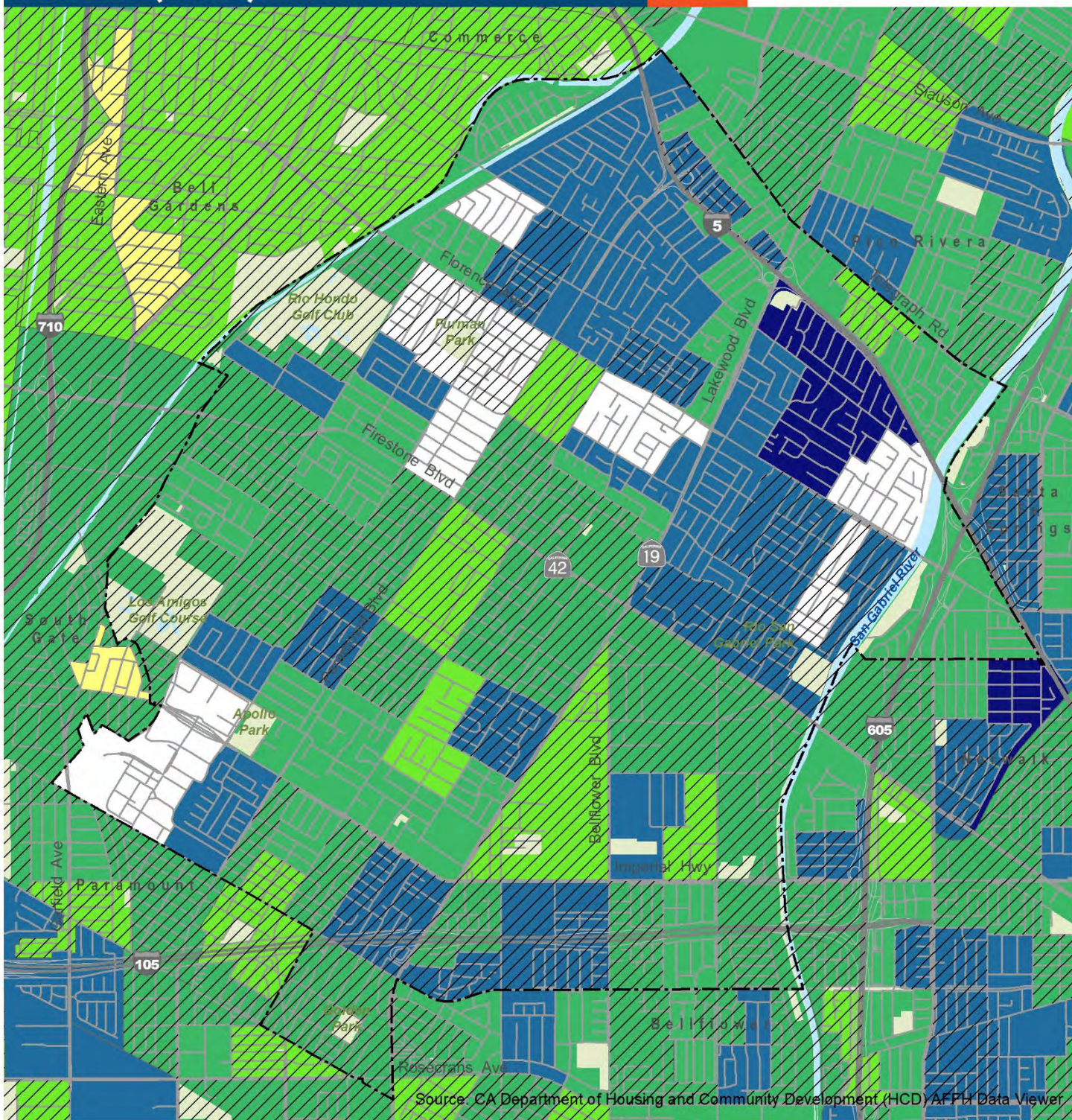
- < 20%
- 21 - 40%
- 41 - 60%
- 61 - 80%
- > 80%

**Base Map Features**

- City Boundary
- Water
- Open Space



# Figure 3.5: Median Household Income (2019)



Source: CA Department of Housing and Community Development (HCD) AFPH Data Viewer

**Median Household Income (2019)**

- < \$30,000
- < \$55,000
- < \$87,000 (2020 CA Median Income)
- < \$125,000
- Greater than \$125,000
- No Data

**HUD Low and Moderate Income Areas (LMI, ACS 2011-2015)**

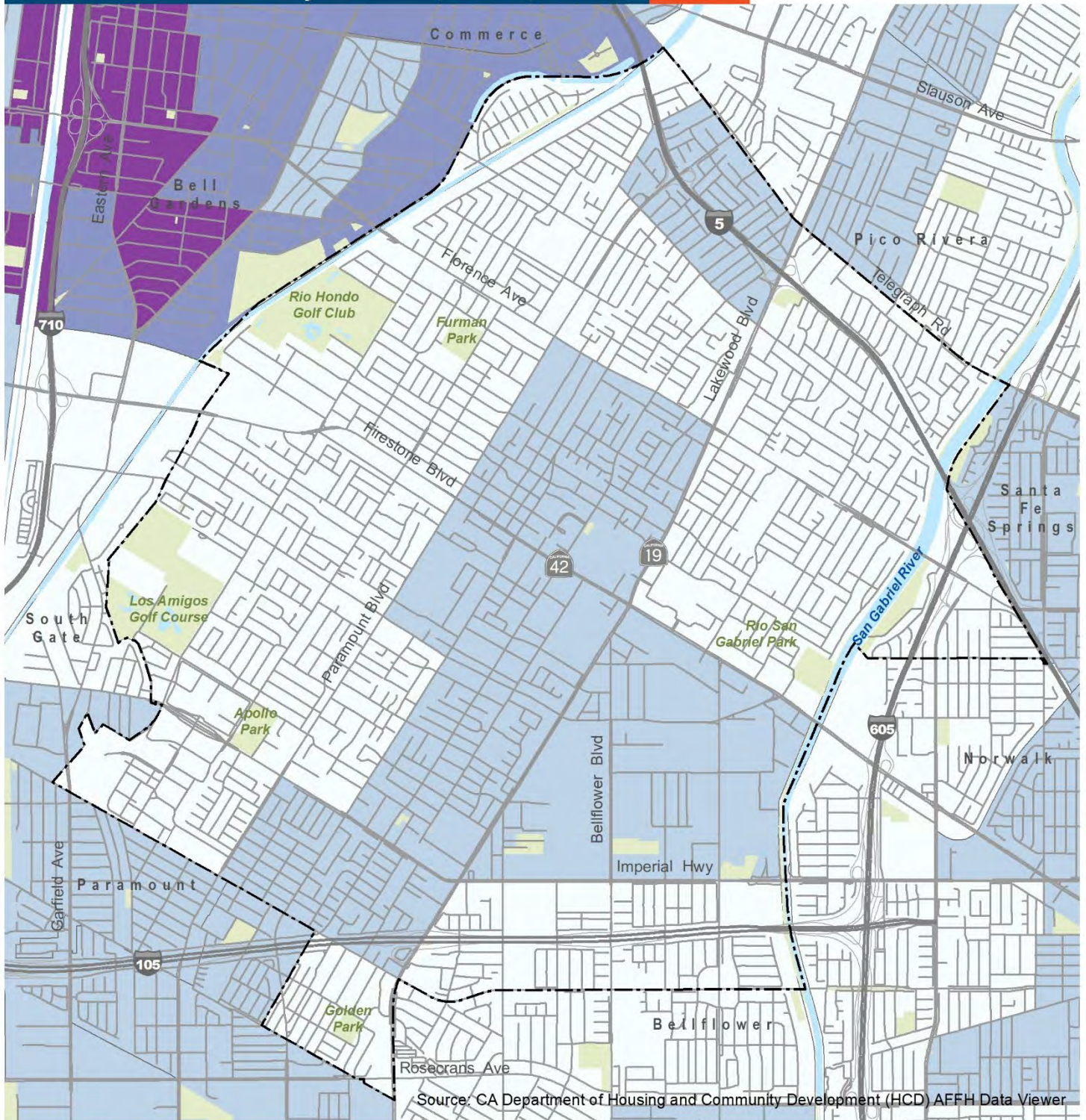
- 51%+ Low/Moderate Income Population

**Base Map Features**

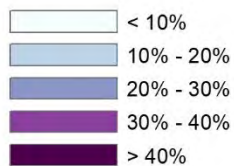
- City Boundary
- Water
- Open Space



# Figure 3.6: Population with Incomes Below the Poverty Level (2019)



**Percent of Population with Incomes Below the Poverty Level (2019)**



**Base Map Features**





## Opportunity Access

The City's Analysis of Impediments (AI) presents findings for seven opportunity indices: environmental health, low poverty index, school proficiency index, labor market index, transit index, low transportation index, and the job proximity index.

- **The environmental health index** summarizes potential exposure to harmful toxins at a neighborhood level. The higher the value, the better the environmental quality of a neighborhood. In Downey across every category, including those results reported for communities below the federal poverty level, Downey scores are well below the regional averages. Downey shows low environmental index scores across the board, regardless of the race or income of the individual.
- **The low poverty index** captures poverty in a neighborhood or jurisdiction where the higher the score, the lower the area's exposure to poverty. Downey's score for each category is either equal to, or well above, the region's average. This represents a much lower exposure to poverty in the jurisdiction. Of note is the lesser exposure that Black and Hispanic residents have in the jurisdiction, as the City's score for those groups is well above the regional scores.
- **The school proficiency index** uses test scores from fourth grade students to determine whether neighborhoods have high-performing, or low-performing, elementary schools. The higher the score, the higher the quality of elementary schools in the area. Compared to regional averages, the jurisdiction is performing in line with the region, with two exceptions for White and Asian and Pacific Islander residents, where the jurisdiction's scores are well below the regional average for those groups.
- **The labor market index** presents the general strength of human capital and labor market engagement in each area. The higher the score, the higher labor market engagement. Compared to the regional scores, Downey is, on average, performing slightly above the expected labor market engagement with two exceptions: for White and Asian and Pacific Islander residents, where the jurisdiction's scores are well below the regional average for those groups.
- **The transit index** is based on estimates of transit trips taken by a family. The higher the score, the more likely residents are to utilize public transportation. For this index, the jurisdiction is performing similar to the region for this index. More importantly, use of transit is relatively consistent across each racial group, suggesting that there does not exist a racial disparity in resident's reliance on, or use of, public transit.
- **The low transportation index** is based on estimates of transportation expenses for a family. The higher the score, the lower the transportation cost for an area. As in the transit index, Downey is performing in line with the region. The high scores for both these indices suggests that residents are using the public transit available to them, and it is relatively affordable.
- **The job proximity index** quantifies the accessibility of a given residential neighborhood as a function of its distance to all job locations within the region, with larger employment centers weighted more heavily. The higher the score, the better access to employment opportunities is for a given area. For every racial category, Downey is slightly performing above the regional averages.

The discussion below addresses opportunity access in more depth regarding education, environmental, transportation, and economic scores.

### Education

Information on schools in the Downey Unified School District (from [publicschoolreview.com](http://publicschoolreview.com)) show that the district's average testing ranking is 7/10, which is in the top 50 percent of public schools in California and is ranked within the top 50 percent of all 989 school districts in California (based on combined math and reading proficiency testing data) for the 2018-2019 school year. School ranking had no significant variation by location. A comparison of schools in the Downey Unified School District on [publicschoolreview.com](http://publicschoolreview.com) shows that a few low-scoring K-12 schools overlap with areas classified as moderate resource (rank of 6/10 or 5/10). The schools include Gauldin Elementary School and Warren High School. A majority of Downey is considered highest resource and as such many top scoring schools are located throughout the City.

### Environmental Justice

The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of certain ethnicities and lower socioeconomic status to environmental pollutants. Figure 3.11 shows CalEnviro Screen 3.0 results for Downey. In general, Downey has lower CalEnviro Screen scores than most areas to the west and north of the City. Within the City, several areas have higher scores. The area south of Firestone Boulevard and east of Lakewood Boulevard shows a concentration of tracts with higher CalEnviro Screen scores. This area of the City has long been developed with industrial uses and is slowly transitioning to commercial and residential uses. A second concentration is found west of Paramount Boulevard (between Florence Avenue and Firestone Boulevard). The highest CalEnviro Screen scores are in the southeast corner of the City in an area bisected by I-105. The areas with the highest CalEnviro Screen scores coincide with the designation of Disadvantaged Communities (DAC) consistent with SB 535. DACs are defined as the top 25 percent scoring areas from CalEnviroScreen. Compared to the County, Downey had similar scores to areas located in the central and eastern parts of the County. The lowest scoring areas are concentrated along the coast, the Santa Monica and San Gabriel Mountains, and parts of the Antelope Valley.

### Transportation

Los Angeles County residents in urban and suburban areas generally enjoy superior access to transportation infrastructure. The County is also traversed by numerous major freeways within its boundaries (including Interstate 5, 10, 710, 605 all of which are either in close proximity or intersect with Downey). Proximity to these highways allows access to employment and other activity centers in Downtown Los Angeles, San Gabriel, West Los Angeles, and Orange County.

Additionally, the City scored 6.9 in the AllTransit Performance Score (Center for Neighborhood Technology 2019, AllTransit, alltransit.cnt.org) indicating that the City had a moderate combination of trips per week and number of jobs accessible enabling a negligible number of people to take transit to work. The City's score was similar to the County score of 6.8. AllTransit data also shows that in Downey, 99.9 percent of workers live within ½ mile of transit compared with 90.1 percent for the County. Downey has access to eight major bus routes provided by LA Metro and is in close proximity to Metro's Lakewood Station, which is a light rail station along the Green Line. LA Metro is also in the planning process for a new light rail service, known as the West Santa Ana Branch, which is planned to have a station on Gardendale Street (southwest area of the City) and a connection point at the Green Line Lakewood Station.

#### Employment/Economic

Local economic characteristics impact local housing needs, even though these characteristics may not be directly related to fair housing. These economic characteristics include the types of jobs available within the municipality, the way residents access jobs (e.g., auto, transit, etc.), the types of occupations held by residents, and their household income. The AI shows that Downey's top ten employers are primarily in the medical, education, and retail sector. Residents who work within Downey are primarily employed in educational services, health care and social assistance, retail trade, and manufacturing. This is consistent with the major employers in the City of Downey. Major employers in the City include Kaiser Permanente with 4,500 employees, Stonewood Center with 2,100 employees, Downey Unified School District with 1,851 employees, and Rancho Los Amigos National Rehabilitation Center with 1,410 employees. Approximately half of the top ten employers in Downey are in the medical sector. Employment characteristics are important as they have a direct relationship with income. In 2018, those employed in educational services, health care and social assistance fields earned a median income that is 6.5 percent greater than the median income in Downey. However, the median income earned by retail trade employees was 27.7 percent lower than the median income for Downey residents.

In terms of unemployment, October 2021 unemployment data from the State Employment Development Department reported that Los Angeles County had an unemployment rate of 9.4 percent while the State of California had an unemployment rate of 6.4 percent. Downey had a lower level of unemployment (7.7 percent) among most cities in southeast Los Angeles County; Lynwood (9.3 percent), South Gate (8.4 percent), Pico Rivera (8.2 percent), Bell Gardens (8.4 percent), and Paramount (9.0 percent). Unemployment in Downey was higher than southeast cities such as Cudahy (6.7 percent), and Santa Fe Springs (4.6 percent).

HCD and the California Tax Credit Allocation Committee (TCAC) coordinated efforts to produce opportunity maps that evaluate specific economic, environmental, and educational characteristics that have been shown by research to support positive economic, educational, and health outcomes for low-income families. The TCAC/HCD Opportunity Maps are intended to display the areas that offer low-income children and adults the best chance at economic advancement, high educational attainment, and good physical and mental health. The primary function of TCAC is to oversee the Low-Income Housing Tax Credit (LIHTC) Program, which provides funding to developers of affordable rental housing. The opportunity maps play a critical role in shaping the future distribution of affordable housing in areas with the highest opportunity.

Shown on **Figure 3.7**, most TCAC opportunity areas in Downey are in the high or moderate resources category. Most of the areas of the City north of Firestone Boulevard are identified as high resources areas. South of Firestone Boulevard, there is a mix of high and moderate resources areas. The City has more high resources areas than neighboring jurisdictions and no low resources areas which is the dominant classification for cities located west of Downey. One area is designated as Moderate Resources (Rapidly Changing) and is located on the southeastern part of the City, adjacent to the eastern City boundary and south of Firestone Boulevard. This area is predominately developed with industrial uses, although a few residential sites identified to be rezoned are located here. These areas have index scores just below the “High Resource” threshold and have experienced rapid increases in opportunity since 2000.

### *Disproportionate Need*

Disproportionate housing need generally refers to a condition in which there are significant disparities in certain groups of residents experiencing a category of housing need when compared to the total population experiencing that category of housing need in the applicable geographic area. The disproportionate housing need analysis looks at cost burden, overcrowding, and environmental justice.

### *Cost Burden (Overpayment)*

State and federal standards specify that households spending more than 30 percent of gross annual income on housing they are overpaying (or experience a housing cost burden). When a household spends more than 30 percent of its income on housing costs, it has less disposable income for other necessities such as health care. In Downey, 43.7 percent of households are overpaying for housing. Overpayment varies by tenure and income. Citywide, 36.2 percent of owner-occupied households are overpaying for housing compared with more than half (51 percent) of renter-occupied households.

The AI identifies disproportionate need related to housing cost burden (spending over 30 percent income on housing). Except for Native American households, Downey has a lower cost burden in the region for every ethnic group and household type. For Native American households, the proportion experiencing severe housing cost burdens is 10 percent above that of all households in the region which experience severe rent burden. American Indian and Alaska Native residents make up 0.1 percent of the Downey population.

**Figures 3.8** and **3.9** show housing overpayment for homeowners and for renters. In general, overpayment is more prevalent for renter households. **Figure 3.8** shows that in most areas of the City 40 to 60 percent of homeowners are overpaying for housing. These areas are located throughout the City, but a noticeable concentration is visible north of Firestone Boulevard. **Figure 3.9** shows that in some areas of the City 60 to 80 percent of renter households are overpaying for housing. These areas are mostly located south of Imperial Highway and in the northern area of the City bounded by Florence Avenue, Tweedy Lan, Gallatin Road and Lakewood Boulevard. Relative to the local region, overpayment in Downey is slightly better particularly when compared to the City of Los Angeles, located about ten miles west of the City boundary. Los Angeles as well as the cities of Lynwood, South Gate, Paramount, and Bell Gardens (located immediate west and south of the City) have higher levels of overpayment for both renters and owners.

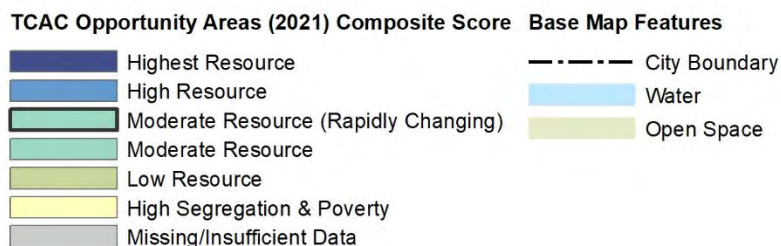
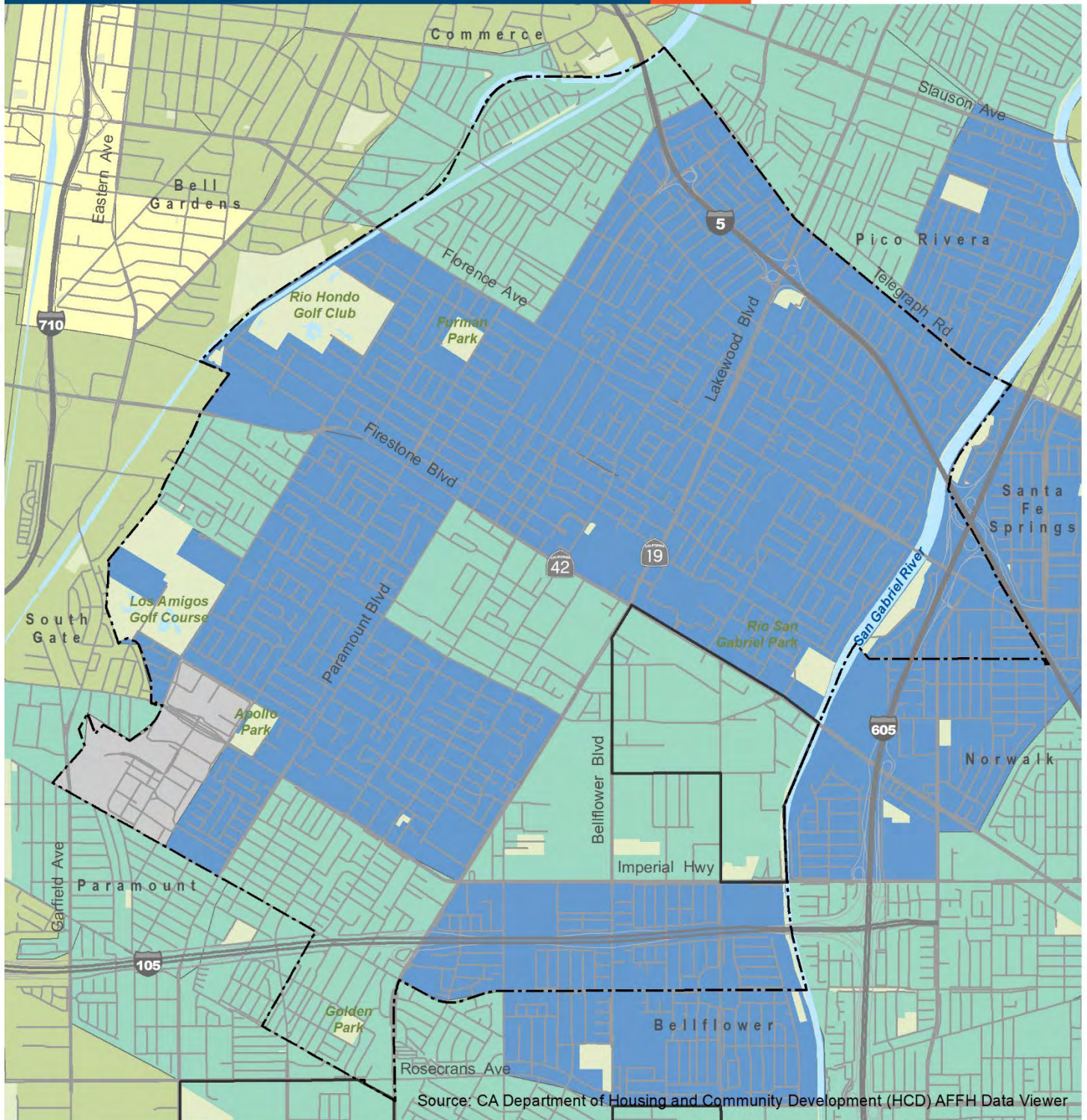
As part of the Housing Element update, the City of Downey proactively engaged the community through a variety of avenues including digital/social media outreach, a community survey, a community workshop, and direct email to stakeholder groups. The results of the workshop and survey findings show that cost burden is a general issue/concern for residents.

- Housing Cost is an issue to many residents:
  - One in four respondents (27.5%) said they struggled to pay their rent or mortgage since the coronavirus outbreak.
  - Some of the most important housing challenges to respondents included ensuring that children who grow up in Downey can afford to live in the City on their own; encouraging rehabilitation of existing housing in older neighborhoods; supporting homeowners at risk of mortgage default to keep their homes; and targeting efforts to address long-term inequities in the housing market, including discrimination in renting.
- Residents expressed an interest in expanding the availability of affordable, multi-family housing and support for lower income, rent burdened households:
  - Residents would like to see new housing in areas with the least impact on traffic and that new housing should be spread evenly across all parts of the City.
  - Residents support tiny home development to help alleviate homelessness
  - Residents support exploring how rezoning might encourage more affordable developments
  - Residents would like that the City ensure long-term affordability covenants on housing

The City has worked to address issues with housing affordability and capacity by proactively addressing most immediate housing needs brought on by COVID-19 by providing emergency rental assistance grants to income-eligible households in Downey that have been economically impacted by COVID-19 through job loss, furlough, or reduction in hours or pay. Through the sites inventory strategy, the City also aims to provide opportunities for higher density development in all parts of the City and not limited to areas where there are current concentrations. This approach will help add a variety of housing types to all parts of the City and avoid concentrations of rental housing.



# Figure 3.7: TCAC Opportunity Areas (2021)





### *Overcrowding and Substandard Housing*

Overcrowding of residential units, in which there is more than one person per room, can be a potential indicator that households are experiencing economic hardship and are struggling to afford housing. In Downey, 11.8 percent of housing units are overcrowded. Overcrowding is more prevalent in rental units (17.1 percent) than owner-occupied units (6.6 percent). In contrast to the level of overcrowding in the City, cities to the west of Downey (Bell Gardens, South Gate, Lynwood, Bell, and Huntington Park) show that there are significantly more tracts with overcrowding levels higher than the State average. Cities east of Downey (Whittier, Santa Fe Springs, La Mirada, and Hacienda Heights), show few tracts with overcrowding levels higher than the State average. The Census Tracts with overcrowding higher than the state average is in the area south of Firestone Boulevard and overlaps with higher levels of overpayments (Figures 3.8 and 3.9), lower incomes (Figure 3.5), and renters (Figure 3.12). As shown on **Figure 3.10**, overcrowding is most prevalent in areas of the City south of Firestone Boulevard.

The Downey AI shows that more than half of Downey households, 53 percent, experience housing problems which include lack of access to kitchen or plumbing facilities, overcrowding, and housing cost burden. Among those households experiencing problems, 33 percent of the total experience severe housing problems. These percentages are almost identical to the regional average. Additionally, as is true in the region, Hispanic households in Downey experience housing problems and severe housing problems at higher rates than the average. Another group experiencing significantly larger housing problems are Native American residents. In Downey, all Native American residents (100 percent of residents in this group) experience problems.

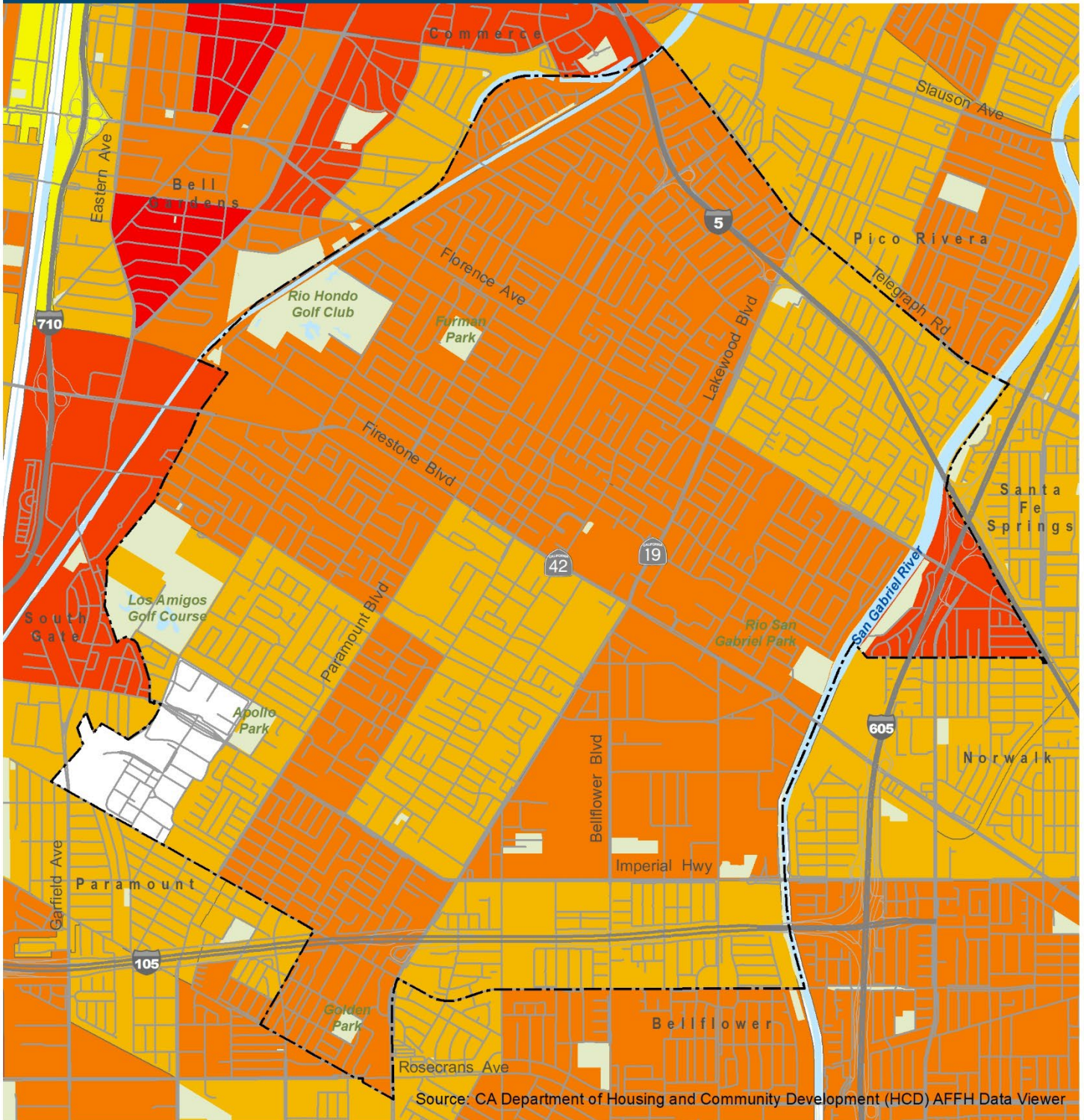
Based upon observations and experiences of the Code Enforcement Division, the City estimates that in 2020, fewer than 25 housing units were in severe need of replacement or substantial rehabilitation due to housing conditions. These units, for example, may be suffering from neglect and building that appears structurally unsound and maintenance is non-existent. This does not include homes or structures that need more traditional rehabilitation such as repairs to maintain a safe and healthy living environment. HUD CHAS data (2014-2018) provides an estimate of households with at least one of four housing problems (incomplete kitchen facilities, incomplete plumbing facilities, more than one person per room, or cost burden greater than 30 percent). In Downey, 48.6 percent of households reported one of these housing problems, a level lower than Los Angeles County (51 percent) and slightly higher than the state (44.3 percent).

### *Environmental Justice*

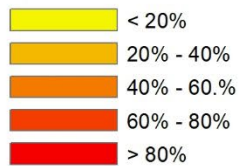
The California Office of Environmental Health Hazard Assessment (OEHHA) developed a screening methodology to help identify California communities disproportionately burdened by multiple sources of pollution called the California Communities Environmental Health Screening Tool (CalEnviro Screen). In addition to environmental factors (pollutant exposure, groundwater threats, toxic sites, and hazardous materials exposure) and sensitive receptors (seniors, children, persons with asthma, and low birth weight infants), CalEnviro Screen also takes into consideration socioeconomic factors. These factors include educational attainment, linguistic isolation, poverty, and unemployment. Research has shown a heightened vulnerability of people of certain ethnicities and lower socioeconomic status to environmental pollutants. **Figure 3.11** shows CalEnviro Screen 3.0 results for Downey. In general, Downey has lower CalEnviro Screen scores than most areas to the west and north of the City. Within the City, several areas have higher scores. The area south of Firestone Boulevard and east of Lakewood



# Figure 3.8: Overpayment by Home Owners (2019)



**Percent of Owner Households (with Mortgages) Spending >30% Income on Housing Costs**

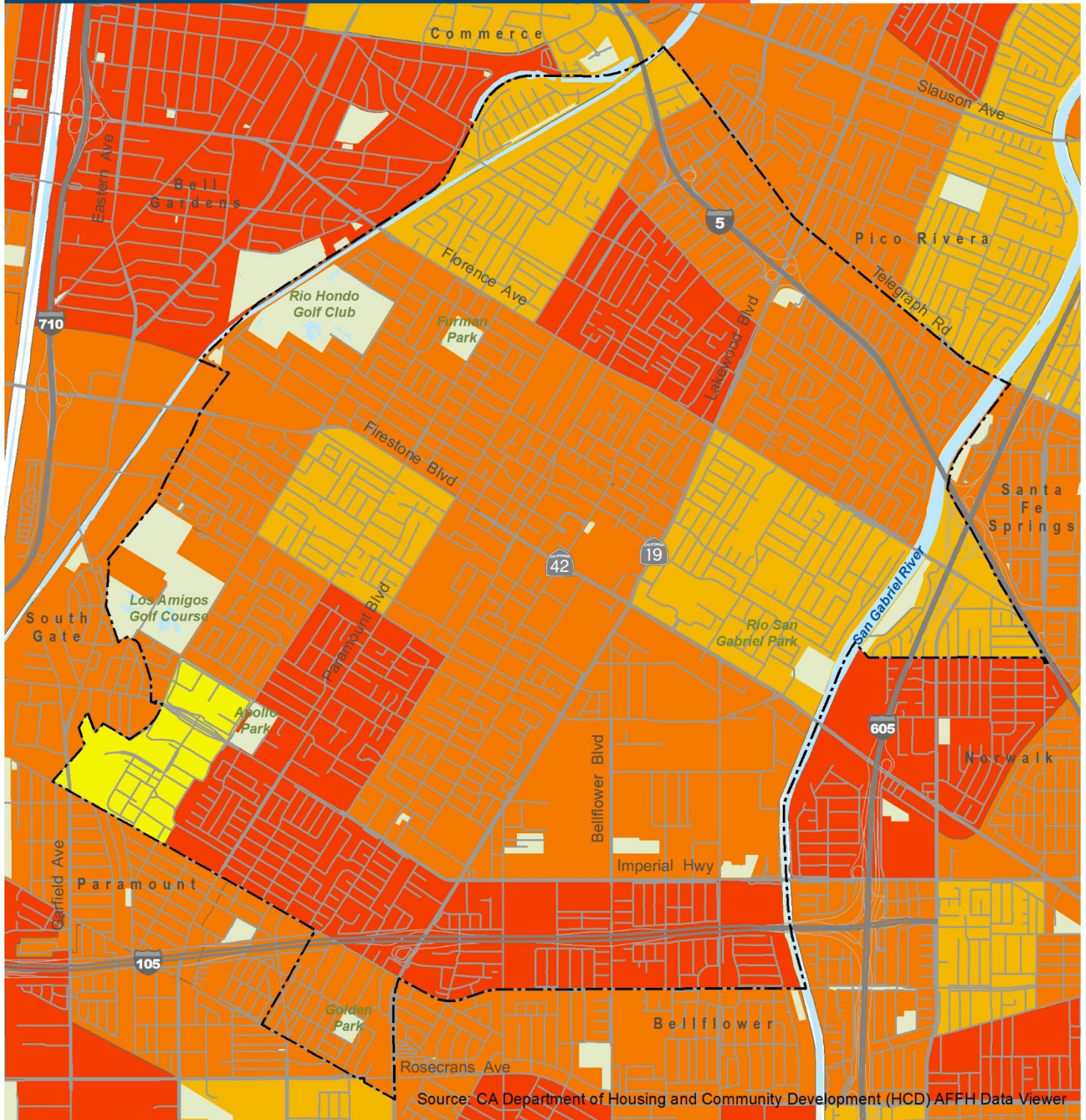


**Base Map Features**





# Figure 3.9: Overpayment by Renters (2019)



**Percent of Renter Households Spending >30% Income on Gross Rent (Rent and Utilities)**

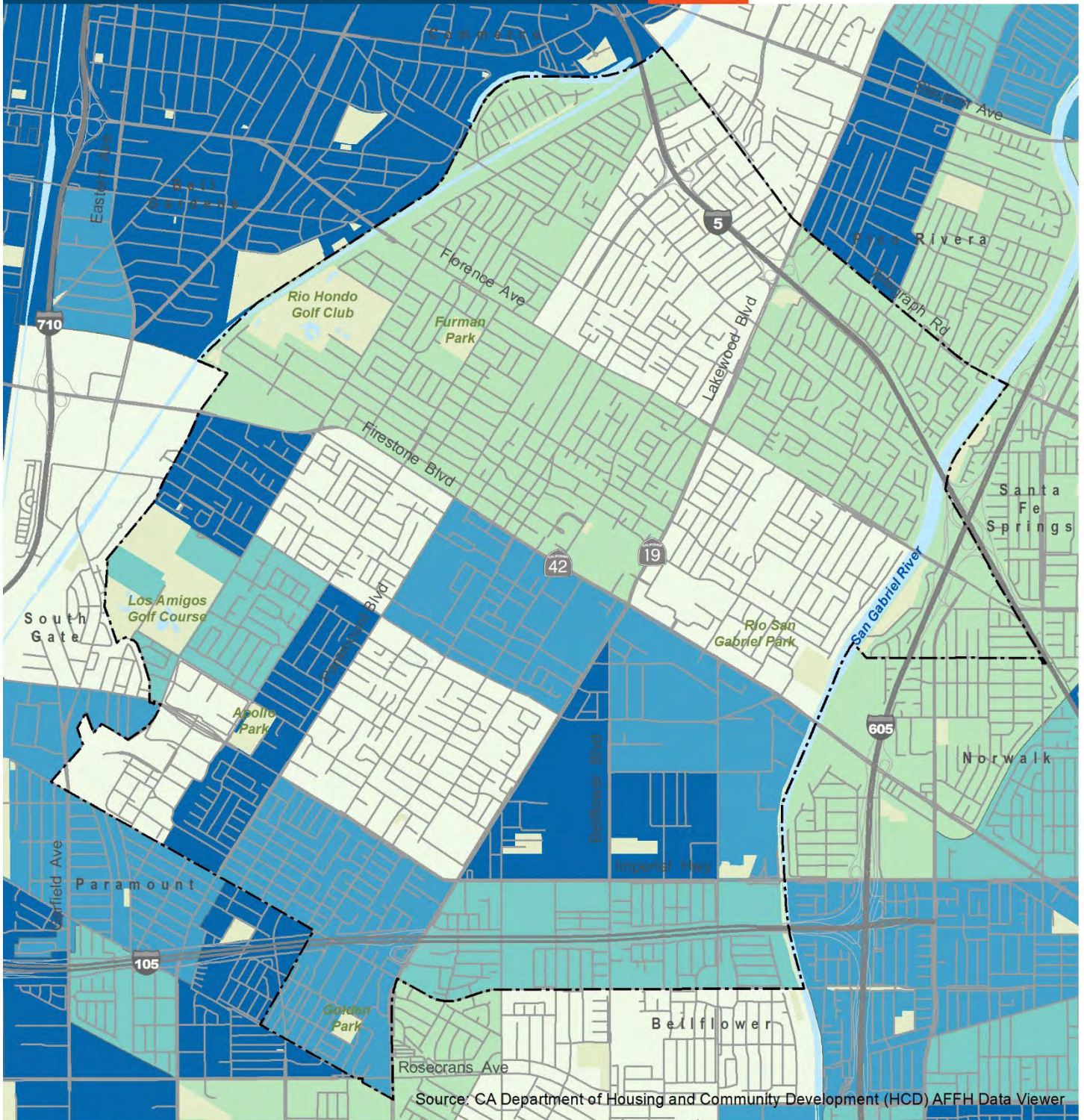
- < 20%
- 20% - 40%
- 40% - 60%
- 60% - 80%
- > 80%

**Base Map Features**

- City Boundary
- Water
- Open Space



# Figure 3.10: Overcrowded Households (2020)



### Percent of Overcrowded Households (>1.0 persons per room)

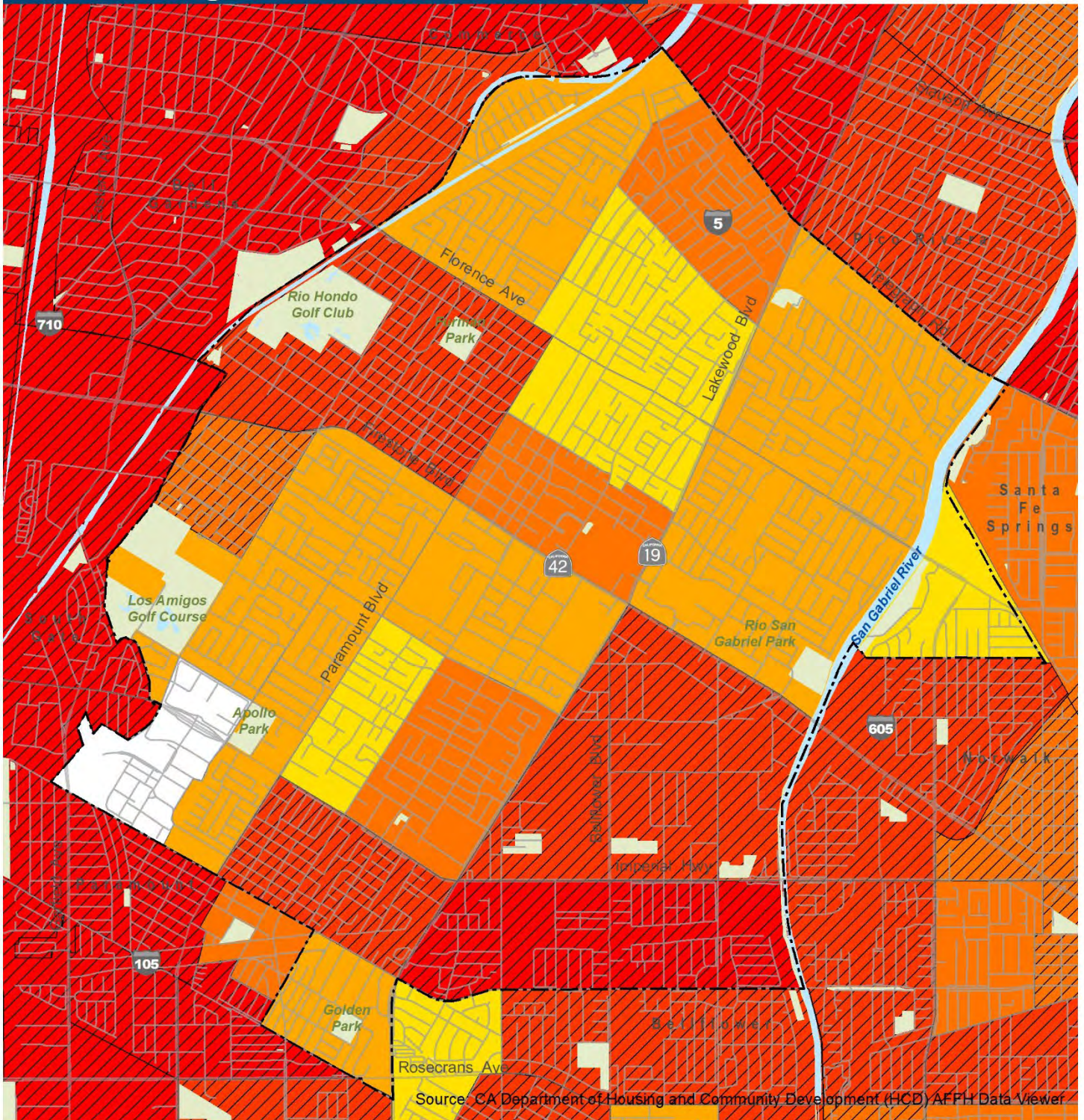
- ≤ 8.2% (State Average)
- 8.3% - 12%
- 12.01% - 15%
- 15.01% - 20%
- >20%

### Base Map Features

- City Boundary
- Water
- Open Space



# Figure 3.11: CalEnviroScreen 3.0 & Disadvantaged Communities



Source: CA Department of Housing and Community Development (HCD) AFFH Data Viewer

### CalEnviroScreen 3.0 Percentile

	91% - 100%		41% - 50%
	81% - 90%		31% - 40%
	71% - 80%		21% - 30%
	61% - 70%		11% - 20%
	51% - 60%		1% to 10%

### Base Map Features

	City Boundary
	Water
	Open Space

SB 535 Disadvantaged Communities (DAC)



Boulevard shows a concentration of tracts with higher CalEnviro Screen scores. This area of the City has long been developed with industrial uses and is slowly transitioning to commercial and residential uses. A second concentration is found west of Paramount Boulevard (between Florence Avenue and Firestone Boulevard). The highest CalEnviro Screen scores are in the southeast corner of the City in an area bisected by I-105. The areas with the highest CalEnviro Screen scores coincide with the designation of Disadvantaged Communities (DAC) consistent with SB 535. DACs are defined as the top 25 percent scoring areas from CalEnviroScreen.

The Disproportionate Need and Displacement analysis shows the need for more housing as there are several pockets of the city (downtown and south of Firestone Boulevard) that have high rates of overcrowding, housing overpayment, and housing burdens that overlap with areas of lower incomes and high proportions of renters. Some of these areas, such as the downtown, also overlap with historic patterns of redlining. In these redlined areas during the 1930s through 1960s, the real estate appraisal system of the Home Owners' Loan Corporation (HOLC) used a four-tiered color code to denote investment risk for federal mortgages: from best to risky (which was almost always reserved for areas where ethnic minorities lived). In 1939, HOLC appraised neighborhoods in Downey. A central-north neighborhood received a yellow grade because of the small presence of Japanese and Mexican field workers, who were "a detrimental influence (*On Race, Housing, and Confronting History*, Downey Patriot, July 10, 2019)." Elsewhere in Downey, developers used race-restrictive covenants to protect the neighborhoods from similar "undesirable" elements. This meant that home deeds in certain tracts, such as the Orange Estates (in the northern parts of the City), specifically prohibited homeowners from reselling their properties to Mexican American or Black homeowners regardless of economic background. It is likely that as a result of this practice many households who could not buy in the northern parts of the City, settled in the southern parts of the City either as homeowners or renters. This pattern can be seen today with higher home and rents.

The higher disproportionate need in the central and southern parts of the City may also be a result of the City's industrial roots. Throughout the years a number of aviation companies operated in Downey, including: Vultee Aircraft, North American Aviation, and Rockwell International, which was later bought by the Boeing Company whose facilities produced systems for the Apollo Project, and the space shuttle. This industry thrived in the City for 70 years, ending when the former Rockwell plant was converted to the Downey Landing development (located in the southeast quadrant of the City). Deindustrialization, the end of the Cold War, a waning military-industrial complex, and tax base restructuring caused the gradual transition away from industrial uses towards commercial and residential uses. In an area just east of the Downey Landing Specific Plan, once a fully industrial areas, there is a high concentration of renter households and the City's last large clusters of industrial land uses.

The site inventory strategy aims to provide opportunities for higher density development in all parts of the City and not limited to areas where there are current concentrations. The City's strategy includes:

- Significantly increasing high-density, residential capacity throughout the City by:
  - Adopting General Plan and Zoning Code amendments to increase the allowable residential density in the Medium Density Residential (MDR) General Plan designation and the R-3 zone.
  - Adopting implementing zone and development standards for the Mixed-Use General Plan designation that will allow residential development at a minimum of 30 units per acre.
  - Adopting a residential overlay zone that will allow high-density housing development at a minimum density of 30 units per acre along key corridors.



- Adding a residential component to three commercial specific plans, requiring a minimum density of 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or by amending or rescinding the governing specific plans.
- Encouraging the development of accessory dwelling units (ADUs) through a facilitated and streamlined process.

The City's industrial pattern of development, along with development of the I-105 freeway, also contribute to the high environmental pollution burdens seen in the southeastern quadrant of the City (see Figure 3.11). As the shift away from industrial uses continues, it is expected that the environmental pollution burden will also ease although that process may take many decades.

### *Displacement Risk*

Displacement refers to instances where a household is forced or pressured to move from their home against their wishes. Areas with high demand for homes drive up housing costs and increase pressure for redevelopment, resulting in the potential for displacement. The displacement risk in Downey can be evaluated based on physical and economic displacement.

The HCD AFFH viewer identifies communities, or places where residents may be particularly vulnerable to displacement in the context of rising property values. The central areas of Los Angeles County, including parts of the San Fernando and San Gabriel Valleys are vulnerable to displacement. The areas vulnerable to displacement in Downey are mostly located in the downtown area and areas just south of downtown. The vulnerability, according to the data is based on the higher proportion of persons of color and lower income and renter households and observed rent increases.

### *Physical Displacement*

Physical displacement is the result of eviction, acquisition, rehabilitation, or demolition of property; the expiration of covenants on rent- or income-restricted housing; or the rising cost of housing. Tenure and displacement are closely tied as renters are at higher risk of displacement from rising rental prices.

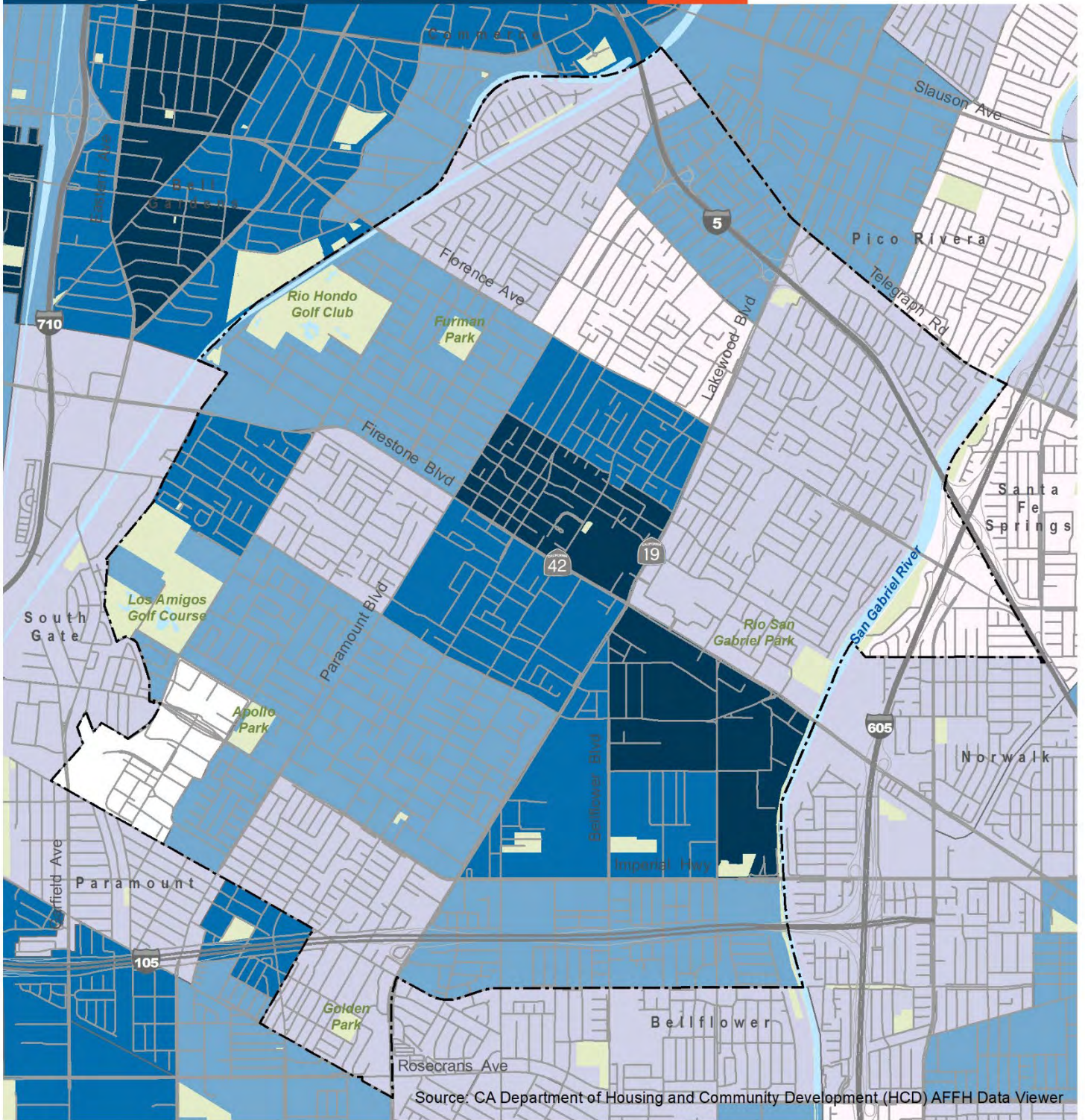
The tenure distribution in Downey is nearly split equally. Owner-occupied households constitute 50.6 percent of all households in 2020, while households that are renter occupied constitute 49.4 percent of all households. **Figure 3.12** shows areas with higher proportion of households in renter-occupied housing units. Several areas of the City are susceptible to displacement because of the high proportion of households that are renters and lower income. In the central areas of the City there are five Census tracts where renter households make up more than 60 percent of all households. In two of these tracts, renter households make up more than 80 percent of all households. One tract is located north of Firestone Boulevard, and it includes the Civic Center, Downey High School, and part of the Downtown Downey Specific Plan area. The second tract is in the eastern part of the City south of Firestone Boulevard. This area has many industrial uses and multi-family residential properties. The City has a Residential Anti-Displacement Policy to comply with the requirements of Section 104(d) of the Housing and Community Development Act of 1974 with respect to the prevention and minimization of residential displacement because of the expenditure of HUD assistance.

Displacement can also occur from the loss of affordable housing. Housing law requires an inventory and analysis of government-assisted dwelling units eligible for conversion from lower-income housing to market rate housing during the next 10 years. Reasons for this conversion may include expiration of subsidies, mortgage pre-payments or pay-offs, and concurrent expiration of affordability restrictions.

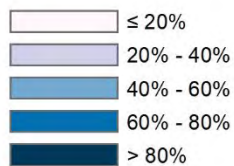
Based on City records and information from the California Housing Partnership Corporation and City records, in the next 10 years (2021-2031) no assisted units have expiring affordability covenant.



# Figure 3.12: Renter-Occupied Housing Units (2019)



**Percent of Renter-Occupied Housing Units**



**Base Map Features**





Also, it is possible for local government policies to result in the displacement or affect representation of minorities or persons living with a disability. Currently, most of the cities with adopted reasonable accommodations procedures have a definition of a disabled person in their zoning ordinances. The City of Downey is in the process of creating a reasonable accommodation ordinance, to be completed by the end 2021.

### *Economic Displacement*

Economic displacement is due to the inability to afford rising rents or costs of homeownership like property taxes. Figure 3.13 shows HUD's Location Affordability Index, which provides standardized housing and transportation costs by state. Most of Downey has a median gross rent of \$1,500. Recent census data show that the median rent in Downey among all apartment units in 2019 was \$1,462 per month. Real estate websites show higher rental costs including Costar which shows an average rent of \$2,025 for a two-bedroom apartment. HUD-determined fair market rents for Los Angeles County fall within the range of the rents within Downey, indicating that rental rates in Downey generally align with the HUD-defined fair market rents although that can be changing due to the escalating rents in the region. In Downey, the areas with the highest rents do not coincide with areas with a high proportion of renter households. There are only four census tracts north of Firestone Boulevard with median gross rents of \$2,000. However, Figure 3.9 shows that the areas south of Imperial Highway have high proportions of overpaying renters. This area generally coincides with higher levels of overcrowding and lower income households.

Regionally, areas in central Los Angeles County have lower median gross rents, as indicated by the Location Affordability Index, than areas in West Los Angeles, the South Bay, a few cities in the northern San Gabriel Valley, and western San Fernando Valley. In terms of housing overpayment, most of Los Angeles County renters and homeowners are experiencing significant housing cost burdens. This could create regional economic pressure in the City of Downey and further decrease the availability of affordable housing as residents in Los Angeles County actively seek areas with lower median rents.

### *Disproportionate Need and Displacement Issues*

The Disproportionate Need and Displacement analysis reveals that areas of the City located south of Firestone Boulevard have disproportionate needs and higher vulnerability to displacement. The areas of the City south of Firestone Boulevard have higher levels of:

- Renter households experiencing housing cost burden
- Overcrowding
- Households with lower median incomes
- Pollution burdens

### *Sites Inventory Consistency with Affirmatively Furthering Fair Housing (AFFH)*

State law requires that for housing elements due on or after January 1, 2021, sites must be identified throughout the community in a manner that affirmatively furthers fair housing opportunities (Government Code Section 65583(c)(10)). Affirmatively furthering fair housing means taking meaningful actions that address significant disparities in housing needs and in access to opportunity. For purposes of the Housing Element site inventory, this means that sites identified to accommodate the lower-income need are not concentrated in low-resourced areas (for example, lack of access to high performing schools, proximity to jobs, location disproportionately exposed to pollution or other health impacts) or areas of segregation and concentrations of poverty. Table 3.12 presents the sites inventory

capacity by income level number of units and their location with respect to location and how that affects the existing patterns for all components of the assessment of fair housing. Table 3.13 presents the sites inventory capacity by income level by Census tract and their location with respect to location and how that affects the existing patterns for all components of the assessment of fair housing.

**Table 3.12: Sites Inventory and AFFH Patterns**

Topic	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA
Total Site Capacity:	2,898	1,188	2,398	6,484
<b>Non-White Population</b>				
<20%	0%	0%	0%	0%
21-40%	0%	0%	0%	0%
41-60%	0%	0%	0%	0%
61-80%	74%	80%	73%	75%
>80%	26%	20%	27%	25%
<b>Persons with Disabilities</b>				
<10 %	88%	76%	89%	86%
10-20%	12%	24%	11%	14%
20-30%	0%	0%	0%	0%
30-40%	0%	0%	0%	0%
>40%	0%	0%	0%	0%
<b>% Children in Married Couple HHs</b>				
<20%	14%	0%	13%	11%
21-40%	0%	0%	0%	0%
41-60%	41%	40%	37%	39%
61-80%	33%	38%	24%	31%
>80%	12%	22%	26%	19%
<b>% Children in Female Headed HHs</b>				
<20%	58%	57%	59%	58%
21-40%	42%	43%	41%	42%
41-60%	0	0	0	0
61-80%	0	0	0	0
>80%	0	0	0	0
<b>% Low- and Moderate-Income (LMI) Population (City is 50.76% LMI)</b>				
<25%	23%	4%	15%	17%
25-50%	14%	14%	10%	13%
50-75%	54%	70%	69%	62%
75-100%	8%	13%	6%	8%
<b>TCAC Opportunity Area</b>				
Highest Resources	0%	0%	0%	0%
High Resources	48%	66%	54%	53%

**Table 3.12: Sites Inventory and AFFH Patterns**

Topic	Lower Income RHNA	Moderate Income RHNA	Above Moderate Income RHNA	Total RHNA
Moderate Resources	38%	30%	32%	34%
Moderate Resources (Rapidly Changing)	0%	4%	2%	1%
Low Resources	0%	0%	0%	0%
High Segregation and Poverty	0%	0%	0%	0%
Missing/Insufficient Data	14%	0%	13%	11%
<b>CalEnviroScreen Score (Percentile) 3.0</b>				
1 - 10% (Lowest Score)	14%	0%	13%	11%
11 - 20%	0%	0%	0%	0%
21 - 30%	0%	0%	0%	0%
31 - 40%	0%	0%	0%	0%
41 - 50%	0%	0%	0%	0%
51 - 60%	15%	12%	9%	12%
61 - 70%	35%	34%	33%	34%
71 - 80%	11%	21%	12%	13%
81 - 90%	20%	32%	30%	26%
91 - 100% (Highest Score)	6%	0%	3%	4%
<b>SB 535 Disadvantaged Communities (DAC) 3.0</b>				
DAC	26%	32%	35%	31%
Not a DAC	74%	68%	65%	69%

The City is made up 22 Census tracts, most (64 percent or 14 tracts) are designated as high resource areas (Table 3.13). The locational analysis and mapping data shows that the proposed candidate sites to meet the RHNA allocation are generally dispersed throughout the community with an emphasis on locating units where there is a high level of access to important public services and transit. Overall, the distribution of potential units does not disproportionately impact areas with more acute housing needs. The locational analysis shows that lower income units are distributed across the City with only a couple of concentrations (discussed below) in moderate income areas or areas with a higher proportion of low- and moderate-income residents. Program action to increase access to housing in higher resources areas is prioritized.

Table 3.3 also shows that identified sites for future housing, including housing affordable to lower income households, are not concentrated in areas where half or more of the population identifies as low- and moderate-income. By proposing an equitable distribution of housing, segregation based on income can be mitigated and would provide lower-income households greater mobility to live in areas that were inaccessible to them before. Additionally, higher income areas tend to have greater access to resources. As a result, more options for lower income households would be available in areas with higher resources and opportunities.

**Table 3.13: Sites Inventory and AFFH Patterns by Census Tracts**

Census Tract	Lower Income RHNA	Moderate Income RHNA	Above Mod. Income RHNA	Total RHNA	% Lower Income Sites	% Mod/ Above Mod. Income Sites	Avg. Non-White %	Avg. Low/Mod Income	TCAC AOP	SB 535 DAC 3.0 (2018)	Res. Overlay Acres***
5504	92	46	46	184	3%	3%	84.7	42.9%	High Resource	No	0
5505	64	44	39	147	2%	2%	81.6	33.8%	High Resource	No	21.57
5506.01	44	20	18	82	2%	1%	85.4	43.0%	High Resource	No	138.72
5506.02	213	7	16	236	8%	1%	75.8	34.0%	High Resource	No	18.60
5507	33	0	2	35	1%	0%	81.5	24.9%	Moderate Resource	No	7.42
5508	83	41	37	161	3%	2%	78.1	45.4%	High Resource	Yes	73.17
5509.01	265	234	234	733	9%	13%	82.4	56.5%	High Resource	No	6.33
5509.02	55	72	75	202	2%	4%	84.5	56.6%	High Resource	No	14.87
5510	175	175	524	874	6%	20%	79.0	52.5%	High Resource	No	46.27
5511.01	396	193	531	1120	14%	21%	90.5	66.0%	Moderate Resource	Yes	28.85
5511.02	0	44	49	93	0%	3%	92.1	74.8%	Moderate Resource (Rapidly Changing)	Yes	11.63
5512.01	48	18	58	124	2%	2%	83.9	45.6%	High Resource	No	18.22
5512.02	92	10	11	113	3%	1%	86.3	49.0%	High Resource	No	22.02
5513	528	48	89	665	19%	4%	83.8	67.8%	Moderate Resource	No	19.47
5514	46	23	64	133	2%	2%	83.7	53.3%*	Mod./High Resource*	Partial**	49.99
5515.01	17	29	30	76	1%	2%	79.9	58.4%	High Resource	No	0.77
5515.02	49	71	69	189	2%	4%	82.7	54.7%	High Resource	No	37.29
5516	300	0	300	600	11%	9%	84.4	NA	Insufficient Data	No	0
5517	114	108	99	321	4%	6%	90.4	54.9%	Moderate Resource	Yes	14.13
5518	158	0	12	170	6%	0%	84.7	57.5%	High Resource	Yes	42.46
5534	24	5	4	33	1%	0%	92.4	58.6%	Moderate Resource	No	12.58

Notes:

\*TCAC and HUD Low/Moderate Income data based on 2020 Census Tracts and the remaining AFFH data uses 2018 Census Tracts. As a result, Tract 5514 is divided into 2 tracts in 2020 data and has been combined to be consistent with the 2018 AFFH data. \*\*Only the western half of the tract is a DAC [5514.01]. Tract 5514.02 is not a DAC.

\*\*\* The Residential Overlay is applied to properties beyond what is identified in the RHNA. Although most of the properties are not RHNA sites, they are included in this table to evaluate the distribution of potential future capacity.

Source: City of Downey, 2020



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- Non-White population: Every block group in the City has a non-White population over 60 percent and there are no concentrations of non-White population. Most of the sites inventory capacity (75 percent) is in areas with a non-white population of 60 to 80 percent. Only 25 percent of the capacity is in areas with a non-white population over 80 percent. This proportion is similar for all income categories. **This results in improved conditions** by avoiding concentration of new development in areas with higher proportions of non-white residents. As shown in Tables 3.12 and 3.13, Downey is predominantly non-White across its entire boundary. Therefore, racial segregation pattern analysis requires a locational approach to identify some of the nuances and patterns that may exist at a Census tract level within a City that is largely non-White. Comparing the RHNA distribution by income shows that two tracts (5510 and 5511.01) have a large portion of overall sites. Both tracts each have a large commercial center where the City will add a residential component at a density of at least 30 units per acre. These two centers are the two largest sites in the inventory. Tract 5511.01 is in the southeastern quadrant of the City and is the location of the Downey Landing Specific Plan and within tract 5510, located in the northeastern quadrant of the City, is the Stonewood Center. The large size of these sites results in a higher potential capacity for residential uses. Tract 5511.01 has the second highest proportion of lower income sites and a non-white population of over 90 percent, higher than the City average of 85.6 percent. This tract is also designated as a disadvantaged community under SB 353, has the second highest proportion of low- and moderate-income residents (based on HUD data), and has an opportunity index rating of moderate. This combination results in **exacerbated conditions** related to the addition of lower income housing in an area with a higher proportion of non-white, lower income residents in an area with relatively lower opportunities. Conversely, by placing more affordable housing in predominantly non-White communities, housing issues such as overcrowding, overpayment, and lack of housing options can be alleviated where they are felt most. The distribution of lower-income household opportunities into places where non-White predominance is not as strong could mean Downey residents could become further integrated in regard to race/ethnicity and income.
- Persons with disabilities: All but two census tracts in the City have less than 10 percent of their population living with a disability. Two tracts have between 10 to 20 percent population living with a disability. Most of the sites inventory capacity (86 percent) is in areas with less than 10 percent of the population living with a disability. Only 14 percent of the capacity is in areas with 10 to 20 percent population living with a disability. This proportion is similar for the This proportion is similar for all income categories. **This results in improved conditions** by avoiding concentration of new development in areas with higher proportions of disabled residents.
- Familial Status: All tracts in the City have less than 40 percent of children living in female-headed households. The sites inventory reflects this in that 58 percent of capacity is in areas with less than 20 percent of children living in female headed households compared to 42 percent of capacity in areas with 21 to 40 percent of children living in female headed households. This proportion is similar for all income categories. **This results in improved conditions** by avoiding concentration of new development in areas with higher proportions of female-headed households with children as these households tend to have lower incomes and a greater need for affordable housing and accessible daycare and other supportive services.
- Low- and moderate-Income (LMI) areas: More than half (50.76 percent) of Downey households earn low- and moderate-incomes (up to 80 percent of the AMI). The sites inventory capacity distribution reflects this as 62 percent of capacity is in areas with 50 to 75 percent LMI

population. The lower income capacity has a lower proportion of units in the same category (54 percent) and the moderate and above moderate-income capacity has a higher proportion of sites in these areas (70 and 69 percent respectively). Overall, this **results in improved conditions** because all income levels are similarly distributed. Nonetheless, it also **results in exacerbated conditions** because only a smaller proportion of sites inventory capacity is in areas with LMI populations less than 50 percent. Placing site capacity in these areas is unavoidable. As shown on Figure 3.5, within the City, LMI areas are in most areas of the City. The site inventory strategy adds high density, residential capacity throughout the City (as a by-right use at a minimum density of 30 units per acre) along the City's major corridors and at the City's major commercial centers. This is positive, considering that these sites today do not support residential uses but represent locations where new higher-density housing can be provided and residents will have access to good schools, diverse jobs, and distant from industrial uses. Because the strategy adds residential capacity to non-residential areas, it is addressing the area's disproportionate need without the risk of displacement of residents improves fair housing and equal opportunity conditions. Geographically, the addition of the overlay is an **improved condition** because the two tracts with the largest acreage in the residential overlay (tracts 5506.01 and 5508) are high opportunity areas with lower LMI populations less than 50 percent. Table 3.3 also shows that identified sites for future housing are not concentrated in areas where half or more of the population identifies as low- and moderate-income. By proposing an equitable distribution of housing, segregation based on income can be mitigated. There is a high proportion of LMI populations compared to the rest of the City in tracts 5511.01 and 5513. These areas are also designated as having moderate resources and a higher proportion of lower income sites compared with the rest of the City. This combination results in **exacerbated conditions** related to the addition of lower income housing in an area with a higher proportion of LMI population in an area with relatively lower opportunities. However, potential low-income units would also help lower income communities by providing lower income households more stable and reliable housing options in their neighborhoods.

- Racially or Ethnically Concentrated Area of Poverty (R/ECAP): R/ECAPs are not included in Table 3.12 due to their absence within City boundaries which is confirmed by data in the HCD AFFH Data Viewer.
- TCAC opportunity areas: most TCAC opportunity areas in Downey are in the high or moderate resources category. The City has no low resources areas which is the dominant classification for cities located west of Downey. The sites inventory capacity distribution reflects this as most (88 percent) if the sites inventory capacity is in high or moderate resources areas. In fact, more than half of the site capacity (53 percent) is in high resources areas. The lower income site capacity is similarly distributed with 48 percent of capacity in high resources areas and 38 percent in moderate resources areas. Tracts 5509.01 and 5510 are designated as high resources areas and have a relatively higher proportion of lower income sites. This distribution **results in improved conditions** by adding sites, specifically lower income sites, in high resource areas. Among tracts with a moderate resources designation there is a high proportion of lower income sites in tract 5513. This area also has a high proportion of LMI residents compared with the rest of the City. This combination results in **exacerbated conditions** related to the addition of lower income housing in an area with a higher proportion of LMI population in an area with relatively lower opportunities.
- Cal EnviroScreen (CES 3.0) and DACs: In general, Downey has lower CalEnviro Screen scores than

most areas to the west and north of the City. Within the City, several areas have higher scores. As expected, most (77 percent) of the site inventory capacity is in areas with CES percentile scores of over 61 percent. The lower income RHNA has a better distribution with only 71 percent of site capacity in the same areas. While 30 percent of all site capacity is in the highest CES percentile group (81% or more), only 26 percent of lower income sites are in this same category. The location of future housing sites in areas with environmental burdens is not ideal, it is unavoidable in a City with high CES scores in all parts of the City. No areas in the city have a CES score lower than 50 percent. The data shows site capacity in the lowest scoring area although this is attributable to insufficient data for the Rancho Los Amigos South Campus Specific Plan area. As a result, the sites inventory **does not exacerbate conditions** as the sites capacity is distributed in all areas and CES percentile groups. Disadvantaged Communities (DAC) are defined as the top 25 percent scoring areas from CalEnviroScreen. Most site capacity (69 percent) is outside of areas designated as DACs. The proportion of sites outside of DACs is higher for lower income site capacity (74 percent of capacity is located outside of DACs). This distribution **results in improved conditions** by locating lower income capacity outside DACs. Four out of the 22 Census tract that make up the City are designated as DACs. Of those, three are in moderate resources areas and one is in a high resource area. Of the three moderate resources DACs, only one shows a concentration of sites (of all income categories). Tract 5511.01 is in the southeastern quadrant of the City and is the location of the Downey Landing Specific Plan. The large size of this site results in a higher overall potential capacity for residential uses. Concentrating housing (of all income levels) in areas with higher environmental burdens could bring more interest in future resource development and investment to these communities.

The AFFH analysis also shows areas of the City located south of Firestone Boulevard have disproportionate needs and higher vulnerability to displacement. The areas of the City south of Firestone Boulevard have higher levels of:

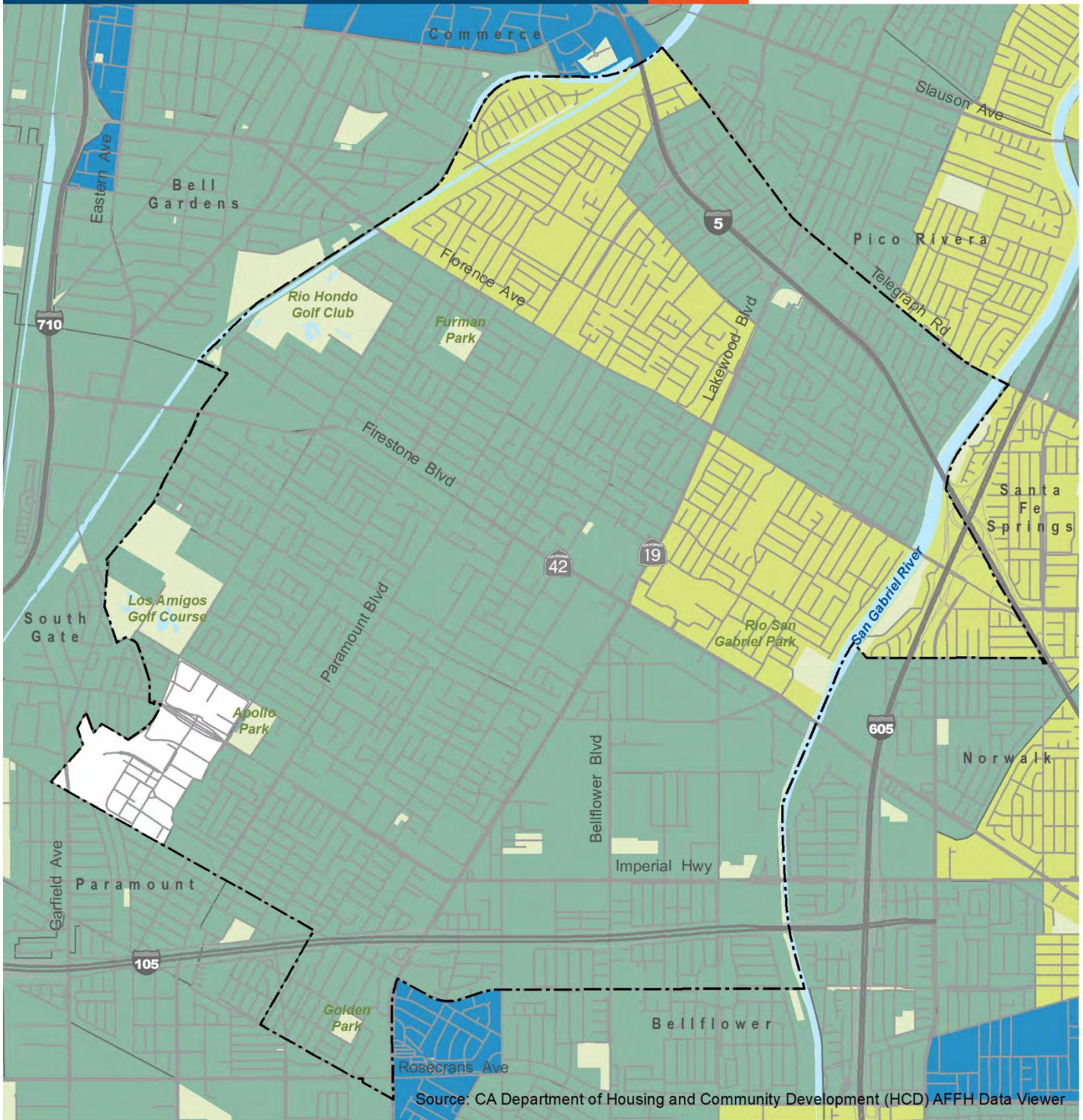
- Renter households experiencing housing cost burden
- Overcrowding
- Households with lower median incomes
- Pollution burdens

More than half (58 percent) of site inventory capacity is located south of Firestone Boulevard. This proportion is larger for lower income sites where 64 percent are located south of Firestone Boulevard. Although this is an exacerbated condition, the City's site strategy focuses on increasing opportunities for more affordable housing options. One strategy to address the lack of affordable housing in the City is to increase high density, residential capacity throughout the City. As part of this strategy the City is adding residential uses (at a minimum density of 30 units per acre) along the City's major corridors and at the City's major commercial centers. This is positive, considering that these sites today do not support residential uses but represent locations where new higher-density housing can be provided and residents will have access to good schools, diverse jobs, and distant from industrial uses—and not concentrated in existing low poverty areas. A significant proportion of that new capacity is south of Firestone Boulevard. Because the strategy adds residential capacity to non-residential areas, it is addressing the area's disproportionate need without the risk of displacement of residents which improves fair housing and equal opportunity conditions.








Program 5.2 in the Housing Plan (Chapter 6) includes program actions to address displacement risk and disproportionate housing need through housing mobility strategies and new housing choices and affordability in areas of opportunity strategies.

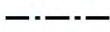


**Figure 3.13: Median Rents (2019)**



**Median Gross Rents**

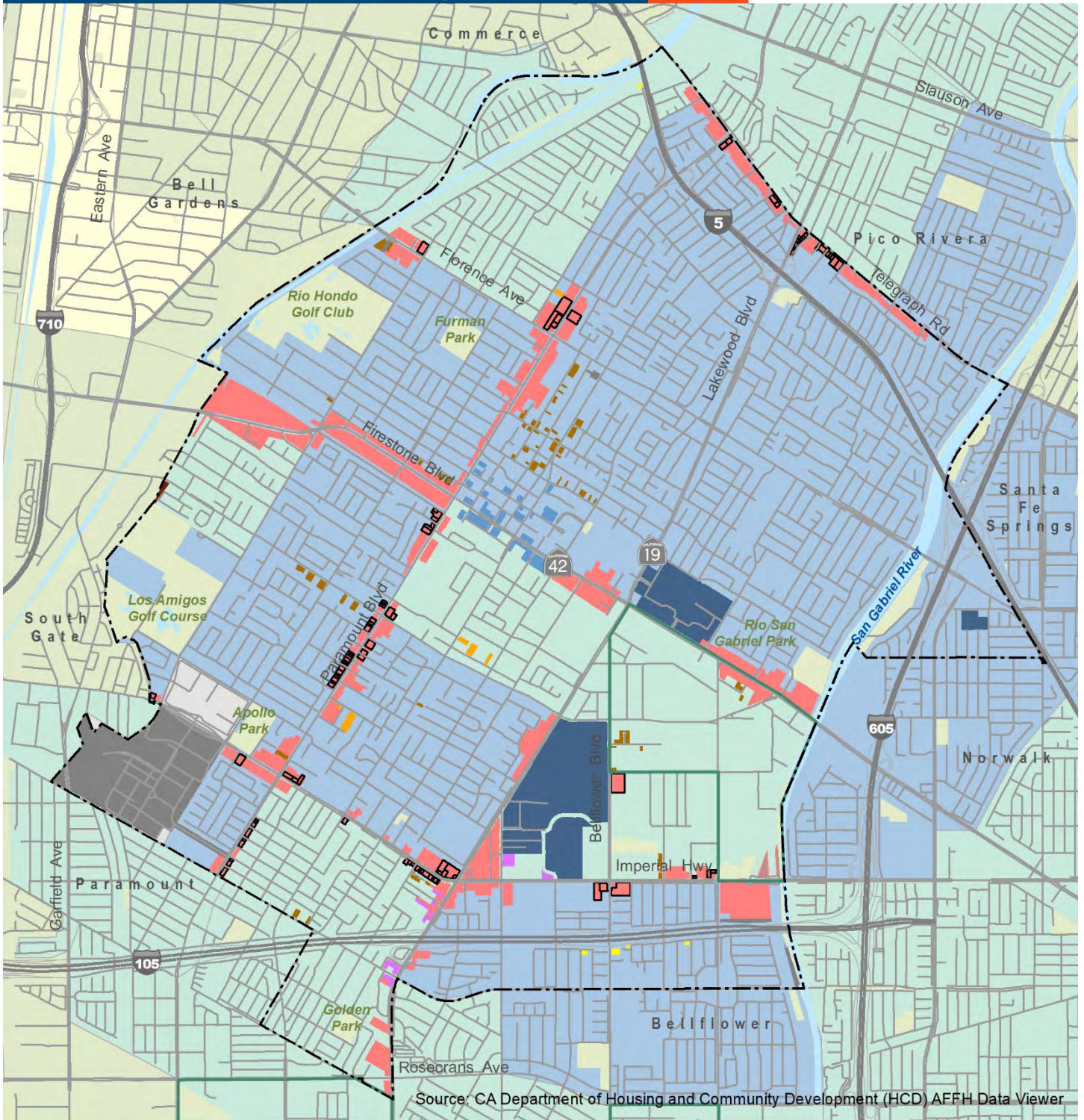
	< \$1,000
	< \$1,500
	< \$2,000
	< \$2,500
	> \$3,000

**Base Map Features**

	City Boundary
	Water
	Open Space



# Figure 3.14: TCAC Opportunity Areas (2021) and Sites Inventory



Source: CA Department of Housing and Community Development (HCD) AFFH Data Viewer

### TCAC Opportunity Areas 2021

- Highest Resource
- High Resource
- Moderate Resource (Rapidly Changing)
- Moderate Resource
- Low Resource
- High Segregation & Poverty
- Missing/Insufficient Data

### 2021-2029 Sites Inventory

- Approved Proposed Projects (Credits)**
- Approved or Proposed Projects
- Sites Currently in Place**
- Vacant and Underutilized R1
- Vacant and Underutilized R2
- Downtown Downey SP Sites

### Sites To Be Rezoned

- MDR/R3 Sites to Rezone
- LDR/R1 Rezone to MDR/R3
- Mixed-Use Sites to Rezone
- Commercial Specific Plan Sites to Rezone
- Residential Overlay Sites
- Residential Overlay Zone



## *AI Recommendations to Improve Fair Housing in the City of Downey*

The 2020 Analysis of Impediments (AI) did not identify any actions, omissions, or decisions by the City of Downey which restrict or limit the housing choices of residents in Downey on the basis of their age, race, color, ancestry, national origin, age, religion, sex, disability, marital status, familial status, source of income, sexual orientation, or any other arbitrary factor. The AI identified four recommendations to improve fair housing choice in Downey.

1. Explore the development and rehabilitation of affordable housing opportunities with local partners as well as outside developers.
2. Promote the construction of affordable for-sale and/or rental housing units with three or more bedrooms that are affordable to very low- and low-income families. The City shall publicize financial and regulatory incentive opportunities (e.g., expediting permit processing, deferred fees, density bonuses, or use of Housing Asset Funds) to developers for these unit types.
3. Actively seek replacement funding sources to recover lost funding (e.g., Redevelopment Agency dissolution, reduction in CDBG allocation, etc.) to continue facilitating affordable housing.
4. Direct the Fair Housing Foundation to provide information on reasonable accommodation to City residents through dissemination of written materials available at City Hall and appropriate community centers. Continue funding a fair housing program that encompasses investigations of discrimination complaints, research of housing related discrimination issues and public education and information.

## *Identification and Prioritization of Local Fair Housing Issues and Contributing Factors*

Housing Element law requires that the City list and prioritize contributing factors to fair housing issues. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues, are fundamental to adequate goals and actions, and must be related to the overall analysis. This identification and prioritization must give highest priority to factors that limit or deny fair housing choice or access to opportunity or negatively impact fair housing. The following are contributing factors that affect fair housing choice in Downey.

### **1. Displacement risk due to regional economic pressure**

Areas with high demand for homes drive up housing costs and increase pressure for redevelopment, resulting in the potential for displacement. Inadequate supply and production of affordable homes available to low-income households and persons in protected classes as well as public opposition to new development are contributing factors to this fair housing issue.

#### *Contributing factors:*

- Inadequate supply/production of affordable/special needs housing
- Displacement of residents due to regional economic pressures
- High land and development costs in the region
- Land use and zoning laws
- Public opposition to new development and land use and zoning laws

### **2. Disproportionate housing needs in areas with lower incomes and higher proportions of renters**



The analysis found that areas south of Firestone Boulevard had higher levels of overcrowding and overpayment that overlapped with lower median incomes and higher proportions of renters.

*Contributing factors:*

- Inadequate supply/production of affordable/special needs housing
- Displacement of residents due to regional economic pressures
- Median gross rents lower than some more expensive areas of the region, such as West Los Angeles and the South Bay
- Location of environmental health hazards

The City is taking several actions (reflected in the Housing Plan) to address these two contributing factors to fair housing issues and affirmatively further fair housing throughout the city. The main strategy to address displacements risk is to expand the opportunity for the development of housing for a variety of income levels through:

- General Plan and Zoning Code amendments to increase the allowable residential density in the Medium Density Residential (MDR) General Plan designation and R-3 zone from 18-24 units per acre to 18-40 units per acre
- Adoption of an implementing zone and development standards for the Mixed-Use General Plan designation that will allow residential development at a density of at least 30 units per acre
- Adoption of a residential overlay zone that will allow high-density housing development at a density of at least 30 units per acre along key City corridors and allows residential development as a by-right use
- Adding a residential component to three key specific plan areas with densities of at least 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or by amending or rescinding the governing specific plans.
- Review and, if needed, revise residential developments standards that may constrain housing development including minimum lot area requirements and building height limits in the R-3 zoning district and minimum unit sizes for all residential development.
- Facilitating and encouraging ADU development
- Exploring the potential for adoption of an inclusionary housing ordinance
- Educating the community on the importance of equitable access for all residents and neighborhoods to affordable housing and financial support
- Creating and convening the Ad Hoc Committee for Affordable Housing to discuss housing affordability issues in Downey, explore concepts such as inclusionary housing and serve as an ongoing space for residents to share concerns and ideas related to affordable housing in the City
- Prioritizing community and stakeholder engagement during controversial development decisions.

## **Environmental Constraints**

Environmental hazards like geologic and seismic conditions provide the greatest threat to the built environment. The City has identified areas where land development should be carefully controlled. The following hazards may impact future development of residential units in the City.

### **Seismic Hazards**

As stated in the General Plan Safety Element, the entire City—as well as most of Southern California—is located within a seismically active region that has been subject to major earthquakes in the past. While

no known faults traverse Downey, the Whittier fault is approximately five miles away, and may generate an earthquake of maximum magnitude in the range of 6.0 to 7.2.<sup>7</sup> The greatest damage from earthquakes results from ground shaking. Although intense ground shaking is generally most severe near quake epicenter, properties such as those in Downey not immediately adjacent to the epicenter may be subject to extreme damage due to liquefaction, a condition related to the area's silt and sandy soils and relatively high water table. The greatest potential danger is the collapse of older residential units constructed from unreinforced masonry and explosions of petroleum and fuel lines. The State Division of Mines and Geology has designated the entire City as a liquefaction zone; the City requires geotechnical reports for construction projects to identify and mitigate the potential undermining of structural integrity during earthquakes.

## **Flooding**

The Federal Emergency Management Agency (FEMA) publishes maps that identify areas of Downey subject to flooding in the event of a major storm. These Flood Insurance Rate Maps (FIRMs) indicate areas that may be inundated in the event of a 100-year or a 500-year storm. Since the Army Corp of Engineers completed raising the channel levees in 2000, no properties within Downey are considered by FEMA to be within a 100-year flood zone (a flood of such intensity that it has a one percent chance of occurring in any given year). Areas that are designated for future residential development do not fall within the 100-year floodplain and are not subject to specialized flood construction requirements.

## **Fire Hazards**

Building and structure fires are the most serious fire threats within the City. Like most Southern California cities on the urban fringe, the late summer fires that result from the accumulation of dried underbrush have the potential to spread into the City proper. But since the City of Downey is largely developed and not adjacent to any brush-covered areas, Downey has a little potential for these types of fires. Other fire hazards within the City may be associated with heavy industrial uses, older commercial and residential structures, the presence of hazardous materials, and arson.

## **Noise**

Noise generated from mobile sources such as traffic and aircraft will continue to have the greatest potential impact on land use in Downey. The amount of noise generated by aircraft traffic is significant since the City lies under the flight path to Los Angeles International Airport (LAX). Also, Interstates 5, 105, and 605 all cross through portions of the City and carry high daily traffic volumes that create significant noise. The General Plan Noise Element describes the existing noise environment using maps that indicate high levels of noise in the planning area. It also identifies noise sources and contains goals and policies to help reduce the effects, if not the actual intensity, of noise experienced by Downey residents. Land use policy discourages the placement of noise-sensitive land uses in areas that are subject to high noise levels.

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<sup>7</sup> According to the Southern California Earthquake Data Center

# downey general plan

# housing element

## CHAPTER 4. HOUSING RESOURCES

This chapter describes the land, financial, and administrative resources available in the City of Downey to address its existing and future housing needs, including its share of the Regional Housing Needs Allocation (RHNA). Government Code Section 65583(a) requires local governments to prepare an inventory of land suitable for residential development, including vacant sites and sites having the potential for redevelopment. The inventory of land suitable for residential development shall be used to identify sites that can be developed for housing within the planning period. Also discussed are the financial and administrative resources available to support affordable housing.

### Housing in Downey

Demand for housing in Downey, and all Southern California in general, has significantly increased over the past decade due to slow housing production. The City has worked to encourage housing development but is constrained, as are other urbanized jurisdictions, by lack of undeveloped (vacant) land, high land prices, open space deficits, and productive industrial uses that create land use conflicts if too close to residential neighborhoods. Factors such as major freeways and rail corridors further limit development potential, as adequate buffers around those locations are needed to create suitable living environments.

All the while, the cost of developing subsidized affordable housing has increased while public funding has decreased. According to a study produced by the Turner Center at UC Berkeley, across the United States, the high costs of developing subsidized housing hinders efforts to address the affordability crisis of low- and moderate-income families and provide homes for unhoused individuals. The number of people overpaying for housing remains at historically high levels, and after many years of decline, homelessness has been on the rise in California. Levels of public subsidy for housing have not kept pace with these growing needs. At the same time, higher costs per unit to build affordable housing means that states and localities produce fewer units with the same amount of subsidy, even as more people need these units<sup>1</sup>. Many of the factors that have influenced housing affordability and availability were intensified by the COVID-19 pandemic. The rise in cost of building materials, the skyrocketing demand

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<sup>1</sup> Turner Center Strategies to Lower Cost and Speed Housing Production: A Case Study of San Francisco's 833 Bryant Street Project

for more affordable housing, and the increase in persons struggling to afford housing costs have exacerbated an already serious situation.

In response to these circumstances, the City of Downey has been proactive in addressing most immediate housing needs brought on by COVID-19, such as disseminating information on local and regional assistance programs, including the City's own COVID-19 Emergency Residential Rental Assistance Program. This program provides emergency rental assistance grants to income-eligible households in Downey that have been economically impacted by COVID-19 through job loss, furlough, or reduction in hours or pay. The City continues to be committed to being part of the statewide process to provide adequate housing, challenges notwithstanding.

This section of the Housing Element will show that SCAG assigned the City a goal of accommodating 6,525 housing units in various income categories from 2021 through 2029. To put that figure into perspective, the allocation is eight times higher than the 2014-2021 RHNA allocated to Downey (814 units) and amounts to more than 18 percent of the City's existing housing stock (2019) which has been developed over the course of more than 60 years. Accommodating the sixth cycle RHNA allocation in a built-out city like Downey within an eight-year period represents a formidable challenge. Nonetheless, the City has paired this housing resources section with an aggressive set of policies and programs that will work to address the challenge. Knowing that the housing needs of Downey residents and their families have reached a critical pitch, the City will embark on many programmatic actions to expand the opportunities for new residential development citywide.

The City will:

- Undertake General Plan and Zoning Code amendments to increase the allowable residential density in the Medium Density Residential (MDR) General Plan designation and the R-3 zone.
- Adopt implementing zone and development standards for the Mixed-Use General Plan designation that will allow residential development at a minimum of 30 units per acre.
- Adopt a residential overlay zone that will allow high-density housing development at a minimum density of 30 units per acre along key corridors.
- Add a residential component to three commercial specific plans, requiring a minimum density of 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or by amending or rescinding the governing specific plans.
- Encourage the development of accessory dwelling units (ADUs) through a facilitated and streamlined process.

As a community approaching full build-out, the City has few remaining vacant sites. The relative scarcity of vacant land necessitates the use of alternative mechanisms for providing sites for housing. In addition, the City has fiscal challenges to maintaining service levels. One mechanism that can support economic development and housing is considering the use of City-owned or publicly owned land, such as parking lots, for development. The City will use a toolkit of housing incentives programs to facilitate the construction of affordable and market rate housing products including the use of Development Agreements to secure long-term fiscal and affordable housing benefits. The City will focus on development projects on City-owned property in the Downtown Downey Specific Plan area and at the Downey Landing commercial center (See Program 2.3).



# Regional Housing Needs Assessment

California General Plan law requires each city and county to have land zoned to accommodate its fair share of the regional housing need. HCD allocates a numeric regional housing goal to SCAG, and SCAG is then mandated to distribute the numerical goal among the cities and counties in the region. This share for the SCAG region is known as the Regional Housing Needs Assessment (RHNA). The housing allocation targets are not building requirements; rather, they are planning goals for each community to accommodate through appropriate planning policies and land use regulations. Allocation targets are intended to ensure that zoning is in place and appropriately zoned sites are available to address anticipated housing demand during the Housing Element planning period.

The sixth cycle RHNA for the SCAG region covers an 8.3-year planning period (June 30, 2021 – October 15, 2029). To address a diversity of housing need, the RHNA is divided into four income categories: very low, low, moderate, and above moderate. As determined by SCAG, the City of Downey’s draft allocation is 6,525 new housing units during this planning cycle, with the units divided among the four income categories as shown in **Table 4.1**.

**Table 4.1: Regional Housing Needs Assessment 2021-2029**

Income Category	Housing Units	% Total
Very Low (0-50 percent AMI)	2,079	32%
Low (51-80 percent AMI)	946	14%
Moderate (81-120 percent AMI)	915	14%
Above Moderate (>120 percent AMI)	2,585	40%
<b>Total Units Needed</b>	<b>6,525</b>	<b>100%</b>

Source: Southern California Association of Governments, 2021  
 AMI = Area Median Income  
 Note: Pursuant to AB 2634, local jurisdictions are also required to project the housing needs of extremely low-income households (0-30% AMI). In estimating the number of extremely low-income households, a jurisdiction can use 50% of the very low-income allocation or apportion the very low-income figure based on Census data. Therefore, the City’s very low-income RHNA of 2,079 units can be split into 1,039 extremely low-income and 1,040 very low-income units.

## Approved and Proposed Projects

Approved and proposed residential development projects can be credited toward the 2021-2029 RHNA. In Downey, projects credited towards the RHNA are shown in **Table 4.2** and **Figure 4.2**

The Veterans Commons Project is being developed on land owned by the Los Angeles County Development Authority. The project includes 100 new affordable (very low- and low-income) housing units for chronically homeless veterans and veteran families. Veterans Commons will be a mixed-use environment with supportive servicers, open space areas, and a workforce development hub serving both residents and the community at-large with job search assistance, employment training, and skill building services. Residential amenities include a 1,500-square-foot resident center, four case management/resident services offices, and a veterans’ memorial public art located at the corner of Gardendale Street and Garfield Avenue. Construction will begin construction in December 2021.

**Table 4.2** also includes a 28-unit townhome development at 12850 Woodruff Avenue which includes two very low-income units provided through the density bonus provisions. The City has worked to assist the property developer in providing an affordable component by introducing the site developer to a developer with extensive experience in obtaining funding specifically for affordable housing development. While the City encouraged the applicant to utilize density bonuses to increase the number of affordable units, the developer has indicated that this is their first project utilizing the density bonus provisions provided for in SB1818 and desire to move forth with a small project to gain experience.

The remaining projects are credited toward the above moderate-income RHNA. In total, the approved/proposed projects will result in 193 units. After these projects are considered, the City has a remaining RHNA of 6,332 units.

**Table 4.2: Approved and Proposed Projects**

Project Name	Affordability Level				Total
	Ex./Very Low Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
<b>Approved Projects</b>					
Veteran Commons Project	50	50	--	--	100
10361 Foster Rd. condominiums	--	--	--	38	38
12850 Woodruff Ave. townhomes	2	--	--	26	28
10303 & 10221 Downey Ave. condominiums	--	--	--	12	12
10224 La Reina Ave. apartments	--	--	--	3	3
7224 Florence Avenue	--	--	--	12	12
<b>Total</b>	<b>52</b>	<b>50</b>	<b>0</b>	<b>91</b>	<b>193</b>
<i>2021-2029 RHNA</i>	<i>2,079</i>	<i>946</i>	<i>915</i>	<i>2,585</i>	<i>6,525</i>
Remaining RHNA	2,027	896	915	2,494	6,332

## Residential Sites Inventory

### Assumptions and Methodology

Consistent with HCD guidelines, the methodology for determining realistic capacity on each identified site must account for land use controls and site improvements. Due to the limited availability of residential land, many property owners and developers may opt for a density bonus to increase the unit count. Starting in 2021, residential projects in California with on-site affordable housing can get a density bonus of up to 50 percent. Previously, under Government Code Section 65915—commonly known as the Density Bonus Law—the maximum bonus was 35 percent. In Downey, affordable housing has been developed on smaller sites, and projects have been able to achieve densities higher than the allowed maximum. Specifically, the 50-unit Downey View affordable housing development was developed on a 0.52-acre property at a density of 96 units per acre in a district that allowed a maximum of 70 units per acre (Downtown Downey Specific Plan, District 5: Firestone Boulevard Gateway District). The following assumptions are consistent with current trends and considered realistic:

- Lower-density residential sites: Realistic capacity for sites in land use designations that allow 17 units or fewer units per acre is calculated at maximum density allowed. Downey is a built-out

city and there are very few opportunities for development in lower density areas as such the assumption is that due to the high cost of developing housing, most developments at these densities will reach maximums. There are very few sites identified at these densities and those sites only yield 108 units at an assumed affordability level of above moderate-income.

- Higher-density residential sites (presented in the second part of this Chapter): Realistic capacity for sites in land use designations that allow a density of more than 17 units per acre is calculated at 80 percent maximum density based on recent trends and the assumption that development standards, combined with unique site features and shared amenities such as parking and open space, may not always lead to 100 percent buildout. This assumption is realistic and conservative as high-density development projects have been developed at much higher densities. This shows the demand for high density residential development is high and given the higher cost of development in the region, reaching maximum or near maximum densities is expected. In 2014 Downey View, a 50-unit, multi-family development was built on a 0.5-acre site at a density of 96 units per acre in a zone that accommodated densities of up to 75 units per acre. Higher building heights are available for projects within the Downtown Downey Specific Plan (DDSP) areas (45 to 75 feet) and several projects have been built at the established heights. As part of the City's Housing Element implementation (Program 1.3), the City is increasing allowable density in the R-3 zone to allow up to 40 units per acre and in the process adjust development standards, accordingly. Program 1.3 also includes an action item to review and revise residential developments standards including building height limits in the R-3 zoning district. Recent project trends show that the density assumption is realistic. A smaller, 8-unit multi-family development was built in 2020 at 10341 Western Avenue on 0.34 acres and yielded a density 23.5 units per acre which is 97.5 percent of maximum allowed density at the time it was built. Four recent projects also show that calculating realistic capacity at 80 percent maximum density is realistic:
  - 10341 Western Avenue (permitted in 2019): 8 units on 0.34 acres and a density of 23.5 units per acre in the R-3 zone (which allows a maximum density of 24 units per acre)
  - 10303/10221 Downey Avenue (approved in 2021): 12 units on 0.83 acres and a density of 14.5 units per acre in the R2 zone (which allows a maximum density of 17 units per acre)
  - 7940 Telegraph Road (completed in 2021): 39 condominiums on 1.6 acres and a density of 24 units per acre in the R3 zone (which allows a maximum density of 24 units per acre)
  - 9553 Firestone Boulevard (permitted in 2019): 24 townhomes on 1.1 acres and a density of 22 units per acre in the R3 zone (which allows a maximum density of 24 units per acre)
- Mixed-use and Residential Overlay sites (presented in the second part of this Chapter): To ensure that the realistic capacity for future mixed-use and residential overlay sites takes into consideration development of non-residential uses for mixed-use projects, such as commercial uses, a minimum density of 30 units per acre is used to calculate capacity. As part of Housing Element implementation, the City will undertake a General Plan and Zoning Code amendments to add a mixed-use zone to implement the Mixed-Use General Plan land use designation and to create a residential overlay for some of the commercial corridors. Both will be implemented at a minimum density of 30 units per acre. The land use update process will include identifying appropriate maximum densities for mixed-use and residential development on commercial corridors. As such, no maximum densities are included in this analysis. This approach provides for a conservative estimate of development potential, as many of the identified mixed-use and commercial corridor sites can achieve significantly higher residential capacity. The residential

overlay will allow 100 percent nonresidential development. The realistic capacity calculation using the minimum density also accounts for the development of non-residential uses as the actual adopted maximum densities will be higher.

- Specific plan sites: Site capacity in the Downtown Downey Specific Plan is based on allowed uses and intensities. The assumptions presented here are realistic, as development in the Downtown Downey Specific Plan have achieved densities of up to 96 units per acre for affordable housing developments. The 50-unit Downey View affordable housing development was developed on a 0.52-acre property at a density of 96 units per acre in a district that allowed a maximum of 70 units per acre (Downtown Downey Specific Plan, District 5: Firestone Boulevard Gateway District). The Heritage Court senior housing project included 31 units at a density of 49.6 units per acre (Downtown Downey Specific Plan, District 2: Downtown Residential District). To calculate residential capacity the following assumptions are made:
  - District 1 and 3 (20 to 40 units per acre) - A median density of 30 units per acre is used to calculate realistic capacity based on actual developed densities in newer developments and to account for development of non-residential uses.
  - District 2 (8 to 40 units per acre) - A typical density of 30 units per acre is used to calculate capacity based on actual developed densities in newer developments and to account for development of non-residential uses.
  - District 4 - No sites in this district are included since residential uses are not allowed.
  - District 5 (40 to 75 units per acre) – A median density of 58 units per acre is used to calculate capacity based on actual developed densities in newer developments and to account for development of non-residential uses.
  - The use of median densities in three of the Downtown Specific Plan districts accounts for the fact that while the Specific Plan allows 100 percent residential development and while densities at or above the maximum allowed can be and have been achieved there is still the potential development of mixed-uses. The use of the lower densities reflects the potential lower yield of a mixed-use development.
- Specific plan sites: Site capacity in the Rancho Los Amigos South Campus Specific Plan is based on the adopted capacity for the Plan which includes development of up to 700 units (including the Veterans Commons Project) at densities of 60 to 100 units per acre. Based on the densities expected to be developed, the 600 units (exclusive of the Veterans Commons Project) can be credited toward the lower-income RHNA based on the provisions of State law allowing developments at “default densities” (at least 30 units per acre in Downey) to be counted as lower-income sites. Nonetheless, recognizing that a variety of housing types and prices may be developed on the campus, the unit count is distributed more conservatively in this Housing Element and split between the lower- and above-moderate income RHNA.

#### *Site Selection*

To identify additional sites with potential for new development or recycling opportunities, the following criteria were used:

- Parcel is currently vacant; or
- If parcel is not vacant:
  - Existing uses are not higher-density residential (condominiums or apartments)
  - Age of structure: most sites in the inventory have existing uses that were built over 30 years ago, but most are older than 40 years old. In The downtown area, a few sites have structures that are 100 years old (but not historically significant).
  - Characteristics of existing uses such as declining uses and large underused portions of the property.



- Land values are higher than improvement values. In a few cases, a parcel is included with a slightly higher improvement value (usually less than five percent higher) if the structure is older or shows obvious signs of deferred maintenance or if the site is underutilized (characterized by large surface parking or unused surface area on the site).
- No recent, significant enhancements have been made (exempt enhancements include site cleanup or paint)
- Gas stations are also not included since redevelopment is more complex given the need to mitigate underground storage tanks.
- Potential for lot consolidation is also taken into consideration including common ownership of adjacent parcels. Sites with multiple parcels are only included if the site functions as one use (one structure over multiple parcels) and the parcels are under common ownership.

Identifying potential sites must balance available information on the site with a visual and contextual assessment. While data pointing at older structures or high improvement value can give a good sense of the redevelopment potential, for many sites visual cues are important. There are a few sites where the data indicates a higher improvement value or a newer structure, but a visual assessment shows that a structure shows signs of disrepair or is underdeveloped in comparison with development nearby. One site for example, is an older liquor store with surface parking in an area with well-maintained, more intensely developed office uses. On the other hand, a site with older structures and a very high land value may not be an ideal site due to a new tenant that has invested in façade improvements such as paint and signage or the nature of the use limits the redevelopment potential, such as a convalescent home. While any of these properties can redevelop, this sites inventory presents the City’s good faith effort to identify sites that show the most potential for redevelopment.

*Existing Uses on Non-Vacant Sites and Development of Non-Residential Uses*

A portion of the City’s currently available (appropriately zoned) developable housing capacity is on sites with zoning that allows both residential and non-residential uses. It is difficult for the City to forecast how properties with zones that permit both stand-alone residential uses, mixed use with a residential component, and stand-alone non-residential uses, such as commercial or office, will develop. However, the City has seen significant numbers of development projects in the surrounding region that mirror many of the characteristics of development opportunities in Downey.

Downey is a primarily built out community. However, the City recognizes that it must provide opportunities for new residential uses throughout the City. The City has seen an increased interest in residential development in non-residential zones due to the scarcity of redevelopable residential land and the acute demand for new residential which has made residential development more lucrative. Residential uses in proximity to services and transportation corridors will also be in demand due to new state law prohibiting parking minimums near transit corridors and transit stops.

The City anticipates increased residential developments in the City’s nonresidential zones for the following reasons:

- There is a general lack of developable residential land in the City.
- There has been a marked increase in inquiries and expressed interest by property owner to redevelop non-residential sites into residential uses, a trend seen in the surrounding region. Specifically, the City has recently received inquiries on two sites by a major residential developer. The two sites are developed with parking lots/private institutional uses and the developer has expressed interest in development of higher density residential housing.

- The proposed General Plan and Zoning update will incentivize mixed use development by allowing higher FARs projects with a residential component and allowing by-right stand-alone residential development.
- Expedited permitting for projects with an affordable housing component
- To expedite review and development, the City will remove the Site Plan review for mixed use developments in the Downtown Downey Specific Plan. Stand-alone residential projects or commercial uses with a residential component will require only an administrative review.
- New State laws (AB2097 and AB2011) provide additional housing incentives. The California Department of Transportation (CALTRANS) has estimated High Quality Transit Areas (HQTA) which are subject to the parking limits in AB 2097 and their data (Estimated High Quality Transit Areas as described in Public Resources Code 21155, 21064.3, 21060.2, updated 2022) shows that most of the developable land in Downey will be subject to AB2097. AB 2097 prohibits the City from imposing any minimum automobile parking requirement on any residential, commercial, or other development project in HQTAs. AB 2097 will apply to the Downtown Downey Specific Plan, Stonewood Center, and the Downey Landing Specific Plan. Most of the residential overlay (81 percent of it) along the City’s commercial corridors will also be subject to AB 2097 per the CALTRANS data set as will all the mixed-use sites identified in this inventory. AB 2011 allows for ministerial, by-right approval for affordable housing on commercially zoned lands and allows such approvals for mixed-income housing along commercial corridors, if the projects meet specified affordability, labor, and environmental criteria. AB 2011 will apply to significant portions of the Downtown Downey Specific Plan, Stonewood Center, Downey Landing Specific Plan, and the residential overlay along the City’s corridors.

Table 4.3 shows a list of projects that have converted from non-residential to residential uses in Downey and in neighboring cities. All the projects involved redevelopment on non-residential uses to stand alone residential uses.

One project and another potential project are in the Downtown Downey Specific Plan. The 28-unit project at 8150 Third Street was developed in a specific plan area allowing 20 to 40 units per acre. The project density is 28 units per acre – or 70 percent of maximum density. The site inventory uses a median density of 30 units per acre in plan areas 1, 3 and 5 as those areas allow the highest residential densities. The project was developed in 2016 and since then the demand for housing has increased significantly. The strong demand for new residential units and the high price of land in the Los Angeles region is resulting in increasingly efficient development at higher densities than was typical in the past. The Banc of California site is developed with a bank building that is in good condition and includes a large surface parking lot. The City has received various inquiries for potential residential development on this site which is in Firestone Boulevard Gateway District of the Downtown Downey Specific Plan. The Zoning would allow a density of 40-75 units per acre and allows for 100 percent non-residential development. While no project has been approved, the property owner interest in residential development supports the use of mixed-use sites to meet the City’s RHNA.

Uses on the projects identified in Table 4.3 are similar and consistent with uses on sites allowing a mix of uses identified in the sites inventory as well as similar size (greater than half an acre), and locations.

- **Existing uses:** The existing site uses in Table 3.x mirror that of the City’s current inventory. In the Downtown and along the residential corridors, historical non-residential areas, the sites have a mix of older stand-alone commercial uses and older strip commercial centers, both with surface parking areas. There are sites with auto sales uses as well. Sites in the Downtown Specific Plan

are characterized by having a variety of commercial uses, but the site selection focused on smaller scale uses such as small stores or buildings. Large multi-story buildings and sites that showed signs of improvement were not included.

- **Size:** Sites in the inventory have an average size of 1.2 acres (this excludes the Rancho Los Amigos South Campus Specific Plan as that is a different site type with an approved land use plan). Table X shows that most residential projects on sites with existing uses and with the potential for development of non-residential uses, have an average size of 1.36 acres, similar to the average for the sites inventory.
- **Location:** The example projects resemble the sites included in the inventory in that they are located along major commercial corridors or in areas that have historically been developed with non-residential uses. In the neighboring City of Whittier, many new projects are located on a major corridor (Whittier Boulevard) that has historically been used for commercial uses. In response to increased interest in residential development along this corridor, the City in 2021 rescinded the specific plan and assigned a large portion of the corridor a high-density residential land use designation (allowing only residential).

Underutilized sites included in this inventory have been chosen based on the potential capacity increase available to property owners. Existing uses on the sites are older or show signs of disinvestment or

**Table 4.3: Non-Vacant and Non-Residential Redevelopment Trends**

Project Name/Address	Total Units	Lot Size (acres)	Zoning	Year Built/ Approved/In quired	Allowed 100% Non-Resid. Use	Current/Previous Use	Project Description	Status
7940 Telegraph Road	39	1.6	C-2/P-B	2016	Yes	Parking Lot	39-unit housing development (2016) project included a zone change from commercial/parking (C-2/P-B) to residential (R-3)	Completed
8150 Third Street	28	1.0	DDSP Downtown Residential	2016	Yes	Two of lots were occupied by single-family homes and two were in use as parking lots.	28-unit housing development (2016) project included the consolidation of 4 parcel.	Completed
9553 Firestone Boulevard	39	1.1	C-2/P-B	2016	Yes	8 residential (non-conforming) uses	39-unit housing development (2016) Site was previously zoned for commercial/parking (C-2/P-B) in the street front part of the property and residential (R-3) in rear portion of the site. The project included a General Plan Amendment and Zone Change for 5 separate parcels. As part of the application, the property owner indicted that the zone change was needed because the existing commercial use was "financially infeasible" and wants the City to change the property's existing General Plan composition and underlying zoning	Completed
Banc of California property	28 - 52	0.7	DDSP Firestone Blvd. Gateway District	2022	Yes	Commercial/office building formerly in use as a bank	the City has received various inquiries for potential residential development on the site in the Firestone Boulevard Gateway District of the Downtown Downey Specific Plan. The Zoning would allow a density of 40-75 units per acre and allows for 100 percent non-residential development.	Interested Owner
Bob's Big Boy restaurant site	NA	1.9	C-2	2022	Yes	Restaurant building of historical importance and parking lot used as	The City has received various inquiries for potential residential development on the property Potential applicants have	Interested Owner



**Table 4.3: Non-Vacant and Non-Residential Redevelopment Trends**

Project Name/Address	Total Units	Lot Size (acres)	Zoning	Year Built/ Approved/In quired	Allowed 100% Non-Resid. Use	Current/Previous Use	Project Description	Status
						storage of new vehicles by an auto dealership	expressed interest in constructing residential units at densities identified in the new residential overlay (minimum density of 30 units per acre).	
11733 Florence Avenue (City of Santa Fe Springs)	63	3.0	PF – Public Use	2022	Yes	Church	The project includes 63 units in a three-story residential development at 11733 Florence Avenue (a former church site)	Under Development
9829 La Serna Drive (City of Whittier)	42	1.8	SP – Specific Plan	2022	Yes	Restaurant and associated parking lot	The site allows for 100 percent non-residential development. The project included consolidation of two parcels. The project was approved in Spring 2022.	Approved
8315/8335 Greenleaf Avenue (City of Whittier)	17	1.2	R-2	2021	No	Industrial/commercial building	Florence Homes, a 17-unit residential development was approved in 2021.	Approved
11716 Floral Drive (City of Whittier)	25	2.5	R-1	2021	No (other than church)	Surplus church property and modifications to the existing Trinity Lutheran Church	The City approved 25-unit detached residential project.	Approved
12826 Philadelphia Street (City of Whittier)	52	0.82	SP – Specific Plan	2022	Yes	large commercial building used for medical businesses	An application was submitted for the development of a four-story multi-family residential project.	Under Review
16440 Whittier Boulevard (City of Whittier)	54	0.31	SP – Specific Plan	2022	Yes	Plant Nursery (Blue Hills Nursery)	A 54-unit residential project is being developed at the former Blue Hills Nursery site and building permits for model homes are anticipated to be issued in 2022.	Under development
11757 Hadley Street (City of Whittier)	32	1.6	C-2	2022	Yes	gas and service station	A 32-unit, three-story residential townhome project is under construction	Under development

**Table 4.3: Non-Vacant and Non-Residential Redevelopment Trends**

Project Name/Address	Total Units	Lot Size (acres)	Zoning	Year Built/ Approved/In quired	Allowed 100% Non-Resid. Use	Current/Previous Use	Project Description	Status
							on a 1.6-acre property at 11757 Hadley Street and expected to be completed by the end of summer 2022.	
14339 Whittier Boulevard (City of Whittier)	76	1.9	SP – Specific Plan	2019	Yes	Mitsubishi automobile car dealership	A 76-unit apartment building was developed in 2019.	Completed
Workman Mill Road near Beverly Boulevard (City of Whittier)	32	2.0	C-2/R-1	2021	Yes	Office building and parking lot	Construction of the 32-unit, three-story combination of detached and attached townhomes on a site previously in use as an office building and parking lot was completed in 2021.	Completed
14660 Whittier Boulevard (City of Whittier)	50	1.3	SP – Specific Plan	2022	Yes	Surplus parking for the car dealership	Construction at the former Toyota Used Car site is ongoing. The 50-unit residential project should be complete by the second quarter of 2022. The property was previously in use as surplus parking for the car dealership.	Under Development
10818 Long Beach Boulevard (City of Lynwood)	4	0.04	Mixed Use	2021	Yes	Older commercial store/ and SF home	An older commercial use (built in the 1930s) was replaced with a 4-unit development. The former use had a land value well in excess of the improvements value.	Completed
5100 Long Beach Blvd. (City of Long Beach)	38	0.38	CCN – Community/R-4 Commercial	2022	Yes	Older commercial shopping center	38 three-story townhomes	Under Construction

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deferred maintenance, indicating a “ripeness” for redevelopment. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain uses of local importance are not included.

In general, the market in Downey and the Gateway Cities Region supports housing as the highest and best use of property, yielding highest returns for property owners, especially in existing neighborhoods, along corridors, and in Downtowns such as Downey’s, with access to goods, services, and high-quality transit. The City has had ongoing communications with local housing developers, who have confirmed that home builders and property owners are interested in repurposing commercial properties in Southern California, including Downey. Similar interest and projects have yielded positive results.

Uses on the projects identified in Table 4.3 are similar and consistent with uses on sites allowing a mix of uses identified in the sites inventory as well as similar size (greater than half an acre), and locations. In the Downtown and along the residential corridors, historical non-residential areas, the sites have a mix of older stand-alone commercial uses and older strip commercial centers, both with surface parking areas. There are sites with auto sales uses as well. Sites in the Downtown Specific Plan are characterized by having a variety of commercial uses, but the site selection focused on smaller scale uses such as small stores or buildings. Large multi-story buildings and sites that showed signs of improvement were not included.

The City will continue to engage local property owners to discuss redevelopment opportunities on their properties. The residential overlay included in this inventory will allow residential development in commercial corridors as a by-right use at a minimum density of 30 units per acre. The residential overlay gives property owners an incentive to develop or sell the property for new uses. In areas such as these where residential development is not allowed, the overlay will facilitate housing production by avoiding a lengthy General Plan amendment/rezoning process. Based on this analysis and future efforts undertaken through the Housing Plan, the City concludes that existing uses will not impede additional residential development and all sites identified in this Housing Element are intended to demonstrate adequate sites to accommodate the RHNA.

### **Densities Appropriate for Accommodating Lower-Income Housing**

The capacity of sites that allow development densities of at least 30 units per acre are credited toward the lower-income RHNA, as allowed by State law. The California Government Code states that if a local government has adopted density standards consistent with the population-based criteria set by State law (at least 30 units per acre for Downey), HCD is obligated to accept sites with those density standards (30 units per acre or higher) as appropriate for accommodating the jurisdiction’s share of regional housing need for lower-income households. Land use designations with density ranges near the default density are considered appropriate to accommodate housing for moderate-income households.

### **Assembly Bill 1397**

Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as HCD has indicated these size parameters best accommodate lower-income housing need. In this inventory, several sites comprising one or more parcels are less than one-half acre in size. These sites are included because the multiple parcels function as one site, such as a structure and its attached, surface, parking lot or a single structure located on multiple parcels. Small sites (less than one-half acre) meeting the default density standard are credited toward the moderate-



and above-moderate income categories to account for a potential variety of types, sizes, and amenity levels in future higher-density development projects.

AB 1397 also adds specific criteria for assessment of the realistic availability of non-vacant sites during the planning period. If non-vacant sites accommodate half or more of the lower-income need, the Housing Element must present “substantial evidence” that the existing use does not constitute an impediment for additional residential use on the site. Due to the built-out nature of Downey, most sites have existing uses. Non-vacant sites included in the inventory have been chosen due to their location, existing uses, and potential for intensification. To ensure that appropriate sites have been chosen, properties that show recent investments or updates or that contain uses of local importance are not included.

Twenty-five parcels within 15 properties in the Downtown Downey Specific Plan are subject to the re-use provisions of AB 1397, which requires that vacant sites identified in the previous two Housing Elements and non-vacant sites identified in the previous Housing Element only be deemed adequate to accommodate a portion of the housing need for lower-income households if the site is zoned at residential densities consistent with the default density established by HCD (30 units per acre) and the site allows residential use by right for housing developments in which at least 20 percent of the units are affordable to lower-income households. The parcels subject to AB 1397 are identified in the sites inventory table in Appendix B. Non-vacant sites identified in the previous Housing Element but credited toward the moderate-or above moderate-income RHNA in the current Housing Element are not subject to the provisions of AB 1397 since they are not being used to address the lower-income RHNA.

### **Small Site Lot Consolidation**

Lot consolidation assumptions in the sites inventory are minimal. Due to the City’s historical parcelization pattern, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to State law and HCD guidance, most small sites are not used to meet the lower income RHNA and as such no lot consolidation is assumed. Two recent projects included consolidation of multiple parcels.

- Downtown Downey Specific Plan (8150 Third Street) a 28-unit housing development (2016) project included the consolidation of 4 parcel. Two of lots were occupied by single-family homes and two were in use as parking lots.
- 9553 Firestone Boulevard 39-unit housing development (2016) Site was previously zoned for commercial/parking (C-2/P-B) in the street front part of the property and residential (R-3) in rear portion of the site. The project included a General Plan Amendment and Zone Change for 5 separate parcels. The property’s improvements consist of eight 1-story, detached nonconforming rental units (small houses) that were built in the 1940s.

There are 304 parcels included in the inventory with a size under 0.5 acres. Of these, 214 are single parcel, standalone sites and no lot consolidation is assumed. While these sites may have densities that are appropriate for lower income RHNA sites, due to the size they are not used for the lower income RHNA.

The following is a summary of lot consolidation potential in the sites inventory.

Several of the small sites do not assume lot consolidation:

- 16 of the small parcels are part of approved projects not sites

- 10 of the small parcels are vacant and underutilized R1 and R2 sites (above moderate affordability). These sites are not assuming any affordability and are in SFR areas of the City.
- Eight of the small parcels are part of the Stonewood Center site – all are included as they all function as one larger use (mall and parking) and is expected to be redeveloped as such.

Only the following sites with common ownership or a single use site (i.e., a site with a building and parking lot under common ownership or a multi parcel site with one building spanning both parcels), or both, are assumed to have the potential for lot consolidation. (Letters indicate the consolidation letter in the HCD Sites Inventory Table in Appendix B):

25 parcels in the Downtown Downey Specific Plan (DDSP) are used to accommodate the lower income RHNA are included in the inventory and are grouped into 11 different sites.

- A. Two parcels (6251-039-025, -026) make up the site and have a common owner and function as one use (a car wash)
- B. three parcels (6251-038-010, -011, -012) make up the site and have a common owner and function as one use (a preschool)
- C. Two parcels (6254-018-008, -027) make up the site and have a common owner and function as one use (parking lot)
- D. Two parcels (6254-017-011, -023) make up the site and have a common owner and function as one use (parking lot)
- E. Four parcels (6254-017-020, 6254-018-019 -020, -021) make up the site and function as one use (office with large lawn). Most of the site is owned by one entity and the smallest site is owned by a separate entity but is still a part of the larger use and redevelopment of this site separately is unlikely.
- F. Two parcels (6251-040-018, -019) make up a single use (shoe store with attached parking surface). Due to the overall size, this site is not used to address the lower income RHNA.
- G. Two parcels (6254-001-901, -902) make up the site and have a common owner and function as one use (a parking lot)
- H. Two parcels (6251-040-006, -023) make up a single use (restaurant) and are under common ownership. Due to the overall size, this site is not used to address the lower income RHNA.
- I. Two parcels (6254-020-028, -903) make up a single use (commercial building with associated parking that is owned by the City). Due to the overall size, this site is not used to address the lower income RHNA.
- J. Consist of two parcels (6255-002-033, -034) that are individually greater than 0.5 acres each, nonetheless, consolidation is assumed based on a single use (commercial center with closed buffet restraint and two other commercial uses) and common ownership.
- K. Consists of two parcels (6255-002-011, -900) used as a parking lot, the majority of the site is owned by the City of Downey. The City-owned site is greater than 0.5 acres and could be a stand-alone site but die to the location and use of the adjacent smaller site, lot consolidation may be likely.
- L. Consist of two parcels (6255-002-008, -009) make up a single use (commercial building with associated parking) and is under common ownership.
- M. Two parcels (6229-001-003, -004) are included as one MDR/R3 site because the parcels are adjacent and are under common ownership – due to the overall size, this site is not used to address the lower income RHNA.

The remaining sites in the DDSP are stand-alone sites that do not assume lot consolidation and are not used to address the lower income RHNA.

Along Imperial Highway there are 6 small parcels grouped into 3 different sites.

- N. 6259-019-030 is a small site that is one half of an older strip commercial center at the NE corner of Imperial Highway and Paramount Boulevard (2 parcels). The site is under common ownership and both parcels function as one use and development of just one parcel would require demolition of only half the building structure which is unlikely.
- O. 6261-014-034 is part of a larger site at the NW corner of Imperial Highway and Paramount Boulevard (2 parcels). The site is under common ownership.
- P. Four small parcels 6263-006-029, --030, -031, 032 make up the site currently developed with a small-scale older strip commercial center at the SE corner of Imperial Highway and Barlin Avenue (2 parcels). The site is under common ownership and all parcels function as one use and development of just one parcel would require demolition of select parts of the building structure which is unlikely.

Along Paramount Boulevard there are 6 small parcels grouped into 3 different sites.

- Q. 6360-010-021 is a small parcel and is part of a larger (4.8 acre) site at the NW corner of Paramount Boulevard and Florence Avenue. The site is an older strip commercial center (parts of which are boarded up) with a large parking lot. The multi parcel site functions as one larger commercial use and development of the small site on its own would be unlikely.
- R. Two parcels 6246—001-027, -030 are under common ownership near the NW corner of Paramount Boulevard and Stewart and Gray Road. Together the parcels make up a small commercial center with a parking area. Because they are under common ownership and share parking, development of just one parcel is unlikely.
- S. Three parcels 6260-011-027, -028, -029 on Paramount Boulevard south of Adoree Street are under common ownership and function as one site. The site is developed with an older strip commercial center and parking. Development of just one parcel would require demolition of select parts of the building structure which is unlikely.

Along Telegraph Road there are 9 parcels grouped into 4 different sites.

- T. 6388-001-002, -003, -009, -010 are four small parcels under common ownership that make up a single use (camper shell sales and storage). Due to the overall size, this site is not used to address the lower income RHNA.
- U. 6388-001-011, -012 are two small parcels under common ownership that make up a single use (used car lot). Development of just one parcel is unlikely.
- V. 6367-015-020 is a small parcel that makes up one half of a strip commercial center site on the SE corner of Telegraph Road and Paramount Boulevard. The two parcels are under common ownership and development of one side of the center would require demolition of only half the building structure which is unlikely.
- W. 6388-001-007, -008 are two parcels under common ownership that make up a single use. Due to the overall size, this site is not used to address the lower income RHNA.
- X. Four of the small parcels are used as a single MDR/R3 rezoning site (APN 6245-019-001, -002, -028, and -029). The parcels that add up to a site size greater than 0.5 acres and is included as a site to address the lower income RHNA because they are under common ownership and consolidation is not needed to redevelop.
- Y. Two adjacent vacant parcels (6229-001-008, -009) have a total site size greater than 0.5 acres and is included as a site to address the lower income RHNA because they are under common ownership and consolidation is not needed to redevelop.

- Z. Two adjacent parcels (6246-012-003, -015) have a total site size greater than 0.5 acres and is included as a site to address the lower income RHNA because they are under common ownership and consolidation is not needed to redevelop.

Also, all mixed-use sites are stand-alone sites, and no lot consolidation is assumed.

Program 3.1 is included to address lot consolidation. The program has been edited to indicate the type of incentives the City will offer to encourage lot consolidation as a way of adding more residential units to a project. Incentives will include deferring fees specifically for consolidation, providing flexible development standards such as setback requirements, reduced/adjusted parking and increased heights, lot coverage or floor area ratio.

## **Detailed Sites Inventory**

### *Currently Available Sites*

The inventory of sites that have appropriate zoning in place includes underutilized land in the Low Density Residential (LDR)/R-1 and Low Medium Density Residential (LMDR)/R-2 General Plan/zoning designations and within the Downtown Downey and Rancho Los Amigos South Campus Specific Plans. The sites have the appropriate land use and zoning designations in place and do not require any rezoning actions. Projected accessory dwelling unit (ADU) production is also included in this section as a resource to meet the RHNA. A summary of currently available sites is presented in **Table 4.4, Figure 4.2,** and detailed listing consistent with state law is included in the appendix.

Additional land resources are available for future residential development on underutilized Medium Density Residential/R-3 sites, commercial corridor sites, and two commercial centers. Due to the allowable densities and uses allowed on these sites, they require changes to the General Plan land use plan and zoning map; these sites will be discussed later in this section as sites that require rezoning actions to become adequate sites.



**Table 4.4: Sites Currently Available**

Site Type	Affordability Level				Total
	Ex./Very Low Income (0-50% AMI)	Low Income (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Estimated ADU Production	119	226	11	151	507
Estimated ADU Production per SB 9	--	--	--	80	80
Vacant/underutilized R-1 sites – 6 parcels, 1.74 acres total	--	--	--	14	14
Vacant/underutilized R-2 sites - 10 parcels, 5.53 acres total	--	--	--	94	94
<i>Downtown Downey Specific Plan:</i>					
District 1 - 20-40 du/ac - 5 parcels (3 sites) and 1.75 acres total	36	--	8	9	53
District 2 - 8-40 du/ac- 12 parcels (4 sites) and 2.05 acres total	35	--	10	11	56
District 3 - 20-40 du/ac - 18 parcels (6 sites) and 4.39 acres total	84	--	35	36	155
District 5 - 40-75 du/ac- 35 parcels (9 sites) and 14.85 acres total	614	--	132	131	877
Rancho Los Amigos - South Campus Specific Plan	300	--	--	300	600
<b>Total Sites Currently Available</b>	<b>1,188</b>	<b>226</b>	<b>196</b>	<b>826</b>	<b>2,436</b>
Remaining RHNA after approved/proposed projects	2,027	896	915	2,494	6,332
<b>Updated Remaining RHNA</b>	<b>839</b>	<b>670</b>	<b>719</b>	<b>1668</b>	<b>3,896</b>

Notes:

- Estimated ADU production are credited toward the RHNA consistent with HCD guidelines and SCAG affordability distribution assumptions (SCAG Regional Accessory Dwelling Unit Affordability Analysis, 2020)
- Sites allowing the State-designated default density standard (at least 30 du/ac) are credited toward the lower income RHNA. Small sites meeting the default density standard are credited toward the moderate- and above moderate-income category.

### Accessory Dwelling Units

Consistent with state law, a projection of ADU development during the planning period is included in the site inventory. While it is impossible to predict the number of ADUs that will be developed in the planning period (2021-2029), the City has estimated a level of ADU development based on permits issued in the last three years. Interest in constructing ADUs is high in Downey and throughout the state. Since 2019, there has been a 485 percent increase in ADU permits with an annual average of 63 ADUs (20 in 2019, 53 in 2020, and 117 in 2021). Based on this average, the City is expected to issue 504 ADU permits in the planning period. This is a conservative estimate as there has been a steady increase in ADU development, and the City expects a continued increase given the lack of new, affordable housing units in the region and the emerging ease and resources available for ADU development. As part of Housing Element implementation, the City will take actions to foster and facilitate ADU development. The projected ADUs are included in the sites inventory consistent with HCD guidelines and SCAG's affordability distribution assumptions (approved by HCD).

### SB 9 Projections

In September 2021, Governor Newsom signed Senate Bill (SB) 9 into law, with an effective date of January 1, 2022. SB 9 (1) mandates ministerial approval of duplexes on lots zoned for a single-family

residence and (2) requires ministerial approval of subdivisions of a single-family lot into two lots, creating the theoretical possibility of four units on each single-family parcel in the state (with some exceptions). The Turner Center for Housing Innovation at UC Berkeley conducted extensive analysis statewide to determine how many parcels could feasibly utilize the provisions of SB 9 and found that approximately seven percent of single-family parcels throughout the State may redevelop in this way. However, that number is increased in communities, such as Downey, with higher average parcel sizes and regional housing market pressures. In Downey, it is estimated that approximately 9 percent of single-family parcels could potentially redevelop, translating into the potential for 1,600 additional housing units in the community. The Turner analysis does not set a horizon year for this buildout. Conservatively estimating that five percent of the ultimate buildout could occur in the next eight years, a projection for an additional 80 housing units through SB 9 lot splits and duplex provisions are assumed for the next planning period. Because the affordability of such units is unknown at this time, they are allocated to the above-moderate income category. Included in the Housing Element is a program with actions aimed at facilitating and encouraging ADU development in Downey.

### *Vacant and Underutilized Residential Sites*

The sites inventory includes 0.70 acres of vacant and 1.04 acres of underutilized land in the Low Density Residential (LDR)/R-1 designation. These LDR/R-1 sites allow a maximum residential density of 8.9 units per acre. Combined, the six sites have a development capacity of 14 units.

The sites inventory includes 2.3 acres of vacant and 3.2 acres of underutilized land in the Low Medium Density Residential (MDR)/R-2 designation. These LMDR/R-2 sites allow a residential density of 9 to 17 units per acre. The 10 sites have an overall development capacity of 94 units.

Underutilized sites included in this inventory have been chosen based on the potential capacity increase available to property owners. On these sites, the residential capacity is two to 13 times the existing development. Existing uses on the sites are older or show signs of disinvestment or deferred maintenance, indicating a “ripeness” for redevelopment.

### *Downtown Downey Specific Plan Sites*

The Downtown Downey Specific Plan, adopted in 2010, was initiated by the City to guide growth and development in Downtown, encourage economic revitalization, and create a lively center of activity. The Specific Plan encompasses 131 acres located at the geographic center of the City and plans for a mix of uses in five unique districts, each with specific development standards and design guidelines. Downtown Downey is envisioned as a vibrant urban center providing a wide array of dining, working, living, shopping, entertainment, and cultural opportunities all within a short walking distance. Historically, the area around Downey Avenue from Firestone Boulevard to Fifth Street has been identified as the Downtown district of Downey. Downtown Downey is at the center of the community, containing major landmarks such as City Hall, the City Library, the Civic Theater, the Downey Depot, and the Rives Mansion. One of the Specific Plan’s six catalytic strategies is allowing a wide range of housing types to provide a customer base for retail uses and create a daytime and nighttime population in Downtown.

Current development trends in Downtown show that higher-density development on currently developed properties is feasible and realistic. Residential development since plan adoption includes various ownership multi-family developments and two affordable developments: the Heritage Court senior housing development (31 units at a density of 49.6 units per acre in Downtown Downey Specific Plan District 2: Downtown Residential District) and Downey View, a 50-unit development (on a 0.5-acre site at a density of 96 units per acre in Downtown Downey Specific Plan, District 5: Firestone Boulevard

Gateway District). A program is included in the Housing Plan and directs the City to monitor development in the Specific Plan area and make any needed amendments if constraints to development in Downtown are identified.

There has been development interest for properties in the Specific Plan area. Staff has received a mixture of inquiries for both commercial and mixed-use development in the Downtown Downey Specific Plan. Most interest has been in the Downtown Core or the Firestone Boulevard Gateway districts of the Specific Plan area. Staff had multiple meetings with two separate property owners who had recently acquired properties in the Downtown and expressed significant interest in mixed-use development on Firestone Boulevard. Staff provided information on available density bonuses and consistently responded to extensive questions from the property owners and their architects. Each separately determined that they were unable to “pencil out” the project because construction costs are currently very high. The properties have not been developed with either commercial or residential development. The properties have not changed hands since the initial meetings so staff believes there may be renewed interest in developing the properties at a later date.

The City used the ULI Office hours to seek guidance from the development community to fully assess constraints and viability of potential inventory sites by establishing a review process with the ULI group. The City held four virtual meetings with a subcommittee of the ULI group made up of a variety of large-scale housing developers who specialize in market rate and affordable housing developments. Regarding the viability of potential sites that were reviewed, feedback from the group focused significantly on the surrounding uses. The ULI group was interested in the proximity to grocery stores, shopping centers, existing multi-family housing development; these factors increased the "attractive" nature of the sites and viability for development. The Downtown Downey Specific Plan is centrally located and meets many of the criteria pointed out by the ULI panel.

Fifty-one sites (with a combined realistic but conservative capacity of 1,076 units) have been identified in the Downtown Downey Specific Plan on sites that allow development at a range of densities, from up to 40 units per acre in Districts 1,2, and 3 and up to 75 units per acre in District 5. Residential development is not allowed in District 4: Civic Center, which is reserved for government and public facility uses such as City Hall, local and regional government offices, parks, and transit centers. The City owns several properties in the Downtown area, including a 399-space, multi-level public parking structure. Site capacity in the Downtown Downey Specific Plan is summarized in **Table 4.4** and shown on **Figure 4.1**. Site selection in Downtown is based on the underutilized nature of the sites given the area’s high profile and the increasing demand for residential development. Sites with existing uses are typically older and underutilized given the development potential afforded by the Specific Plan development standards. Examples of existing uses include small-scale commercial uses, car washes, and structures with large surface parking lots. Sites with existing residential uses provide the opportunity for significant capacity increases.

- **District 1:** The Paramount Boulevard Professional District is located east of Paramount Boulevard and generally west of Parrot Avenue between Second and Seventh Streets. The primary intent of this District is to create a professional office environment with a residential component. District 1 allows 100 percent residential projects but buildings fronting Paramount Boulevard require that residential uses be allowed on the second floor or above of the building. For all other streets in the district, residential uses are permitted on any floor. For properties fronting Paramount Boulevard, residential uses may be located on the second and third floors. The existing uses on District 1 sites are all over 40 years old and have land values higher than

improvement values. The four sites in District 1 have a realistic capacity of 53 units on sites allowing residential densities of 20 to 40 units per acre.

- District 2: The Downtown Residential District is located north of Second Street and south of Fifth Street, between College Avenue and La Reina Avenue. The primary intent of this district is to establish a residential neighborhood within Downtown. Neighborhood-serving commercial uses are permitted on the ground floor only. District 2 allows 100 percent residential projects. The existing uses on District 2 sites are all over 40 years old and most have land values higher than improvement values. Two sites are included with higher improvement values: one is included because the structure is vacant and for sale and the other is included because the structure is over 50 years old. A study by Turner Center for Housing Innovation at the University of California at Berkeley found that parcels with older commercial buildings were more likely to be converted to residential use in the Los Angeles metro area as older buildings are more likely to be run-down or outdated, thereby lending themselves to redevelopment. The eight sites in District 2 have a realistic capacity of 56 units on sites allowing residential densities of 20 to 40 units per acre. Heritage Court, a 31-unit senior housing development built at a density of 49.6 units per acre, is in this district.
- District 3: The Downtown Core District is generally located north of Second Street and south of Fifth Street, between La Reina Avenue and Civic Center Drive. The vision for this district is a vibrant, pedestrian-oriented downtown with a mix of uses with commercial uses on the ground floor and residential on the second and third floors. District 3 allows 100 percent residential projects but buildings fronting Downey Avenue require that residential uses be allowed on the second floor or above of the building. For all other streets in the district, residential uses are permitted on any floor. The existing uses on District 3 sites are all over 30 years old but most are over 50 years old, and two sites have structure built 100 years ago. Only six of the 19 parcels that make up the sites in District 3 have improvement values higher than land values but these structures are all over 50 years old and three of these are over 95 years old. The 14 sites in District 3 have a realistic capacity of 155 units on sites allowing residential densities of 20 to 40 units per acre.
- District 5: The Firestone Boulevard Gateway District is located north of the Union Pacific railroad right-of-way and south of Second Street, between Paramount Boulevard and Brookshire Avenue. The vision for District 5 is a lively area consisting of high intensity/density development with flexible retail, office, and residential space. District 5 allows 100 percent residential projects but buildings fronting Firestone Boulevard require that residential uses be allowed on the second floor or above of the building. For all other streets in the district, residential uses are permitted on any floor. Along Firestone Boulevard, the ground floor is reserved for office and commercial uses; residential uses may be located on the second floor and above. Most of the parcels that make up the District 5 sites have existing uses on them built over 50 years ago. Of the 35 parcels that make up the District 5 sites, only four are less than 30 years old and these are included because one is a surface parking lot that is independently owned (not associated with the adjacent building) and the other are part of a center where surface parking makes up the majority of the acreage and a large empty building. The 28 sites in District 5 have a realistic, but conservative, capacity of 877 units on sites allowing residential densities of 40 to 75 units per acre. Three of the sites are partially owned by the City of Downey, and several sites are located next to the Downey View, a 50-unit affordable housing development built at a density of 96 units per acre on a lot of just over one-half acre in size.




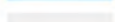


# Figure 4.1: Downtown Sites Map



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Base Map Features**

-  Downey City Boundary
-  Parks and Open Space
-  Rivers and Waterbodies
-  Downtown Downey Specific Plan Area

**Downtown Downey Specific Plan Sites**

-  District 1
-  District 2
-  District 3
-  District 4
-  District 5



### *Rancho Los Amigos South Campus Specific Plan Capacity*

Capacity for 600 units is included as part of the newly adopted The Rancho Los Amigos South Campus Specific Plan which will guide long-term development of a mixed-use, compact, and multi-modal environment. The Plan area is located on approximately 123 acres of County-owned land and will create a new neighborhood and district that includes cultural uses and public spaces, stronger connections with local neighborhoods, and connectivity with mobility options in a manner that will reinforce the character and history of Downey and the Rancho Los Amigos South Campus. The City applied for and received a \$425,000 grant to create the specific plan around a new station that is planned for the future Eco-Rapid light rail line. The plan includes development of up to 700 units (including the Veterans Commons Project) at densities of 60 to 100 units per acre. Based on the densities expected to be developed, the 600 units (exclusive of the Veterans Commons Project) can be credited toward the lower-income RHNA based on the provisions of State law allowing developments at “default densities” (at least 30 units per acre in Downey) to be counted as lower-income sites. Nonetheless, recognizing that a variety of housing types and prices may be developed on the campus, the unit count is distributed more conservatively in this Housing Element and split between the lower- and above-moderate income RHNA.

As the Specific Plan area consists entirely of property owned by the County of Los Angeles, the County was consulted throughout development of the Specific Plan. During these consultations, the County stated that they had begun receiving inquiries and preliminary interest in multi-family housing developments within the Specific Plan area before the Specific Plan was finalized and adopted on October 12, 2021. The Plan was adopted very recently as such no activity has yet been submitted under the new provisions, however, there has been significant activity and inquiry surrounding the potential for development in this area. The property is owned by the County of Los Angeles, so they are the entity that has been approached with potential housing development projects. Information about interest was shared with Downey City staff by the County, but the City has not received any preliminary proposals. City staff has received general inquiries from different developers about potential for development in different areas within the Specific Plan. Staff always directs inquiries to the property owner before engaging in further discussions about potential development.



The Plan area is generally bounded by the Imperial Highway to the north, Gardendale Street to the south, Rives Avenue to the east, and Old River School Road to the west. Within the southwest portion of the Plan area, Metro is building a light rail station located adjacent to Gardendale Street as part of the planned West Santa Ana Branch (WSAB) light rail transit corridor. The Plan area’s proximity to a major transit facility is anticipated to further generate activity in the area and significant development is anticipated within the Specific Plan area during the 2021-2029 planning period.

## Remaining RHNA

The City can meet 46 percent of the RHNA with approved and proposed projects, projected ADU development, and development on vacant and underutilized land in two residential designations and the Downtown Downey and Rancho Los Amigos South Campus Specific Plans. After accounting for this capacity, a shortfall of 3,553 units remains.

To address the shortfall, the City has identified various sites that, while appropriate for redevelopment and intensification, require General Plan amendments, zone changes, and the addition of residential overlays to facilitate residential development. Once appropriate land use and zoning actions are taken, the City can accommodate the remaining RHNA.

## RHNA Shortfall Site Requirements

Sites that will be rezoned and used to address an unaccommodated, lower-income RHNA are subject to additional requirements under State law. Housing Element law (Government Code 65583.2[h]) requires that the City accommodate all the lower-income, unaccommodated RHNA on sites that are:

1. Zoned to permit owner-occupied and rental multifamily residential use by right for developments in which at least 20 percent of the units are affordable to lower-income households during the planning period; and
2. Permit at least 16 units per site at a density of at least 20 units per acre

Also, at least half of the very low- and low-income housing need must be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted, except that a city or county may accommodate all the very low- and low-income housing need on sites designated for mixed-uses if those sites allow 100 percent residential use and require that residential use occupy 50 percent of the total floor area of a mixed-use project.

Sites to accommodate the moderate- and above moderate-income RHNA are *not* subject to these requirements. Sites that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above moderate-income RHNA shortfall.

**Table 4.4** summarizes the sites to be rezoned and shows that once appropriate land use and zoning actions are taken, the City can adequately accommodate the remaining RHNA. While the table shows a deficit of 670 units for the low-income RHNA, those units can be addressed with the surplus of 888 units on very low-income sites. Detailed descriptions of sites to be rezoned are presented following **Table 4.5** and on **Figure 4.2**; a detailed listing of sites is included in the appendix as required by State law.

**Table 4.5: Sites to be Rezoned to Accommodate RHNA Shortfall**

Site Type*	Affordability Level				Total
	Ex./Very Low (0-50% AMI)**	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Medium Density Residential (R-3) Sites (133 parcels, 22.4 acres total)	83	--	316	314	713
Low Density Residential site to be Rezoned to Medium Density Residential (R-3) (1 parcel, 1.3 acres total)	4	--	--	40	44
Mixed-Use Sites (21 parcels, 7.78 acres total)	143	--	46	42	231
Corridor Residential Overlay Sites:					
Telegraph Road (15 sites, 21 parcels, 7.33 acres total)	108	--	64	57	229
Paramount Boulevard (42 sites, 49 parcels, 22.88 acres total)	427	--	134	129	690
Florence Avenue (2 sites, 2 parcel, 1.82 acres total)	55	--	--	--	55
Imperial Highway (20 sites, 25 parcels, 14.72 acres total)	341	--	52	49	442
Bellflower/Washburn Stand Alone Site (1 parcel, 3.5 acres total)	106	--	--	--	106
7421 Firestone Boulevard Stand Alone Site (1 parcel, 0.77 acres total)	23	--	--	--	23
Stonewood Center	175	--	175	524	874
Downey Landing	170	--	170	511	851
Florence Avenue/I-5 Specific Plan	92	--	46	46	184
<b>Total Sites</b>	<b>1,727</b>	<b>--</b>	<b>1,003</b>	<b>1,712</b>	<b>4,442</b>
Remaining RHNA after approved/proposed projects and sites currently in place	<b>839</b>	<b>670</b>	<b>719</b>	<b>1,668</b>	<b>3,896</b>
Remaining RHNA (-shortfall/+surplus)	+888	-670	+284	+44	+546

Notes:

\* Sites with multiple parcels are only included if the site functions as one use (one structure over multiple parcels) and the parcels are under common ownership.

\*\*Sites allowing the State-designated default density standard (at least 30 du/ac) and meet the rollover requirements of Government Code 65583.2[h] are credited toward the lower-income RHNA. Small sites (less than 0.5 acres) meeting the default density standard but not the 16-unit capacity requirements for rollover sites are credited toward the moderate- and above-moderate income category.



## Sites to Be Rezoned

### Residential Sites

The City's Medium Density Residential (MDR) General Plan land use designation and the implementing R-3 zoning district allow for developments with densities between 18 and 24 units per acre. The lack of available developable land, large sites, and the current development of lower-density residential uses means that higher-density residential projects are few in Downey today. To incentivize private redevelopment of properties in the R-3 zone, the City will increase the development potential on sites designated MDR and zoned R-3. Updated land use and development standards will increase the maximum density to 40 units per acre. The City will also explore increasing the minimum density as part of a comprehensive land use plan update. The methodology in this Housing Element assumes only the increase to a maximum density of 40 units per acre and uses 80 percent of maximum to calculate realistic capacity.

As the land use change will apply to all MDR/R-3 properties, the potential for new development is significant. This Housing Element only includes a small subset of sites that show potential for redevelopment. The sites identified have a combined capacity for 757 units distributed among the affordability levels based on size and realistic capacity. Sites meeting the size and minimum capacity requirement (16 units) outlined in State law for shortfall sites are credited toward the lower-income RHNA. Small sites (less than 0.5 acres) that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above moderate-income RHNA shortfall. Most of the MDR/R-3 sites included in the inventory existing residential uses, but only sites with a maximum of two existing units was included. Two sites have four existing units but are included because the sites have capacity for a four-fold increase in capacity. Most sites have land values that are higher than improvement value and about half have a land value that is twice the value of improvements on the property. A handful of sites are included with slightly lower land values (compared with improvement values), but those sites were chosen due to the potential capacity increase on the size or the age of the structures (all over 60 years old). The sites chosen have a General Plan designation of MDR and a zoning designation of R-3. While there are many more potential sites in the MDR designation, many of those sites do not have the appropriate zoning and are excluded from the inventory. However, these properties will have the correct zoning when the City completes its General Plan and Zoning updates and additional capacity (that is not accounted for in this Housing Element) will be available. The average age of the structures on the sites in the inventory is 73 years. The handful of sites that have relatively newer structures (22 to 24 years old) are only included due to the significant potential for additional capacity or if the land value is especially high in comparison with the site's improvement value.

Increased maximum densities would allow for a significant increase in capacity and serve as a redevelopment incentive. A current project at 7224 Florence Avenue will result in replacement of five older housing units with 12 new units, showing that the demand for redevelopment exists. Sites with multi-story apartment buildings are not included in the inventory because the capacity increase is lower. Nonetheless, property owners for these aging residential uses may see the 66 percent increase in maximum density as an incentive for redevelopment.

A 1.3-acre site included in the inventory is currently designated for Low Density Residential development (R1 zone) and developed as commercial truck parking or storage. The property owner for the site, located on Stewart and Gray Road adjacent to the City's western city boundary, has requested a

land use/zone change to allow development of high-density residential units. The property owner has expressed interest in developing 44 to 48 units and including an affordable component of 11 percent of units affordable to very low-income households. The site is included in the inventory with a capacity of 44 units with four of those units designated for very low-income affordability and 40 for above moderate-income affordability.

### **Mixed Use Sites**

The Mixed-Use General Plan designation allows for integrated developments with significant residential components. The designation applies to the Downey Landing and Downtown Downey Specific Plan areas, Downey and Warren High Schools, and an area at the southern end of the City along Lakewood Boulevard north and south I-105. This last location is intended to leverage the Lakewood Boulevard station of the Metro Green Line with future, intensified transit-oriented development. The mixed-use area in this part of Downey supports a variety of commercial, office, and residential uses. The Mixed-Use General Plan designation allows a density of up to 24 units per acre. The City has never adopted an implementing zone for the Mixed-Use designation.

To incentivize redevelopment of properties in the area around the Green Line station and other focal areas such as the Downey Landing and Downtown Downey Specific Plan areas, the City will increase the development potential on sites designated for Mixed-Use by adopting an implementing zone and development standards that allow 30 or more units per acre. The City will also explore establishing a maximum density upwards of 50 units per acre, potentially higher. The maximum density analysis will occur as part of the land use update to occur after Housing Element adoption. The methodology in this Housing Element assumes only the establishment of a minimum density of 30 units per acre and that density is used to calculate realistic capacity as that will be the required density for standalone residential and mixed-use developments.

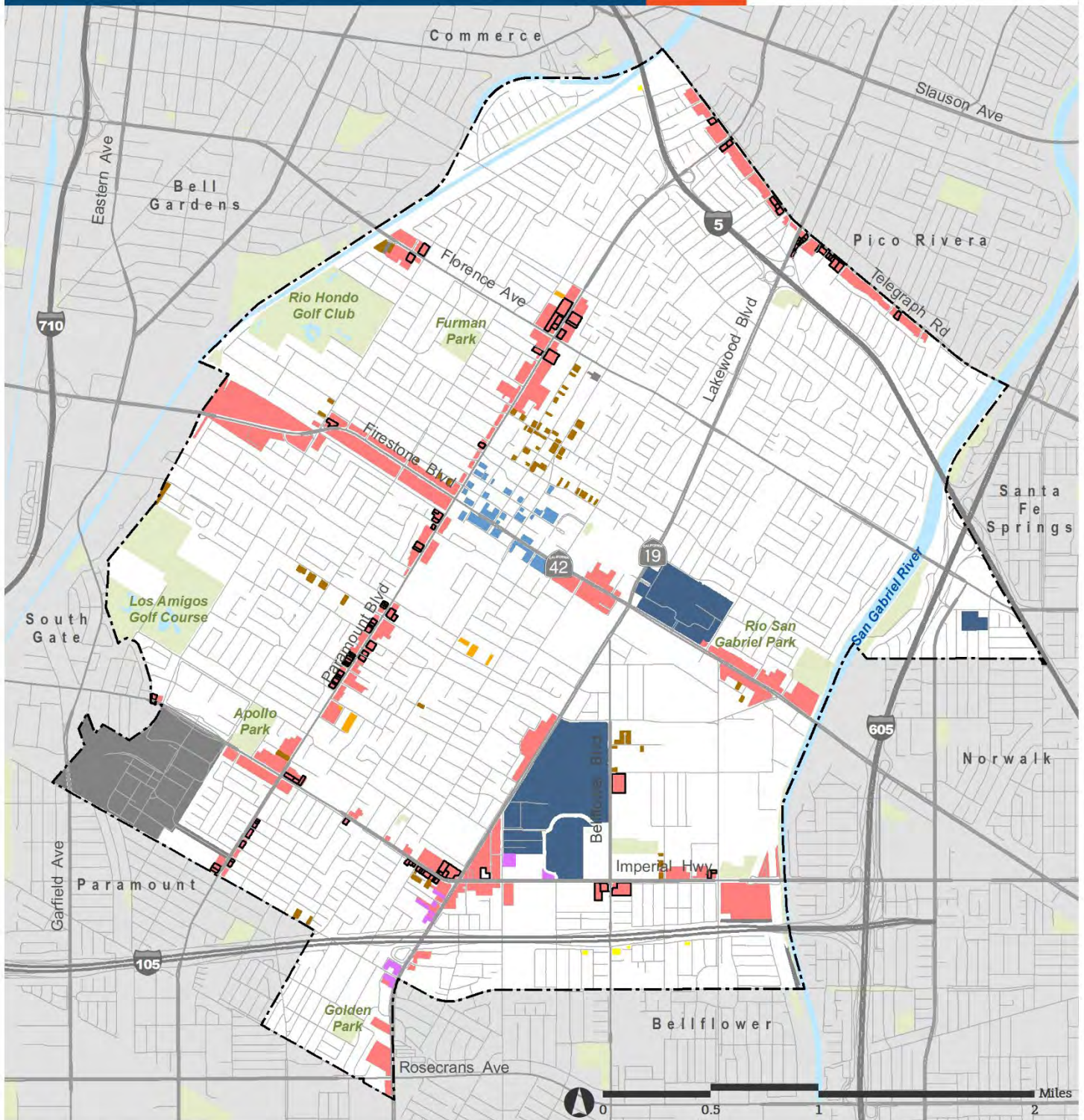
As the land use change will apply to all Mixed-Use properties in Downey, the potential for new development is significant. This Housing Element only includes a small subset of sites that show potential for redevelopment. The sites identified have a combined capacity for 231 units, distributed among the affordability levels based on size and realistic capacity. Sites meeting the size and minimum capacity requirement (16 units) outlined in State law for shortfall sites are credited toward the lower-income RHNA. Small sites (less than 0.5 acres) that meet the density requirement but do not have a minimum capacity for 16 units are credited toward the moderate- and above moderate-income RHNA shortfall.

Mixed-Use sites included in the inventory have been chosen based on existing uses, land value compared to improvement value, and the potential for the potential increase in residential capacity. All mixed-use sites are stand-alone sites, and no lot consolidation is assumed. The sites have a variety of existing uses, including single-family homes, strip commercial centers, and smaller, older commercial and office uses that show lack of investment. The average age of the structures on the sites in the inventory is 68 years and nineteen of the 21 parcels that make up the mixed-use sites have structures that are 60 years or older. The handful of sites that have relatively newer structures (22 to 24 years old) are only included due to the significant potential for additional capacity or if the land value is especially high in comparison with the site's improvement value. All but one parcel that make up the mixed-use sites have a potential for a three-fold increase in existing capacity. Increased maximum densities would allow for a significant increase in capacity and serve as a redevelopment incentive for property owners,




particularly for those properties near the Metro station. As part of the land use plan update, the City will also explore additional locations to designate for mixed use.




# Figure 4.2: Sites Inventory Map






**Base Map Features**

-  Downey City Boundary
-  Parks and Open Space
-  Rivers and Waterbodies




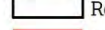

**Approved Proposed Projects (Credits)**

-  Approved or Proposed Projects

**Sites Currently in Place**

-  Vacant and Underutilized R1
-  Vacant and Underutilized R2
-  Downtown Downey SP Sites

**Sites To Be Rezoned**

-  MDR/R3 Sites to Rezone
-  Mixed-Use Sites to Rezone
-  Commercial Specific Plan Sites to Rezone
-  Residential Overlay Sites
-  Residential Overlay Zone



## Corridor Residential Overlay

The major arterial roadways traversing Downey—Firestone Boulevard, Paramount Boulevard, Telegraph Road, Lakewood Boulevard, Florence Avenue, and Imperial Highway—are lined with commercial uses interspersed with residential developments of varying densities. Many corridor sections are characterized by older, strip commercial shopping centers with prominent parking lots. Most structures along the corridors are more than 40 years old and many over 50 years old. Most residential uses on commercial properties are currently not allowed. Data from several studies from the Turner Center for Housing Innovation at the University of California at Berkeley shows that the underutilization of commercial land used for office and retail has only accelerated given the uncertainty around remote work and brick-and-mortar retail in a post-pandemic economy. From 2014 to 2019, about 38,000 homes were built on commercially zoned land across the state’s four major metro areas. Of those homes, 28,000 were built in the Los Angeles region, contributing 13.8 percent of the region’s net housing growth during that period. With the changes in the retail environment resulting from increased use of on-line commerce and the effects of COVID-19, many centers and buildings exhibit signs of underuse and disinvestment.

To incentivize redevelopment and investment in properties along the major commercial corridors and to provide opportunities for much-needed housing, the City will adopt an overlay zone that will allow high-density housing development as a by-right use at a minimum density of 30 units per acre. The residential overlay will allow 100 percent nonresidential development. The overlay zone will apply to non-industrial, non-R-1 zoned properties located in key areas of six key commercial corridors identified on Figure 4.2 (Residential Overlay Zone). The sites inventory includes sites that have the greatest potential for residential development based on a combination of site selection methodology (choosing only 7 percent of properties in the overlay) and is paired with aggressive programmatic action requiring minimum densities for stand-alone and mixed-use developments, as well as codifying incentives that will be used to catalyze development. The City is also relying on a strong demand for residential development on non-residential sites. City staff has indicated that the demand for housing in Downey is high even for sites developed with or zoned for non-residential uses. Recent projects where residential development is currently occurring shows that there are a variety of existing uses that are being recycled and replaced with housing, ranging from small-scale commercial, offices, and parking lots. The trends seen in Downey are also occurring in the general region due to the high demand for housing. Many of these sites also had large parking lots, low land to value ratios, and aging buildings. A list of local and subregional projects and trends are included earlier in this chapter under “Existing Uses on Non-Vacant Sites.” Further support for residential development along the City’s corridors was provided by the ULI panel feedback. ULI panel participants familiar with development in the County expressed that most developers are interested in properties with proximity to grocery stores, shopping centers, existing multi-family housing development; these factors increased the "attractive" nature of the sites and viability for development. The corridor residential overlay meets many of the criteria pointed out by the ULI panel as many older multi-family developments are located along the corridors in addition to commercial and service uses.

To ensure development of housing at levels included in this Element, residential and mixed-use sites will require a minimum density of 30 units per acre in the overlay. The City recognizes its responsibility under state law to maintaining adequate sites and will continue refining the sites inventory by doing direct outreach to property owners in the new residential overlay zone as part of the General Plan update and Zoning Code amendments and gauge interest in redevelopment. The City will add any residential overlay properties not currently included into the sites inventory if redevelopment interest is

expressed. The new sites will be grouped into sites that meet the shortfall requirements of sites and those that do not (but are still considered opportunity sites). The City will remove/replace sites in the inventory as requested by owners to maintain adequate sites throughout the planning period as required by law. This action will be initiated along with the General Plan and Zoning updates (see Programs 1.1 and 1.3).

Allowing residential development as a by-right use in these areas would affirmatively further fair housing (as requires by law) by introducing new housing in virtually every area of the City. The City's strategy to expand residential development opportunities, and to allow those uses as a by-right use, is strongly supported by the Turner Center studies that found that new homes built on commercial parcels comprised meaningful amounts of overall housing growth in areas where commercial to residential conversions are likely explicitly allowed. The studies found nearly double the rate of conversions of commercial to residential uses in cities that allow multifamily development in commercial areas compared with those that do not.

The corridor residential overlay will be refined as part of the General Plan and Zoning updates and may include properties beyond what is identified in this Housing Element. Because Housing Element law requires identification of specific sites, individual sites are identified in this inventory. Nonetheless, the overlay would apply to non-industrial, non-R-1 zoned properties located in key areas of six key commercial corridors identified on Figure 4.2 (Residential Overlay Zone). The minimum density for the corridor will be set at 30 units per acre. A maximum density will be determined as part of the land use plan update to occur after Housing Element adoption. The methodology in this Housing Element assumes a realistic capacity of 30 units per acre. It is expected that the overlay will allow greater than 30 units per acre, so the capacity on identified sites is conservative and accounts for the development of non-residential uses such as a mixed-use or stand-alone developments that may include commercial or office uses. The inventory addresses more than the RHNA assigned to the City to and allows for the development of non-residential uses on these sites. The housing element is an 8-year plan and predicting with exact precision which sites on the corridor will transition to residential uses is impossible. The residential overlay applies to 783 parcels (totaling over 584 acres). Only less than 7.3 percent of that acreage (just over 57 acres) is included in the sites inventory. The site selection methodology focused on sites that had aging uses showing signs of deferred maintenance or upgrades. Selecting sites that were deemed "ripe" for redevelopment coupled with trends in the City showing uses that are being recycled and replaced with housing, ranging from small-scale commercial, offices, and parking lots. The trends seen in Downey are also occurring in the general region due to the high demand for housing. Because residential uses already exist along the corridors, the addition of new housing would not be unusual and given market demand, would be feasible and reasonable. Consultation with development experts from the Urban Land Institute (ULI-LA) indicated that developers prefer to develop multi-family housing in areas where multi-family housing already exists. The ULI panel expressed that this approach ensures more limited pushback from the public in areas where multi-family uses are being introduced as a new use. The corridors identified have a mix of commercial, office interspersed with residential developments of varying densities including older higher density one- and two-story apartment buildings. Future multi-family or high-density mixed-use developments along the identified corridors represent a similar use to what is currently developed.

Housing/residential overlay zones are added zoning layers that give property owners options and reason to consider either selling to a residential developer or making investments themselves in housing. In locations where land use policy and zoning do not allow residential development, use of overlays can facilitate housing production by avoiding a lengthy General Plan amendment/rezoning process. Overlays

can also allow a mix of uses, such as adding housing to an underused portion of a large site, like a parking lot. Overlay zones may include a variety of incentives to developers to include affordable units in their projects, such as:

- Increased density or allowable heights
- Adjusted parking requirements
- By-right zoning or administrative project approval
- Streamlined permitting
- Allowing housing in locations not zoned for residential uses
- Incentives for lot consolidation

For this Housing Element, six corridors have been identified for application of a new residential overlay zone: Firestone Boulevard, Paramount Boulevard, Telegraph Road, Lakewood Boulevard, Florence Avenue, and Imperial Highway. While the overlay would apply to most of the identified corridors, only a handful of sites are included in this inventory. Sites chosen for the Housing Element do not include residential uses and instead focus on sites that are underused based on the availability of land (such as large surface parking lots), older non-residential uses that have not been improved or shows signs of deferred maintenance, and vacant or for-sale properties. Gas stations are also not included since redevelopment is more complex given the need to mitigate underground storage tanks. Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as HCD has indicated these size parameters best accommodate lower-income housing need. In this inventory, several sites comprising one or more parcels are less than one-half acre in size. These sites are included because the multiple parcels function as one site, such as a structure and its attached, surface, parking lot or a single structure located on multiple parcels. Multi-parcel sites are under common ownership. Sites meeting the size and minimum capacity requirement (16 units) outlined in State law for shortfall sites are credited toward the lower-income RHNA. Small sites (less than 0.5 acres or those sites with a capacity less than the 16 units required by law) are credited toward the moderate- and above moderate-income RHNA shortfall.

To maximize the potential for residential development on identified sites, the City will:

1. Allow high-density housing development as a by-right use at a minimum density of 30 units per acre
2. Require a minimum density of 30 units per acre in mixed-use developments
3. Adopt specific incentives for development of housing as part of the General Plan update and Zoning Code amendments including deferring fees specifically for lot consolidation, providing flexible development standards such as setback requirements, reduced/adjusted parking options and increased heights, lot coverage or floor area ratio (Program 1.3).
4. Continue refining the sites inventory by doing direct outreach to property owners in the new residential overlay zone as part of the General Plan update and Zoning Code amendments and gauge interest in redevelopment. The City will add any residential overlay properties not currently included into the sites inventory if redevelopment interest is expressed. The City will remove/replace sites in the inventory as requested by owners to maintain adequate sites throughout the planning period as required by law.

### *Telegraph Road*

Telegraph Road forms Downey's northern boundary and abuts the City of Pico Rivera. Only the south side of the corridor is in the city of Downey. Uses along this corridor include lower-scale commercial

uses and older, high-density residential apartments interspersed with some newer high-density housing development, such as the 39-unit High Point townhouse development. The overlay is applied to over 162 acres along Telegraph Road but only a few sites are specifically identified in this Housing Element as required by law. The 15 Telegraph Road overlay sites that have been specifically identified for this Housing Element have a combined capacity for 229 units, distributed among the affordability levels based on size and realistic capacity (see Table 4.4).

### *Paramount Boulevard*

Paramount Boulevard runs the full length of the City between its north and south boundaries. Uses consist largely of lower-scale commercial and small office uses —many with large surface parking lots— and a mix of residential uses, from single-family homes to apartment buildings. The corridor also forms the western boundary of the Downtown Downey Specific Plan. (No sites in the Specific Plan area are planned for the overlay since the plan already accommodates higher-density residential uses.) The overlay is applied to over 106 acres along Paramount Boulevard but only a few sites are specifically identified in this Housing Element as required by law. The 42 Paramount Boulevard overlay sites that have been specifically identified for this Housing Element have a combined capacity for 690 units, distributed among the affordability levels based on size and realistic capacity (see Table 4.4).

### *Florence Avenue*

Florence Avenue is an east-west corridor that runs the full length of the City. The uses along this corridor include lower-scale commercial strip centers (many with larger surface parking lots) and a mix of residential uses, from single-family homes to apartment buildings. The overlay is applied to over 13 acres of properties on Florence Avenue west of Old River School Road but only a few sites are specifically identified in this Housing Element as required by law. The two Florence Avenue overlay site that has been specifically identified for this Housing Element has a capacity for 55 units, distributed among the affordability levels based on size and realistic capacity (see Table 4.4).

### *Imperial Highway*

Imperial Highway is a major east-west regional corridor that runs from the City of El Segundo east to eastern Orange County. In Downey, Imperial Highway, a Caltrans-owned roadway, runs the full length of the City just north of I-105. Major uses along this corridor include government uses such as administration offices for the County of Los Angeles, the Rancho Los Amigos National Rehabilitation Center, and Kaiser Permanent Medical Center (within the Downey Landing Specific Plan). Like all other corridors discussed here, commercial uses predominate, with a scattering of residential developments, but also parks, schools, and industrial businesses. The overlay is applied to over 83 acres along Imperial Boulevard but only a few sites are specifically identified in this Housing Element as required by law. The 20 Imperial Highway overlay sites that have been specifically identified for this Housing Element have a combined capacity for 442 units, distributed among the affordability levels based on size and realistic capacity (see Table 4.4).

### *Lakewood Boulevard*

Lakewood Boulevard runs the full length of the City between its north and south boundaries. Uses consist largely of lower-scale commercial and small office uses —many with large surface parking lots— and a mix of residential uses, from single-family homes to apartment buildings. The overlay is applied to properties on Lakewood Boulevard south of Stewart and Gray Road. This southern portion of the Lakewood Boulevard corridor was identified for its location near to major activity focal areas, the Downey Landing Specific Plan area, and the Lakewood Station for the Metro C (Green) light rail line.



While no sites have been identified for this Housing Element along Lakewood Boulevard, the overlay is applied to over 49 acres.

### ***Firestone Boulevard***

Firestone Boulevard is an east-west corridor that runs the full length of the City. The corridor also runs adjacent to the Downtown Downey, Stonewood Center, and Lakewood/Firestone Specific Plan areas. (Specific Plan areas are excluded from the overlay as development on those properties are guided by development standards in their respective Specific Plans). Uses along this corridor range from more intensive commercial and residential uses (such as those in the Downtown Downey and Stonewood Center Specific Plan areas) to smaller commercial uses with a scattering of residential developments, but also parks, schools, and industrial businesses. Various sites along Firestone Boulevard are included in the sites inventory but are located outside the overlay in the Downtown Downey and Stonewood Centers Specific Plan areas. While no sites have been identified for this Housing Element along Firestone Boulevard (outside of the Downtown Downey and Stonewood Centers Specific Plan areas), the overlay is applied to over 166 acres.

### ***Stand Alone Sites***

Two standalone sites are included in the Corridor Residential Overlay due to owner interest in redeveloping the properties. No project plans are available as the owners have not begun any plans to develop the properties but are interested in residential development with the potential to include affordable units. One 3.53-acre site is included in the overlay with a capacity for 106 units at a minimum density of 30 units per acre. The site is located on the southeast corner of Bellflower Boulevard and Washburn Road. The site has been included as there has been property owner interest to redevelop the property with housing. The site is located across the street from two newer regional commercial center. The Downey Landing and the Promenade at Downey are commercial “lifestyle” centers, providing places for shopping, eating, and public gathering. These centers are still being developed and new residential uses are anticipated. The site is ripe for redevelopment given its large size, the adjacent uses, and its location less than half a mile north of Imperial Boulevard, one of the region’s major corridors. The single-parcel, 3.5-acre site has a realistic capacity of 106 units. A second site is located along Firestone Boulevard (at Old River School Road) and is currently developed with a car wash and auto lube business and a surface parking lot. The 0.77-acre site has the capacity for 23 units. The City will work closely with the developers to provide assistance and to work toward the inclusion of affordable units in the developments.

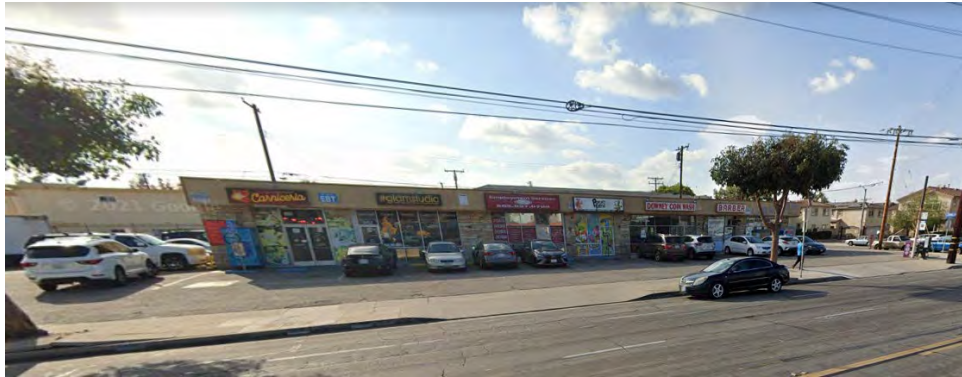
### ***Non-Residential Specific Plans***

The Housing Element sites inventory includes three sites in non-residential specific plan areas. The sites are commercial in nature but provide ideal opportunities to add residential uses. Malls and shopping centers nationwide are in precarious position, as they are dependent upon struggling retailers—particularly department stores—and subject to growing consumer reliance on e-commerce. In their heyday, malls were popular shopping destinations and public gathering spaces. But in the past decade, as shopping dollars migrated online and many well-known retailers went out of business, many commercial centers have experienced an ongoing cycle of dwindling traffic, lower sales, and disappearing storefronts. One in four U.S. malls is expected to close by 2022, and mall vacancies are at an eight-year high, according to a 2017 report by Credit Suisse.<sup>2</sup> This trend is significant for mall owners, as the rate of retail store closures accelerated during the 2020-21 coronavirus pandemic.

Downey is largely built out, with little land to accommodate new housing development. Lack of housing supply compounds affordability and homelessness issues. By adding residential opportunities to the City’s commercial centers, the City recognizes that diverse housing types and higher-density residential development will be necessary to meet pent-up demand and ensure affordable housing options for people of all ages, family sizes, and incomes. Also, higher-density residential development typically is more affordable than lower-density development and the only path toward significantly contributing to housing affordability. Adding residential uses to these sites provides property owners with the incentive to invest.

### **Corridor Residential Overlay Site Examples**

#### **Telegraph Road**



*Telegraph Road at Stamps Road*



*Telegraph Road at Arlington Avenue*

#### **Paramount Boulevard**



*Paramount Boulevard at Florence Avenue*



*Paramount Boulevard at Alameda Street*

## Corridor Residential Overlay Site Examples

### Florence Avenue



*Florence Avenue at Rives Avenue*



*Lakewood Boulevard at Florence Avenue*

### Imperial Highway



*Imperial Highway near Lakewood Boulevard*





*Imperial Highway near Bellflower Boulevard*

The City has had ongoing communications with local housing developers, who have confirmed that home builders and property owners are interested in repurposing commercial properties in Southern California, including Downey. Similar interest and projects have yielded positive results.

- City of Whittier: Property owners of the Whittwood Center in nearby Whittier added a significant residential component to the southern portion of this commercial development. As part of its current General Plan update, and with the property owner's concurrence, the City is redesignating the property for mixed-use, with a housing density of 60 units per acre. A development agreement with property owners will ensure a portion of units will be affordable.
- City of Pasadena: In Pasadena, the 10 West Walnut project now under construction will result in 394 residential units, ground-floor retail/restaurant space, and a five-story office building, all being constructed on a former surface parking lot serving the Parsons corporate office building.
- City of Paso Robles: Paso Robles is in the process of entitling River Walk Terrace, a new affordable senior housing site with 79 units for seniors 62 years of age and older. The development site is 4.21 acres and will be within walking distance to several destinations, including department stores, groceries, pharmacies, and the Salinas River Trail. The General Plan designates this site as a Regional Commercial zoning district with a Mixed-Use Overlay. The City's 2021-2028 General Plan Housing Element update identified the vacant parcel as a suitable site for housing.
- City of Azusa: Citrus Junction consists of 102 new townhomes located adjacent to Citrus Crossing, a dominant retail hub on Alondra Boulevard and across the street from Azusa Pacific University. This neighborhood falls within a Mixed-Use District.
- City of Redondo Beach: In 2019, Redondo Beach approved a proposed overhaul of the South Bay Galleria, an enclosed shopping mall. The reinvention will retain commercial uses in an open-air configuration while providing 300 new apartments, a 150-room hotel, and public gathering spaces.

### *Stonewood Center Specific Plan*

The Stonewood Center, also known as the Stonewood Mall, is a Downey landmark. When the center was established in the 1960s, it was the largest commercial development in the community's history and one of the first regional shopping centers in Southern California. In 1990, the center underwent a \$100-million transformation into an enclosed mall which included over 40 new stores. The Stonewood Specific Plan, adopted in 1989, was established to guide renovations of the 62-acre commercial center, located at the southeast corner of Lakewood and Firestone Boulevards. The center is anchored by four department stores, a variety of smaller retailers and eateries. More than half of the property is dedicated to surface parking.



The Stonewood Center presents an ideal opportunity for residential development, given the site configuration and acres of surface parking lots. Residential uses could easily be added while retaining the existing commercial structures. Consistent with planned densities for other commercial sites, the City will add a residential component at a density of at least 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or through re-designation of properties should the Stonewood Specific Plan be rescinded. The City will evaluate the high end of the density range for this site as part of a comprehensive General Plan update but anticipates that the density range will be consistent with other high-density designations: at least 40 units per acre but potentially up to 60 units per acre given the site size and the Center’s location along two major corridors. Site development standards will ensure buffering between new uses and residential neighborhoods to the north and east. The Stonewood Center’s property management company has expressed interest in a potential redevelopment of the site and is initiating similar projects for two nearby commercial centers it owns outright.



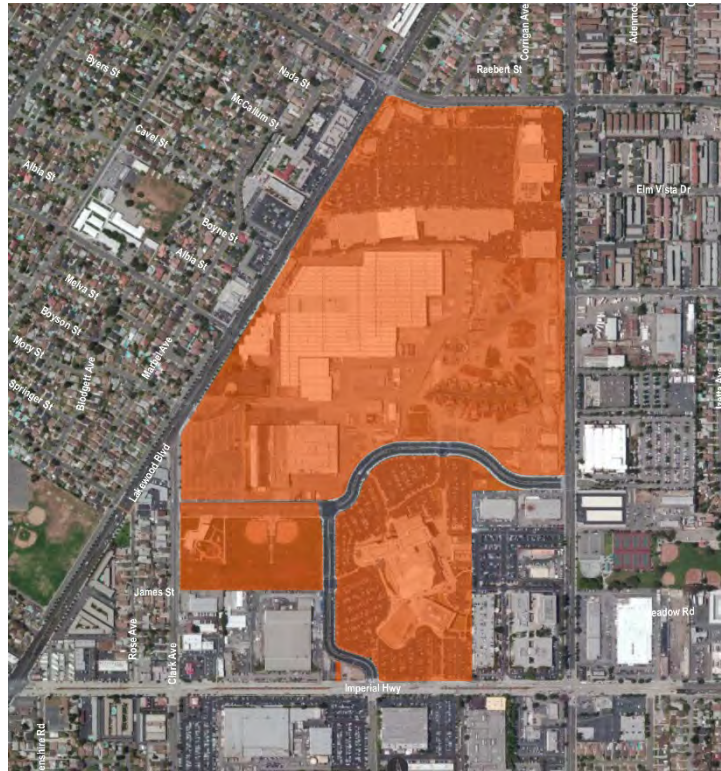
**Stonewood Center Specific Plan**

Future development on the Stonewood Center comes with a level of uncertainty about the type and configuration that residential development can take. To account for this, the estimates of capacity for purposes of this Housing Element are very conservative. While the entire site (62.56 acres) developed at a minimum residential density of 30 units per acre could yield over 1,800 units, the Housing Element estimates a lower realistic capacity to account for site improvements, public amenities, and interior roadways. The realistic capacity assumes redevelopment of only the parcels currently used as surface parking lots (36.43 acres) to account for the potential to remodel and preserve the original commercial structure, as has been done in other centers where enclosed malls have been transformed into open-air commercial centers. Site improvements such as roadways and public amenities are accounted for by using only 80 percent of the parking lot acreage. Using this methodology yields a capacity of 874 units at a residential density of 30 units per acre. The City will work with property owners and local developers to push for inclusion of affordable units. To account for the inclusion of affordable units and the potential for development of smaller units affordable by design or by market costs, capacity at the Stonewood Center is credited toward the low-income (20 percent or 175 units), moderate-income (20 percent or 175 units) and above moderate-income (60 percent of capacity or 524 units) categories.

***Downey Landing Specific Plan***

The amended (2011) Downey Landing Specific Plan contains a vision, land use concepts, infrastructure and service plans, design guidelines, and development regulations for approximately 154 acres of a former industrial property. The plan area, originally an industrial site, is in the southern portion of the City and bounded by Lakewood Boulevard, Stewart and Gray Road, Bellflower Boulevard, Imperial

Highway, and Columbia Way. As of 2021, the Specific Plan area has been and will be developed into three major components: a commercial development on approximately 111 acres, a new Kaiser Hospital and Medical Office Complex on approximately 30 acres, and a 13-acre site for the Discovery Sports Complex and the Columbia Memorial Space Center. (NASA's space shuttle program included shuttle construction at this former industrial property.) The commercial portion of the site currently is developed with two commercial centers—the Downey Landing and the Promenade at Downey—with vacant land still available for development. The commercial centers are “lifestyle” centers, providing places for shopping, eating, and public gathering. The uses are relatively new and as such, in a better position to withstand the cycle of dwindling retail traffic, lower sales, and disappearing storefronts affecting commercial centers nationwide. Nonetheless, the remaining vacant parcels could be considered for residential development complementary to the lifestyle centers, consistent with the diversity of uses envisioned in the Specific Plan



**Downey Landing Specific Plan Area**

Consistent with densities for other non-residential sites such as commercial centers, the City will add a residential component to the site at a density of at least 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or via a Specific Plan amendment. The City will evaluate the high end of the density range for this site as part of a comprehensive General Plan update but anticipates allowing at least 40 units per acre—but potentially higher given the site size and more urban character.

Assuming that residential uses would be most appropriate in the northern (commercial) portion of the site (111 acres), and exclusive of the Kaiser Permanente Medical Center, Discovery Sports Complex, and the Columbia Memorial Space Center, the addition of a residential overlay allowing at least 30 units per acre would yield over 3,300 units. However, the Housing Element estimates a lower realistic capacity to account for maintaining existing structures/uses, site improvements, public amenities, and interior roadways. The realistic capacity estimate uses only half of a 5.63-acre, vacant, City-owned parcel (based on expressed developer interest) and 25 percent of the 90.93-acre commercial center. Using this methodology yields a capacity of 851 units at a residential density of 30 units per acre. The City will work with property owners and local developers to advocate for the inclusion of affordable. To account for the inclusion of affordable units and the potential for development of smaller units affordable by design or by market costs, capacity at the Downey Landing is credited toward the low-income (20 percent or 170 units), moderate income (20 percent or 170 units) and above moderate-income (60 percent of capacity or 511 units) categories.



### **Florence Avenue/I-5 Specific Plan**

Adopted in 1991, the Florence Avenue/I-5 Specific Plan was established to guide development and improvements in a 39-acre area located south of Florence Avenue between the I-605 and I-5 freeways. The land use concept at the time was the introduction and intensification of auto- and auto-related uses into the area. Residential uses are not currently allowed. Through the years, several successful automobile dealerships were established, including Cadillac and Honda. The Great Recession took a drastic toll on the local automobile industry, and the Ford, Lincoln, and Cadillac dealerships all closed in 2009. The remaining major auto use is the Honda World Downey facility that includes car sales and automobile services. The automobile sales portion of the business currently occupies a smaller parcel to the west of this site and the automobile service component occupies the identified 6.1-acre parcel. The business is developing construction plans for relocating all components of the business to a 7.1-acre site to the north of the identified site and leaving the 6.1-acre site available for residential development that will complement residential uses adjacent to the site. To incentivize residential development in this area, the City will add a residential component to the current Honda World site. While the current site is a commercial use, it is surrounded on the west, east, and south with residential uses.



**Florence Ave./I-5 Specific Plan Site**

Consistent with densities for other non-residential sites such as commercial centers, the City will add a residential component to the site at a density of at least 30 units per acre. The residential component will be implemented via a residential or mixed-use overlay or through a re-designation of land uses in the event the Specific Plan is rescinded. The City will evaluate the high end of the density range for this site as part of a comprehensive General Plan update but anticipates estimates considering 40 to 60 units per acre given the location with ready access to Florence Avenue and two freeways. Site development

standards will ensure buffering between higher density and non-residential use and the surrounding residential neighborhoods. The 6.1-acre site is estimated to have a realistic capacity of 184 units based on minimum density of 30 units per acre. All 184 units can be credited toward the lower-income RHNA based on the density that will be allowed and the size of the site (between 0.5 and 10 acres). Nonetheless, to account for possible development of a variety of housing types and price ranges, half of the site capacity is credited toward the low-income (50 percent or 92 units), and the other half is credited to the moderate-income (25 percent or 46 units) and above moderate-income (25 percent of capacity or 46 units) categories. The site has the potential for much more residential capacity at higher densities, but the use of a minimum density of 30 units per acre to estimate realistic capacity also accounts for the possible development of non-residential uses in a mixed-use setting.

## Adequacy of the Sites Inventory

Overall, the sites inventory identified in this chapter (including sites that require rezoning actions) total 7,071 units, 3,243 unit of which are in the very low- and low-income RHNA categories. Overall, the City can adequately accommodate—and have excess capacity for—to accommodate the RHNA once promised rezoning actions are completed. **Table 4.6** shows a shortfall of 670 low-income units but those can be addressed with the surplus of site capacity in the very low-income category.

**Table 4.6: RHNA/Sites Inventory Summary**

Site Type	Affordability Level				Total
	Ex./Very Low (0-50% AMI)	Low (50-80% AMI)	Moderate Income (80-120% AMI)	Above Moderate Income (120%+ AMI)	
Approved and Proposed Projects	52	50	0	91	193
Sites Currently Available (including estimated ADU production)	1,188	226	196	826	2,436
Sites to be Rezoned	1,727	--	1,003	1,712	4,442
Total Sites	2,967	276	1,199	2,629	7,071
2021-2029 RHNA	2,079	946	915	2,585	6,525
<b>RHNA status (-shortfall/+surplus)</b>	<b>+888</b>	<b>-670</b>	<b>+284</b>	<b>+44</b>	<b>+546</b>

## No Net Loss Provision

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city must “identify and make available” additional adequate sites to accommodate the jurisdiction’s share of housing need by income level within 180 days of approving the reduced-density project.

## Site Infrastructure and Environmental Constraints

The sites inventoried in this Housing Element all lie within urban areas well served by street and utility infrastructure. The City operates its own street, water, wastewater, and storm drain systems, and prepares master plans to ensure infrastructure improvements are planned and funded to meet growth needs.

### Site Infrastructure

Downey is fully developed, and full urban-level services are available to each site in the inventory. Specifically, water and sewer service are available for all the sites included in the inventory. The City’s water and sewer master plans show that there is adequate capacity for services to housing estimated under the City’s current land use policy but will most likely necessitate adjustments to the City’s infrastructure system to accommodate housing capacity increases that will occur as part of Housing Element implementation.



## *Water*

The City of Downey is a water retailer and provides water supply for domestic, irrigation and fire protection uses. The water service area is approximately 12.3 square miles and covers approximately 98 percent of the land within the City's municipal boundaries. The remaining portions of the City, including the area that lies east of the San Gabriel River, south of I-5, and north of Cecilia Avenue, are currently served by other water purveyors. The City provides water service to an area with a current population of approximately 112,400. The City's 2015 Urban Water Management Plan (UWMP) projected population of approximately 127,300 by 2040. Projected populations in the City's service area were based on projections obtained from the Southern California Association of Governments (SCAG). The SCAG data incorporates demographic trends, existing land use, general plan land use policies, and input and projections from the Department of Finance (DOF) and the US Census Bureau. In 2015, the City's Water demand was 15,030 acre-feet per year (AFY), of which 10,800 AFY was used by residential uses. The 2015 UWMP projected water use estimates a total demand of approximately 19,529 AFY by 2040, representing an increase of 29 percent. Primary demand would continue to occur from residential uses throughout the City. Accordingly, necessary improvements to water conveyance infrastructure would be planned through Capital Improvement Programs and development fees. Based on current groundwater management practices in the Central Basin, the reliability of supplemental water purchased from CBMWD for emergency use, and water conservation efforts from customers, dry year or multiple dry year scenarios do not compromise the City's ability to provide a reliable supply of water to its customers. Additionally, recycled water facilities would be expanded through the planning horizon to meet demands for non-potable water.

According to the Public Works Department, the City's water supply system has the groundwater well capacity to meet the added demands to accommodate the regional housing need allocation. However, increases in water demand would increase operation and maintenance costs for the City and impact the ability of the City to meet its water conservation requirements moving forward. Further, although the City's groundwater well capacity would be able to accommodate the additional units, local water distribution facilities including but not limited to water mains, water service lines, meter, fire service connections, and fire hydrants would require upgrading as a typical part of the development requirements particular when there is an intensification of uses that affect water demand. To minimize the impacts of any potable water demand increase as a result of the additional units, such developments would be required to meet, as would all new developments, the latest conservation fixture, landscape, and irrigation requirements per the latest plumbing and building code in effect at the time of the development and also maximize use of recycled water where available.

## *Sewer*

The City owns, operates, and maintains a sanitary sewer system that serves the City of Downey. The City's sewers discharge to trunk sewers owned, operated, and maintained by the County Sanitation Districts of Los Angeles County (CSDLAC), which also provides for the treatment and disposal of the City's wastewater. The City of Downey (City) is located within the jurisdictional boundaries of the Los Angeles County Sanitation Districts Nos. 2 and 18. The Los Angeles County Sanitation District owns, operates, and maintains the large trunk sewers that form the backbone of the regional wastewater conveyance system. Local collector and/or lateral sewer lines are the responsibility of the jurisdiction in which they are located. As of 2021, the Los Angeles County Sanitation District has stated that there are presently no deficiencies that exist in Districts' facilities that serve the City. The City's portion of the sewer system consists of approximately 193 miles of sanitary sewer mains, 4,250 manholes, and two small lift stations. The majority of the system was built between 1945 and 1955, with the oldest sewers dating back to 1927. As part of the 2010 Master Plan, the City selected gravity sewers for inspection,

with the target of inspecting 50,000 feet of pipe, approximately 5 percent of the City's sewer system. The sewers selected for inspection included sewers of all ages and located throughout the City. The results of these inspections were extrapolated to characterize the overall condition of the system to allow for a reasonable initial projection of future repair, rehabilitation, and replacement needs. The Master Plan also included a system evaluation that found that all the City-owned sewers meet the capacity criteria established in this study (i.e., depth of flow less than or equal to 75 percent of pipe diameter) under both existing and build-out dry weather flow conditions.

According to the Public Works Department, the City's sanitary sewer collection is anticipated to have the capacity necessary to meet the added demands from the potential increase in units to accommodate the regional housing need allocation. It is possible however, that a particular development depending on its size and location may require the upsizing and replacement of existing smaller sewer collection mains to accommodate the development. Further, it should be noted that the City's owns and maintains 200 miles of sanitary sewer collection mains. These collection mains connect and discharge to County Sanitation Districts of Los Angeles County (CSDLAC) trunk sewers which then deliver the wastewater to CSDLAC wastewater treatment plants. Therefore, any future development would also have to go through CSDLAC approval to confirm capacity prior to adding additional wastewater loads to the CSDLAC trunk sewers.

To ensure that infrastructure needs of specific projects are addressed, the City requires that project applications for new development be reviewed for adequate infrastructure. Applications are evaluated on a case-by-case basis to ensure the capacity exists to service new developments. To accommodate the 2021-2029 RHNA of over 6,500 residential units, within three years of adopting this Housing Element, the City will undertake a series of land use actions to increase development potential. These proposed land use actions will require thorough infrastructure and environmental review and any additional constraints will be identified at the time the actions are taken, along with any necessary mitigation measures to address infrastructure system and service provision.

### *Environmental Constraints*

Available data from the California Department of Conservation (California Earthquake Hazards Zone Application or "EQ Zapp" accessed on November 12, 2021) indicates there are no identified Alquist Priolo fault traces or fault zones in Downey. Seismic Hazard Zone Maps from the California Department of Conservation indicate that the City is in an area where liquefaction may occur during a strong earthquake. The identified area spans a large portion of Los Angeles and Orange and is not limited to just the City of Downey. The City is predominantly flat and lacks any substantial topographical variations. There are no identified landslide areas in the City of Downey. None of the parcels identified in the residential sites inventory are constrained by sensitive habitat or contamination that would prohibit developers from building. The sites inventory does not include industrial properties as such constraints due to soil contamination is not a factor. The vacant sites identified in the land survey are infill sites and are flat and generally rectangular in shape. As a result, no major grading would be required on these parcels. The underutilized sites are infill commercial sites with potential to redevelop with residential uses. Available data from the California Department of Forestry and Fire Protection (CAL FIRE) shows that there are no Fire Hazard Severity areas in Downey and the City is not on the Agency's list of high-risk communities with wildland-urban interfaces. No properties within the City are considered by FEMA to be within a 100-year flood zone. Therefore, no impacts associated with flood hazards, tsunami, or seiche would occur. The City requires engineering reports to establish appropriate design standards and mitigation measures taken to alleviate any identified hazards. However, the necessity of these reports is

offset by the need for public safety and welfare, and thus the City does not consider the reports a constraint to housing development.

## Financial and Administrative Resources

### Financial Resources

A variety of potential funding sources are available to finance housing activities in Downey. Due to both the high cost of developing and preserving housing, and limitations on both the amount and uses of funds, layering of funding sources may be required for affordable housing programs and projects.

The City participates in HUD federal funding programs and receives CDBG and HOME funds from HUD on a formula basis each year and in turn, awards, grants, and loans to nonprofit and public organizations for programs and projects in furtherance of Housing Element goals and policies. The CDBG and HOME programs generally provide for a wide range of eligible activities for the benefit of low- and moderate-income residents. For the 2020-2021 program year, the City received \$1,094,600 of CDBG funds and \$457,821 of HOME funds. When combined with \$170,575 in estimated HOME program income generated during the prior program year, the 2020-2021 Action Plan allocates \$1,094,600 of CDBG funds and \$628,396 of HOME funds to the following program activities, to be implemented from July 1, 2020 to June 30, 2021.

- In partnership with housing developers, the City will leverage HOME and CDBG funds to support the development or creation of affordable housing opportunities for home buyers, with units affordable to households earning less than 80 percent of Area Median Income, including units for individuals, families, persons with special needs, and persons experiencing homelessness or at-risk of homelessness.
- Using CDBG and HOME funds, the City will continue to provide a Residential Rehabilitation Program for existing housing units occupied by low- and moderate-income households.
- The City will continue to use CDBG funds to affirmatively further fair housing choice through by funding fair housing education, counseling, antidiscrimination, and landlord-tenant mediation services.

As a City with substantial housing and community development needs, Downey leverages its CDBG and HOME entitlement grants with a variety of funding resources including but not limited to those listed below to maximize the effectiveness of available funds.

### State Resources

- State Low-Income Housing Tax Credit Program
- Building Equity and Growth in Neighborhoods Program (BEGIN)
- CalHome Program
- Multifamily Housing Program (MHP)
- Housing Related Parks Grant
- CalHFA Single and Multi-Family Program
- Mental Health Service Act (MHSA) Funding

### Local Resources

- Los Angeles County Continuum of Care (CoC)

- Housing Authority of County of Los Angeles County (HACoLA)
- Southern California Home Financing Authority (SCHFA)

### **Private Resources**

- Federal Home Loan Bank Affordable Housing Program (AHP)
- Community Reinvestment Act Programs
- United Way Funding
- Private Contributions

The City has also received funding from the State of California Local Early Action Planning Grant Program (LEAP) for planning activities that accelerate housing production. LEAP provides one-time grant funding to cities and counties to update their planning documents and implement process improvements that will facilitate the acceleration of housing production and help local governments prepare for their sixth cycle housing elements.

Several resources from the County of Los Angeles are available to the Downey community. The federally funded Housing Choice Voucher program (formerly Section 8) is overseen by the Los Angeles County Development Authority (LACDA) and provides rental assistance payments to owners of private market rate units on behalf of low-income tenants. LACDA also oversees the First Home Mortgage Program, which is open to all Los Angeles County residents (outside of the City of Los Angeles). The Mortgage Credit Certificate (MCC) program provides federal tax credit for low- and moderate- income homebuyers who have not owned a home in the past three years. Allocation for MCC is provided by the State and administered by the County of Los Angeles.

### **Administrative Resources**

Agencies with administrative capacity to implement programs contained in the Housing Element include the City of Downey and local and regional non-profit private developers. The Planning Division within the Community Development Department takes the lead to implement Housing Element programs and policies. The Division is responsible for implementing the General Plan by ensuring that development projects are consistent with the General Plan, the Zoning Ordinance, and State codes. The City also works closely with non-profit developers to expand affordable housing opportunities in Downey. In 2016, the City and Habitat for Humanity of Greater Los Angeles (Habitat LA) partnered on development of six affordable homeownership units. In 2014, National CORE, with assistance from the City, developed Downey View, a 50-unit affordable housing complex.



# downey general plan

# housing element

## CHAPTER 5:

### 2014-2019 HOUSING ELEMENT PROGRAM ACCOMPLISHMENTS

This chapter analyzes program performance for the City of Downey 2014-2021 Housing Element programs. State law (California Government Code Section 65588[a]) requires each jurisdiction to review its Housing Element as frequently as appropriate and evaluate:

- The appropriateness of the housing goals, objectives, and policies in contributing to the attainment of the state housing goal
- The effectiveness of the Housing Element in attainment of the community's housing goals and objectives
- Progress in implementation of the Housing Element

This evaluation provides critical information on the extent to which programs have achieved stated objectives and whether these programs continue to be relevant to addressing current and future housing needs in Downey. The evaluation provides the basis for recommended modifications to policies and programs and the establishment of new housing objectives.

Through program implementation during the 2014-2021 planning period, the City of Downey has made considerable progress in addressing the housing needs of the special populations. Lower income households have been assisted through the Housing Rebate and Grant Program which offers grants to promote the improvement, rehabilitation and/or the preservation of housing units occupied by low- to moderate-income households. In June of 2020, Downey launched a COVID Rental Assistance Program to cover one month of rental payments for income-eligible households. In March of 2021, Downey began to offer assistance for up to three months. The City also offers the Housing Rehabilitation and Assistance program to assist disabled households with architectural modifications to their homes and continue to implement the provisions of the Americans with Disabilities Act (ADA). However, no applications have been submitted recently. The City also made moderate progress in expanding housing opportunities. In 2014 the Downey View development, with 50 affordable units, was built. Downey View replaced an outdated telephone service building with an urban-infill, transit-oriented development. Four (4) units were designated to those individuals who experience a physical or sensory disability. Through its HUD-funded grant program, the City was able to provide public services designed to provide residents with special needs including, but not limited to, those concerned with mental disabilities, physical disabilities, developmental disabilities, and other conditions as well as seniors. For 2020-2021 the City provided \$85,00 in funding to three organizations that assist the elderly and those with special needs.

To address the needs of persons experiencing homelessness, the City allocated \$25,000 in funding to The Whole Child, a non-profit organization that assists with homeless assistance and prevention programs. In 2018, the City adopted a *Plan to Prevent and Combat Homelessness*, which outline the City’s priorities as it continues to address issues related to homelessness. While programs efforts to assist special needs groups were generally favorable, the City’s efforts to address the needs of special needs groups are hindered by limited funding.

The Department of Housing and Community Development determined that the Downey 2014-2021 Housing Element was in full compliance with State law. Following adoption in 2013, the City was tasked with following through on the commitments made in the 21 housing programs. Following the evaluation table, the quantified objective performance is summarized.

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
<p><b>PROGRAM 1: CODE ENFORCEMENT</b> Continue to conduct inspections on a complaint basis through the City’s Code Enforcement Division.</p>	<p>The City achieved 95 percent compliance toward corrective action in years 2014 to 2016. From 2018 to 2019, the City changed the program assessment metric to code enforcement cases filed. For 2018 and 2019, there were a total of 6,420 code enforcement cases filed. In 2020, 5,768 code enforcement cases were filed. These cases typically involve required maintenance of a property or illegal construction within the residential zoning districts. Residents are encouraged to apply for rehabilitation assistance when the case is applicable.</p> <p><i>Continued Appropriateness:</i> Property maintenance is an important City goal. This program will remain in the Housing Element with modified quantifiable objectives consistent with available funding.</p>
<p><b>PROGRAM 2: HOUSING REBATE AND GRANT PROGRAM</b> Address property, structural, and energy/water conservation improvements for low-income homeowners in the City. The City anticipates that 10 projects will be assisted annually based on funding availability.</p>	<p>During the planning period, the City of Downey provided a total of 120 grants of up to a range of \$10,000 to \$35,000 each (total of more than \$1.78 million in funds), toward improvements to residential properties occupied by low- to moderate-income households, far more than the 80 expected over the element period.</p> <p><i>Continued Appropriateness:</i> The 2020-2024 Consolidated Plan listed the Residential Rehabilitation Program as key Housing Preservation Initiative. This program will remain in the Housing Element with updated objectives that will be consistent with the latest Consolidated Plan.</p>
<p><b>PROGRAM 3: MONITOR AND PRESERVE AFFORDABLE HOUSING</b> City staff will maintain a list of affordable units throughout the City including affordability information to ensure landlords are compliant with deed restrictions and to preserve affordable units. The Housing Division will continue to pursue partnership opportunities with non-profits to preserve and expand affordable housing in the City.</p>	<p>An inventory of the City’s affordable housing units is kept and maintained by the Community Development Department. The City partnered with Habitat for Humanity to develop six low-income ownership units. The City had no multi-family residential developments at risk during this Housing Element cycle. The City monitored four at-risk units during the housing cycle which have since lost their affordability covenants.</p>

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	<p>The citywide total of affordable units as of December 2019 was 202. The current Consolidated Plan (2020-2024) commits CDBG/HOME funds to develop four affordable rental units and rehabilitate 100 existing units. Continued education is provided to property owners to maintain compliance with deed restrictions. Standards, benefits, and incentives related to affordable housing are also shared with any persons interested in the construction of a residential development.</p> <p><i>Continued Appropriateness:</i> Preservation of affordable housing is an important goal for the City. An updated version of this program will be included in the Housing Element and will include details based on an updated risk analysis.</p>
<p><b>PROGRAM 4: ENERGY EFFICIENT DESIGN</b> Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects. Encourage energy conservation devices, including but not limited to lighting, water heater treatments, and solar energy systems for all residential projects. Encourage maximum utilization of Federal, State, and local government programs, such as the County of Los Angeles Home Weatherization Program, that assist homeowners in providing energy conservation measures. Continue to provide information on home loan programs available through the City and encourage residents to use the programs to implement energy efficient design.</p>	<p>The program is ongoing. The City offers all development applications within single-family residential zones the incentive of increasing floor-area ratio (FAR) by an additional 0.5 for projects that incorporate energy-efficient elements. This bonus was used once in 2019 and once in 2020. All 2019 and 2020 Rehabilitation Assistance awardees (see Program 2) made energy efficiency improvements to their properties.</p> <p><i>Continued Appropriateness:</i> This program will remain in the Housing Element as part of a comprehensive energy conservation program.</p>
<p><b>PROGRAM 5: HOUSING OPPORTUNITY SITES</b> Staff will continue to facilitate the redevelopment of underutilized sites through various outreach methods to the development community through an updated inventory available throughout the 2014-2021 planning cycle. Provide information to interested developers and on the City’s website about potential residential opportunity sites.</p>	<p>The City continues to encourage and advocate for the construction/redevelopment of underutilized parcels as an ongoing effort. The City worked to increase densities at seven sites during this Housing Element cycle, adding a total of 57 units. At least one identified opportunity site within Downtown Specific Plan area was developed; information about some opportunity sites is available through the City’s website.</p> <p><i>Continued Appropriateness:</i> The 2021 Housing Element will include an updated adequate sites program that will reflect the new RHNA and sites inventory. A revised version of this program will remain in the Housing Element.</p>
<p><b>PROGRAM 6: SECOND UNIT ZONING</b> Based on previous planning periods, it is reasonable to expect 8-12 second units to be constructed during the planning period, therefore. Throughout the planning period, the City will inform eligible property owners of</p>	<p>In 2018 and 2019, the City updated its second unit standards to comply with statewide ADU regulations, which expanded development opportunities to all properties with single-family residence in residential zone districts. The City expected a total of 8 to 10 ADUs during the entire element period; it approved a total of 19 ADU projects from 2018 to</p>

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
<p>the potential to construct second units through updated handouts and information on the City’s website.</p>	<p>2019). In 2020, a total of 53 ADUs were approved, and 134 applications were submitted. Those that have not been approved are anticipated to be issued sometime in 2021. Information regarding standards is continuously provided to property owners. Currently, the City provides information handouts at the public counter. The State released ADU design guidelines that staff provides to the public at the counter and on the City’s website.</p> <p><i>Continued Appropriateness:</i> Due to the numerous changes to State laws regulating ADU development (previously known as second units), the City can adopt a revised ADU ordinance or apply standards established under State law. This program is an important component of the City’s affordable housing strategy and will remain in the Housing Element with strengthened actions to promote development of ADUs consistent with State law.</p>
<p><b>PROGRAM 7: SENIOR HOUSING ZONING</b> The City will continue to offer incentives to developers to facilitate the development of alternative housing models that are favorable to senior residents. Throughout the planning period, the City will inform eligible property owners of the incentives to develop senior housing through updated handouts and information on the City’s website.</p>	<p>The City continues to encourage and advocate for senior housing development. The City offers incentives in the form of reduced parking, lower minimum unit sizes, increases in heights and allowed stories, and increased lot coverage. The allowed density is also greater than traditional multi-family developments, and a density bonus is available.</p> <p>Staff provides information/language from the Municipal Code at the public counter. Staff will be generating a handout and will provide information on the City’s website.</p> <p><i>Continued Appropriateness:</i> This program is an important component of the City’s affordable housing strategy and will remain in the Housing Element either as a stand-alone program or as part of a more comprehensive program addressing the development of special needs housing.</p>
<p><b>PROGRAM 8: MORTGAGE CREDIT CERTIFICATE</b> Continue participation and distribute fliers and advertise program availability.</p>	<p>The City of Downey continues to provide information to residents and members of the public who may be interested in the program and assists individuals in locating Los Angeles County Housing Authority’s offices and website.</p> <p>Two families benefitted from this program from 2017-2018.</p> <p><i>Continued Appropriateness:</i> The Mortgage Credit Certificate (MCC) Program is run by the Los Angeles County Development Authority (LACDA). MCC is an important resource for low- and moderate-income first-time home buyers and will remain in the Housing Element with updated objectives for continued coordination with LACDA.</p>
<p><b>PROGRAM 9: SECTION 8 RENTAL ASSISTANCE</b> Continue to provide assistance to households through continued participation in the Section 8 program and</p>	<p>2020 records show 455 total units within the City participating in Section 8 Housing Choice Voucher Program. There were 630 vouchers used in Downey in 2016.</p>



**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
<p>encourage rental property owners to register their units with the Housing Authority. The Housing Division will continue to monitor the number of residents accessing the program and units available for rent.</p>	<p>In June of 2020, Downey launched a COVID Rental Assistance Program--\$500,000 budget, 457 tenant applications for assistance from the City to cover one month of rental payments for income-eligible households. In March of 2021, Downey began to offer assistance for up to three months.</p> <p><i>Continued Appropriateness:</i> The Section 8 Housing Choice Voucher is operated by the Los Angeles County Development Authority (LACDA). The Housing Choice Voucher program (Section 8) is an important affordable housing resource for City residents and will remain in the Housing Element with updated objectives for preservation of vouchers and continued coordination with LACDA.</p>
<p><b>PROGRAM 10: LOS ANGELES COUNTY PARTNERSHIP</b> Increase resident awareness about housing programs offered by the County by advertising them on the City’s website and by offering Staff assistance at City Hall.</p>	<p>The City continues to provide members of the public with information regarding County-sponsored housing programs/assistance.</p> <p><i>Continued Appropriateness:</i> The County offers a variety of housing assistance programs that can supplement the City’s current housing programs. The partnership will remain a program with updated objectives for continued coordination with LA County Community Development Corporation and LACDA.</p>
<p><b>PROGRAM 11: REMOVE DEVELOPMENT CONSTRAINTS</b> On an annual basis, the City will review development standards, to ensure that the development of lower income housing can occur. Revise the development code to address all constraints identified in Section 5 of the Housing Element. Staff will continue to use flexible development standards to facilitate the development of affordable housing through promotion of maximum development densities.</p>	<p>The City was not able to make substantial updates or changes to the Municipal Code during the last cycle due to staffing and funding constraints. Recently however, Residential Design Guidelines have been developed to provide streamlined and objective reviews for single-family residential development.</p> <p>The City is in the process of updating ADU standards and permit streamlining to comply with recent State legislation. All residential properties now have potential density of two units per lot. While no applications for residential developments were submitted for the year 2019, the City's Downtown Specific Plan has helped facilitate large residential development in the past and preliminary proposals have been discussed for the near future.</p> <p><i>Continued Appropriateness:</i> Removal of constraints is of ongoing importance to the City, and this program will remain in the Housing Element with specific program actions to be identified during the update of the Housing Element.</p>
<p><b>PROGRAM 12: DENSITY BONUS</b> Inform and encourage developers to utilize the density program by promoting the program on the City’s website and by offering Staff assistance at City Hall.</p>	<p>The City continues to provide density bonus as a resource for new developments. The City offers developers density increases of 35 percent plus development incentives for qualified affordable housing projects. Eligible projects must</p>

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	<p>contain at least 20 percent units for low-income households, or at least five percent reserved for very low-income, or 50 percent reserved for senior households. This program was not used in 2018, 2019, or 2020 and no data are available about previous years.</p> <p>The City will update its ordinance to remain in compliance with Government Code §65915, and to meet the revised standards in recent State legislation which include more relaxed thresholds and higher bonus percentages.</p> <p>Staff will create a handout and promote the City’s density bonuses on the City website for future developers.</p> <p><i>Continued Appropriateness:</i> Density bonuses are an important tool for the City and will remain in the Housing Element as a strategy to encourage housing development.</p>
<p><b>PROGRAM 13: PLANNED UNIT DEVELOPMENTS</b> Continue to encourage Planned Unit Developments to provide affordable housing through creative land use techniques. Inform developers of the density incentives under the program.</p>	<p>The City has approved one PUD at 8601 Gallatin Road, between 2014-2017, and the development was constructed. No PUDs were proposed in the City during 2018, 2019, and 2020.</p> <p>PUD proposals have not been a common request. Staff may promote through handouts and potentially on City website once staff reviews the current code section.</p> <p>The program remains a tool within the Downey Municipal Code that may be utilized when appropriate to create large (potentially affordable) creative residential development projects.</p> <p><i>Continued Appropriateness:</i> PUDs are important to the City and will remain in the Housing Element as a strategy to encourage housing development.</p>
<p><b>PROGRAM 14: STREAMLINE PROCESSING</b> Continue to monitor permit processing times and investigate ways to streamline the process. Continue to digitize information including building permits and the Zoning Code.</p>	<p>The City of Downey diligently complies with all applicable streamlining policies and practices. In 2018, the City digitized resources including archived building permits and planning entitlements to further streamline permit processing and reduce the amount of time it takes to conduct property research. Upgrades were also made to the City's permitting software to ensure accurate information and speedier service.</p> <p>The City is also undergoing the establishment of electronic plan check system that will be implemented by the end of 2021 for a more streamlined plan check review.</p> <p><i>Continued Appropriateness:</i></p>

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	<p>This program will remain in the Housing Element as part of a larger project streamlining program that will also address new streamlining requirements under SB 35.</p>
<p><b>PROGRAM 15: PRIORITIZE HOUSING PROGRAM ACTIVITIES</b>            Identify housing needs and prioritize housing program activities to meet those needs through annual updates to the City’s Consolidated Plan.</p>	<p>The City’s Housing Rehabilitation Assistance Program has been identified by the Community Development Department as an ongoing priority program based upon annual needs assessments and the City’s previous and current Consolidated Plans. The City allocated approximately \$455,000 to 13 separate properties of low- to moderate-income households in both 2018 and 2019. The 2020-2024 Consolidated Plan Action Plan sets aside funds to support rehabilitation of 20 low- to moderate-income household properties per year in each of the next five years.</p> <p><i>Continued Appropriateness:</i>            The City prioritizes housing program activities as part of their HUD entitlement grant funding. This program is no longer needed and will be removed.</p>
<p><b>PROGRAM 16: PLANNING AND DEVELOPMENT FEES</b>            Continue to conduct annual reviews of planning and development fees.</p>	<p>Annual reviews of fees are necessary and are a preferred timeline in the City of Downey. Consumer Price Index (CPI) adjustments are made at the beginning of every fiscal year. Changes to planning and development fees were made to recover cost for services, yet total cost for service remains higher than the applicable fee. City fees remain appropriate and consistent with surrounding communities. In 2020, fees were adjusted and raised 2.5 percent for most development applications. Fees were also adjusted and raised in 2018 and 2019. Changes were made to recover cost for services, yet total cost for service remains higher than the applicable fee. Change in fees remains appropriate and consistent with surrounding communities.</p> <p><i>Continued Appropriateness:</i>            Maintaining an appropriate fee structure is important to balancing the need to recover cost for services but not constrain residential development. This program will remain in the Housing Element.</p>
<p><b>PROGRAM 17: WATER AND SEWER SERVICE PROVIDERS</b>            Submit the adopted Housing Element to local water and sewer providers for their review and input.</p>	<p>The City submitted the adopted Housing Element to local water and sewer providers consistent with the requirements of State law.</p> <p><i>Continued Appropriateness:</i>            This remains a requirement of Housing Element law and will remain in the updated Housing Element.</p>
<p><b>PROGRAM 18: FLOOD MANAGEMENT</b>            Ensure that flood risks are considered when making land use decisions.</p>	<p>Assessments regarding flood risks are ongoing. City staff professionals with the appropriate knowledge review every development application.</p> <p><i>Continued Appropriateness:</i></p>

**Table 5.1: 2014-2021 Program Accomplishments**

2014-2021 Housing Element Program	Progress and Continued Appropriateness
	Flooding is addressed in the General Plan Safety Element; to avoid duplication, this program will be removed.
<p><b>PROGRAM 19: LOT CONSOLIDATION</b> Encourage lot consolidation of smaller parcels to accommodate projects including a minimum of 16 units at a density of at least 30 dwelling units per acre or higher.</p>	<p>The City continues to encourage lot consolidation; however, no lots were consolidated within the City during this planning period.</p> <p><i>Continued Appropriateness:</i> Lot consolidation is important to the City, and this program objective will remain in the Housing Element either as a stand-alone program or as part of a more comprehensive program addressing new housing development.</p>
<p><b>PROGRAM 20: REASONABLE ACCOMMODATION FOR PERSONS WITH DISABILITIES</b> Administer the Housing Rebate and Grant Program to assist disabled households with architectural modifications to their homes and continue to implement the provisions of the Americans with Disabilities Act (ADA). Provide information in public places regarding the City’s reasonable accommodation ordinance that expands upon the provisions of the Housing Rebate and Grant Program and make information on this program more widely available to residents. If necessary, implement reasonable accommodate procedures within one year.</p>	<p>The City currently does not have a reasonable accommodation ordinance. As part of the last Housing Element cycle, staff is working on forming the ordinance. Adoption of the ordinance is anticipated for 2021.</p> <p>The City offers the Housing Rehabilitation and Assistance program to fund needed accessibility home modifications. However, no applications have been submitted recently.</p> <p><i>Continued Appropriateness:</i> This program is continued in the Housing Element.</p>
<p><b>PROGRAM 21: FAIR HOUSING</b> Continue to assist households through the Fair Housing Foundation and continue to refer fair housing complaints to the Fair Housing Foundation.</p>	<p>The City continues to contract with the Fair Housing Foundation (FHF), which serves 250 Downey residents per year, providing services including tenant and landlord counseling, and workshops and trainings tailored to tenants, landlords, property owners and managers. The City provides contact information for FHF on its website and provides fair housing information at its Housing Resource Fairs.</p> <p><i>Continued Appropriateness:</i> Fair housing is an important issue to the City, and an expanded version of the program will remain in the Housing Element consistent with new State laws requiring cities to Affirmatively Furthering Fair Housing (AB 686, 2018).</p>

**Quantified Objectives**

Table 5.2 shows the progress the City has made in meeting the program objective included in the 2014-2021 Housing Element, including progress meeting the City’s fifth cycle RHNA. Through December of 2020, 39 percent of the total units in the RHNA allocation (or 466 of 1,201 units) were built. However, this is mostly due to development of moderate- and above-moderate units. No very low- or extremely low-income units were built so far during this period.

The City did not include a rehabilitation objective in the 2014 Housing Element. Nonetheless, through the Housing Rebate and Grant Program, the City provided a total of 120 grants of up to a range of \$10,000 to \$35,000 each (total of \$1.78 million in funds) toward improvements to residential properties occupied by low- to moderate-income households.



The conservation goal was to preserve four at-risk ownership units. Those ownership units are no longer affordable, but none of the City’s stock of affordable multi-family housing converted to market rate housing during the planning period.

**Table 5.2: Summary of 2014-2021 Quantified Objectives and Progress**

Objectives	Income Levels					Total
	Extremely Low	Very Low	Low	Moderate	Above Moderate	
<b>Construction Objective <sup>a</sup></b>	2	10	50	20	100	<b>182</b>
<b>Units Accommodated by Opportunity Sites (RHNA)*</b>	239	239	242	135	346	<b>1,201</b>
<b>Combined Total, Construction and Opportunity Sites (RHNA)*</b>	<b>241</b>	<b>249</b>	<b>292</b>	<b>155</b>	<b>446</b>	<b>1,383</b>
Progress [Total units]	0	0	6	70	390	<b>466</b>
Progress [Percent of Construction Objective Reached]	0%	0%	12%	350%	390%	<b>256%</b>
Progress [Percent of Combined Total Construction and RHNA Opportunity Sites]	0%	0%	2%	45%	87%	<b>34%</b>
<b>Rehabilitation Objective (CDBG funding) <sup>b</sup></b>	0	0	0	0	0	<b>0</b>
Progress	0	0	120	0	0	<b>120</b>
<b>Conservation/Preservation Objective <sup>c</sup></b>	0	0	4	0	0	<b>4</b>
Progress	0	0	0	0	0	<b>0</b>
<b>Units Assisted through Other Programs <sup>d</sup></b>	0	20	20	30	0	<b>70</b>
Progress			97 (139%)			<b>97 (139%)</b>

Notes:

(a) Construction objectives represent the number of units the City realistically expects might be constructed within the planning period, as opposed to the “units accommodated by opportunity sites” which includes the City’s remaining RHNA.

(b) Any CDBG funding received during the planning period will be used to fund projects that improve and maintain the quality of the City’s housing stock and residential infrastructure. The rehabilitation objective is consistent with the City’s Housing Plan.

(c) The conservation/ preservation objective is consistent with the City’s total count of affordable units that are permanent but could potentially be at-risk units including 4 at risk ownership units.

(d) The units included in the table as assisted through programs includes 10 households assisted annually through the Housing Rebate and Grant Program. The number of units was estimated by income category based on past utilization of the program.

\*RHNA total represents number of units needed to accommodate shortfall from previous HE Cycle, since Downey did not make available adequate sites to accommodate the Fourth Cycle RHNA (2008-2014).

Source: City of Downey 2014-2021 Housing Element, page 40; Housing Element Annual Reports, 2014 to 2020

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# downey general plan

# housing element

## CHAPTER 6. HOUSING PLAN

This Housing Plan's goals, policies, and programs have been established to address housing issues in Downey and to meet State law housing requirements. The City's enduring objective is to facilitate and encourage safe, decent housing that fulfills the diverse needs of current and future residents. To achieve this vision, the Housing Plan identifies long-term housing goals and shorter-term policies and programs to address identified housing needs, constraints to development confronting the City, and resources available to address the housing needs. These are informed by recent community input, the housing needs assessment (Chapter 2), housing constraints analysis (Chapter 3), housing resources analysis (Chapter 4), and the review of program accomplishments for the previous (2014-2021) Housing Element (Chapter 5).

To make adequate provision for the housing needs of people of all income levels, State law (Government Code 65583[c]) requires that the City, at a minimum, identify programs that do all the following:

- Identify adequate sites, with appropriate zoning and development standards and services to accommodate the locality's share of the regional housing needs for each income level.
- Assist in the development of adequate housing to meet the needs of extremely low-, very low-, low-, and moderate-income households.
- Address and, where possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for people at all income levels, as well as housing for people with disabilities.
- Conserve and improve the condition of the existing affordable housing stock and preserve assisted housing developments at risk of conversion to market-rate housing.
- Promote equal housing opportunities for all people, regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.

The programs below identify the actions that will be taken to make sites available during the planning period with appropriate land use and development standards, and with services and facilities to accommodate the City's share of regional housing need for each income level. The programs also address identified housing issues in Downey and approaches to meet State law housing requirements.

Programs generally include a statement of specific City action(s) necessary to implement a policy or goal and identify the City department or other agency responsible for implementation, the quantified objectives (where applicable), and a timeframe for completion. A summary of quantified objectives is included following the program descriptions.

This Housing Plan focuses on goals, policies, and programs that can realistically be accomplished based on current funding and staffing levels. This does not preclude the City from undertaking additional program actions not included in this Plan if they are consistent with the goals and policies set here and throughout the General Plan.

## Goal and Policies

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<b>Goal 1.</b>	<b>Encourage a variety of housing types to meet the existing and future needs of City residents.</b>
Policy 1.1	Accommodate a variety of housing types to meet the needs of all residents.
Policy 1.2	Encourage and facilitate a range of housing to accommodate the City’s share of regional housing and special housing needs.
Policy 1.3	Implement land use policies and standards that allow for a range of residential densities and housing types that will enable households of all types and income levels opportunities to find suitable ownership and rental housing in the City.
Policy 1.4	Encourage the development of residential units and the provision of related services for special needs groups, including the elderly, large households, single parents, persons with disabilities, extremely low-income persons, and persons experiencing homelessness.
Policy 1.5	Encourage infill development and recycling of land to provide adequate residential sites.
Policy 1.6	Support the assembly of small vacant or underutilized parcels to enhance the feasibility of infill development.
Policy 1.7	Facilitate the development of accessory dwelling units on single-family properties citywide.

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<b>Goal 2.</b>	<b>Assist in the development of adequate housing and provide resources to meet the needs of low- and moderate-income and special needs households.</b>
Policy 2.1	Facilitate housing development of affordable to lower-income households by providing technical assistance, regulatory incentives and concessions, and financial resources as funding permits.
Policy 2.2	Encourage the inclusion of housing affordable to lower-income households when reviewing proposals for new housing developments



- Policy 2.3 Encourage and provide incentives for both the private and public sectors to produce or assist in the production of affordable housing, with emphasis on housing affordable to persons with disabilities, seniors, large families, female-headed households with children, and people experiencing homelessness.
- Policy 2.4 As funding allows, provide rental assistance to address existing housing problems and support regional programs to assist prospective homebuyers.
- Policy 2.5 Support regional efforts to develop affordable housing and address homelessness.
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**Goal 3. Address and where legally possible, remove governmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities.**

- Policy 3.1 Review and adjust residential development standards, regulations, ordinances, departmental processing procedures, and residential fees related to rehabilitation and construction that are determined to constrain housing development.
- Policy 3.2 Utilize density bonuses, fee reductions, or other regulatory incentives, as available and appropriate, to minimize the effect of governmental constraints.
- Policy 3.3 Monitor State and federal housing-related legislation, and update City plans, ordinances, and processes as appropriate to remove or reduce governmental constraints.
- Policy 3.4 Facilitate coordination between lending institutions, the real estate and development community, and the City to better understand and address non-governmental constraints and facilitate production of affordable housing.
- Policy 3.5 Eliminate zoning and other regulatory barriers to the placement and operation of housing facilities for the homeless and special needs populations in appropriate locations throughout the City.
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**Goal 4. Conserve and improve the conditions of neighborhoods and existing housing, especially affordable housing.**

- Policy 4.1 Assist in the conservation and preservation of all affordable housing units, including mobile home parks and government-subsidized housing, and especially those at risk of converting to market rate housing.
- Policy 4.2 Promote the repair, revitalization, and rehabilitation of residential structures which have fallen into disrepair.
- Policy 4.3 Leverage State and federal loans and grants to assist in preserving existing housing and rehabilitating unsound housing structures.

- Policy 4.4 Pursue comprehensive neighborhood preservation and reinvestment strategies for portions of the community with aging and deteriorating housing and infrastructure.
  - Policy 4.5 Encourage energy conservation and sustainable building measures in new and existing homes.
  - Policy 4.6 Encourage development and long-range planning that uses compact urban forms that foster connectivity, walkability, and use of alternative transportation modes.
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**Goal 5. Promote and affirmatively further fair housing opportunities and promote housing throughout the community for all.**

- Policy 5.1 Affirmatively further fair housing related to the sale, rental, and financing of housing to avoid discrimination based on race, religion, age, sex, marital status, ancestry, national origin, color, familial status, or disability, or any other arbitrary factor.
  - Policy 5.2 Promote and affirmatively further fair housing opportunities and promote housing options throughout the community for all persons.
  - Policy 5.3 Assist in the enforcement of fair housing laws by providing support to organizations that can receive and investigate fair housing allegations, monitor compliance with fair housing laws, and refer possible violations to enforcing agencies.
  - Policy 5.4 Ensure that persons with disabilities have adequate access to housing.
  - Policy 5.5 Facilitate increased participation among traditionally underrepresented groups in the public decision-making process.
  - Policy 5.6 Provide outreach and education for the broader community of residents, residential property owners and operators regarding fair housing practices and requirements.
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## Implementing Programs

The programs below identify the actions that will be taken to address identified housing need and issues in Downey and approaches to meet state law housing requirements. Program numbers reference corresponding goals listed above.

### PROGRAM 1.1: ADEQUATE SITES

The City of Downey has a remaining RHNA of 6,332 units for the 2021-2029 RHNA planning period after credits for permitted or approved units are taken into consideration. After approved and proposed projects, projected ADU development, and sites on vacant and underutilized land for two residential designations and within the Downtown Downey Specific Plan area are identified there is a RHNA shortfall is 3,896 units. To address the shortfall, the City has identified various sites that, while appropriate for redevelopment and intensification, require General Plan amendments, zone changes,

and the addition of residential overlays to facilitate residential development. Once appropriate land use and zoning actions are taken, the City can adequately accommodate the remaining RHNA. The General Plan and Zoning update and its associated environmental review will include all necessary technical studies including a thorough infrastructure assessment and mitigation program.

### *Site Rezoning*

The RHNA shortfall to be addressed for the 2021-2029 planning period is 839 units in the very low-income category, 670 units in the low-income category, 719 units in the moderate-income category, and 1,668 in the above moderate-income category. The City will make available sites to accommodate the RHNA shortfall by:

- Completing General Plan and Zoning Code amendments to increase the allowable residential density in the Medium Density Residential (MDR) General Plan designation and R-3 zone from 18-24 units per acre to 18-40 units per acre. The sites inventory includes 24.5 acres of MDR/R-3 sites.
- Completing a land use and zone change to APN 6232-020-004 from Low Density Residential/R-1 to High Density Residential/R-3.
- Adopt an implementing zone and development standards for the Mixed-Use General Plan designation that will allow residential development at a density of at least 30 units per acre. The sites inventory includes 7.78 acres of mixed-use sites.
- Adopt a residential overlay zone that will allow high-density housing development at a density of at least 30 units per acre along key City corridors and allows residential development as a by-right use. The overlay zone will apply to non-industrial, non-R-1 zoned properties located in key areas of six key commercial corridors identified on Figure 4.2 (Residential Overlay Zone) as well as one stand-alone property (APN 6283-001-035). While the overlay applies to non-industrial, non-R-1 zoned properties located in key areas of six key commercial corridors identified on Figure 4.2 (Residential Overlay Zone), specific sites totaling 49.4 acres have been chosen for the Housing Element consistent with State law.
- Add a residential component to three key specific plan areas with densities of at least 30 units per acre. The residential component will be implemented by a residential or mixed-use overlay or by amending or rescinding the governing specific plans. The sites inventory includes three non-residential specific plans.

The 839 very low- income and the 670 low-income RHNA shortfall units are subject to the requirements of Government Code 65583.2(h) and (i)). Consistent with the requirements of Government Code 65583.2(h) and (i), the sites rezoned will allow owner-occupied and rental multifamily residential uses “by-right” for developments in which at least 20 percent of the units are affordable to lower income households. The sites will have capacity for at least 16 units per site at a density of at least 20 units per acre and at least half of the very low- and low-income housing need will be accommodated on sites designated for residential use and for which nonresidential uses or mixed-uses are not permitted. The sites inventory shows that not enough identified capacity exists on sites designated exclusively for residential use. Thus, the very low- and low-income RHNA shortfall will be accommodated on sites designated for mixed use, with land use regulations that allow stand-alone residential uses and require that at least 50 percent of the total floor area of mixed-use projects have a residential use.

The amendments and rezoning will be completed within three years of Housing Element adoption. Sites to be rezoned, listed in the sites inventory table in the appendix, have an identified total realistic capacity for 4,442 units (exceeding the RHNA shortfall).

The City will continue to facilitate redevelopment of underutilized sites through outreach methods to the development community by providing on the City's website an updated inventory available throughout the 2021-2029 planning cycle. This information will be available to interested developers as residential opportunity sites. The City will continue to track the affordability of new housing projects and progress toward meeting the City's RHNA.

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

**Funding Source:** *General Fund (staff time) and application fees*  
**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Rezoning actions within three years of Housing Element adoption; Complete an infrastructure assessment and mitigation program as part of the General Plan update and Zoning Code amendments within three years of Housing Element adoption; ongoing implementation and annual assessment of status of housing sites inventory as part of the annual reporting process; initiate direct outreach to property owners in the new residential overlay zone as part of the General Plan update and Zoning Code amendments and gauge interest in redevelopment. Add any residential overlay properties not currently included into the sites inventory if redevelopment interest is expressed. Remove/replace sites in the inventory as requested by owners to maintain adequate sites throughout the planning period as required by law. Identify sites that meet the shortfall requirements (Government Code 65583.2[h]) and those that do not, but are still considered opportunity sites, to ensure adequate sites by income level are maintained.*

## **PROGRAM 1.2: NO NET LOSS**

Government Code Section 65863 stipulates that a jurisdiction must ensure that its Housing Element inventory can accommodate its share of the RHNA by income level throughout the planning period. If a jurisdiction approves a housing project at a lower density or with fewer units by income category than identified in the Housing Element, it must quantify at the time of approval the remaining unmet housing need at each income level and determine whether there is sufficient capacity to meet that need. If not, the city or county must "identify and make available" additional adequate sites to accommodate the jurisdiction's share of housing need by income level within 180 days of approving the reduced-density project.

The City will evaluate residential development proposals for consistency with goals and policies of the General Plan and the 2021-2029 Housing Element sites inventory and make written findings that the density reduction is consistent with the General Plan and that the remaining sites identified in the Housing Element are adequate to accommodate the RHNA by income level. If a proposed reduction of residential density will result in the residential sites inventory failing to accommodate the RHNA by income level, the City will identify and make available additional adequate sites to accommodate its share of housing need by income level within 180 days of approving the reduced density project.

**Funding Source:** *General Fund (staff time) and application fees*



**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Ongoing; as part of the entitlement review process, evaluate new projects for consistency with General Plan objectives as they relate to housing and RHNA obligations*

### **PROGRAM 1.3: LAND USE POLICY CHANGES**

- Amend the General Plan Land Use Element to: 1) establish the Medium Density Residential designation density range at 18.0 to 40.0 units per acre, 2) establish a new Residential Overlay designation with a minimum density of at least 30 units per acre, and 3) ensure land use policy discussion reflects these two changes and direction to allow housing along specified corridors and within specified specific plan areas.
- In the Zoning Code and/or Specific Plans:
  - Amend regulations for the Medium Density (R-3) zone to allow up to 40 units per acre and adjust development standards accordingly.
  - Amend the Zoning Code to include a Residential Overlay that allows a minimum density of 30 units per acre and allows residential development as a by-right use. Apply the Residential Overlay to all non-industrial properties located along commercial corridors identified in the sites inventory. Require a minimum density of 30 units per acre in residential and mixed-use developments.
  - Amend the Stonewood Center, Downey Landing, and Florence/I-5 Specific Plans to allow housing at a density of at least 30 units per acre on properties identified in the sites inventory. For sites that are identified to meet the very low- and low-income RHNA shortfall, development standards in the Specific Plans will allow stand-alone residential uses and require that 50 percent of the total floor area of mixed-use projects have a residential use. As an option to amending the Specific Plans, the City may consider rescinding one or more of the plans and applying the appropriate residential zones or overlays to sites identified in the sites inventory needed to meet the RHNA shortfall.
  - Create a new zone and development standards to implement the General Plan Mixed-Use designation. Adopt standards that allow for a minimum density of at least 30 units per acre, including parking. For sites that are identified to meet the very low- and low-income RHNA shortfall, development standards will allow stand-alone residential uses and require that 50 percent of the total floor area of mixed-use projects have a residential use.
  - To increase development opportunities, identify opportunities to apply the Mixed-Use zone to other locations for future mixed-use/residential development, while considering appropriate jobs/housing balance and fiscal impacts. Pursuant to AB 1397, amend the Zoning Ordinance to require by-right approval of housing development that include at least 20 percent of the units as housing affordable to lower-income households. These provisions will apply only to sites being used to meet the sixth cycle lower-income RHNA that were previously identified in the fourth and fifth cycle Housing Elements as housing sites. These “reuse” sites are specifically identified in the Housing Element appendix.
  - Identify and codify incentives to encourage development of residential uses in areas with the new Residential Overlay and Mixed-Use zone. Incentives will include deferring fees specifically for lot consolidation, providing flexible development standards such as setback requirements, reduced/adjusted parking options and increased heights, lot coverage or floor area ratio.

- Remove the Site Plan review for mixed use developments in the Downtown Downey Specific Plan. Require only an administrative review for stand-alone residential projects or commercial uses with a residential component.
- Revise residential developments standards including minimum lot area requirements and building height limits in the R-3 zoning district and minimum unit sizes for all residential development.
- Update development standards for multi-family projects to remove the Site Plan Review requirement and allow for this review to be completed administratively without discretionary approval. Currently, the Site Plan review only applies to developments in the R-3 zone and this action will remove that requirement for all residential uses in the R-3 zone.
- Update off-street parking requirements for multi-family units to better reflect demonstrated need and take into account unit sizes (bedrooms). As part of the update, modify or remove garage requirements for multi-family units to ensure that parking is not a constraint, particularly for studio and one-bedroom units.
- Resolve General Plan and Zoning Ordinance inconsistencies in residential land use designations.
- Explore additional opportunities to expand residential development in the City, including, but not limited to, the Florence Avenue/I-5 Specific Plan (90-1).

**Funding Source:** *General Fund*

**Responsible Party:** *Community Development Department, Planning Division*

**Timeframe:** *Ongoing; Update of General Plan and Zoning Regulations and adoption of densities in the MDR/R-3 designation, mixed-use standards, and residential overlay for corridors and identified specific plan sites within three years of Housing Element adoption. Identification of additional mixed-use opportunity areas as part of a General Plan update.*

#### **PROGRAM 1.4: ACCESSORY DWELLING UNITS**

Promote the development of accessory dwelling units (ADUs) by adopting an ADU ordinance that reflects current State law, including permit streamlining processes and fee assessment. Facilitate and encourage ADU development in Downey as follows:

- Create a process to bring unpermitted ADUs up to code.
- Consider reducing development fees for ADUs.
- Create a one-stop assistance center for homeowners interested in developing an ADU. Establish a one-stop webpage on the City’s website to serve as a repository for ADU information including developments standards and requirements, fee estimated, information on ADU development through the provisions of Senate Bill 9.
- Implement, and provide to interested homeowners, state architect standard plans, when released, to support ADU development and streamline the plan check process for ADUs.
- Continue the City’s public outreach program to encourage ADU development, including advertising ADU development opportunities on the City’s website, in local newspapers, in local utility bills, and at various community centers, including the public library. Establish ADU office hours every other month to allow for one-on-one help to interested homeowners on an appointment basis.

- Monitor ADU permit applications, approvals, and affordability through the Housing Element Annual Progress Report process. Identify and implement additional incentives or other strategies, as appropriate, to ensure adequate sites during the planning period. If production falls below levels anticipated in the Housing Element, the City will evaluate and ensure that adequate sites are available through the adopted sites inventory, or it will identify additional sites to ensure continued provision of adequate sites.

**Funding Source:** *General Fund, State grants*  
**Responsible Party:** *Community Development Department, Planning Division and Building Division*  
**Timeframe:** *Adopt ordinance within two years of Housing Element adoption; ongoing ADU development support; one-stop center and ADU office hours within one year; evaluation of ADU production: annually.*  
**Quantified Objective:** *930 ADUs during the planning period (this objective is a subset of and not in addition to the Quantified Objective for Program 1: Adequate Sites)*

### **PROGRAM 1.5: DENSITY BONUS**

Maintain an affordable housing density bonus ordinance that establishes procedures for obtaining and monitoring density bonuses in compliance with State law. Update the City’s density bonus ordinance to remain in compliance with Government Code §65915. Enhance its applicability for the Downtown, Stonewood, Downey Landing, and Florence/I-5 Specific Plans. Consider providing additional incentives to developers to encourage use of the density bonus. Continue to promote the program and survey developers about interests in and constraints to using a density bonus. To show prospective developers the potential advantages of using the state’s density bonus provisions, a detailed list of completed density bonus projects in Downey and in neighboring cities and a list of available concessions will be compiled and shared with all new applicants inquiring about or submitting plans for multi-family developments.

**Funding Source:** *General Fund (staff time)*  
**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Adopt a density bonus ordinance including within two years of Housing Element adoption; Evaluate and identify additional incentives concurrent with the ordinance update (within two years of Housing Element adoption); List of density bonus project examples within one year; Gauge developer interest and constraints: during pre-submittal meetings.*  
**Quantified Objective:** *24 projects with density bonus units during the planning period (this objective is a subset of and not in addition to the Quantified Objective for Program 1: Adequate Sites).*

### **PROGRAM 1.6: INCLUSIONARY HOUSING**

Study and, if shown to be appropriate for Downey, adopt an inclusionary housing ordinance and program. As the City studies its viability, it will also determine and try to mitigate any constraints such an ordinance might have on residential development in the City.

**Funding Source:** *General Fund (staff time)*  
**Responsible Party:** *Community Development Department, Planning Division; City Council*

**Timeframe:** *Evaluate feasibility of an inclusionary ordinance within one year of Housing Element adoption; If appropriate, develop for possible adoption within four years of Element adoption.*

### **PROGRAM 1.7: PLANNED UNIT DEVELOPMENTS**

Continue to encourage Planned Unit Developments to provide affordable housing through creative development approaches. Inform developers of the density incentives under the program. Review relevant Municipal Code provisions to make sure the program complies with State law.

**Funding Source:** *General Fund (staff time)*  
**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Ongoing*

### **PROGRAM 1.8: REPLACEMENT OF UNITS ON SITES**

Pursuant to Government Code Section 65583.2(g)(3), require the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site identified in the Housing Element consistent with those requirements set forth in Government Code section 65915(c)(3). Replacement requirements shall be required for sites identified in the inventory that currently have residential uses, or within the past five years have had residential uses that have been vacated or demolished, and:

- 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; or
- Subject to any other form of rent or price control through a public entity's valid exercise of its police power; or
- Occupied by low or very low-income households For the purpose of this program "previous five years" is based on the date the application for development was submitted.

Pursuant to Government Code section 66300(d) (Chapter 654, Statutes of 2019 (SB 330)), the City shall not approve a housing development project that will require the demolition of residential dwelling units regardless of whether the parcel was listed in the inventory unless a) the project will create at least as many residential dwelling units as will be demolished, and b) certain affordability criteria are met.

**Funding Source:** *General Fund (staff time)*  
**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Ongoing*

### **PROGRAM 2.1: SPECIAL NEEDS HOUSING**

Provide housing opportunities to meet the needs of special needs residents—including seniors, residents with disabilities and developmental disabilities, large families, extremely low-income households, and those experiencing homelessness—by giving priority to development projects that include a component for special needs groups in addition to other lower-income households.

Expand incentives available to senior housing to all special needs housing types, including reduced parking standards and unit sizes, increased height allowances, and maximum lot coverage. Provide additional regulatory incentives and concessions to projects targeted for special needs groups.



Encourage developers of single-family dwellings to incorporate universal design and/or "visitability" improvements.

**Funding Source:** *Community Development Department budget (staff time) and other sources, as available*

**Responsible Party:** *Community Development Department, Planning Division*

**Timeframe:** *Ongoing; Establish a list of regulatory and/or financial incentives for special needs housing within one-year.*

## **PROGRAM 2.2: HOUSING FOR PERSONS WITH DISABILITIES**

Assist in meeting the housing needs for persons with disabilities, including persons with developmental disabilities, by implementing the following actions:

- Assist developers who seek State and Federal monies in support of housing construction and rehabilitation targeted for persons with disabilities, including persons with developmental disabilities.
- Provide regulatory incentives and concessions to projects targeted for persons with disabilities, including persons with developmental disabilities.
- As part of the land use policy changes, revise the permit and processing procedure for group homes for 7+ clients to ensure that these uses are treated objectively, do not discriminate against persons with disabilities, and provide approval certainty for housing for persons with disabilities.

**Funding Source:** *Community Development Department budget*

**Responsible Party:** *Community Development Department, Planning and Housing Divisions*

**Timeframe:** *Support grant applications at least once during the planning period; develop informational material within two years of Housing Element adoption; provide incentives for development of housing for persons with disabilities on an ongoing basis; Permit processing procedure review as part of the land use updates to be completed within three years of Housing Element adoption.*

## **PROGRAM 2.3: AFFORDABLE HOUSING DEVELOPMENT INCENTIVES**

As a community approaching full build-out, the City has few remaining vacant sites. The relative scarcity of vacant land necessitates the use of alternative mechanisms for providing sites for housing. In addition, the City has fiscal challenges to maintaining service levels. The City will use a toolkit of housing incentives programs to facilitate the construction of affordable and market rate housing products and will implement the following actions:

- Use Development Agreements to secure long-term fiscal and affordable housing benefits with a focus on development projects on City-owned property in the Downtown Downey Specific Plan area and at the Downey Landing commercial center.
- Provide, when possible, developer incentives such as expedited permit processing and developer impact fee deferrals for units that are affordable to lower-income households, including extremely low-income households.

- Use resources such as HUD Section 208/811 loans, HOPE II and III Homeownership program funds, HOME funds, CDBG funds, Low-Income Housing Tax Credit Programs, and California Housing Finance Agency single-family and multi-family programs to stimulate private developer and non-profit entity efforts in the development and financing of housing for lower- and moderate-income households.
- Facilitate discussions between developers and local banks to meet their obligations pursuant to the California Community Reinvestment Act (CCRA) providing favorable financing to developers involved in projects designed to provide lower and moderate-income housing opportunities.

**Funding Source:** HUD, HOME, CalHFA, General Fund (staff time)  
**Responsible Party:** Community Development Department, Planning and Housing Divisions  
**Timeframe:** Ongoing; Establish a list of regulatory and/or financial incentives for special needs housing within one-year; If no projects with affordability components have been developed on City-owned land, issue an RFP for development on City-owned properties that includes a development agreement to secure an affordability component within three years of Housing Element adoption (following General Plan and Zoning update).  
**Quantified Objective:** Provide assistance and incentives to 4 special needs projects during the planning period; Development of 2 residential or mixed-use projects with an affordability components on City-owned land.

#### **PROGRAM 2.4: AFFORDABLE HOUSING TECHNICAL ASSISTANCE**

- Provide pre-application technical assistance to affordable housing providers to determine project feasibility and address zoning and code compliance issues in the most cost-effective and expeditious manner possible.
- Consult with local affordable housing developers, including offering letters of support for grant applications, advising on local zoning and code compliance, and facilitating partnerships.
- Encourage multi-family housing development near transit routes.
- Maintain a list of mortgage lenders participating in the California Housing Finance Agency (CHFA) loan programs and refer the program to builders or corporations interested in developing housing in the City.
- Educate the community on the importance of equitable access for all residents and neighborhoods to affordable housing and financial support

**Funding Source:** General Fund (staff time)  
**Responsible Party:** Community Development Department, Planning Division  
**Timeframe:** Ongoing; pre-application technical assistance to all residential development applicants that includes options, incentives, and resources (list of affordable housing developers and affordable housing financing agencies/programs) or technical assistance for including affordable units in the project; Within 1 year compile a list of local for profit and nonprofit developers and lenders/finance programs for property owners interested in developing housing; Consultation with local developers (including nonprofit developers) to start immediately after Housing Element adoption and continue annually and also as part of the General Plan and zoning update outreach process (to occur within one to two years); Addition of opportunities for multifamily housing along transit routes as part of the General Plan and zoning update (including the addition of the residential

*overlay along the City's major corridors) within 3 years; Education on equitable access to affordable housing as part of the inclusionary housing ordinance process (currently underway with the Affordable Housing Subcommittee through potential ordinance adoption by 2023) and as part of the General Plan update outreach process (within 3 years).*

**Quantified Objective:** *Assist 5 affordable housing projects*

## **PROGRAM 2.5: AD HOC COMMITTEE FOR AFFORDABLE HOUSING**

Continue to convene the Ad Hoc Committee for Affordable Housing, launched in 2021, to discuss housing affordability issues in Downey and explore concepts to be included in the General Plan and Zoning Code amendments, such as (but not limited to) inclusionary housing. Serve as an ongoing space for residents to share concerns and ideas related to affordable housing in the City.

**Funding Source:** *General Fund (staff time)*

**Responsible Party:** *Community Development Department, City Council*

**Timeframe:** *2021 to 2029*

**Quantified Objective:** *Meet quarterly throughout the planning period*

## **PROGRAM 2.6: FIRST-TIME HOME BUYER ASSISTANCE**

Continue to support first-time, low-and moderate-income home buyers in Downey by connecting interested residents and members of the public to the Mortgage Credit Certificate and First Home Mortgage programs, run by Los Angeles County Development Authority (LACDA). Direct residents to the LACDA offices and website and review key eligibility requirements. Advertise and encourage interested first-time, low-income homebuyers in Downey to apply for the federal Home Ownership Program (HOP), financed with HOME funds provided by the U.S. Department of Housing and Urban Development (HUD). Coordinate with Downey service providers and other community-based organizations to publicize housing assistance programs. Provide information on housing programs on the City's website and via social media, through flyers posted at City facilities, and via staff assistance at City Hall.

**Funding Source:** *General Fund (staff time)*

**Responsible Party:** *Community Development Department, Housing Division*

**Timeframe:** *2021 to 2029; Update the City's website to post a list of resources and regional agencies assisting first-time home buyers including eligibility requirements, provide the list at City facilities, on the City's social media pages, and to community organizations within one year.*

**Quantified Objective:** *Coordinate with the County to assist 15 first time homebuyers during the planning period.*

## **PROGRAM 2.7: ADDRESS HOMELESSNESS**

Implement the City's Plan to Prevent and Combat Homelessness, which includes the following goals:

- Ensure all City staff are equipped to address the intersection of homelessness and their departments by providing trainings with local service providers on engagement techniques and available services.

- Facilitate City and broader community working groups to address homelessness and housing affordability in Downey.
- Mobilize and engage Downey residents, businesses, and faith communities to advocate for and champion long-term solutions to prevent and address homelessness.
- Continue to support local organizations that provide emergency resources and provide opportunities for service expansion, such as co-location at City of Downey facilities.
- Continue to participate in regional efforts to address homelessness, and support additional bridge housing, access centers, and other homeless services offered in the region.
- Identify potential sites in the City for emergency shelters to serve unmet needs of those in Downey experiencing homelessness.
- Ensure the Zoning Code defines supportive and transitional housing as residential uses.
- Provide rental assistance and services coordination to prevent Downey residents from becoming homeless.

In addition to the goals above, the City will:

- Continue working with service providers and other non-profit organizations who aid residents experiencing homelessness and provide technical support as needed.
- Support and promote local housing opportunities for Downey residents by seeking space for local veterans experiencing homelessness in the Veterans Commons, 100 units of transitional housing planned for development in the Rancho Los Amigos South Campus Specific Plan area.

**Funding Source:** *General Fund (staff time)*

**Responsible Party:** *Community Development Department, City Manager's Office*

**Timeframe:** *2021 to 2029; Zoning revisions for emergency shelter siting and development standards within one year of Housing Element adoption (see Program 3.5); Veterans Commons development to be completed by end of 2022; Biweekly meetings with Veterans Commons developer; Presentation on best practices and regional issues and opportunities related to addressing homelessness to the Ad Hoc Committee for Affordable Housing in 2022.*

**Quantified Objective:** *Assist 50 persons experiencing homelessness into housing as indicated in the City of Downey Consolidated Plan 2020-2024 (Assist 25 persons experiencing homelessness 2020-2024)*

## **PROGRAM 2.8: COUNTY AND REGIONAL PARTNERSHIPS**

Coordinate with LACDA and other Los Angeles County agencies to promote local supportive housing development and rental opportunities for Downey residents, including Veterans Commons and the Restorative Care Village. The Rancho Los Amigos South Campus Specific Plan area is owned by the County of Los Angeles and while the City does not have land use jurisdiction over the property, the City will coordinate with the County and encourage housing development opportunities in the Rancho Los Amigos South Campus Specific Plan area. Coordinate with Gateway Council of Governments to explore regional solutions to address housing needs.

**Funding Source:** *General Fund*

**Responsible Party:** *Community Development Department, Planning and Housing Divisions; City Managers' Office*



**Timeframe:** *Ongoing; Veterans Commons development to be completed by end of 2023; Biweekly meetings with Veterans Commons developer; Discussion with staff from the County of Los Angeles on any proposed development applications to ensure they meet the goals outlined in the Rancho Los Amigos South Campus Specific Plan.*

## **PROGRAM 2.9: MONITOR AND PRESERVE AFFORDABLE HOUSING AND AT-RISK UNITS**

Maintain an inventory of affordable housing units in the City, with unit affordability information to ensure landlords are compliant with deed restrictions. Continue to work with non-profit organizations, like Habitat for Humanity and PATH, to preserve existing affordable housing in the City. Pursue funding for ownership when necessary.

While no subsidized affordable units in the City currently are at risk of conversion to market rate, City staff will be prepared to provide technical assistance to owners, tenants, and non-profit housing corporation buyers of existing subsidized low-income housing complexes to extend subsidy contracts and/or find government financing (e.g., HOME funds) for acquisition of affordable rental units. If conversion of a subsidized complex or other affordable housing to market rate becomes likely, the City will work with tenants of at-risk units and provide them with education regarding tenant rights, first right of refusal, and conversion procedures. The City will also provide tenants information regarding Housing Choice Voucher (Section 8) rent subsidies through the Housing Authority and other affordable housing opportunities.

In addition, to promote the preservation of affordable housing in Downey, the City will explore the development of a community land trust to preserve the affordability of the housing stock. Work with regional transportation agencies to minimize and, if possible, eliminate the loss of housing in the City due to planned transportation expansion projects, such as the widening of Interstate 5.

**Funding Source:** *CDBG, HOME*  
**Responsible Party:** *Community Development Department Planning Division and Housing Division*  
**Timeframe:** *Ongoing*  
**Quantified Objective:** *Preserve 195 units of affordable housing through the planning period (as listed in Chapter 2: Community Profile/Housing Needs Assessment)*

## **PROGRAM 2.10: HOUSING CHOICE VOUCHERS (SECTION 8)**

- Continue partnership with the Los Angeles County Development Authority (LACDA), which administers the Housing Choice Voucher (Section 8) rental assistance program in Downey through a memorandum of understanding (MOU) with the City. Support additional Housing Choice Vouchers in the community and encourage rental property owners to rent to Housing Choice Voucher holders and register their units with the LACDA.
- Affirmatively market and promote the use of Housing Choice Vouchers in high opportunity areas.
- Advertise and encourage landlords in Downey to participate in the Homeless Incentive Program run by LACDA, which provides financial support for property owners who rent to homeless Section 8 voucher holders.

- Continue to monitor the number of residents accessing the Housing Choice Voucher program, households on the wait list, and units available for rent. Direct interested residents to the County website and continue to provide information on the program, including new legal requirements pursuant to SB 329, which prohibits housing discrimination on the basis of source of income (including Housing Choice Vouchers).

**Funding Source:** U.S. Department of Housing and Urban Development (HUD)  
**Responsible Party:** Community Development Department, Housing Division in coordination with LACDA  
**Timeframe:** Ongoing  
**Quantified Objective:** Preservation of 455 vouchers in use in Downey (2020)

**PROGRAM 2.11: COVID-19 PANDEMIC RENTAL AND MORTGAGE ASSISTANCE**

The City has allocated \$950,000 to provide rental assistance to income eligible households adversely affected by the COVID-19 pandemic. The City provided rental assistance to 457 Downey renters in June 2020 to cover one month of rental payments for income eligible households. In 2021, the City updated the program guidelines to extend assistance from 1 month to 3 months of rental assistance to income eligible households, who’s income was adversely affected by the COVID-19 pandemic. As of May 2021, the city has assisted a total of 184 households.

As funding allows, provide financial assistance, including rental assistance to Downey residents suffering from income loss due to the COVID-19 pandemic. As funding allows, expand to support homeowners at risk of foreclosure based on demonstrated ongoing need and funding availability.

Publicize the State’s COVID-19 rent relief program, which is being administered by the California Business, Consumer Services and Housing Agency, and open to income eligible Downey households who need financial assistance for unpaid rent between April 1, 2020, and March 31, 2021.

**Funding Source:** HOME, Set Aside Funds, CDBG-CV Cares Act  
**Responsible Party:** Community Development Department Housing Division  
**Timeframe:** As needed  
**Quantified Objective:** Rental and mortgage assistance to 300 households during planning period, as funding permits

**PROGRAM 2.12: REASONABLE ACCOMMODATION FOR PERSONS WITH DISABILITIES**

Adopt a Reasonable Accommodation Ordinance as required by State law and implement procedures within one year. Accommodate persons with disabilities who seek reasonable waiver or modification of land use controls and/or development standards pursuant to procedures and criteria set forth in the Municipal Code. Continue to administer the Housing Rehabilitation and Assistance program to assist disabled households with accessibility modifications to their homes. Coordinate with Downey health care and other service providers to publicize the program to eligible residents.

Continue to implement and enforce State accessibility standards and the provisions of the Americans with Disabilities Act (ADA). Provide updated information regarding reasonable accommodation on the City’s website, at City Hall and at other public facilities. Facilitate training sessions with City staff,

developers, service providers and residents regarding reasonable accommodation and ensuring equal access to housing for residents with disabilities.

**Funding Source:** *Community Development Department budget*  
**Responsible Party:** *Community Development Department, Planning and Housing Divisions*  
**Timeframe:** *Adopt ordinance or resolution within one year of Housing Element adoption; ongoing implementation*

### **PROGRAM 3.1: LOT CONSOLIDATION**

Encourage lot consolidation of smaller parcels to accommodate larger residential and mixed-use development projects on vacant and/or underutilized sites through provisions in the Zoning Code. As part of the General Plan and Zoning update, adopt additional incentives for projects that include lot consolidation as a way of adding more residential units to a project. Incentives will include deferring fees specifically for consolidation, providing flexible development standards such as setback requirements, reduced/adjusted parking and increased heights, lot coverage or floor area ratio. Continue to promote the program at City Hall and on the City's website.

**Funding Source:** *Community Development Department budget*  
**Responsible Party:** *Community Development Department, Planning Division*  
**Timeframe:** *Ongoing; Adopt incentives as part of the update of General Plan and Zoning Regulations within three years of Housing Element adoption.*

### **PROGRAM 3.2: DEVELOPMENT PROCESS STREAMLINING**

Continue to monitor permit processing times and investigate ways to continue to streamline the process. Continue to digitize information, including building permits, to better understand timelines. Expedite permit processing and reduce unnecessary delays by completing upgrades to the City's existing online permitting and licensing program as part of the City's Building Homes and Jobs Act (SB2, 2017) grant.

As of July 17, 2020, HCD determined that the City of Downey was subject to SB 35 streamlining for proposed developments with 50 percent or greater affordability. To accommodate future SB 35 applications and inquiries, the City will create and make available an informational packet that explains SB 35 streamlining provisions in Downey and provides SB 35 eligibility information.

**Funding Source:** *Community Development Department budget ; grants*  
**Responsible Party:** *Community Development Department, Planning Division and Building Division*  
**Timeframe:** *Ongoing; electronic plan check system during FY 2021-2022; SB 35 informational material within one year of Housing Element adoption*

### **PROGRAM 3.3: OBJECTIVE DESIGN STANDARDS**

Adopt objective design standards to ensure that the City can provide local guidance on design and standards for by-right projects as allowed by State law. Adoption of objective design standards will facilitate high-quality residential development and compliance with State objectives. The objective design standards will ensure provision of adequate private open space, parking, and related features, as well as architectural design.

**Funding Source:** Community Development Department budget ; grants  
**Responsible Party:** Community Development Department, Planning Division  
**Timeframe:** Within two years of Housing Element adoption

### **PROGRAM 3.4: PLANNING AND DEVELOPMENT FEES**

Continue to conduct annual reviews of planning and development fees to ensure that the fees are not excessive and are appropriate to cover the cost of services provided. Pursue additional streamlining opportunities to minimize costs for services as well as those assumed by the project applicant.

**Funding Source:** Community Development Department budget  
**Responsible Party:** Community Development Department, Planning Division  
**Timeframe:** Ongoing; annual review of fees

### **PROGRAM 3.5: SPECIAL NEEDS HOUSING LAW**

- Amend the Zoning Code to define employee housing and to clarify that employee housing serving six or fewer employees shall be deemed a single-family structure and shall be subject to the same standards for a single-family residence in the same zone consistent with the Employee Housing Act.
- Amend the Zoning Code to allow development of emergency shelters in the M-2 zone instead of the H-M zone and make the following changes to the zoning code consistent with State Law (Government Code Section 65583.(a)(4)):
  - Change the City’s distancing requirement for emergency shelter
  - Remove the requirements for criminal background of staff at emergency shelters;
  - Modify or remove the parking requirements related to spaces per beds to reflect sufficient parking to accommodate all staff, provided that the standards do not require more parking for emergency shelters than for other residential or commercial uses within the same zone, and,
  - Adjust hours of operation and curfew times to ensure compliance with State law.
- Review the Zoning Ordinance and other pertinent documents such as Specific Plans to make any necessary changes to ensure compliance with the Supportive Housing Streamlining Act (AB 2162) and AB 101 (Low-Barrier Navigation Centers).

**Funding Source:** Community Development Department budget  
**Responsible Party:** Community Development Department, Planning Division  
**Timeframe:** Emergency Shelter, Employee Housing, and AB 2162 and AB 101 zoning changes within one year of Housing Element Adoption.

### **PROGRAM 3.6: DEFINITION OF FAMILY**

As part of the General Plan and Zoning update, Modify/replace the Zoning Ordinance definition of “family” to ensure it does not exclude allowed uses and is inclusive/nondiscriminatory. Modify/replace the definition as appropriate.

**Funding Source:** Community Development Department budget  
**Responsible Party:** Community Development Department, Planning Division



**Timeframe:** *Adoption Update of General Plan and Zoning Regulations within three years of Housing Element adoption.*

### **PROGRAM 3.7: REMOVE DEVELOPMENT CONSTRAINTS**

Review development standards periodically to ensure that they do not constrain development of affordable housing and housing for special needs groups, such as individuals with disabilities. Revise development regulations and processes where it is needed and appropriate to address any identified constraints.

**Funding Source:** *General Fund*

**Responsible Party:** *Community Development Department, Planning Division*

**Timeframe:** *Ongoing; annual review*

### **PROGRAM 3.8: ENERGY CONSERVATION**

- Encourage energy-efficient design and energy conservation, and help residents minimize energy-related expenses. Maintain and distribute literature on energy conservation, including solar power, additional insulation, and subsidies available from utility companies, and encourage homeowners and landlords to incorporate these features into construction and remodeling projects.
- Encourage maximum utilization of federal, State, and local government programs, such as the County of Los Angeles Home Weatherization Program, that assist homeowners in providing energy conservation measures.
- Continue to provide information on home loan programs available through the City and encourage residents to use the programs to implement energy efficient design.
- Encourage and explore additional funding opportunities for energy conservation devices, including but not limited to lighting, water heater treatments, and solar energy systems in all residential projects.
- Review ordinances and recommend changes where necessary to encourage energy-efficient housing design and practices that are consistent with State regulations and advances in technology. Continue to enforce the State energy standards of the California Green Building Code.

**Funding Source:** *Community Development Department budget , CDBG, HOME*

**Responsible Party:** *Community Development Department, Planning and Building & Safety Divisions*

**Timeframe:** *Ongoing; Energy conservation information available two years after adoption of the Housing Element; Modifications to the City's development standards to ensure compliance with the latest energy conservation laws as part of the update to the General Plan and Zoning Regulations within three years of Housing Element adoption.*

**Quantified Objective:** *Rehabilitation assistance to approximately 20 low- and moderate-income households annually through the City's Housing Rebate And Grant Program, which covers energy-efficient design and energy conservation upgrades and*

*modifications (or 166 households during the planning period) in rehabilitation assistance program as indicated in the City of Downey Consolidated Plan 2020-2024. (this objective is also included in Program 4.2); Modifications to the City's development standards to ensure compliance with the latest energy conservation laws.*

### **PROGRAM 3.9: WATER AND SEWER SERVICE PROVIDERS**

Submit the adopted Housing Element to City of Downey water and sewer service providers—including internal City departments—in accordance with Government Code Section 65589.7 and coordinate with relevant contacts regarding their review and input. The City provides water and sewer services in Downey and do not have procedures in place to grant priority for the provision of water and sewer services to proposed developments that include units affordable to lower-income households as required by law. The City's sewer and water departments will adopt required procedures to grant priority for the provision of water and sewer services to proposed developments that include units affordable to lower-income households as required by Government Code 65589.7.

**Funding Source:** *General Fund (staff time)*  
**Responsible Party:** *Community Development Department, Planning Division; Public Works*  
**Timeframe:** *Submit the adopted Housing Element to City of Downey water and sewer service providers within 30 days of adoption of Element; Adopt required procedures to grant priority for the provision of water and sewer services to proposed developments that include units affordable to lower-income households as required by Government Code 65589.7 within three years of Housing Element adoption; Coordination – ongoing.*

### **PROGRAM 3.10: NON-GOVERNMENTAL CONSTRAINTS**

Continue to monitor and evaluate development standards and advances in housing construction methods. Although the City has limited influence over non-governmental constraints, if non-governmental constraints are identified, the City will review, and if necessary, revise, any development regulations or processes that can potentially lessen those constraints.

**Funding Source:** *Community Development Department budget*  
**Responsible Party:** *Community Development Department, Planning, Housing, and Building & Safety Divisions*  
**Timeframe:** *Ongoing implementation*

### **PROGRAM 4.1: CODE ENFORCEMENT**

Continue to use code enforcement to support housing preservation and neighborhood quality and identify housing maintenance issues. Continue the City's proactive code enforcement program that targets areas of concentrated rehabilitation needs, results in repairs, and mitigates potential cost, displacement, and relocation impacts on residents. Continue code enforcement referrals of property owners with compliance needs to housing staff for rehabilitation assistance.

**Funding Source:** *Community Development Department budget , CDBG*

**Responsible Party:** Community Development Department, Code Enforcement Division  
**Timeframe:** Ongoing  
**Quantified Objective:** Assist 4,000 low- and moderate-income persons through the Code Enforcement program as indicated in the City of Downey Consolidated Plan 2020-2024 (assist 500 persons annually 2020-2024)

#### **PROGRAM 4.2: HOUSING REBATE AND GRANT PROGRAM**

Provide grant assistance of up to \$35,000 to very low-income households to address code enforcement violations and health and safety concerns, and to complete exterior painting. Grants can also be used to complete exterior and interior home repairs and make architectural modifications to achieve ADA compliance or reasonable accommodation for residents with disabilities. Provide refunds of 50 or 80 percent to low-income homeowners who have completed property, structural, and energy and/or water conservation improvements. The City anticipates that 20 projects will be assisted annually based on funding availability.

**Funding Source:** CDBG and HOME  
**Responsible Party:** Community Development Department, Housing Division  
**Timeframe:** Ongoing  
**Quantified Objective:** Rehabilitation assistance to 20 low- and moderate-income households annually (or 166 households during the planning period) as indicated in the City of Downey Consolidated Plan 2020-2024.

#### **PROGRAM 5.1: FAIR HOUSING**

Continue to contract with and refer fair housing complaints to the Fair Housing Foundation, whose services include counseling and mediation between tenants and landlords, fair housing trainings, workshops, and outreach. Facilitate public education and outreach by creating informational, multilingual informational material on fair housing that will be made available at public counters, libraries, post office, other community locations and on the City's website.

Promote public awareness of federal, State, and local regulations regarding equal access to housing. Provide information to the public on various state and federal housing programs and fair housing law. Maintain referral information on the City's web site and at a variety of other locations such as community and senior centers, local social service offices, social media, via email, and at other public locations including City Hall and the library.

**Funding Source:** CDBG  
**Responsible Party:** Community Development Department, Housing Division  
**Timeframe:** Ongoing; Conduct fair housing workshops four times per year as part of fair housing workshops by the Fair Housing Foundation and other housing related events.  
**Quantified Objective:** Refer 290 Downey residents annually to Fair Housing Services as indicated in the City of Downey Consolidated Plan 2020-2024 (35 persons annually).

**PROGRAM 5.2: AFFIRMATIVELY FURTHERING FAIR HOUSING**

The City promotes and affirmatively furthers fair housing opportunities and promotes housing for all persons, including those protected by the California Fair Employment and Housing Act and any other State and federal fair housing and planning laws. Chapter 3 summarizes the fair housing issues and concerns in Downey based on research conducted as part of this Housing Element update and supplemented by findings of the City’s 2020-2024 Analysis of Impediments to Fair Housing Choice. Program 5.2 includes the following summary of the issues, contributing factors, and the City’s actions in addressing these issues.

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
Displacement risk due to regional economic pressure (Priority: High)	<ol style="list-style-type: none"> <li>1. Inadequate supply/production of affordable/special needs housing</li> <li>2. Displacement of residents due to regional economic pressures</li> <li>3. High land and development costs in the region</li> <li>4. Land use and zoning laws</li> </ol>	<p>The two identified fair housing issues are closely related, as such, the meaningful and quantifiable action items address both issues (displacement risk and disproportionate housing need). Related program actions in other programs in this Housing are noted and program details, measurable outcomes, and timeframe for implementation can be found under the referenced program.</p>
Disproportionate housing needs in areas with lower incomes and higher proportions of renters (Priority: High)	<ol style="list-style-type: none"> <li>1. Inadequate supply/production of affordable/special needs housing</li> <li>2. Displacement of residents due to regional economic pressures</li> <li>3. Median gross rents lower than some more expensive areas of the region, such as West Los Angeles and the South Bay</li> <li>4. Location of environmental health hazards</li> </ol>	<p><b>A. Increase affordable housing opportunities:</b></p> <ul style="list-style-type: none"> <li>• Ensure that all development applications are considered, reviewed, and approved without prejudice to the proposed residents, contingent on the development application’s compliance with all entitlement requirements. <i>Metric/Timeframe: Annually evaluate (as part of the APR process) the outcome of development applications for affordable or special needs housing; Annual and ongoing</i></li> <li>• Apply for or support applications for affordable housing funds for projects or programs that are consistent with the goals and objectives of the Housing Element. <i>Metric/Timeframe: Annual and ongoing; Apply for one program per year.</i></li> <li>• Conduct outreach and education on the new source of income protections regarding the use of Housing Choice Vouchers. Annually include in the City’s social media and website, multilingual versions of the Sources of Income Fact</li> </ul>



Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p>Sheet and FAQ made available by the California Department of Fair Employment and Housing. Provide information for rental property owners and managers on the benefits of participation in the Housing Choice Voucher.</p> <p><i>Metric/Timeframe: one outreach effort per year, post once per year on source of income protections; by December 2023, annually thereafter.</i></p> <ul style="list-style-type: none"> <li>• Affirmatively marketing available development sites to at least 2 affordable housing developers annually with a focus on City owned (fully or partially) sites <i>Metric/Timeframe: Market 2 development sites per year and conduct one outreach event per year; By December 2023, annually thereafter.</i></li> <li>• Increase allowable development densities (and overall capacity) in key zones in the City including a new residential overlay and mixed-use Zone as a means of encouraging new multi-family development for residents priced out of the ownership market (see Program 1.3: Land Use Policy Changes)</li> <li>• Expand opportunities for higher density residential development by allowing residential development at key, underused commercial centers with Specific Plans. (see Program 1.3: Land Use Policy Changes)</li> <li>• Expand opportunity for by-right residential development by permitting by-right residential uses in the Residential overlay and commercial Specific Plan areas identified in Program 1.3 and by removing the Site Plan Review requirement for multi-family projects to allow for an administrative review without discretionary approval. (see Program 1.3: Land Use Policy Changes)</li> <li>• Promote the development of accessory dwelling units (ADUs) by adopting an ADU ordinance that reflects current State</li> </ul>

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p>law, including permit streamlining processes and fee assessment. (see Program 1.4: Accessory Dwelling Units)</p> <ul style="list-style-type: none"> <li>• Study and, if shown to be appropriate for Downey, adopt an inclusionary housing ordinance and program to increase the City’s stock of affordable housing. (see Program 1.6: Inclusionary Housing)</li> <li>• If no projects with affordability components have been developed on City-owned land, issue an RFP for development on City-owned properties that includes a development agreement to secure an affordability component within three years of Housing Element adoption (following General Plan and Zoning update). (see Program 2.3: Affordable Housing Development Incentives)</li> <li>• Within 1 year compile a list of local for profit and nonprofit developers and lenders/finance programs for property owners interested in developing housing; Consultation with local developers (including nonprofit developers) as part of the General Plan and zoning update outreach process (within 1 to 2 years). (see Program 2.4: Affordable Housing Technical Assistance)</li> <li>• Update the City’s website to post a list of resources and regional agencies assisting first-time home buyers including eligibility requirements, provide the list at City facilities, on the City’s social media pages, and to community organizations within one year. (see Program 2.6: First-Time Home Buyer Assistance)</li> <li>• Remove discretionary review for by-right projects by adopting objective design standards to ensure that the City can provide local guidance on design and standards as allowed by State law. (Program 3.3: Objective Design Standards)</li> </ul>

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p><b>B. Address displacement risk:</b></p> <ul style="list-style-type: none"> <li>• Address potential displacement by requiring the replacement of units affordable to the same or lower income level as a condition of any development on a nonvacant site identified in the Housing Element Program (see Program 1.8: Replacement of Units On Sites)</li> <li>• Support additional Housing Choice Vouchers in the community and encourage rental property owners to rent to Housing Choice Voucher holders. Send an annual notice to all multifamily property owners in Downey about participation in the HCV program including available incentives from the LACDC. Increase landlord participation in the HCV program by 20% by 2029. Ensure use of HCV in high opportunity areas. Increase use of available HCV in high opportunity areas by 25%. Support additional participation in the Homeless Incentive Program run by LACDA, which provides financial support for property owners who rent to homeless HCV holders by 5%. Coordinate with the LACDC by April 2023 to establish a baseline number of landlords that have registered to participate in the HCV program, the number of HCV by Census tract, and the number of property owners that have participated in the Homeless Incentive Program. Evaluate participation changes and the geographic distribution of HCV by opportunity designation annually.</li> <li>• Provide financial assistance including rental assistance to 300 income-eligible households suffering from income loss due to the COVID-19 pandemic during the planning period. (see Program 2.11: Covid-19 Pandemic Rental And Mortgage Assistance)</li> <li>• Establish a list of regulatory and/or financial incentives for special needs housing within one-year. Expand incentives available to senior housing to all special needs housing types, including reduced parking standards and unit sizes, increased</li> </ul>

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p>height allowances, and maximum lot coverage. Provide additional regulatory incentives and concessions to projects targeted for special needs groups. Assist in the development of 2 special needs housing developments during the planning period. (see Program 2.1: Special Needs Housing)</p> <ul style="list-style-type: none"> <li>• Preserve affordable housing units by providing technical assistance to owners, tenants, and non-profit housing corporation buyers of existing subsidized low-income housing complexes to extend subsidy contracts and/or find government financing (e.g., HOME funds) for acquisition of affordable rental units. Preserve 195 units of affordable housing through the planning period. (see Program 2.9: Monitor And Preserve Affordable Housing And At-Risk Units)</li> </ul> <p><b>C. Address disproportionate need/placed-based strategies:</b></p> <ul style="list-style-type: none"> <li>• Create new housing opportunities in higher need areas. Through the Residential Overlay. Three-quarters of the acreage in the Residential Overlay is in high resources areas. The City will target 50% of new affordable/lower income units in higher resources areas.</li> <li>• Continue the City’s proactive code enforcement program that targets areas of concentrated rehabilitation needs, results in repairs, and mitigates potential cost, displacement, and relocation impacts on residents. Continue code enforcement referrals of property owners with compliance needs to housing staff for rehabilitation assistance. Assist 4,000 low- and moderate-income persons through the Code Enforcement program (500 persons annually) 2020-2024. (see Program 4.1: Code Enforcement)</li> <li>• Provide housing rehabilitation assistance to 20 low- and moderate-income households annually through grant</li> </ul>



Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p>assistance of up to \$35,000 to very low-income households to address code enforcement violations and health and safety concerns, and to complete exterior painting or refunds of 50 or 80 percent to low-income homeowners who have completed property, structural, and energy and/or water conservation improvements. (see Program 4.2: Housing Rebate And Grant Program).</p> <ul style="list-style-type: none"> <li>• Pursue funding and target neighborhoods of concentrated poverty for investment in rehabilitation, parks, transit, and active transportation. Ensure economic development plans reflect the needs of lower-opportunity neighborhoods. Metric/Timeframe: Establish a priority list of investment projects in high need areas (based on factors such as DAC designation, proportion of low/moderate income households, and opportunity index scores) by December 2023. Complete one priority investment project and one rehabilitation project per year.</li> <li>• Provide information to the public on various state and federal housing programs and fair housing law. Maintain referral information on the City’s web site and at a variety of other locations such as community and senior centers, local social service offices, social media, via email, and at other public locations including City Hall and the library. Conduct four fair housing workshops per year as part of fair housing workshops by the Fair Housing Foundation and other housing related events. Assist at least 290 Downey residents annually (see Program 5.1: Fair Housing)</li> <li>• Continue to employ a wide variety of media and methods to notify the public of important housing decisions and opportunities to provide input. Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide</li> </ul>

Identified Fair Housing Issue and Priority (high, medium, low*)	Contributing Factors	Actions/Metrics/Milestones
		<p>interpretation and translation services when requested at public meetings. Prioritize community and stakeholder engagement during controversial development decisions. Metric/Timeframe: Expand access to community meetings for 50 residents annually through accessibility accommodations (physical or language). (see Program 5.3: Outreach)</p> <p><b>D. Address environmental hazards:</b></p> <ul style="list-style-type: none"> <li>• Adopt an Environmental Justice Element with a focus on identifying steps that can be taken to address Census Tracts with a “Disadvantaged Community” designation and environmental issue identification and actions. <i>Metric/Timeframe: Adopt an Environmental Justice Element by December 2024</i></li> <li>• Update and Implement the Analysis of Impediments to Fair Housing Choice and HUD Consolidated Plan. <i>Metric/Timeframe: Update the AI in 2025 and address identified fair housing issues and contributing factors identified in the Housing Element. Ongoing.</i></li> </ul>
<p>* State law requires that prioritization of contributing factors giving highest priority to those factors that most affect fair housing choice or access to opportunity in Downey.</p>		

**Funding Source:** General

**Responsible Party:** Community Development Department, Housing Division

**Timeframe:** Varies by action item, see action items above.

**Objective:** Promote and affirmatively further fair housing opportunities for all persons.

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## PROGRAM 5.3: OUTREACH

- Continue to employ a wide variety of media and methods to notify the public of important housing decisions and opportunities to provide input.
- Prioritize community and stakeholder engagement during controversial development decisions.
- Conduct public meetings at suitable times, accessible to persons with disabilities, and near public transit. Resources will be invested to provide interpretation and translation services when requested at public meetings.
- Expand outreach to non-profit developers, area service providers, and community-based organizations. Partner with local community-based organizations to hold community meetings to gain input from Downey residents about housing needs, issues, and ideas to support the development of more affordable housing in the City. Invest resources to provide food, childcare, interpretation, and translation services at these events.
- Actively recruit residents from underserved neighborhoods to participate on committees to address homelessness and affordable housing needs.
- Develop presentations and/or materials which address the local need for affordable housing and more resilient neighborhoods.
- Consider developing a housing resources handbook for Downey residents, homeowners, and developers.

**Objective:** *Offer interpretation/translation services at every meeting; create a stakeholder/community organization list to contact for outreach related to controversial development decisions by 2023; post information in English language alternatives for every meeting related to controversial development decisions; Ongoing.*

**Funding Source:** *General Fund (staff time)*

**Responsible Party:** *Community Development Department, Planning and Housing Divisions; City Managers' Office*

**Timeframe:** *Create a stakeholder list by 2023; Ongoing*

## Summary of Quantified Objectives

**Table 6.1** summarizes the City's quantified objectives for the 2021-2029 planning period by income group. While all programs list specific action to be undertaken, not all program actions are quantifiable and therefore only key programs include quantified objectives. The objectives are aggregated from the programs that indicate quantified objectives and are grouped under three categories as indicated in State Housing Element law. Not included in **Table 6.1** is an additional 4,340 persons or households who will be assisted under the Fair Housing, Code Enforcement, Homeless Assistance programs.

- The Construction Objective represents the City's remaining (after counting as credit the units with approved or issued permits) 2021-2029 RHNA of 6,332 units.
- The Rehabilitation Objective represents objectives for the Housing Rehabilitation Assistance program (20 low- and moderate-income households annually or 166 households during the planning period). The objective is divided between the lower three income categories as follows: 20%, 40%, 40%.
- The Conservation/Preservation objective refers to maintenance of the current level of assistance (455 vouchers) through the Housing Choice (formerly Section 8) Voucher program from the Los



Angeles County Development Authority (LACDA), the preservation of 195 units of affordable housing identified in the affordable housing at-risk analysis in Chapter 2: Community Profile and Needs Assessment and the provision of COVID-19 rental/mortgage support to 300 low-income households for a total assistance to 950 units/households.

**Table 6.1: Quantified Objectives**

Objectives	Income Levels					Total
	Extremely Low- Income (0-30% AMI)	Very Low-Income 3(0-50% AMI)	Low-Income (50-80% AMI)	Moderate-Income (80-120% AMI)	Above Moderate-Income (120%+ AMI)	
Construction Objective *	1,013	1,014	896	915	2,494	6,332
Rehabilitation Objective	33	66	67	--	--	166
Conservation/Preservation Objective	950			--	--	950
Total	4,039			915	2,494	7,448

\*Note: The City of Downey is not responsible for the actual construction of these units. The City is, however, responsible for creating a regulatory environment in which the private market could build these units. This includes the creation, adoption, and implementation of General Plan policies, zoning standards, and/or incentives to encourage the construction of various types of units.

# **Appendix A: Public Outreach**





# downey general plan

# housing element

## APPENDIX A. PUBLIC OUTREACH

This appendix discusses the City of Downey’s public outreach to date during the development of the 2021-2029 Housing Element. The sections below include summaries of the first of two planned community workshops and a citywide survey to gather input about Downey housing needs. A third section lists organizations contacted through the City’s outreach work.

### SUMMARY, COMMUNITY WORKSHOP #1

On December 17, 2020, the City conducted a community workshop to gather input from key local stakeholders, housing advocates, and residents. The meeting included a PowerPoint presentation about the intent of the Housing Element update and Regional Housing Needs Assessment (RHNA), opportunities to meet local housing needs, and creative approaches to address the City’s constraints to housing production, which was followed by a facilitated discussion regarding housing issues. The workshop had 58 attendees. Below is a summary of themes from the workshop, and screenshots of the notes taken during the meeting.

Key themes emerged during the discussion, including:

- The need for more affordable, multi-family housing
- Consider residents first, especially most vulnerable
- Housing near transit and transit-oriented development
- Revisit City zoning code and land use planning policies
- Less restrictive development standards
- Supporting Accessory Dwelling Unit (ADU) and tiny house development
- Address climate change issues and resilience
- Parking, safety, and traffic concerns
- Potential negative effects of freeway expansion on Downey neighborhoods

When asked about challenges, respondents talked about strict development standards and zoning, parking and traffic, limits on ADU development, declining affordability in the City, and the need for City staff to do more outreach and to educate the community on what level of income “affordable” housing serves.

Responses when asked about the types of housing needed in Downey included affordable, family friendly housing, tiny houses, housing for vulnerable populations, diverse housing types, middle housing like duplexes and triplexes, and housing built with a focus on connectivity, and along transit corridors.

Participants were asked where in the City they felt new housing could be accommodated. Responses included along transportation corridors, providing expanded opportunities for mixed use development and ADUs, row housing, and housing that would accommodate students and young people. There were also concerns raised about how new housing would accommodate parking for new units.

The group had many creative solutions for addressing housing needs in Downey. Allowing creative ADU designs and easing ADU restrictions, creating more flexible zoning laws, introducing more mixed use designations, and allowing housing on other land uses, developing parking structures to address new parking needs, encouraging walkable communities, creating policies to promote climate friendly and resilient building design, and initiating a community land trust for affordable housing. Other comments included focusing on pedestrian and bike safety, advocating for homeowners against expansion of the freeway, educating the community about local 20-minute communities, and working toward preserving the culture, character, and history of the City of Downey.

The following pages display visuals of notes taken during the discussion.

# Screenshots of Mural Notes from Workshop #1 (see following pages for larger views of detail)



December 17, 2020  
6:00 - 8:00 pm

### Discussion Questions

- Question 1.** What are the major housing issues/challenges in Downey?
- Question 2.** What types of housing are particularly needed in the community?
- Question 3.** Downey's RHNA is **6,510** housing units. The City has challenged this allocation. If this allocation becomes final, where can new housing be accommodated in the City and what are creative solutions to address the need for housing in Downey?

### Key Themes



### Major Challenges

More housing will create increased need for parking	Parking requirements should be reduced to allow densification	Support walkability and bicycling by providing more infrastructure
High RHNA number	City no longer has funding for the same major programs as in the past	Department is not fully funded to address transportation
Address parking infrastructure	Lower density for single family homes	Density in decreasing neighborhoods
Use ADU incentives	Support ADU construction	ADU
Work on multi-use bike lanes	Need more funding for multi-use trails and bike lanes	Need to be strategic about where we build multi-use trails
High density use of parking lot to create park or parking space	Many residents have been told they can't build a garage	Transition to higher density of parking
Address street parking	Address parking infrastructure	ADU incentives for walk areas
Parking in & around	Need to build out of City and use as a buffer to our urban core	Messaging around to encourage residents that we're not just building
✓✓✓		

### Housing Needs

City issues:	Address housing types	Make it easier to build parking infrastructure
Address climate change	Addresser support forms with low cost for tenants	Multi-family
Need housing for the most vulnerable - look out for vulnerable but	Addresser support forms with low cost for tenants	

### New Housing

Address new housing needs to meet the needs of the most vulnerable	ADU/Incentives	ADU/Incentives
ADU/Incentives	ADU/Incentives	ADU/Incentives

### Creative Solutions

Affordable housing programs for low income	More space - changing zoning	ADU/Incentives for ADU/Incentives
ADU/Incentives	ADU/Incentives	ADU/Incentives
ADU/Incentives	ADU/Incentives	ADU/Incentives

### Additional Comments

Don't build around areas with high traffic, accident rates	The current RHNA number is 6,510 units in the city of Downey	People built 1000	Present at culture, commerce, and history of City	RHNA number is the 3,000 units in the last 10 years	Which options would be completed this year/next year/next 5 years								
Address other for parking													



December 17, 2020  
6:00 - 8:00 pm

### Discussion Questions

- Question 1.** What are the major housing issues/challenges in Downey?
- Question 2.** What types of housing are particularly needed in the community?
- Question 3.** Downey's RHNA is **6,510** housing units. The City has challenged this allocation. If this allocation becomes final, where can new housing be accommodated in the City and what are creative solutions to address the need for housing in Downey?

### Key Themes





Screenshot of Mural Notes from Workshop #1

## Major Challenges

More housing will create increased need for parking	Parking requirements should not be decreased for multi-family homes	Impact traffic safety, especially around schools
High RHNA number	City no longer has funding for first time buyer program(s) - for about 5 years	Outreach so far for the housing element - representation
✓ Abolish parking minimums/ requirements	Down-zoned for single family homes	Downey is becoming unaffordable
strict ADU restrictions	✓ Transportation corridors - haven't allowed multi-fam units to be built along corridors	✓ Zoning

Setback and min sq ft for units	Social media/ Facebook to communicate with public and share information	Mindful of language around how we talk about affordable housing
Not every unit of housing has to correlate with a parking space	Many residents (from large mutl-fam buildings) park on residential streets and leave them there	Translation captioning in meetings
Limited street parking	✓ Appropriate parking allocated with new development (safety and practicality)	Strict standards to build units
Parking is a need	Getting pushed out of a City that we've lived in our whole lives	Messaging needs to accurately address that 140% AMI is aff housing
✓✓✓ Traffic		

Screenshot of Mural Notes from Workshop #1

## Housing Needs

Tiny houses	Diverse housing types	Multi-family along transportation corridors
Increase connectivity throughout the City	Affordable decent homes with low rent for families	✓ Middle housing
Build housing for the most vulnerable - look out for minorities first	✓ Outdoor open space with new development	

## New Housing

Any/all new housing would be required to meet parking standards	Along transportation corridors	Row homes
ADUs	✓ Mixed Use	We need new housing - but not luxury housing units!
New housing for college students, young people, or single		

Screenshot of Mural Notes from Workshop #1

## Creative Solutions

Affordable housing programs for first time buyers	Think about changing zoning	Hold City accountable for RHNA number
Allow creative ADU designs	Allow/ Introduce Mixed Use Designations	Is there anything we can do within this plan to allow the City more flexibility?
<div style="text-align: center;">✓</div> Parking structures	Flexible zoning laws - City to revisit strict zoning standards	State level - key tool is through land use planning and zoning
Incentives for community land trusts for affordable housing	Ease restrictions on ADUs	Tax incentives to developers?
City Council to use eminent domain	Pathway for currently illegal ADUs - make it safe for those currently living in them, bring them up to code	Incentives for solar panels
talk about climate change and link to housing conversation	TOD around new rail line	Housing integrated throughout Old Rancho Los Amigos Campus

Urgency to address these issues	Make use of non-essential land uses such as commercial property and private recreation	Acquiring properties and providing them at low cost to developers
Everyone should have guaranteed housing	Traffic analysis	Encourage walkable communities/self sustainable communities
create housing policies and programs that are in line with the Resilient Cities initiative	Incentivize small businesses	Community gardens and access to healthy foods
Promote policies and programs that reduce the burden on our electrical grid through climate-cooled buildings	Priority should be given to existing residents	Include public art - should be part of new development
Ideas for outreach methods: more background into why housing is needed - sprawl and infrastructure for more sustainable practices		



Screenshot of Mural Notes from Workshop #1

# Additional Comments

Don't build around areas with high traffic accident rates	The current freeway expansion plans to demolish through 250+ homes in Downey, part of Unsworth Elementary & Dennis the Menace Park	need to be shown tradeoffs of continued suburban development vs identifying opportunities to foster local, 20-minute communities	People over profit
Add safe bike lanes	Make it safer for walking		

✓ Preserve culture, character, and history of City	RHNA number is low - 300 units in the last 10 years	RHNA number should be considered min (or the floor) not the ceiling



## SUMMARY, COMMUNITY WORKSHOP #2

On June 14, 2021, the City conducted a community workshop to gather feedback on the Public Review Draft Housing Element from key local stakeholders, housing advocates, and residents. The meeting included a PowerPoint presentation presenting key portions of the 2021-2029 Housing Element, including site suggestions and programs the City will undertake to address housing issues in Downey and to meet State law housing requirements. The workshop had 58 attendees and included a dedicated Spanish breakout room where the presentation was conducted in Spanish, however there were no attendees who chose to participate in Spanish. Both English and Spanish versions of the presentations were recorded and posted to the City's website for residents not able to make the meeting. Below is a summary of themes from the workshop, and screenshots of the notes taken during the meeting.

Key themes emerged during the discussion, including:

- Expand availability of affordable, multi-family housing
- Encourage development near transit corridors
- Parking, traffic, and overcrowding concerns
- Having a future orientation to support young people growing up in Downey and young families who want to stay in the City
- Balancing the needs of long-time homeowners and renters
- More support needed for lower income, rent-burdened households
- Address growing climate impacts

When asked about how the City might encourage more housing development in Downey, recommendations from the group included:

- Reduce or remove parking requirements
- Support pooled parking opportunities for developments
- Encourage development along transit corridors and expanding bike infrastructure
- Support tiny home development to help alleviate homelessness
- Explore how rezoning might encourage more affordable developments
- Ensure long-term affordability covenants on housing
- Focus new multi-family developments in areas with lower impacts
- Seek more input from under-represented groups

**D City of Downey Housing Element Community Workshop**

June 14, 2021  
6:00 - 8:00 pm

# SHARE YOUR THOUGHTS

## Draft 2021-2029 Housing Element



### Comments/Questions

Expand zoning for multi-family housing	Residents want to stay in Downey but not many places for rent	Will the City focus on transit corridor developments along Green Line?	How does the Housing Element help current renters with stagnating wages?	Concern about current traffic conditions in City	Concerns about growing homelessness due to rent burdens	How does rezoning lead to develop affordable units?	Can sites with older buildings/businesses be considered for new housing?
Access to parking is not as important for younger residents	Does this plan address parking requirements?	Increasing densities may be a challenge in some areas	How can community handle an increase in students, burdens to schools?	This plan creates capacity for Downey to grow by 6500 units	Support working people and help prevent homelessness	Will transitional housing include more security/police presence?	Consider that we are building for the future, address growing climate impacts
Parking conflicts - having a parking requirement for new housing is needed	Not complying with State law may have negative financial impacts	The main issue is that there are not enough places for people to live in	How does the Housing Element measure units and tenants?	Concerns about parking for future development	Lack of parking causes overflow into other neighborhoods	More advertising about meetings	Support TOD, mixed use, affordable housing with longer term rent restrictions
Families need space and parking	Inclusionary housing - should help not hurt residential development	How do you define affordable housing? paying 30% of income	New housing is vital to our community	Young people cannot afford to stay in Downey, in region	Is transitional housing a part of the 6,500?	Impact of parking and traffic around Rancho. Will the impact study be released?	Impossible for younger people to afford to live in Downey
What can the City do to support rent-burdened households?	How does the plan take into account the implications to traffic, crowding?	Few housing opportunities near Green Line, transit	Units on LA County owned land count toward Downey's RHNA	High density housing does not allow for quality of life, no recreation room for kids or outside activities			

### Recommendations

Reduce/ Remove Parking Requirements	focus multifamily housing in areas with lower impacts	Use more county land to build affordable housing	Make sure that new residents have the same access to quality living environments as established residents do	Consider joint parking opportunities among developments	Create communities with green space, access to transit, new schools for additional students
Ensure long term affordability covenants on housing	Address the climate crisis - reducing driving by placing housing near areas with transit and bike infrastructure	Encourage development along transit corridors	More outreach and advertising for community meetings/ input	Be future oriented so kids can stay here into adulthood if they choose	Seek input from underrepresented people for broad community input
Look to neighboring cities for ideas	Consider how rezoning might lead to more development of affordable units	Don't make parking mandatory	Support young working families	Have a tiny home village for unhoused community members	Study traffic and parking patterns as these are impacted by new housing and businesses

Screenshot of Mural Notes from Workshop #2

# Comments/Questions

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# Recommendations

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## SUMMARY, COMMUNITY SURVEY



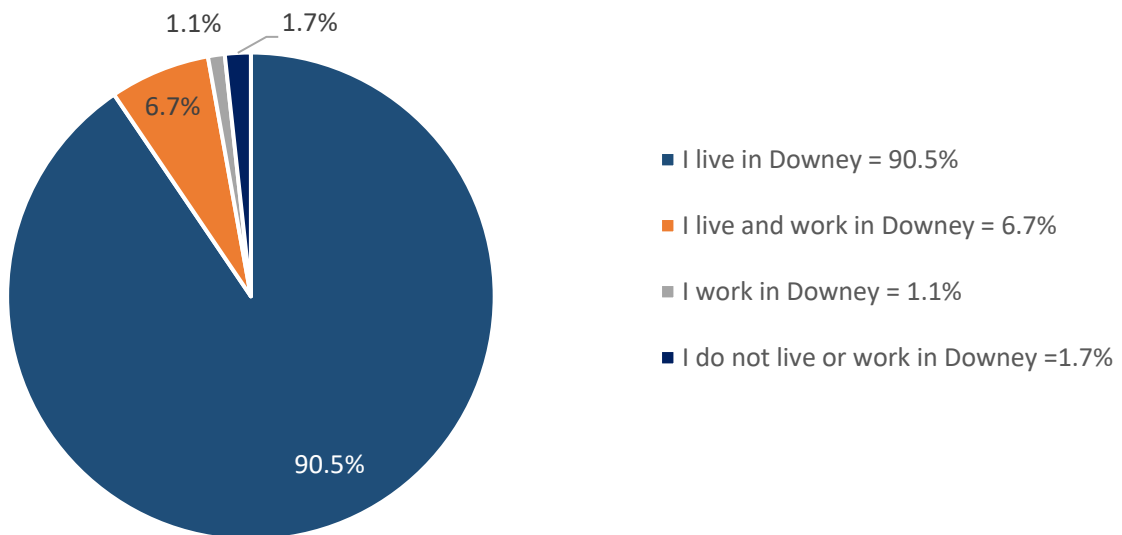
### City of Downey Housing Element Update Community Survey: Meeting Our Housing Needs

Survey Results, March 1, 2021

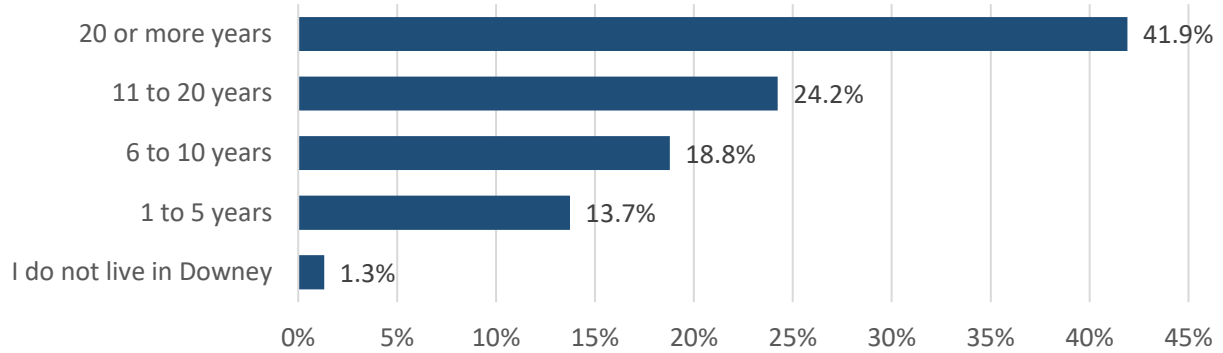
The City of Downey developed a community survey to gather feedback for its 2021 Housing Element Update from Downey residents, workers, property owners and others interested in housing issues in the city. The survey was posted on the City of Downey’s website, from December 18, 2020, to February 2, 2021, and available in both English and Spanish. The survey received a total of 991 responses; 54 surveys (5.4%) were completed using the Spanish language version of the survey.

The figures below display respondents’ answers on how the city of Downey might meet its housing needs in the coming years. The “n =” which follows at the end of each figure heading refers to the total number of respondents who answered each question.

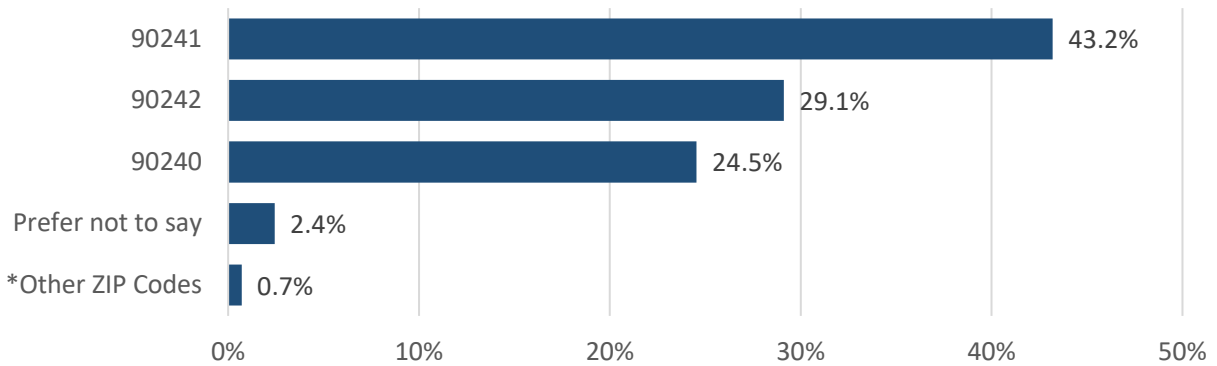
**Figure 1: Currently, do you live or work in Downey? (Question 1; n=991)**



**Figure 2: How long have you lived in Downey? (Question 12; n=990)**

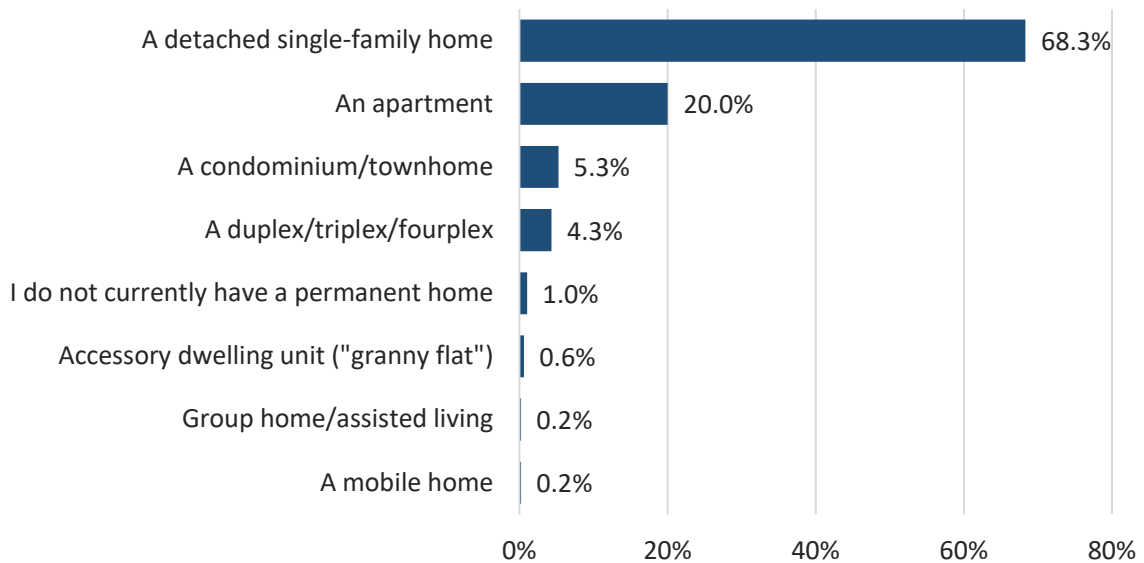


**Figure 3: Which ZIP code do you reside in? (Question 17; n=986)**

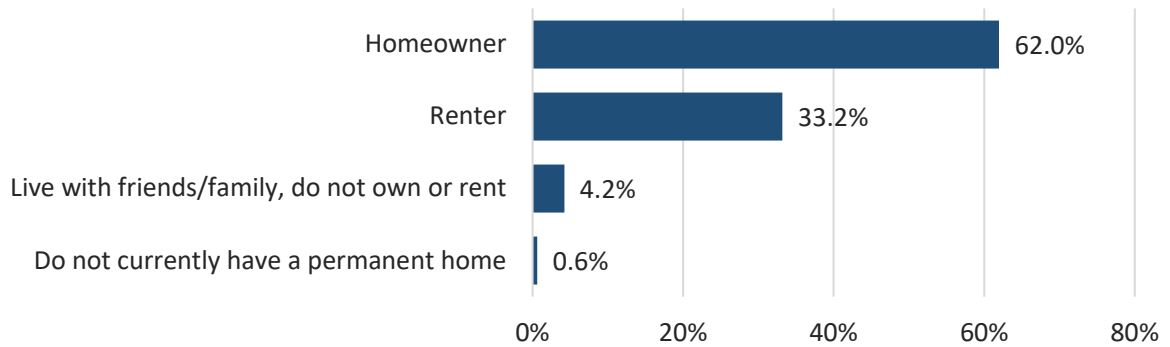


\*Other ZIP Codes include: 90710; 91745; 90220; 90280 and 92395.

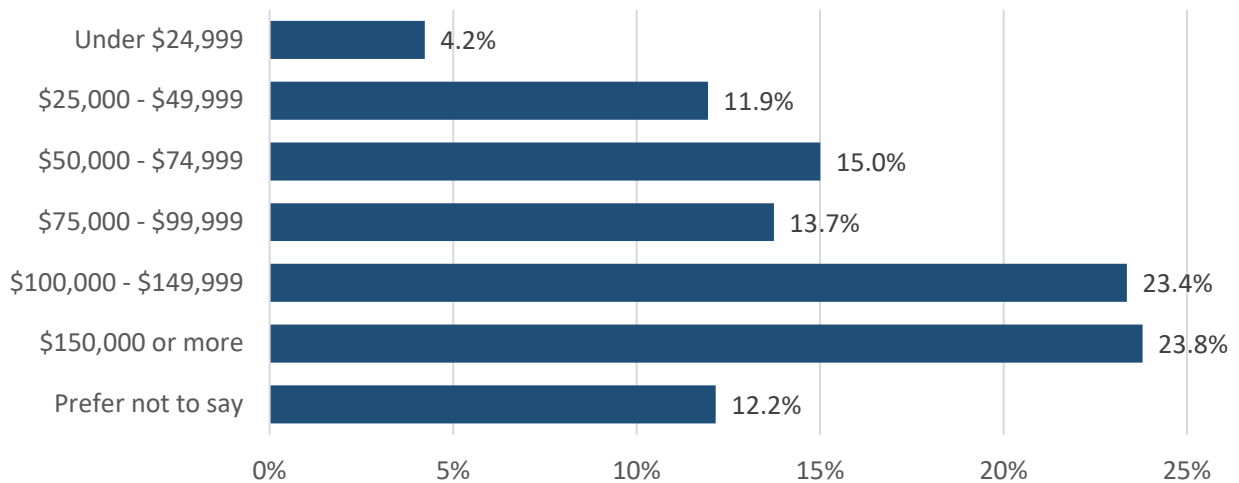
**Figure 4: Which best describes your current living situation? (Question 2; n=969)**



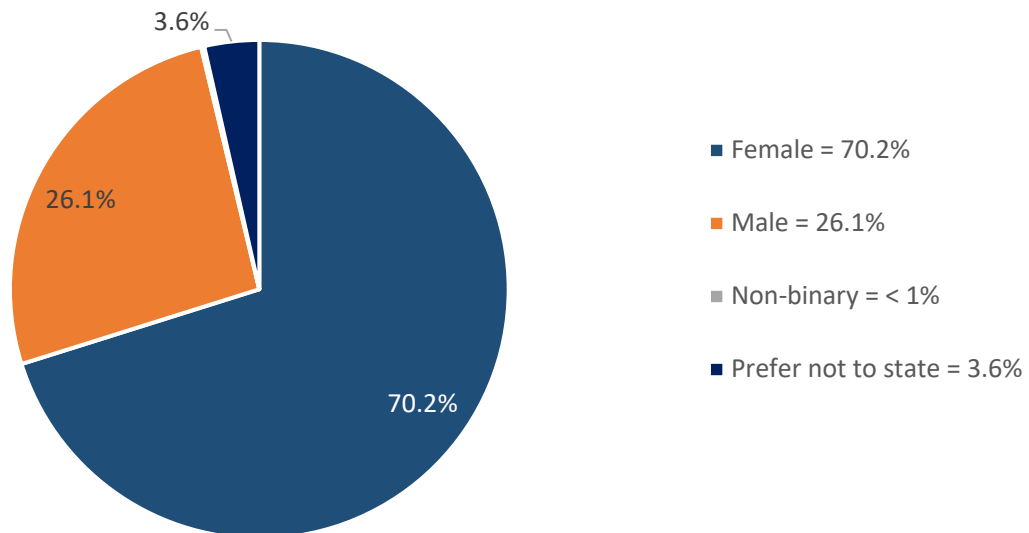
**Figure 5: Which best describes your current housing situation? (Question 3; n=973)**



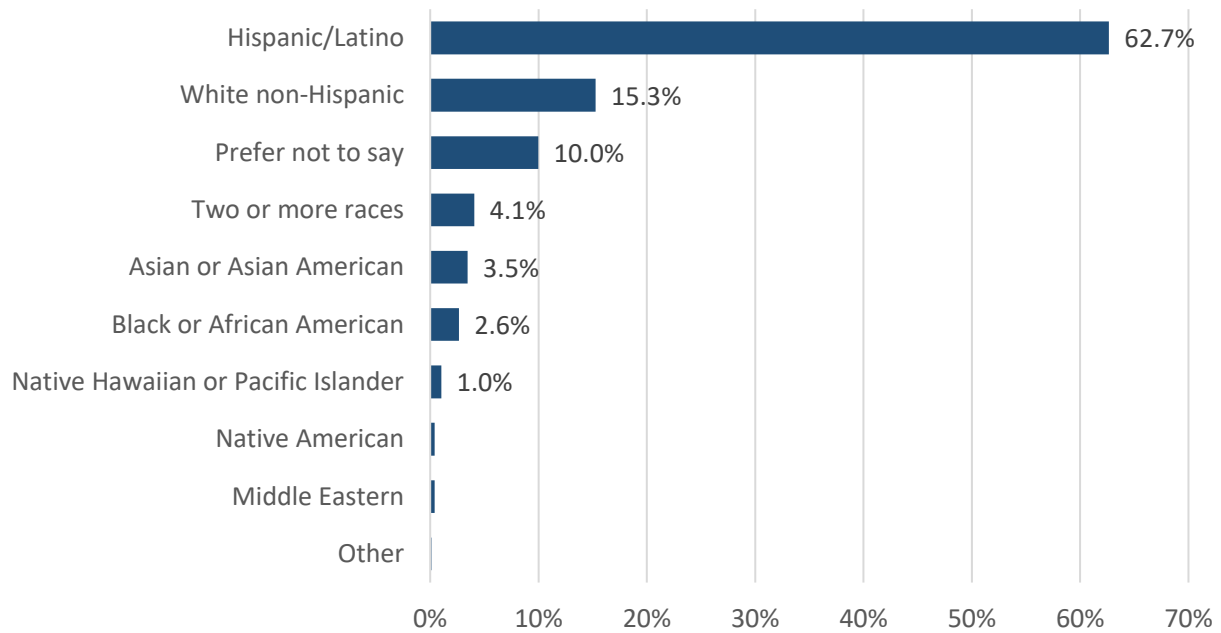
**Figure 6: Which best describes your annual household income? (Question 18; n=986)**



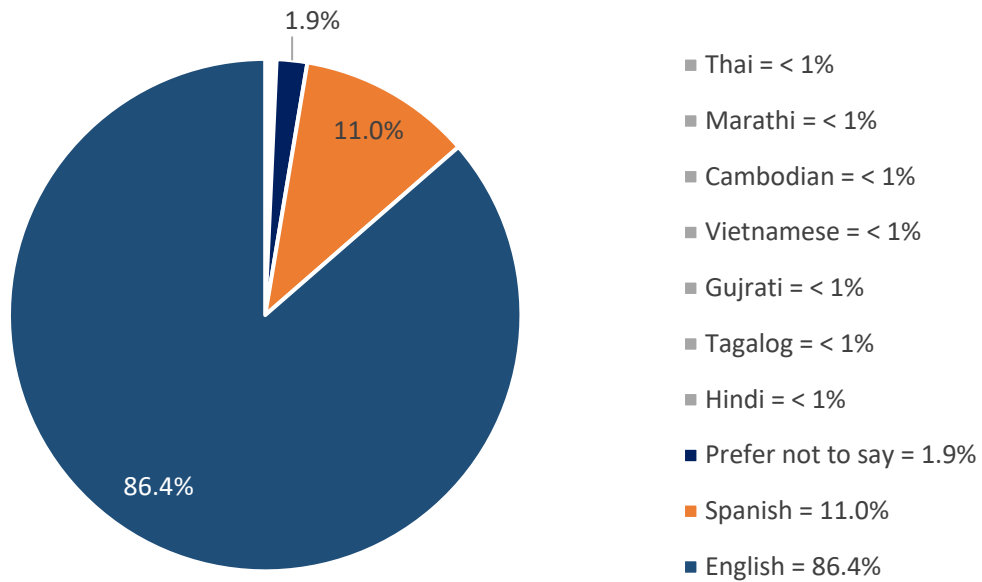
**Figure 7: Please indicate your gender (Question 13; n=985)**



**Figure 8: How do you identify yourself? (Question 14; n=983)**

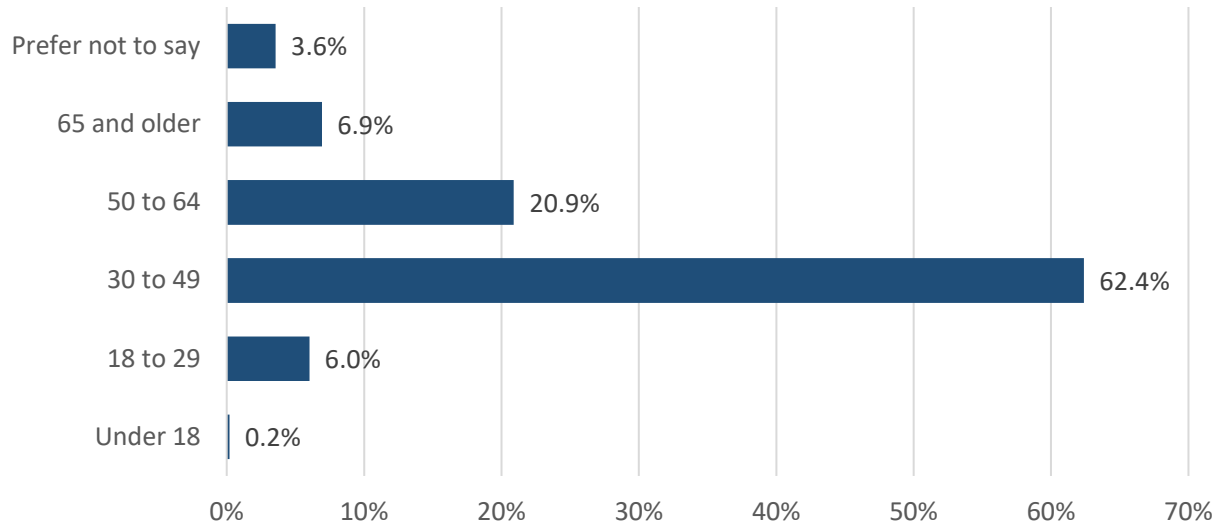


**Figure 9: What language is primarily spoken in your household? (Question 15; n=985)**

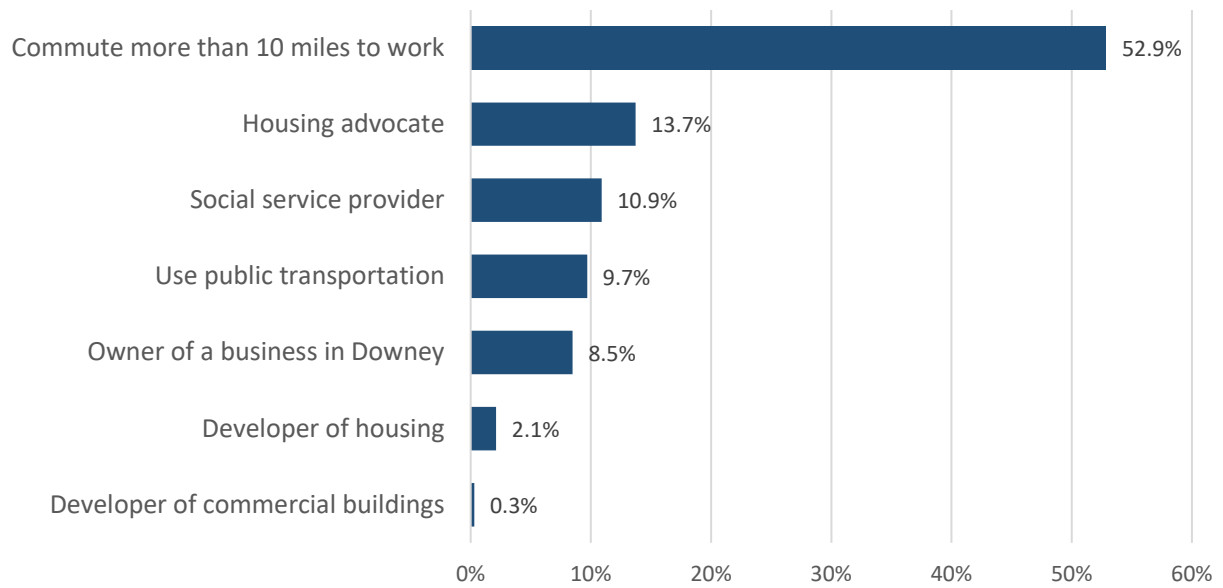




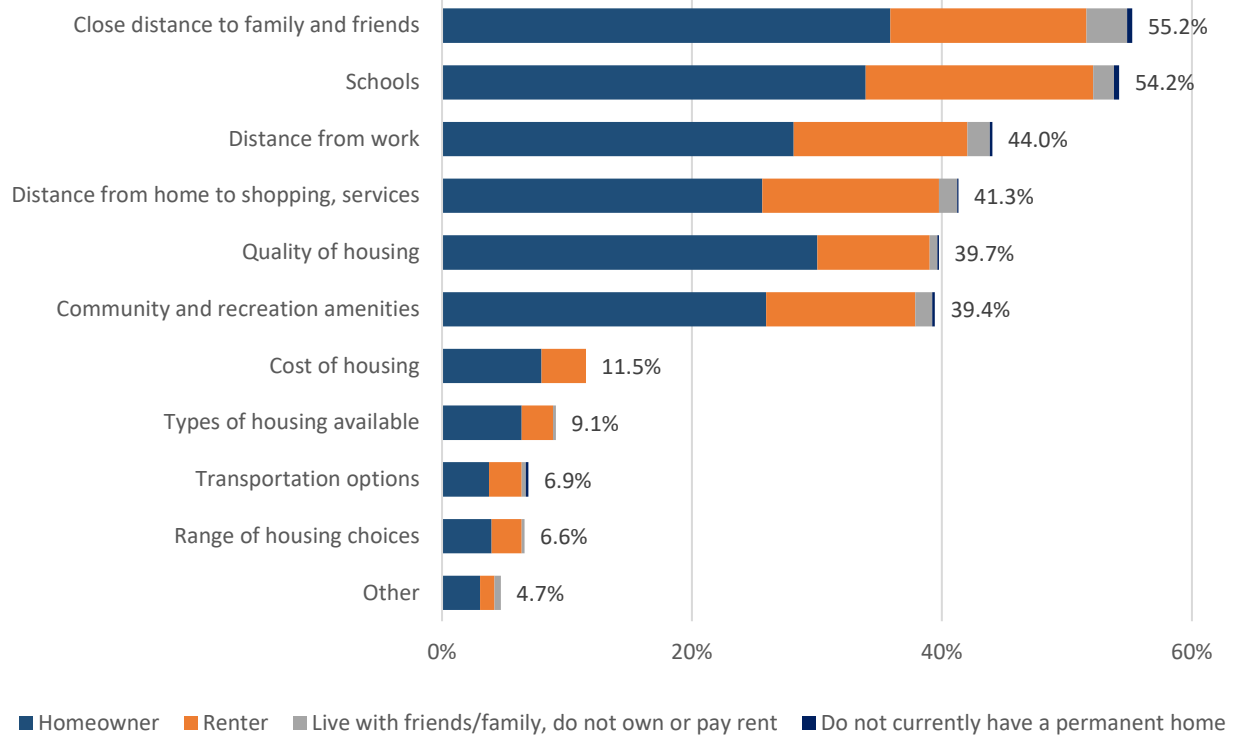
**Figure 10: How old are you? (Question 16; n =981)**



**Figure 11: Check all that apply. "Do you/Are you a..." (Q19; n=991)**



**Figure 12: What are your reasons for living in Downey? Choose all that apply. (Question 4; n=956)**

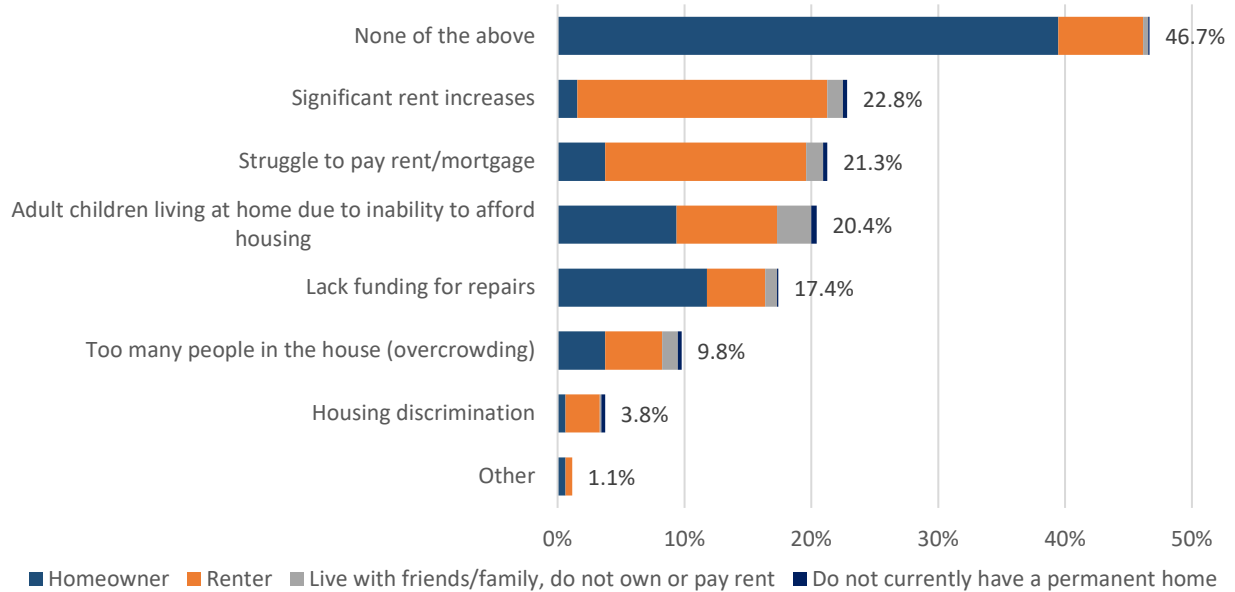


**Figure 13: What are your reasons for living in Downey? “Other” responses (n=45)**

The size of phrases below are based upon the number of similar “other” responses to this question. For instance, seven survey respondents said they had lived in Downey for a long time, and another six indicated they were born and raised in Downey. Two respondents mentioned good neighborhoods as the reason they lived in Downey, while another two respondents talked about affordability.



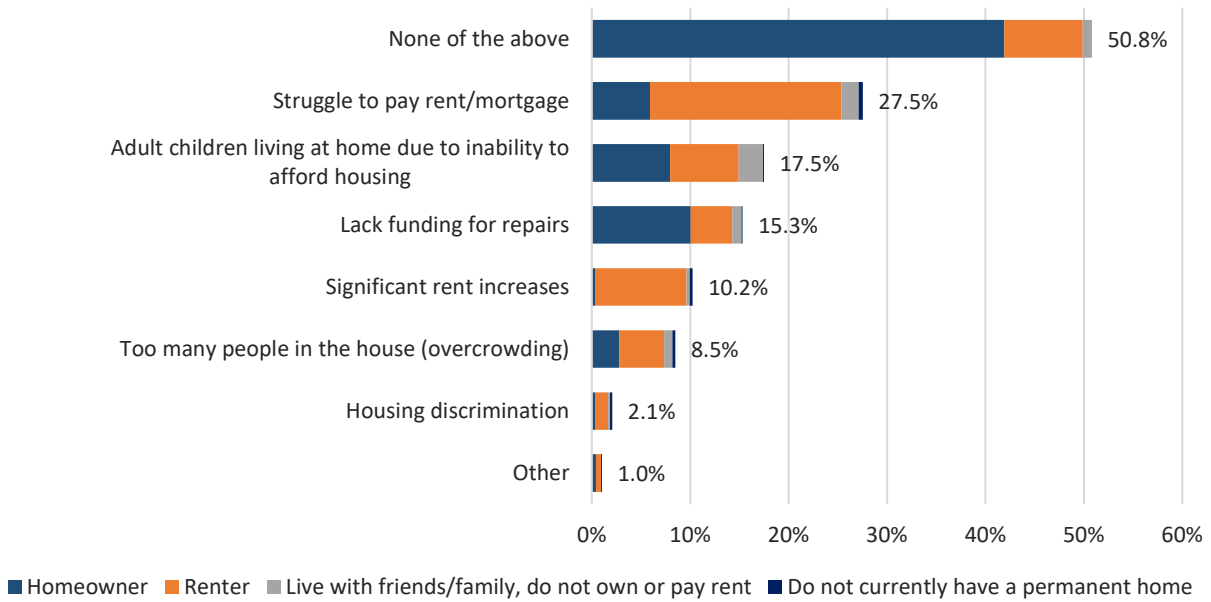
**Figure 14: Prior to the coronavirus outbreak, had you experienced any of the following housing issues within the last 5 years? Select all that apply. (Question 5; n=960)**



**Other responses to question 5:**

- Parking issues (3 responses)
- Family struggling to find affordable housing (3 responses)
- Childcare costs
- City permit acquisition is hard
- Housing is too expensive
- Investors buying homes
- Rent is increasing often

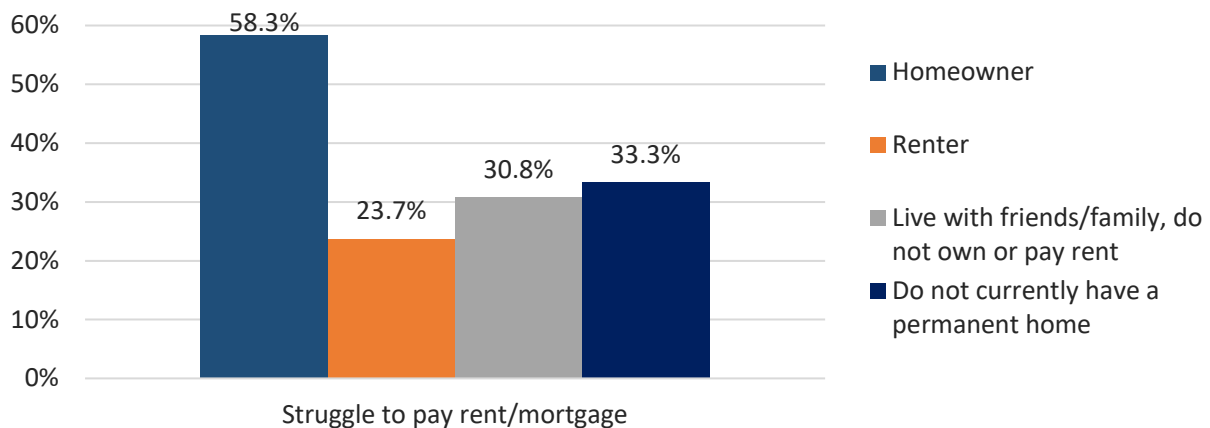
**Figure 15: Have you experienced any of the following housing issues this year since the coronavirus outbreak? Select all that apply. (Question 6; n=966)**



**Other responses to question 6 include:**

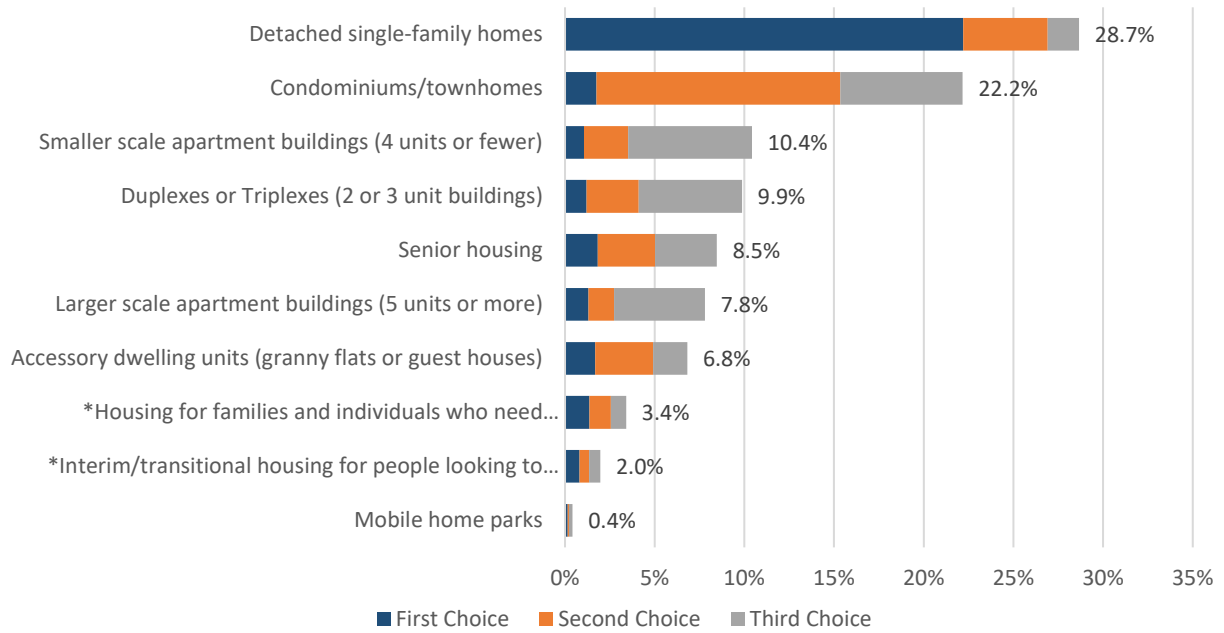
- Neighbors experiencing overcrowding
- Few homebuying opportunities
- Helping adult children with rent
- Senior parent moving in
- Landlord not doing repairs
- Apartment manager refused county rental assistance for tenants
- Working and living at home

**Figure 16: Change in Downey families struggling to pay rent or mortgage, from before (Question 5; n=204) to during coronavirus outbreak (Question 6; n=266)**

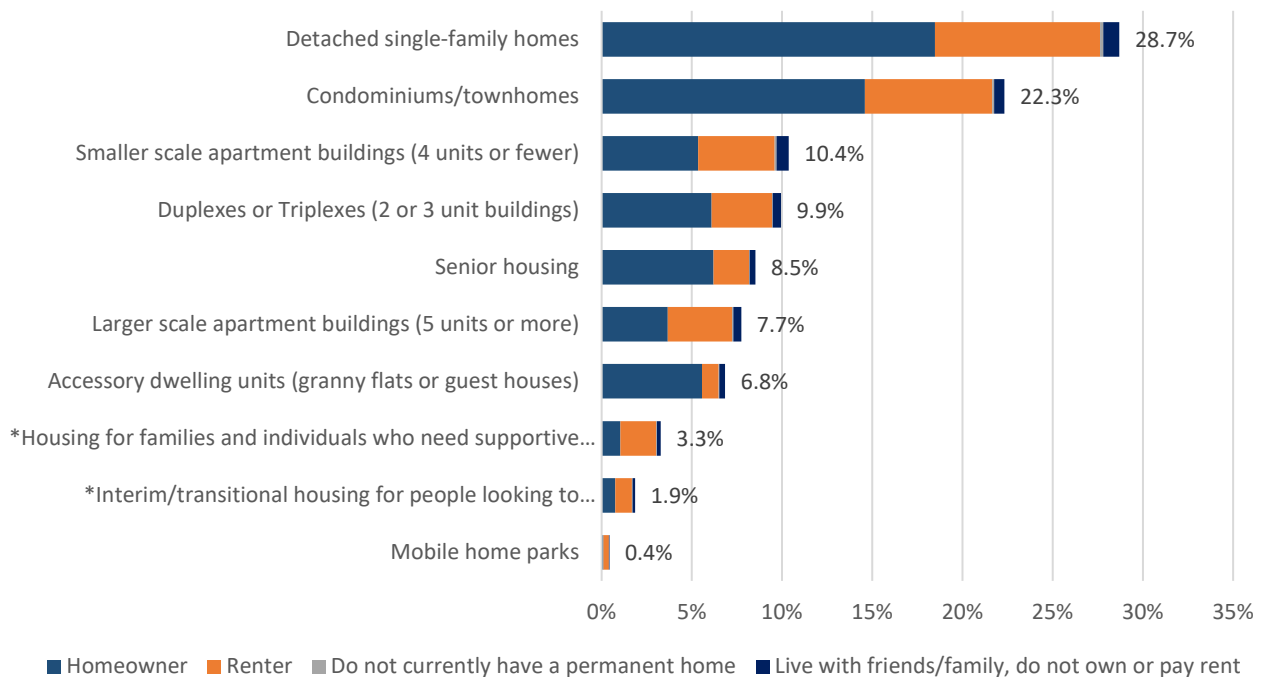




**Figure 17: What types of housing does Downey need most? Choose top three. (Question 7; n=949)**

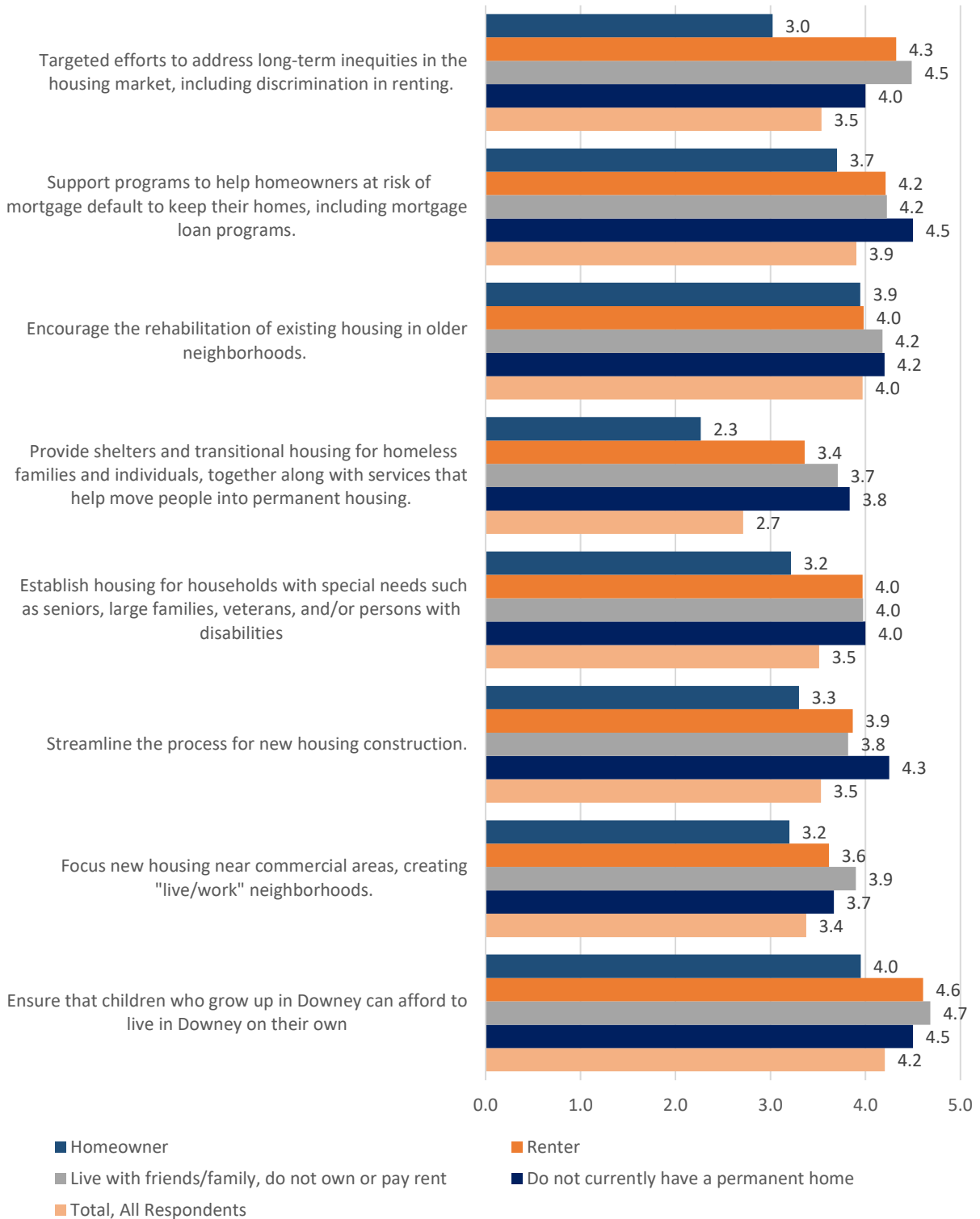


**Figure 18: What types of housing does Downey need most? Choose top three. Organized by Housing Situation. (Question 7; n=949)**

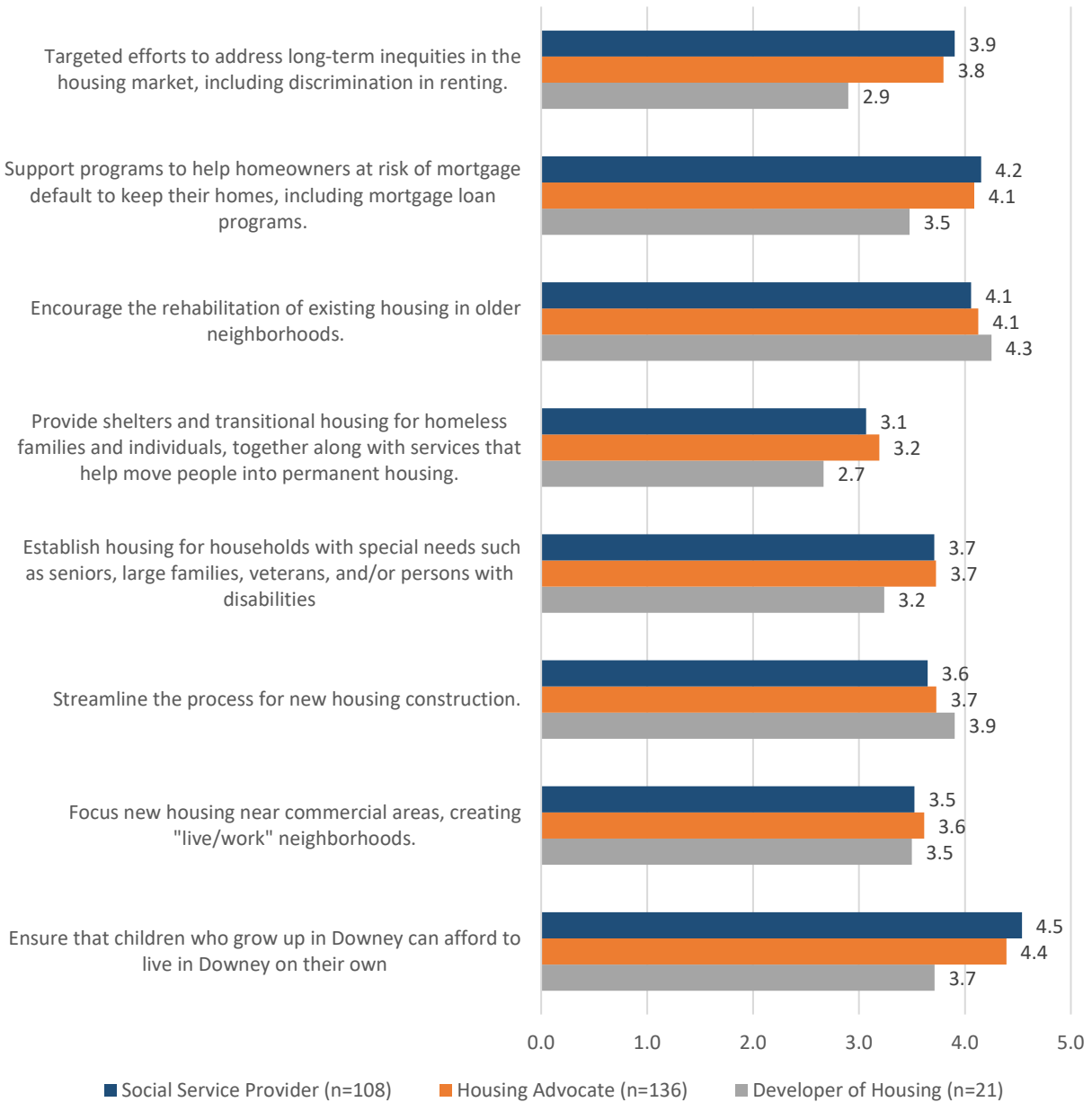


\*Note: these types are Housing for families and individuals who need supportive services like jobs training and social services; and Interim/transitional housing for people looking to transition from homelessness.

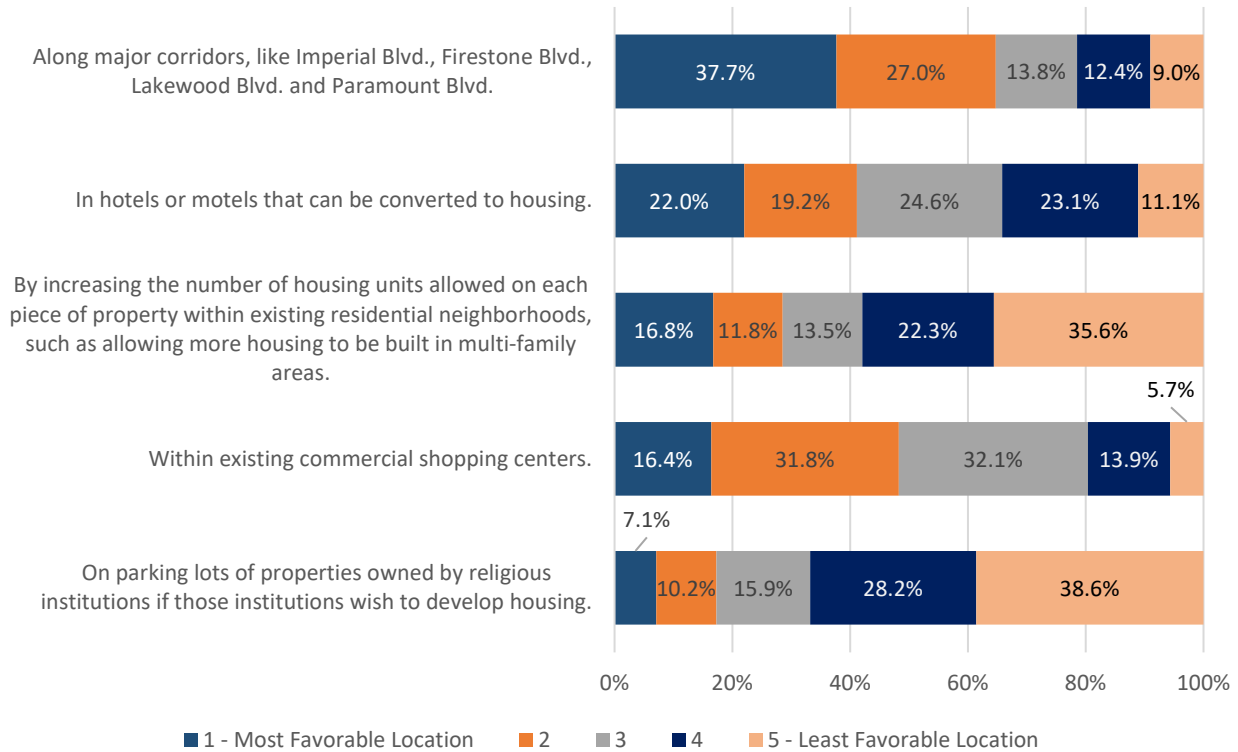
**Figure 19: Rank on a scale of 1 to 5 the importance of current housing challenges in Downey. (1= Not Important, 3=somewhat important, 5= very important) (Question 8; n=987)**



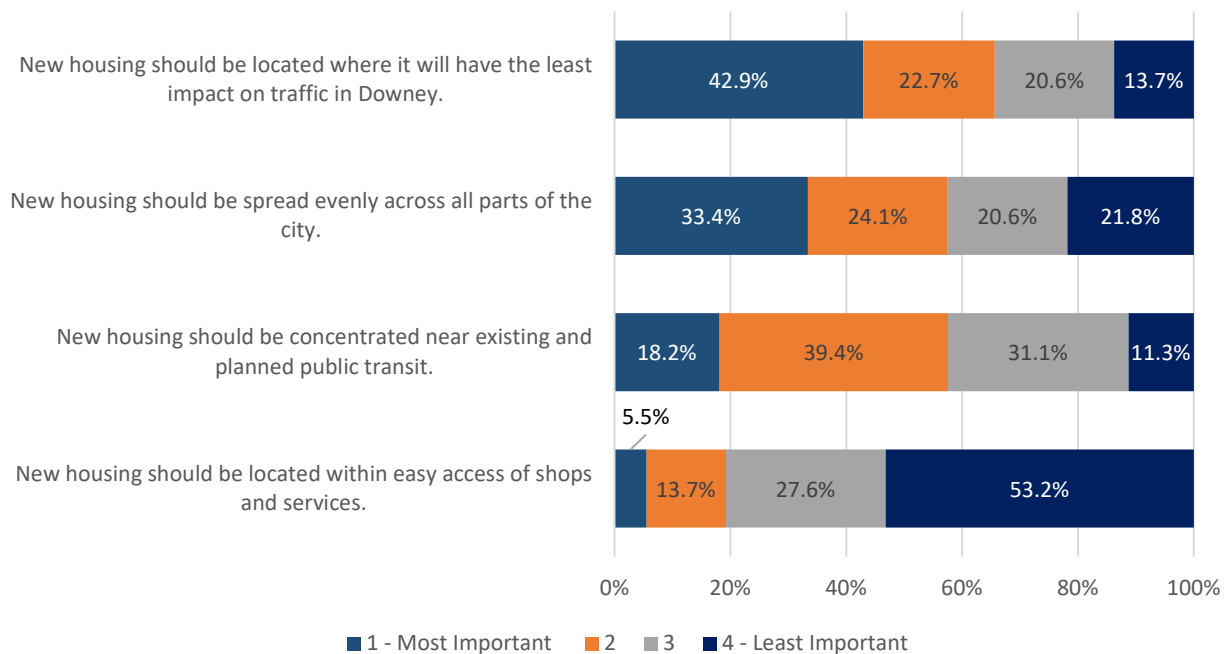
**Figure 20: Rank the importance of current housing challenges in Downey, (1= Not Important, 3=somewhat important, 5= very important) by Respondent type (Service Provider, Housing Advocate, Developer of Housing) (Question 8; n=108;136;21)**



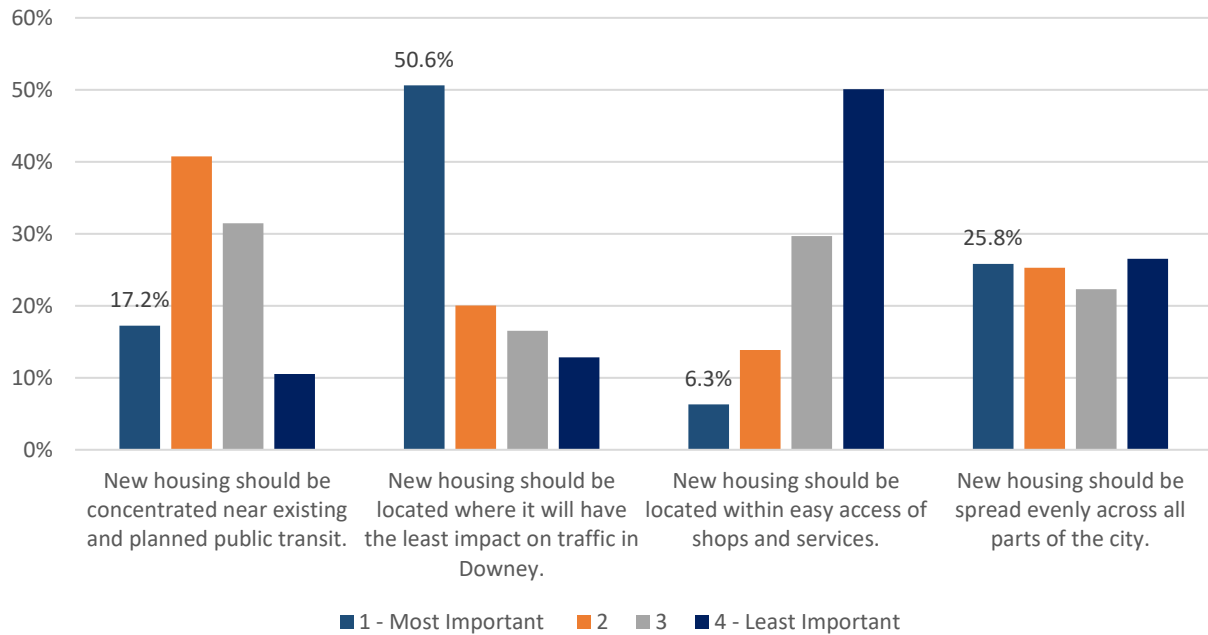
**Figure 21: Please rank the ideas below based on what you think are the best general locations in Downey for new housing. (Question 9; n=918)**



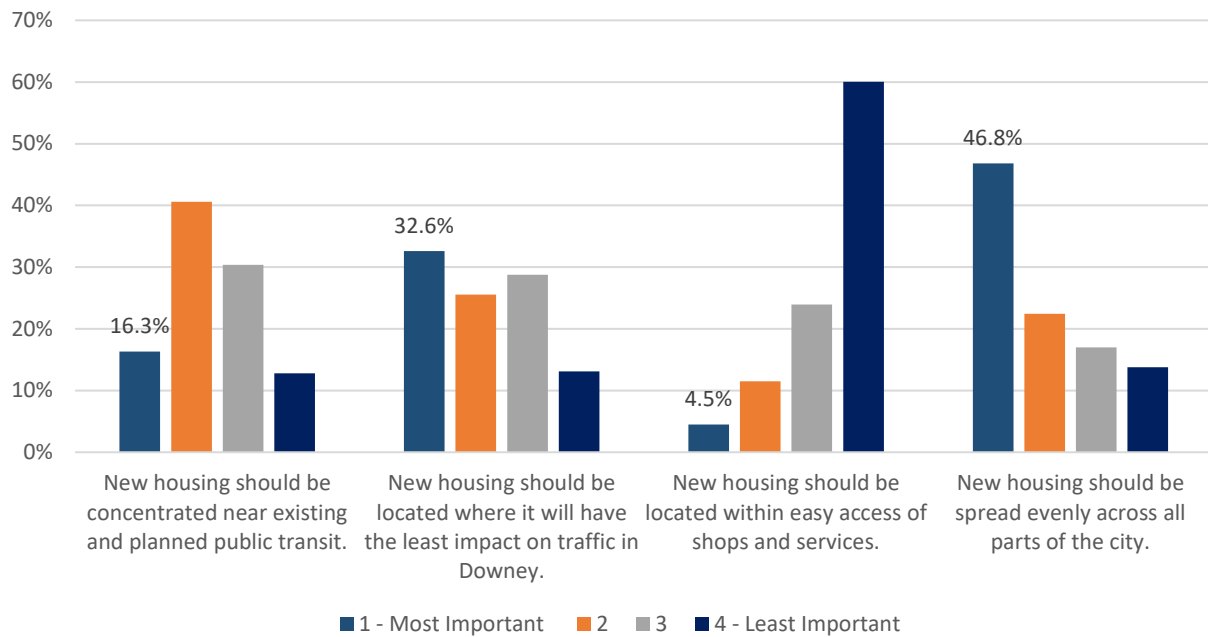
**Figure 22: There are a number of approaches for deciding where to allow new housing in Downey. Please rank the following in order of importance. (Question 10; n= 941)**



**Figure 23: City of Downey Homeowner Responses to: There are a number of approaches for deciding where to allow new housing in Downey. Please rank the following in order of importance. (Question 10; n=569)**



**Figure 24: City of Downey Renter Responses to: There are a number of approaches for deciding where to allow new housing in Downey. Please rank the following in order of importance. (Question 10; n=313)**





**Figure 25: What else would you like the City to consider when updating Downey's Housing Element?  
(Question 11; n=654)**

**Key themes from responses included:**

- Need for more housing
- Affordable housing
- Traffic
- Homelessness
- Bus and transit accessibility and connections to new housing
- Consider the needs of seniors and other special needs groups
- Overcrowding concerns
- Financial support for homeowners to rehabilitate homes
- Promote diversity
- Build more multi-unit housing
- Build housing near schools
- Transform older hotels and motels
- Adjust zoning code and ease requirements to make it easier to build housing
- Housing policies which support renters rights and financial support
- Maintain single family zoning
- Concerns related to building more housing

## City of Downey Community Survey – Meeting Our Housing Needs

In 2008, the City of Downey adopted a plan—called the General Plan—to guide decisions affecting the community’s long-term physical growth and provision of public services. The City is now updating the Housing Element of that plan, which looks at the community’s housing needs, and includes approaches Downey will use to respond to demands for new housing, housing maintenance, and equal access to housing. Your input is critical to developing a housing plan that responds to local needs, values, and preferences. Please help by identifying what you believe are the most important issues to address over the next five to 10 years. Thank you for participating!

### 1. Currently, do you:

- a. Live in Downey
- b. Work in Downey
- c. Live and work in Downey
- d. I do not live or work in Downey (go to question 7)

### 2. Which best describes your current living situation?

- a. A detached single-family home
- b. A duplex/triplex/fourplex
- c. A condominium/townhome
- d. An apartment
- e. Accessory dwelling unit (granny flat/guest house)
- f. A mobile home
- g. Group home/assisted living
- h. Interim/transitional housing and shelter
- i. Do not currently have a permanent home

Other (please specify) \_\_\_\_\_

### 3. Which best describes your current housing situation?

- a. Rent
- b. Own
- c. Live with friends/family, do not own or pay rent
- d. Do not currently have a permanent home

Other (please specify) \_\_\_\_\_

**4. What are your reasons for living in Downey? Choose all that apply.**

- a. Cost of housing
- b. Quality of housing
- c. Range of housing choices
- d. Types of housing available
- e. Community and recreation amenities, like parks and recreation centers
- f. Schools
- g. Distance from work
- h. Transportation options
- i. Distance from home to shopping, restaurants, healthcare, or other services
- j. Close distance to family and friends

Other (please specify) \_\_\_\_\_

**5. Prior to the coronavirus outbreak, had you experienced any of the following housing issues within the last 5 years? Select all that apply.**

- a. Struggle to pay rent/mortgage
- b. Lack funding for repairs
- c. Significant rent increases
- d. Housing discrimination
- e. Too many people in the house (overcrowding)
- f. Adult children living at home due to inability to afford housing

**6. Have you experienced any of the following housing issues this year since the coronavirus outbreak? Select all that apply.**

- a. Struggle to pay rent/mortgage
- b. Lack funding for repairs
- c. Significant rent increases
- d. Housing discrimination
- e. Too many people in the house (overcrowding)
- f. Adult children living at home due to inability to afford housing

## 7. What types of housing does Downey need most?

*Drag and drop your top three priorities from the "Your choices" list on the left to the "Your ranking" box on the right, ranking them in order of importance, with the most important on top and the least important on the bottom.*

*Your ranking*

- a. Detached single-family homes
- b. Condominiums/townhomes
- c. Larger scale apartment buildings (5 units or more)
- d. Smaller scale apartment buildings (4 units or fewer)
- e. Duplexes or Triplexes (2 or 3 unit buildings)
- f. Senior housing
- g. Mobile home parks
- h. Housing for families and individuals who need supportive services like jobs training and social services
- i. Interim/transitional housing for people looking to transition from homelessness
- j. Accessory dwelling units (granny flats or guest houses)

**8. Rank the importance of current housing challenges in Downey.**

	Very Important	Somewhat Important	Not Important	Don't Know
Ensure that children who grow up in Downey can afford to live in Downey on their own.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Focus new housing near commercial areas, creating "live/work" neighborhoods.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Streamline the process for new housing construction.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establish housing for households with special needs such as seniors, large families, veterans, and/or persons with disabilities.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide shelters and transitional housing for homeless families and individuals, together along with services that help move people into permanent housing.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Encourage the rehabilitation of existing housing in older neighborhoods.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support programs to help homeowners at risk of mortgage default to keep their homes, including mortgage loan programs.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Targeted efforts to address long-term inequities in the housing market, including discrimination in renting.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



**9. To meet the City’s long-term housing needs, the City will need to plan for more homes. This includes single-family homes as well as apartments, townhomes, and condominiums. Please rank the ideas below based on what you think are the best general locations in Downey for new housing.**

*Drag and drop your top three priorities from the "Your choices" list on the left to the "Your ranking" box on the right, ranking them in order of importance, with the most important on top and the least important on the bottom.*

*Your ranking*

- a. Along major corridors, like Imperial Blvd., Firestone Blvd., Lakewood Blvd. and Paramount Blvd.
- b. Within existing commercial shopping centers.
- c. In hotels or motels that can be converted to housing.
- d. By increasing the number of housing units allowed on each piece of property within existing residential neighborhoods, such as allowing more housing to be built in multi-family areas.
- e. On parking lots of properties owned by religious institutions if those institutions wish to develop housing.

<b>Housing Terms</b>		
<b>SINGLE-FAMILY</b>	<b>MULTI-FAMILY</b>	<b>ACCESSORY DWELLING UNIT</b>
A single-family property has one building on its own lot, meant for one family.	A multi-family property has more than one housing unit, where each holds a different family or household. These include duplexes, condos, townhomes and apartment buildings.	An Accessory Dwelling Unit (ADU) is an extra housing unit, either a separate home or an apartment, built by a homeowner on their property for use by family members or to rent to others.

**10. There are a number of approaches for deciding where to allow new housing in Downey. Please rank the following in order of importance.**

*Drag and drop your top three priorities from the "Your choices" list on the left to the "Your ranking" box on the right, ranking them in order of importance, with the most important on top and the least important on the bottom.*

*Your ranking*

- a. New housing should be concentrated near existing and planned public transit.
- b. New housing should be spread evenly across all parts of the city.
- c. New housing should be located where it will have the least impact on traffic in Downey.
- d. New housing should be located within easy access of shops and services.

**11. What else would you like the City to consider when updating Downey's Housing Element?**

---

**About You**

**12. How long have you lived in Downey?**

- a. 1 to 5 years
- b. 6 to 10 years
- c. 11 to 20 years
- d. 21 or more years
- e. I do not live in Downey

**13. Please indicate your gender.**

- a. Male
- b. Female
- c. Non-binary
- d. Prefer not to state

**14. How do you identify yourself? (Select all that apply)**

- a. White non-Hispanic
- b. Black or African American
- c. Hispanic/Latino
- d. Asian or Asian American
- e. Native Hawaiian or Pacific Islander
- f. Native American
- g. Prefer not to say

If you prefer to self-identify, do so here: \_\_\_\_\_

**15. What language is primarily spoken in your household?**

- a. English
- b. Spanish
- c. Korean
- d. Tagalog
- e. Chinese
- f. Vietnamese

Other (please specify) \_\_\_\_\_

**16. How old are you?**

- a. Under 18
- b. 18 to 29
- c. 30 to 49
- d. 50 to 64
- e. 65 and older

**17. Which ZIP code do you reside in?**

- a. 90240
- b. 90241
- c. 90242
- d. 90280
- e. 90723

Other (please specify) \_\_\_\_\_

**18. Which best describes your annual household income?**

- a. Under \$24,999
- b. \$25,000 - \$49,999
- c. \$50,000 - \$74,999
- d. \$75,000 - \$99,999
- e. \$100,000 - \$149,999
- f. \$150,000 or more
- g. Prefer not to state

**19. Check all that apply to you:**

- a. Owner of a business in Downey
- b. Developer of housing
- c. Developer of commercial buildings
- d. Use public transportation
- e. Commute more than 10 miles to work
- f. Housing advocate
- g. Social service provider

**Thank you for your time and ideas!**

[www.downeyca.org/heupdate](http://www.downeyca.org/heupdate)

## Encuesta Comunitaria de la Ciudad de Downey: Identificando Nuestras Necesidades de Vivienda

En 2008, la Ciudad de Downey adoptó un plan, llamado Plan General, para guiar las decisiones que afectan el crecimiento físico a largo plazo de la comunidad y la provisión de servicios públicos. La Ciudad ahora está actualizando el Elemento de Vivienda de ese plan, que analiza las necesidades de vivienda de la comunidad e incluye estrategias que Downey utilizará para responder a las demandas de viviendas nuevas, mantenimiento de viviendas y acceso equitativo a la vivienda. Su opinión es importante para desarrollar un plan de vivienda que responda a las necesidades, valores y preferencias locales. Por favor ayude identificando lo que cree que son los temas más importantes para abordar durante los próximos cinco a diez años. ¡Gracias por participar!

### 1. Actualmente, usted:

- a. Vive en Downey
- b. Trabaja en Downey
- c. Vive y trabaja en Downey
- d. No vive ni trabaja en Downey (pase a la pregunta 7)

### 2. ¿Cuál describe mejor su situación de vida actual?

- a. Una vivienda unifamiliar independiente
- b. Un duplex / triplex / fourplex
- c. Un condominio
- d. Un apartamento
- e. Unidad de vivienda accesoria (ADU o segunda vivienda)
- f. Una casa móvil
- g. Hogar grupal / vida asistida
- h. Vivienda y refugio provisional / de transición
- i. Actualmente no tiene un hogar permanente

Otros (por favor especifique) \_\_\_\_\_

### 3. ¿Cuál describe mejor su situación actual de vivienda?

- a. Inquilino
- b. Propietario
- c. Vive con amigos / familiares, no es propietario ni paga alquiler
- d. Actualmente no tiene un hogar permanente

Otros (por favor especifique) \_\_\_\_\_



**4. ¿Cuáles son sus razones para vivir en Downey? Elija todas las que correspondan.**

- a. Costo de vivienda
- b. Calidad de la vivienda
- c. Variedad de opciones de vivienda
- d. Tipos de vivienda disponibles
- e. Servicios comunitarios y recreativos, como parques y centros recreativos
- f. Escuelas
- g. Distancia al trabajo
- h. Opciones de transporte
- i. Distancia desde el hogar a tiendas, restaurantes, atención médica u otros servicios
- j. Distancia cercana a familiares y amigos

Otros (por favor especifique) \_\_\_\_\_

**5. Antes del brote de coronavirus, ¿había experimentado alguno de los siguientes problemas de vivienda en los últimos 5 años? Seleccione todas las que correspondan.**

- a. Dificultad para pagar la renta/la hipoteca
- b. Falta de fondos para reparaciones
- c. Aumentos significativos de alquiler/renta
- d. Discriminación de vivienda
- e. Demasiadas personas en la casa (hacinamiento)
- f. Hijos adultos que viven en casa debido a la dificultad para pagar una vivienda
- g. Ninguna de las anteriores

**6. ¿Ha experimentado alguno de los siguientes problemas de vivienda este año desde que comenzó el brote de coronavirus? Seleccione todas las que correspondan.**

- a. Dificultad para pagar la renta/la hipoteca
- b. Falta de fondos para reparaciones
- c. Aumentos significativos de alquiler/renta
- d. Discriminación de vivienda
- e. Demasiadas personas en la casa (hacinamiento)
- f. Hijos adultos que viven en casa debido a la dificultad para pagar una vivienda
- g. Ninguna de las anteriores

## 7. ¿Qué tipo de vivienda necesita más Downey?

*Arrastre y suelte sus tres prioridades principales de la lista "Sus elecciones" de la izquierda al cuadro "Su clasificación" de la derecha, clasificándolas en orden de importancia, con las más importantes en la parte de arriba y las menos importantes en la parte de abajo.*

*Categorizar por nivel de importancia*

- a. Vivienda unifamiliar independiente
- b. Condominios
- c. Edificios de apartamentos de mayor escala (5 unidades o más)
- d. Edificios de apartamentos de menor escala (4 unidades o menos)
- e. Dúplex o Triplex (edificios de 2 o 3 unidades)
- f. Vivienda para personas mayores
- g. Parques de casas móviles
- h. Viviendas para familias e individuos que necesitan servicios de apoyo como capacitación de empleo y servicios sociales
- i. Vivienda provisional /transitoria para personas que buscan hacer la transición de la falta de vivienda (homeless)
- j. Unidad de vivienda accesoria (ADU o segunda vivienda)

**8. Clasifique la importancia de los problemas de vivienda en Downey.**

	Muy importante	Algo importante	No importante	No se
Asegurar de que los hijos que crecen en Downey puedan permitirse un día vivir independientemente en Downey.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Crear viviendas nuevas cerca de áreas comerciales, creando vecindarios de “vivir/ trabajar”.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitar/agilizar el proceso de construcción de viviendas nuevas.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Establecer viviendas para hogares con necesidades especiales como personas mayores, familias numerosas, veteranos y / o personas con discapacidades.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Proporcionar refugios (“shelters”) y viviendas de transición para familias e individuos sin hogar, junto con servicios que ayuden a las personas a mudarse a viviendas permanentes.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promover la rehabilitación de viviendas en vecindarios más antiguos.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apoyar programas para ayudar a los propietarios de viviendas en riesgo de incumplimiento de la hipoteca a conservar sus viviendas, que incluyen programas de préstamos hipotecarios.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Esfuerzos dirigidos a reducir las desigualdades a largo plazo en el mercado de la vivienda, esto incluye la discriminación de los inquilinos.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**9. Para satisfacer las necesidades de vivienda a largo plazo de la Ciudad, la Ciudad deberá planificar más viviendas. Esto incluye viviendas unifamiliares, así como apartamentos, y condominios. Clasifique las ideas a continuación según lo que crea que son las mejores ubicaciones generales en Downey para viviendas nuevas.**

*Arrastre y suelte sus tres prioridades principales de la lista "Sus elecciones" de la izquierda al cuadro "Su clasificación" de la derecha, clasificándolas en orden de importancia, con las más importantes en la parte de arriba y las menos importantes en la parte de abajo.*

*Categorizar por nivel de importancia*

- a. A lo largo de las calles principales, como Imperial Blvd., Firestone Blvd., Lakewood Blvd. y Paramount Blvd.
- b. Dentro de los centros comerciales
- c. En hoteles o moteles que se puedan convertir en viviendas
- d. Al aumentar la cantidad de unidades de vivienda permitidas en cada propiedad dentro de los vecindarios residenciales, como permitir que se construyan más viviendas en áreas multifamiliares
- e. En estacionamientos de las instituciones religiosas, si dichas instituciones desean desarrollar viviendas

**10. Hay varias estrategias para decidir dónde permitir nuevas viviendas en Downey. Clasifique los siguientes en orden de importancia.**

*Arrastre y suelte sus tres prioridades principales de la lista "Sus elecciones" de la izquierda al cuadro "Su clasificación" de la derecha, clasificándolas en orden de importancia, con las más importantes en la parte de arriba y las menos importantes en la parte de abajo.*

*Categorizar por nivel de importancia*

- a. Las viviendas nuevas deben concentrarse cerca del transporte público existente o planificado.
- b. Las viviendas nuevas deben distribuirse de manera uniforme en todas las partes de la ciudad.
- c. Las viviendas nuevas deben ubicarse donde tengan el menor impacto en el tráfico en Downey.
- d. Las viviendas nuevas deben ubicarse con fácil acceso a comercios y servicios.

**11. ¿Qué más le gustaría que la Ciudad considere al actualizar el Elemento de Vivienda de Downey?**

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**Acerca de usted**

**12. ¿Cuánto tiempo ha vivido en Downey?**

- a. 1 a 5 años
- b. 6 a 10 años
- c. 11 a 20 años
- d. 21 o más años
- e. Yo no vivo en Downey

**13. Indique su sexo.**

- a. Masculino
- b. Femenino
- c. No binaria/o
- d. Prefiero no contestar

**14. ¿Cómo te identificas? (Seleccione todas las que correspondan)**

- a. Blanco (no hispano)
- b. Negro o afroamericano
- c. Hispano /Latino
- d. Asiático o asiático americano
- e. Nativo de Hawái o de las islas del Pacífico
- f. Indígena de las Américas
- g. Prefiero no contestar

Si prefiere identificarse a sí mismo, hágalo aquí: \_\_\_\_\_

**15. ¿Qué idioma se habla principalmente en su hogar?**

- a. Inglés
- b. Español
- c. Coreano
- d. Tagalo
- e. Chino
- f. Vietnamés

Otros (especificar) \_\_\_\_\_



**16. ¿Qué edad tiene?**

- a. Menor de 18 años
- b. 18 a 29
- c. 30 a 49
- d. 50 a 64
- e. 65 años o más

**17. ¿En qué código postal vive?**

- a. 90240
- b. 90241
- c. 90242
- d. 90280
- e. 90723

Otros (especificar) \_\_\_\_\_

**18. ¿Cuál describe mejor su ingreso familiar anual?**

- a. Menos de \$ 24,999
- b. \$ 25,000 - \$ 49,999
- c. \$ 50,000 - \$ 74,999
- d. \$ 75,000 - \$ 99,999
- e. \$ 100,000 - \$ 149,999
- f. \$ 150,000 o más
- g. Prefiero no contestar

**19. Marque todo lo que le corresponda:**

- a. Propietario de una empresa en Downey
- b. Desarrollador de viviendas
- c. Desarrollador de edificios comerciales
- d. Uso transporte público
- e. Viajo más de 10 millas al trabajo
- f. Activista por los temas de vivienda
- g. Proveedor de servicios sociales

**¡Gracias por su tiempo e ideas!**

[www.downeyca.org/heupdate](http://www.downeyca.org/heupdate)

## OUTREACH LIST

10/20 Club  
Abode Communities  
Abundant Hope Christian Center  
Affordable Living for the Aging  
American Legion Post #270  
Angel Step Inn, Southern California Alcohol and Drug Programs, Inc.  
Arc Mid-Cities  
Arc of Los Angeles and Orange Counties  
Assistance League of Downey  
BIA of Southern California  
Birchcrest Apartments  
Brite New Horizons Services Inc  
CA Emerging Technology Fund (CETF)  
California Assembly  
California Association of Realtors  
California Department of Housing and Community Development  
California Senate  
Calvary Chapel Christian School  
Calvary Chapel Christian School, Grizzly Academy  
Calvary Chapel Church  
Casa Youth Shelter  
Catholic Charities  
Catholic Charities - Family Shelter  
Children's Dental Health Clinic  
Christian Outreach Appeal  
City of Downey - Adult Literacy Program  
City of Downey - ASPIRE Program  
City of Downey - Community Development Department  
City of Downey - Fire Department  
City of Downey - Library  
City of Downey - Police Department  
City of Downey - Public Works  
City of Downey - Recreation Department  
City of Downey - Senior Meals Program  
Clark Manor Apartments (National CORE)  
Clothes the Deal  
Coast to Coast Foundation  
Commission on HIV - County of Los Angeles  
Communities for a Better Environment  
Community Development Commission of Downey  
Community Family Guidance Center  
Creative Beginnings Elementary  
Department of Rehabilitation, State of California  
Desert Reign Church  
Disabled American Veterans  
Downey Adult School  
Downey Arts Coalition  
Downey Chamber of Commerce  
Downey Christian School  
Downey Community Corner (Facebook group)  
Downey Community Health Center  
Downey Conservancy  
Downey Coordinating Council  
Downey Council PTA  
Downey Council PTA-Helps  
Downey Family YMCA  
Downey First Christian Church  
Downey Historical Society  
Downey Meals on Wheels  
Downey Memorial Christian Church  
Downey Newcomers Club  
Downey Seniors Club  
Downey Tenants Union  
Downey Unified School District  
Downey United Methodist Church  
Downey View Apartments (National CORE)  
East La Community Corporation (ELACC)  
East Los Angeles Women's Center  
Exchange Club Family Support Center  
Fair Housing Council of Orange County  
Fair Housing Foundation  
Family Crisis Center  
FEMA  
Food Help (Downey First)  
Foster Youth Services Coordinating Program  
FPC (First Presbyterian Church) Downey  
Gangs Out of Downey (GOOD)  
Gateway Cities Council of Governments  
Good Shepherd Lutheran Church  
Greater Downey Association of Realtors  
Habitat for Humanity  
Harbor Interfaith Shelter  
Helpline Youth Counseling, Inc.

Heritage Court Apartments (Abode Senior Housing)  
House of Yahweh  
HUD Office of Fair Housing and Equal Opportunity  
Human Services Association of LA  
Imago Dei Church  
Imperial Highway Church of Christ  
John Stewart Company  
Jovenes Inc.  
Kaiser Permanente  
KB Home  
Keep Downey Beautiful  
Kids in Need of Defense  
Kingdom Causes Bellflower  
Kirkwood Christian Schools, Elementary Campus  
Kirkwood Christian Schools, Preschool Campus  
Kiwanis - Downey Los Amigos  
Kiwanis Club of Downey  
La Casita, Southern California Alcohol and Drug Programs, Inc.  
LA County Dept. of Public Health Childhood Lead & Poisoning Prevention Program  
LDS Church  
Legacy Church (First Baptist Church of Downey)  
Light & Life Church Downey  
Lions Club of Downey  
Living Help Center  
Long Beach Rescue Mission  
Long Beach Small Business Development Center  
Los Angeles Community Development Authority  
Los Angeles County Board of Supervisors  
Los Angeles County Department Child Protective Services  
Los Angeles County Department of Children and Family Services  
Los Angeles County Department of Public Health  
Los Angeles County Office of Education  
Los Angeles County Regional Broadband Consortium  
Los Angeles Homeless Services Authority (LAHSA)  
Messiah Lutheran Church  
Meta Housing Corp  
Mexican American Opportunity Foundation - Downey Center

Mexican American Opportunity Foundation - Headquarters  
Montessori Children's Academy  
National Community Renaissance and Hope Through Housing Foundation  
New Living Way Church  
New Season LA | Downey  
North Downey Church of Christ  
OLPH Women's Guild  
Optimist Club of Downey  
Our Lady of Perpetual Help  
Our Lady of Perpetual Help School  
Partnership Housing Inc.  
People Assisting the Homeless (PATH)  
Pathways Community Services  
PIH Health  
Project Sister  
Q-Up (Therapeutic Horseback Riding for Disabled Persons)  
Rancho Los Amigos Foundation/Health System  
Rotary Club of Downey  
Saints of Value  
Salvation Army  
Save the Brave USA  
South Central Los Angeles Regional Center  
Southern CA Council of Governments (SCAG)  
Southern California Rehab Service  
Southern California Resource Services for Independent Living  
SpectrumLinc, Inc  
St Mark's Episcopal School  
St Pius X- St Matthias Academy  
St Raymond School  
St. Francis Medical Center Foundation  
St. Raymond Catholic Church  
Stay Gallery  
Sunshine Community Resource Organization Center  
The Whole Child  
The Salvation Army Bell Shelter  
The Women's Council, Southern California Alcohol and Drug Programs, Inc.  
TLC Family Resource Center (at Downey Unified School District)  
Transitional Living Centers  
True Lasting Connections (TLC)  
U.S. Department of HUD  
U.S. House of Representatives

U.S. Senate  
Volunteers of America Greater Los Angeles

Watch-it-Grow Urban Gardening Foundation

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

2020 W. El Camino Avenue, Suite 500  
Sacramento, CA 95833  
(916) 263-2911 / FAX (916) 263-7453  
[www.hcd.ca.gov](http://www.hcd.ca.gov)



November 10, 2021

Aldo Schindler, Director  
Community Development Department  
City of Downey  
11111 Brookshire Avenue  
Downey, CA 90241

Dear Aldo Schindler:

**RE: City of Downey's 6<sup>th</sup> Cycle (2021-2029) Draft Housing Element**

Thank you for submitting the City of Downey's (City) draft housing element received for review on September 15, 2021. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review. Our review was facilitated by a conversation on November 8, 2021 with Senior Planner Crystal Landavazo, Associate Planner Irving Anaya, and consultant, Diana Gonzalez, of MIG. In addition, HCD considered comments from Californians for Homeownership pursuant to Government Code section 65585, subdivision (c).

The draft element addresses many statutory requirements; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes the revisions needed to comply with State Housing Element Law.

The City's statutory deadline to adopt a housing element was October 15, 2021. For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of this statutory deadline, then any rezoning to accommodate the Regional Housing Needs Allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criterion. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting



requirements pursuant to Government Code section 65400. With a compliant housing element, the City will meet housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at:

[http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and  
[http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

We are committed to assist the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Colin Cross, of our staff, at [colin.cross@hcd.ca.gov](mailto:colin.cross@hcd.ca.gov).

Sincerely,



Paul McDougall  
Senior Program Manager

Enclosure

## APPENDIX CITY OF DOWNEY

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, Building Blocks for Effective Housing Elements (Building Blocks), available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

**Outreach:** The element describes outreach efforts for the broader housing element, but it should also incorporate outreach relative to affirmatively furthering fair housing (AFFH). This outreach is particularly important to informing fair housing issues, contributing factors and appropriate goals and actions. Outreach should consider a variety of methods to gather input on the various components of the assessment of fair housing (e.g., segregation and integration, disparities in access to opportunity, disproportionate housing needs) and may utilize information from the 2020 Analysis of Impediments to Fair Housing Choice.

**Patterns and Trends:** The element reports data regarding the patterns of various socio-economic characteristics across all components of the required analysis (e.g., segregation and integration, access to opportunity, displacement). However, the element should also generally analyze the various socio-economic characteristics. An analysis should generally address patterns at a regional and local level and trends in patterns over time. Patterns at a regional level must compare conditions at the local level to the rest of the region. This analysis should compare the locality at a county level or other regional level such as a Council of Governments, where appropriate, for the purposes of promoting more inclusive communities. Patterns at a local level must address whether certain areas strongly differ from other areas. The analysis should also address any coincidence with other components of the assessment of fair housing and local data and knowledge and other relevant factors as described below.

Disparities in Access to Opportunity: The element reports data from the TCAC/HCD Opportunity maps at a composite level, but it should also separately report and analyze data, patterns and trends related to education, economy and transportation.

Disproportionate Housing Need, Including Displacement Risk: The element describes displacement relative to tenure; however, it could also consider information from the HCD AFFH Data Viewer and provide analysis as described above, including overlapping coincidence with other components of the assessment of fair housing.

Local Data and Knowledge: The element should incorporate local data and knowledge of the jurisdiction into the AFFH section. To assist in meeting this requirement, the element should provide local data not captured in regional, state, or federal data analysis, including information obtained through community participation or consultation.

Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, history of lending practices and demographic trends.

Sites Inventory: The element discusses identified sites relative to the TCAC/HCD Opportunity Map at a composite level but should also address the other components of the assessment of fair housing (e.g., segregation and integration, disproportionate housing need, including displacement risk), identified sites by income group and location, magnitude of the impact and any isolation of the RHNA by income group.

Contributing Factors to Fair Housing Issues: The element should re-visit and prioritize contributing factors to fair housing based on the outcomes of a complete analysis. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions. Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing.

Strategies and Actions: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Current program actions include the City's already existing strategies to provide adequate sites and do not demonstrate a connection to the fair housing issues and contributing factors identified. This is not adequate to satisfy the requirement for specific and meaningful actions. Program actions should be proactive, facilitate meaningful change, and respond directly to the contributing factors to fair housing issues that were identified. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. The element must add and revise programs based on a complete analysis and connect to prioritized contributing factors to fair housing issues.

- An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Progress in Meeting the RHNA: The City's RHNA may be reduced by the number of new units built since June 30, 2021, but the element must describe the City's methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period. Specifically, the element credits 28 townhomes (12850 Woodruff Avenue), of which 2 will be affordable to very low-income households. However, it must demonstrate affordability as described above. In addition, the element lists 600 approved units, of which 300 are expected to be affordable to very low-income households, from the Rancho Los Amigos South Campus Specific Plan. The element must address the status of these proposed units, including potential availability in the planning period and demonstrate anticipated affordability as described above.

Realistic Capacity: The methodology for calculating residential capacity on identified sites must account for land use controls, site improvements and typical densities of existing or approved residential developments at a similar affordability level. While the element utilizes various potential unit yields, it must still support these assumptions. For example, for higher-density sites that do not require rezoning, the element assumes 80 percent of potential yield. The element supports this assumption by referring to two high-density developments, one of which dates back to 2014. Further support is needed to justify this assumption. The element does not clarify what zones these two high-density projects were developed in, or whether density bonus projects such as these are typical of residential development in those zones. The element should demonstrate what specific trends, factors, and other evidence led to the assumptions, including a more holistic view of development trends.

In addition, for sites where zoning allows 100 percent nonresidential uses, this analysis must adjust for the likelihood of 100 percent nonresidential development. For example, the element could describe the underlying zoning, whether 100 percent nonresidential development is allowed in these zones, analyze all development activity in these non-residential zones, how often residential development occurs and adjust residential capacity calculation, policies and program accordingly. The element could also incorporate any relevant programs or policies the City is undertaking to facilitate residential development in zones allowing 100 percent nonresidential uses.

Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element states that sites were selected based on "potential capacity increase available to property owners" and on location and existing uses (p. 4-8); the element also generally describes

some existing uses, but it must include analysis to demonstrate the potential for additional development. The analysis should consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For example, the element could clarify what is meant by "potential for intensification" (p. 4-6) and consider additional indicators such as age and condition of the existing structure, presence of expiring leases, expressed developer interest in *residential* development, low improvement to land value ratio, and other factors.

In addition, because the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, it must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.

Small Sites: The element identifies many sites at less than a half-acre. These sites are not eligible absent a demonstration that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless other evidence is provided. If the inventory indicates some sites can be consolidated it should also provide analysis demonstrating the potential for consolidation. For example, the analysis could describe the City's role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for lot consolidation, or information from the owners of each aggregated site.

Accessory Dwelling Units (ADUs): The element assumes an average of 125 ADUs per year will be constructed during the planning period, for a total of 1,038 ADUs. The element's analysis and programs do not support this assumption. Based on HCD records and numbers reported in the element, the City is averaging about 24 ADU permits per year since 2018. To include a realistic estimate of the potential for ADUs, the element must reduce the number of ADUs assumed per year and include analysis, policies and programs as appropriate. The element must commit to monitor ADU production and affordability throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element by a certain date. Additional actions, if necessary, should be taken in a timely manner (e.g., within 6 months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar



would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.

Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must describe any known environmental constraints or other conditions that could impact housing development on identified sites in the planning period.

Infrastructure: The element generally describes infrastructure. However, it must also demonstrate sufficient total water and sewer capacity (existing and planned) to accommodate the regional housing need by community plan area.

In addition, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) The element should discuss compliance with this requirement and if necessary, add or modify programs to establish a written procedure by a date early in the planning period.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

#### Zoning for a Variety of Housing Types:

- *Emergency Shelters:* The element describes that emergency shelters are permitted in the H-M zone without discretionary action. The element should also describe development standards, including parking requirements, for compliance with statutory requirements. In addition, the element states that no properties are available in the areas zoned to permit emergency shelters. As a result, the element should identify another zone and area to accommodate the need for emergency shelters, including a description of capacity and add or modify Program 2.7 (Address Homelessness) to amend zoning as appropriate.
- *Employee Housing:* The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs. Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.

3. *An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land Use Controls: The element must identify and analyze all relevant land-use controls as potential constraints on a variety of housing types, both independently and cumulatively with other land-use controls. Further analysis is needed of the City's requirements related to heights in multifamily zones, particularly the Downtown Core, and parking requirements. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.

Site Plan Review: The element must analyze the City's Site Plan Review, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply, cost and approval certainty. Specifically, certain approval findings, such as that a proposed development should "integrate harmoniously", prevent "extremes of dissimilarity or monotony", and focus on the compatibility of the design, appear subjective and should be analyzed as a potential constraint. A full analysis should discuss whether approval findings, standards and guidelines provide for development certainty and impact the cost and timing of approvals. The element must add or modify programs as appropriate to address identified constraints.

Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards on the City's website and include programs if appropriate.

4. *An analysis of potential and actual nongovernmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the availability of financing, the price of land, the cost of construction, the requests to develop housing at densities below those anticipated in the analysis required by subdivision (c) of Government Code section 65583.2, and the length of time between receiving approval for a housing development and submittal of an application for building permits for that housing development that hinder the construction of a locality's share of the regional housing need in accordance with Government Code section 65584... (Gov. Code, § 65583, subd. (a)(6).)*

The element must include analysis of requests to develop housing at densities below those anticipated in the site inventory. The element notes that the City does not discourage developers who choose to develop at lower densities, but it still must analyze any such requests and address any hinderances on the construction of the RHNA.

5. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

While the element quantifies various special needs groups, it must also analyze those housing needs. The analysis should include, but is not limited to, factors such as household income, tenure, housing types, overpayment, trends, zoning and related strategies, available resources and gaps in addressing housing needs. Local officials, special needs service providers, or City/County social and health service providers may be able to assist with information to complete the analysis. For additional information and a sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/large-families-female-head-household.shtml>.

In addition, to supplement analysis and better formulate policies and programs, the element should also identify and analyze persons with disabilities by type (e.g., ambulatory, vision difficulty, cognitive) and permanent and seasonal farmworkers at a county level (e.g., USDA Agricultural Census).

## **B. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, objectives and specific and clear commitment to outcomes.

Programs to be revised with discrete timelines (e.g., annually, Spring 2022) include Programs 1.4 (Accessory Dwelling Units), 1.5 (Density Bonus), 2.1 (Special Needs Housing), 2.3 (Affordable Housing Development Incentives), 2.4 (Affordable Housing Technical Assistance), 2.6 (First-Time Home Buyer Assistance), 2.7 (Address Homelessness), 2.8 (County and Regional Partnerships) and 3.5 (Special Needs Housing Law).

Programs to be revised with objectives include Programs 1.5 (Density Bonus), 2.3 (Affordable Housing Development Incentives), 2.6 (First-Time Homebuyer Assistance) and 3.8 (Energy Conservation).

Programs to be revised with specific and clear commitment to outcomes include:

- *Program 1.3 (Land Use Policy Changes)* commits to revise residential standards, “if needed”; however, the program should specifically commit to making revisions consistent with the feedback of expert practitioners as noted on page 1-8.
- *Program 2.2 (Housing for Persons with Disabilities)* should go beyond reviewing procedures and revise procedures to ensure objective procedures that promote approval certainty and address barriers to housing for persons with disabilities.
- *Program 3.1 (Lot Consolidation)* should commit to additional actions given the lack of progress in the prior planning period (p. 5-8) and reliance on small sites.
- *Program 3.6 (Definition of Family)* commits to evaluate and amend the definition of family if appropriate. Based on the information in the element, the definition of family is a constraint on housing for persons with disabilities and the Program should clearly commit to amend the definition.
- *Program 3.9 (Water and Sewer Providers)* simply commits to confirm procedures are available for the eight-year planning period. However, confirmation should occur as part of the housing element update and clear commitment should be included to establish procedures, particularly if the City plays a role in granting water and sewer service.

2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city’s or county’s share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition:

- *Program 1.1 (Adequate Sites)* commits to rezoning and satisfies many requirements, but it should also clarify by-right and minimum densities consistent with Government Code sections 65583.2, subdivisions (h) and (i) and commit to

establish incentives to encourage intended uses consistent with the overlay given allowable uses by the base zoning.

- *City-owned Sites:* The element should consider a schedule of actions to facilitate development of City-owned site(s). Additional actions include outreach with developers, incentives, fee waivers, priority processing and financial assistance.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs.

5. *Develop a plan that incentivizes and promotes the creation of ADUs that can be offered at affordable rent, as defined in Section 50053 of the Health and Safety Code, for very low, low-, or moderate-income households. For purposes of this paragraph, “accessory dwelling units” has the same meaning as “accessory dwelling unit” as defined in paragraph (4) of subdivision (i) of Section 65852.2. (Gov. Code, § 65583, subd. (c)(7).)*

Program 1.4 (Accessory Dwelling Units) generally includes outreach and some other actions but should consider additional commitment to incentives, particularly if the City continues to utilize ADUs toward a significant portion of the RHNA. Examples could include exploring and pursuing funding, modifying development standards and homeowner/applicant assistance tools. In addition, Program 1.4 (Accessory Dwelling Units) should monitor affordability in addition to productions and must commit to take alternative actions beyond incentives if necessary (e.g., rezoning) and by a specified date (e.g., within 6 months).



### **C. Public Participation**

*Local governments shall make a diligent effort to achieve public participation of all economic segments of the community in the development of the Housing Element, and the element shall describe this effort. (Gov. Code, § 65583, subd.(c)(8).)*

HCD understands the City made the element available to the public two weeks prior its submittal to HCD. By not providing ample opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element. This reduces HCD's ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD's review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD's future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City's consideration of public comments must not be limited by HCD's findings in this review letter.

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>A.1. Outreach: The element describes outreach efforts for the broader housing element, but it should also incorporate outreach relative to affirmatively furthering fair housing (AFFH). This outreach is particularly important to informing fair housing issues, contributing factors and appropriate goals and actions. Outreach should consider a variety of methods to gather input on the various components of the assessment of fair housing (e.g., segregation and integration, disparities in access to opportunity, disproportionate housing needs) and may utilize information from the 2020 Analysis of Impediments to Fair Housing Choice.</p>	<p>Chapter 1 has been edited to expand the outreach discussion related to AFFH and components of the assessment.</p>
<p>A.1. Patterns and Trends: The element reports data regarding the patterns of various socio-economic characteristics across all components of the required analysis (e.g., <u>segregation and integration, access to opportunity, displacement</u>). However, the element should also generally analyze the various socio-economic characteristics. An analysis should generally address patterns at a regional and local level and trends in patterns overtime. Patterns at a regional level must compare conditions at the local level to the rest of the region. This analysis should compare the locality at a county level or other regional level such as a Council of Governments, where appropriate, for the purposes of promoting more inclusive communities. Patterns at a local level must address whether certain areas strongly differ from other areas. The analysis should also address any coincidence with other components of the assessment of fair housing and local data and knowledge and other relevant factors as described below.</p>	<p>The AFFH analysis has been edited to add:</p> <ul style="list-style-type: none"> <li>• More local and regional information related to segregation</li> <li>• Add information on low- and moderate-income areas of the City and surrounding region including adding LMI data to Figure 3.5</li> <li>• Summary of findings from local and regional data for segregation and integration</li> <li>• Additional local and regional data and analysis for R/ECAPs and Racially/Ethnically Concentrated Areas of Affluence</li> </ul>
<p>A.3. Disparities in Access to Opportunity: The element reports data from the TCAC/HCD Opportunity maps at a composite level, but it should also separately report and analyze data, patterns and trends related to education, economy and transportation.</p>	<p>The AFFH analysis has been edited to add:</p> <ul style="list-style-type: none"> <li>• Opportunity access information related to education, environmental justice, transportation, and employment.</li> </ul>
<p>A.4. Disproportionate Housing Need, Including Displacement Risk: The element describes displacement relative to tenure; however, it could also consider information from the HCD AFFH Data Viewer and provide analysis as described above, including overlapping coincidence with other components of the assessment of fair housing.</p>	<p>The AFFH analysis has been edited to add:</p> <ul style="list-style-type: none"> <li>• Regional data for overcrowding, displacement risk,</li> <li>• Identification of overlapping coincidence with other components of the assessment</li> <li>• Additional regional comparison for substandard housing</li> <li>• Summary of findings from local and regional data for segregation and integration</li> </ul>
<p>A.5. Local Data and Knowledge: The element should incorporate local data and knowledge of the jurisdiction into the AFFH section. To assist in meeting this requirement, the element should provide local data not captured in regional, state, or federal data analysis, including information obtained through community participation or consultation.</p>	<p>The AFFH analysis has been edited to add a local knowledge section that addresses related issues identified in the public outreach process as well as historical patterns of development.</p>
<p>A.6. Other Relevant Factors: The element must include other relevant factors that contribute to fair housing issues in the jurisdiction. For instance, the element can analyze historical land use, zoning, governmental and nongovernmental spending including transportation investments, history of lending practices and demographic trends.</p>	<p>The AFFH analysis has been edited to add a local knowledge section that addresses related issues identified in the public outreach process as well as historical patterns of development.</p>
<p>A.7. Sites Inventory: The element discusses identified sites relative to the TCAC/HCD Opportunity Map at a composite level but should also address the other components of the assessment of fair housing (e.g., segregation and integration, disproportionate housing need, including displacement risk), identified sites by income group and location, magnitude of the impact and any isolation of the RHNA by income group.</p>	<p>The sites inventory AFFH section is edited to identify areas that the AFFH analysis showed had disproportionate needs and higher vulnerability to displacement.</p>
<p>A.8. Contributing Factors to Fair Housing Issues: The element should re-visit and prioritize contributing factors to fair housing based on the outcomes of a complete analysis. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to adequate goals and actions.</p>	<p>The AFFH analysis has been edited to the Identification and Prioritization of Local Fair Housing Issues and Contributing Factors discussion and includes a list of related contributing factors</p>

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>Examples include community opposition to affordable housing, housing discrimination, land use and zoning laws, lack of regional cooperation, location and type or lack of affordable housing and lack of public or private investment in areas of opportunity or affordable housing choices. The analysis shall result in strategic approaches to inform and connect goals and actions to mitigate contributing factors to affordable housing.</p>	
<p>A.9. Strategies and Actions: Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Current program actions include the City’s already existing strategies to provide adequate sites and do not demonstrate a connection to the fair housing issues and contributing factors identified. This is not adequate to satisfy the requirement for specific and meaningful actions. Program actions should be proactive, facilitate meaningful change, and respond directly to the contributing factors to fair housing issues that were identified. Furthermore, the element must include metrics and milestones for evaluating progress on programs, actions, and fair housing results. The element must add and revise programs based on a complete analysis and connect to prioritized contributing factors to fair housing issues.</p>	<p>The element (particularly Program 5.2 in Chapter 6) is revised and enhanced with additional program actions based on the complete analysis and listing and prioritization of contributing factors to fair housing issues.</p>
<p>A.2.1. Progress in Meeting the RHNA: The City’s RHNA may be reduced by the number of new units built since June 30, 2021, but the element must describe the City’s methodology for assigning these units to the various income groups based on actual sales price or rent level of the units and demonstrate their availability in the planning period. Specifically, the element credits 28 townhomes (12850 Woodruff Avenue), of which 2 will be affordable to very low-income households. However, it must demonstrate affordability as described above. In addition, the element lists 600 approved units, of which 300 are expected to be affordable to very low-income households, from the Rancho Los Amigos South Campus Specific Plan. The element must address the status of these proposed units, including potential availability in the planning period and demonstrate anticipated affordability as described above.</p>	<ul style="list-style-type: none"> <li>• Information on the affordability of the two units at 12850 Woodruff Avenue has been added under the Approved and Proposed Projects heading in Chapter 4.</li> <li>• Residential development potential in the adopted Rancho Los Amigos South Campus Specific Plan has been moved from the Approved and Proposed Projects section to the Sites Inventory Section. The revisions address the status of the proposed units, including potential availability in the planning period and as well as information on recent development inquiries.</li> </ul>
<p>A.2.2. Realistic Capacity: The methodology for calculating residential capacity on identified sites must account for land use controls, site improvements and typical densities of existing or approved residential developments at a similar affordability level. While the element utilizes various potential unit yields, it must still support these assumptions. For example, for higher-density sites that do not require rezoning, the element assumes 80 percent of potential yield. The element supports this assumption by referring to two high-density developments, one of which dates back to 2014. Further support is needed to justify this assumption. The element does not clarify what zones these two high-density projects were developed in, or whether density bonus projects such as these are typical of residential development in those zones. The element should demonstrate what specific trends, factors, and other evidence led to the assumptions, including a more holistic view of development trends.</p> <p>In addition, for sites where zoning allows 100 percent nonresidential uses, this analysis must adjust for the likelihood of 100 percent nonresidential development. For example, the element could describe the underlying zoning, whether 100 percent nonresidential development is allowed in these zones, analyze all development activity in these non-residential zones, how often residential development occurs and adjust residential capacity calculation, policies and program accordingly. The element could also incorporate any relevant programs or policies the City is undertaking to facilitate residential development in zones allowing 100 percent nonresidential uses.</p>	<p>Chapter 4 is edited to add:</p> <ul style="list-style-type: none"> <li>• text to clarify location of two affordable projects in the Downtown Downey Specific Plan</li> <li>• Development interest in the two specific plan areas</li> <li>• Additional examples of multifamily development to support the use of 80% of maximum allowed density to calculate realistic capacity. Recent project trends show that the density assumption is realistic.</li> </ul> <p>Also, Chapter 4 is edited to clarify that the use of densities significantly lower than what is allowed accounts for the potential development of mixed uses. As part of the City’s Housing Element implementation (Program 1.3), the City is increasing allowable density in the R-3 zone to allow up to 40 units per acre and in the process adjust development standards, accordingly. Program 1.3 also includes an action item to review and revise residential developments standards including building height limits in the R-3 zoning district and to identify and codify incentives to encourage development of residential uses in areas with the new Residential Overlay and Mixed-Use zone.</p> <p>As part of the General Plan and Zoning update, The City will also adopt additional incentives for projects that include lot consolidation as a way of adding more residential units to a project (Program 1.3).</p>
<p>A.2.3. Suitability of Nonvacant Sites: The element must include an analysis demonstrating the potential for redevelopment of nonvacant sites. To address this requirement, the element states that sites were selected based on “potential capacity increase available to property owners” and on location and existing uses (p. 4-8);</p>	<p>Chapter 4 is edited to:</p>

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>the element also generally describes some existing uses, but it must include analysis to demonstrate the potential for additional development. The analysis should consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. For example, the element could clarify what is meant by “potential for intensification” (p. 4-6) and consider additional indicators such as age and condition of the existing structure, presence of expiring leases, expressed developer interest in residential development, low improvement to land value ratio, and other factors.</p> <p>In addition, because the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower-income households, it must demonstrate existing uses are not an impediment to additional residential development and will likely discontinue in the planning period. (Gov. Code, § 65583.2, subd. (g)(2).) Absent findings (e.g., adoption resolution) based on substantial evidence, the existing uses will be presumed to impede additional residential development and will not be utilized toward demonstrating adequate sites to accommodate the RHNA.</p>	<p>Refine the site inventory and focus on sites that meet the existing use, land value, and intensification criteria stated in the Chapter. As part of the revision process several sites were removed and replaced with more suitable sites.</p> <p>The City will include findings in the adopting resolution for the Housing Element that indicates that existing uses are not an impediment to additional residential development and will likely discontinue in the planning period.</p>
<p>A.2.4. Small Sites: The element identifies many sites at less than a half-acre. These sites are not eligible absent a demonstration that sites of equivalent size were successfully developed during the prior planning period for an equivalent number of lower-income housing units as projected for the site or unless other evidence is provided. If the inventory indicates some sites can be consolidated it should also provide analysis demonstrating the potential for consolidation. For example, the analysis could describe the City’s role or track record in facilitating small-lot consolidation, policies or incentives offered or proposed to encourage and facilitate lot consolidation, conditions rendering parcels suitable and ready for lot consolidation, or information from the owners of each aggregated site.</p>	<p>Consistent with updated Housing Element law (Assembly Bill 1397) related to the suitability of small and large sites, the lower-income sites inventory presented in this section is predominately limited to parcels between 0.5 and 10 acres in size, as HCD has indicated these size parameters best accommodate lower-income housing need. In this inventory, only 40 of the 424 parcels that make up the sites inventory are less than half an acre in size (9%) and they are included only if they are part of a larger site that function as one use (for example, a single structure or use over more than 1 parcel) and/or the parcels are adjacent and under common ownership .</p> <p>Several sites comprising one or more parcels are less than one-half acre in size. These sites are included because the multiple parcels function as one site, such as a structure and its attached, surface, parking lot or a single structure located on multiple parcels. Small sites (less than one-half acre) meeting the default density standard <b>are NOT</b> credited toward the lower-income RHNA. Lot consolidation assumptions in the sites inventory are limited.</p> <p>Text in Chapter 4 has been edited to clarify these points.</p>
<p>A.2.5. Accessory Dwelling Units (ADUs): The element assumes an average of 125 ADUs per year will be constructed during the planning period, for a total of 1,038 ADUs. The element’s analysis and programs do not support this assumption. Based on HCD records and numbers reported in the element, the City is averaging about 24 ADU permits per year since 2018. To include a realistic estimate of the potential for ADUs, the element must reduce the number of ADUs assumed per year and include analysis, policies and programs as appropriate. The element must commit to monitor ADU production and affordability throughout the course of the planning period and implement additional actions if not meeting target numbers anticipated in the housing element by a certain date. Additional actions, if necessary, should be taken in a timely manner (e.g., within 6</p>	<p>The ADU portion of the sites inventory is edited to update the number of ADU permits provided in 2021 (as of October). The revised estimates for the planning period account for pent-up demand at the start of the planning period and the potential leveling off of ADU development in the later part of the planning period. A very conservative estimate of ADU development under the provisions of SB 9 is also added.</p>

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>months). Finally, if necessary, the degree of additional actions should be in stride with the degree of the gap in production and affordability. For example, if actual production and affordability of ADUs is far from anticipated trends, then rezoning or something similar would be an appropriate action. If actual production and affordability is near anticipated trends, then measures like outreach and marketing might be more appropriate.</p>	
<p>A.2.6. Environmental Constraints: While the element generally describes a few environmental conditions within the City, it must describe any known environmental constraints or other conditions that could impact housing development on identified sites in the planning period.</p>	<p>The discussion under the Site Infrastructure and Constraints section in Chapter 4 has been updated to include information on environmental hazards (earthquakes, liquefaction, landslides, flooding). None of the parcels identified in the residential sites inventory are constrained by sensitive habitat or contamination that would prohibit developers from building. The City requires engineering reports to establish appropriate design standards and mitigation measures taken to alleviate any identified hazards. However, the necessity of these reports is offset by the need for public safety and welfare, and thus the City does not consider the reports a constraint to housing development.</p>
<p>A.2.7. Infrastructure: The element generally describes infrastructure. However, it must also demonstrate sufficient total water and sewer capacity (existing and planned) to accommodate the regional housing need by community plan area.</p> <p>In addition, water and sewer service providers must establish specific procedures to grant priority water and sewer service to developments with units affordable to lower-income households. (Gov. Code, § 65589.7.) The element should discuss compliance with this requirement and if necessary, add or modify programs to establish a written procedure by a date early in the planning period.</p>	<p>Additional information for water and sewer capacity is added to the element under the “Site Infrastructure and Environmental Constraints” heading in Chapter 4. To accommodate the 2021-2029 RHNA of over 6,500 residential units, within three years of adopting this Housing Element, the City will undertake a series of land use actions to increase development potential. These proposed land use actions will require thorough infrastructure and environmental review, and any additional constraints will be identified at the time the actions are taken, along with any necessary mitigation measures to address infrastructure system and service provision.</p> <p>Program 3.9, included in the Draft Housing Element submitted to the Department, is already in place to address the required actions of the City’s water and sewer service providers.</p>
<p>A.2.8. Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD’s housing element webpage at <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element">https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.</p>	<p>Noted.</p>
<p>A.2.9. Zoning for a Variety of Housing Types:</p> <ul style="list-style-type: none"> <li>• Emergency Shelters: The element describes that emergency shelters are permitted in the H-M zone without discretionary action. The element should also describe development standards, including parking requirements, for compliance with statutory requirements. In addition, the element states that no properties are available in the areas zoned to permit emergency shelters. As a result, the element should identify another zone and area to accommodate the need for emergency shelters, including a description of capacity and add or modify Program 2.7 (Address Homelessness) to amend zoning as appropriate.</li> <li>• Employee Housing: The element must demonstrate zoning is consistent with the Employee Housing Act (Health and Safety Code, § 17000 et seq.) or add or modify programs. Specifically, section 17021.5 requires employee housing for six or fewer employees to be treated as a single-family structure and permitted in the same manner as other dwellings of the same type in the same zone. Section 17021.6 requires employee housing consisting of no more than 12 units or 36 beds to be permitted in the same manner as other agricultural uses in the same zone.</li> </ul>	<p>The element has been edited to describe development standards, including parking requirements, for compliance with statutory requirements. As a result of this edit, a new action item is added to Program 3.5 to identify the M-2 zone for emergency shelter development and to ensure compliance with State law, including addressing the City’s distancing requirements.</p> <p>A heading for Employee Housing is added to Chapter 3 under Zoning for a Variety of Housing Types and Program 1.3 is updated to add an action item committing to update the Zoning Code to define employee housing and to clarify that employee housing serving six or fewer employees shall be deemed a single-family structure and shall be subject to the same standards for a single-family residence in the same zone.</p>



HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>A.3.1. Land Use Controls: The element must identify and analyze all relevant land-use controls as potential constraints on a variety of housing types, both independently and cumulatively with other land-use controls. Further analysis is needed of the City’s requirements related to heights in multifamily zones, particularly the Downtown Core, and parking requirements. The analysis should address any impacts on cost, supply, housing choice, affordability, timing, approval certainty and ability to achieve maximum densities and include programs to address identified constraints.</p>	<p>Parking: Tables 3.3, 3.5, and 3.6 are updated to include parking standards. Following Table 3.6 is a new heading, “Parking for Multi-Family Developments” which addresses parking in the R-3 zone and in the Downtown Downey Specific Plan (DDSP) area. Parking reductions for uses in the DDSP and for senior and affordable housing are addressed.</p> <p>Building Heights: Chapter 3 under the Residential Development Standards heading is updated to add information on building heights in the R-3 zone and in the Downtown Downey Specific Plan area.</p>
<p>A.3.2. Site Plan Review: The element must analyze the City’s Site Plan Review, including approval procedures and decision-making criteria, for their impact as potential constraints on housing supply, cost and approval certainty. Specifically, certain approval findings, such as that a proposed development should “integrate harmoniously”, prevent “extremes of dissimilarity or monotony”, and focus on the compatibility of the design, appear subjective and should be analyzed as a potential constraint. A full analysis should discuss whether approval findings, standards and guidelines provide for development certainty and impact the cost and timing of approvals. The element must add or modify programs as appropriate to address identified constraints.</p>	<p>Chapter 3 under the Site Plan Review heading is updated to include more information on the site plan review process and Program 1.3 is updated to add that the City will update development standards for multi-family projects that will not require the Site Plan Review process and allow for this review to be completed administratively without discretionary approval. In addition, Program 3.3 is included and indicates that the City will adopt objective design standards to ensure that the City can provide local guidance on design and standards for by-right projects as allowed by State law.</p>
<p>A.3.3. Zoning and Fees Transparency: The element must clarify its compliance with new transparency requirements for posting all zoning and development standards on the City’s website and include programs if appropriate.</p>	<ul style="list-style-type: none"> <li>• Information about online access to the City’s development process information and resources is added to Chapter 3 under the Residential Development Standards heading</li> <li>• The location of the City’s fees is added at the end of the Fees and Exactions section in Chapter 3</li> </ul>
<p>A.4.1. The element must include analysis of requests to develop housing at densities below those anticipated in the site inventory. The element notes that the City does not discourage developers who choose to develop at lower densities, but it still must analyze any such requests and address any hinderances on the construction of the RHNA.</p>	<p>The discussion under Government Code 65583(a)(6) Development Analysis is edited to add more detail and experiences with lower density requests and Programs 1.5 is edited to add additional actions to encourage development at higher densities.</p>
<p>A.5.1. While the element quantifies various special needs groups, it must also analyze those housing needs. The analysis should include, but is not limited to, factors such as household income, tenure, housing types, overpayment, trends, zoning and related strategies, available resources and gaps in addressing housing needs. Local officials, special needs service providers, or City/County social and health service providers may be able to assist with information to complete the analysis. For additional information and a sample analysis, see the Building Blocks at <a href="http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/large-families-female-head-household.shtml">http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/large-families-female-head-household.shtml</a>.</p> <p>In addition, to supplement analysis and better formulate policies and programs, the element should also identify and analyze persons with disabilities by type (e.g., ambulatory, vision difficulty, cognitive) and permanent and seasonal farmworkers at a county level (e.g., USDA Agricultural Census).</p>	<p>Chapter 2 under the Special Needs is edited to add:</p> <ul style="list-style-type: none"> <li>• Information on persons with disabilities by type (e.g., ambulatory, vision difficulty, cognitive) as well as resources.</li> <li>• Resources for seniors.</li> <li>• Housing stock, income and poverty information related to large households.</li> <li>• The number of farmworkers at a county level</li> <li>• Issues, number of households with children, change since 2014, resources for female headed households.</li> </ul>
<p>B.2.1. To have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines, objectives and specific and clear commitment to outcomes.</p> <p>Programs to be revised with discrete timelines (e.g., annually, Spring 2022) include Programs 1.4 (Accessory Dwelling Units), 1.5 (Density Bonus), 2.1 (Special Needs Housing), 2.3 (Affordable Housing Development Incentives), 2.4 (Affordable Housing Technical Assistance), 2.6 (First-Time Home Buyer Assistance), 2.7 (Address Homelessness), 2.8 (County and Regional Partnerships) and 3.5 (Special Needs Housing Law).</p>	<ul style="list-style-type: none"> <li>• Program 1.3 is edited to change “Review and, if needed, revise” to “revise” as it relates to development standards (minimum lot area requirements and building height limits in the R-3 zoning district and minimum unit sizes for all residential development).</li> <li>• Program 1.4 is edited to add more information on ADU resources such as the one-stop webpage and to add that if production falls below levels anticipated in the Housing Element, the City will evaluate and ensure that adequate sites are available through the adopted sites inventory,</li> </ul>

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>Programs to be revised with objectives include Programs 1.5 (Density Bonus), 2.3 (Affordable Housing Development Incentives), 2.6 (First-Time Homebuyer Assistance) and 3.8 (Energy Conservation).</p> <p>Programs to be revised with specific and clear commitment to outcomes include:</p> <ul style="list-style-type: none"> <li>• Program 1.3 (Land Use Policy Changes) commits to revise residential standards, “if needed”; however, the program should specifically commit to making revisions consistent with the feedback of expert practitioners as noted on page 1-8.</li> <li>• Program 2.2 (Housing for Persons with Disabilities) should go beyond reviewing procedures and revise procedures to ensure objective procedures that promote approval certainty and address barriers to housing for persons with disabilities.</li> <li>• Program 3.1 (Lot Consolidation) should commit to additional actions given the lack of progress in the prior planning period (p. 5-8) and reliance on small sites.</li> <li>• Program 3.6 (Definition of Family) commits to evaluate and amend the definition of family if appropriate. Based on the information in the element, the definition of family is a constraint on housing for persons with disabilities and the Program should clearly commit to amend the definition.</li> <li>• Program 3.9 (Water and Sewer Providers) simply commits to confirm procedures are available for the eight-year planning period. However, confirmation should occur as part of the housing element update and clear commitment should be included to establish procedures, particularly if the City plays a role in granting water and sewer service.</li> </ul>	<p>or it will identify additional sites to ensure continued provision of adequate sites. Additional action items such as establishing ADU office hours are added.</p> <ul style="list-style-type: none"> <li>• Program 1.5 is edited to add additional action items, objectives, and timeframes</li> <li>• Program 2.1 is edited to add a more specific timeframe</li> <li>• Program 2.2 is edited to remove the “review” action and commit to specific action</li> <li>• Program 2.3 is edited to add objectives and a specific timeframe</li> <li>• Program 2.4 is edited to add specific timeframe details</li> <li>• Program 2.6 is edited to add objectives and a specific timeframes</li> <li>• Program 2.7 is edited to add specific timeframe details</li> <li>• Program 2.8 is edited to add specific timeframe details</li> <li>• Program 3.1 is edited to commit to more specific action and a new timeframe is added</li> <li>• Program 3.5 is edited to add action items related to zoning for emergency shelter and employee housing and specific timeframe details</li> <li>• Program 3.6 is edited to provide more definitive action related to the modification/replacement of the City’s definition of “family”.</li> <li>• Program 3.8 is edited to add objectives and timeframes</li> <li>• Program 3.9 is edited to clarify that the City (which provides water and sewer services, does not have procedures in place to grant priority for the provision of water and sewer services to proposed developments that include units affordable to lower-income households as required by law. An action item to address this is added as is a timeframe.</li> </ul>
<p>B.1.2. As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types. In addition:</p> <ul style="list-style-type: none"> <li>• Program 1.1 (Adequate Sites) commits to rezoning and satisfies many requirements, but it should also clarify by-right and minimum densities consistent with Government Code sections 65583.2, subdivisions (h) and (i) and commit to establish incentives to encourage intended uses consistent with the overlay given allowable uses by the base zoning.</li> <li>• City-owned Sites: The element should consider a schedule of actions to facilitate development of City-owned site(s). Additional actions include outreach with developers, incentives, fee waivers, priority processing and financial assistance.</li> </ul>	<ul style="list-style-type: none"> <li>• Program 1.1 is edited to clarify by-right and minimum densities consistent with Government Code sections 65583.2 and reflects edits to the sites inventory.</li> <li>• Program 1.3 is edited to add that the City will identify and codify incentives to encourage development residential uses in areas with the new Residential Overlay and Mixed-Use zone and to change “Review and, if needed, revise” to “revise” as it relates to development standards (minimum lot area requirements and building height limits in the R-3 zoning district and minimum unit sizes for all residential development).</li> <li>• Program 2.4 is edited to add actions related to development on on City-owned sites.</li> </ul>

HCD Findings from 11/10/21 Letter	Summary of City Edits/Response
<p>B.3.1. As noted in Findings A3 and A4, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<p>Edits have been made to Program 1.3 that include:</p> <ul style="list-style-type: none"> <li>Action item to remove site plan review process from multi-family housing approval process</li> </ul> <p>The element has been edited to describe development standards, including parking requirements, for compliance with statutory requirements. As a result of this edit, a new action item is added to Program 3.5 to identify the M-2 zone for emergency shelter development and to ensure compliance with State law, including addressing the City’s distancing requirements.</p> <p>Edits have been made to Program 1.5 and an action item is added to provide a detailed list of completed density bonus projects in Downey and in neighboring cities and a list of available concessions to show prospective developers the potential advantages of using the state’s density bonus provisions and shared with all new applicant inquiring about or submitting plans for multi-family developments.</p>
<p>B.4.1. As noted in Finding A1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs.</p>	<p>The AFFH program has been revised to show the connection between the AFFH issues, contributing factors, and program actions.</p>
<p>B.5.1. Program 1.4 (Accessory Dwelling Units) generally includes outreach and some other actions but should consider additional commitment to incentives, particularly if the City continues to utilize ADUs toward a significant portion of the RHNA. Examples could include exploring and pursuing funding, modifying development standards and homeowner/applicant assistance tools. In addition, Program 1.4 (Accessory Dwelling Units) should monitor affordability in addition to productions and must commit to take alternative actions beyond incentives if necessary (e.g., rezoning) and by a specified date (e.g., within 6 months).</p>	<p>Program 1.4 is edited to add more information on ADU resources such as the one-stop webpage and to add that if production falls below levels anticipated in the Housing Element, the City will evaluate and ensure that adequate sites are available through the adopted sites inventory, or it will identify additional sites to ensure continued provision of adequate sites. Additional action items such as establishing ADU office hours are added. More information on timing is also added. The City’s ADU program reflects the City’s staffing and funding levels.</p>
<p>C.1.1. HCD understands the City made the element available to the public two weeks prior its submittal to HCD. By not providing ample opportunity for the public to review and comment on a draft of the element in advance of submission, the City has not yet complied with statutory mandates to make a diligent effort to encourage the public participation in the development of the element. This reduces HCD’s ability to consider public comments in its review. The availability of the document to the public and opportunity for public comment prior to submittal to HCD is essential to the public process and HCD’s review. The City must proactively make future revisions available to the public, including any commenters, prior to submitting any revisions to HCD and diligently consider and address comments, including making revisions to the document where appropriate. HCD’s future review will consider the extent to which the revised element documents how the City solicited, considered, and addressed public comments in the element. The City’s consideration of public comments must not be limited by HCD’s findings in this review letter.</p>	<p>The revised Draft Housing Element was made available to the public 10 days prior to submitting the Housing Element for a 2<sup>nd</sup> review. Comments received and information on how they were addressed in the Element is included in the Introduction (Chapter 1).</p>

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT  
DIVISION OF HOUSING POLICY DEVELOPMENT**

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February 18, 2022

Aldo Schindler, Director  
Community Development Department  
City of Downey  
11111 Brookshire Avenue  
Downey, CA 90241

Dear Aldo Schindler:

**RE: City of Downey's 6<sup>th</sup> Cycle (2021-2029) Revised Draft Housing Element**

Thank you for submitting the City of Downey's (City) revised draft housing element received for review on December 22, 2021, along with revisions received on February 3, 2022. Pursuant to Government Code section 65585, subdivision (b), the California Department of Housing and Community Development (HCD) is reporting the results of its review.

The revised draft element addresses many statutory requirements described in HCD's November 10, 2021 review; however, revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code). The enclosed Appendix describes revisions needed to comply with State Housing Element Law.

As a reminder, the City's 6th cycle housing element was due October 15, 2021. As of today, the City has not completed the housing element process for the 6th cycle. The City's 5th cycle housing element no longer satisfies statutory requirements. HCD encourages the City to revise the element as described above, adopt, and submit to HCD to regain housing element compliance.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), if a local government fails to adopt a compliant housing element within 120 days of the statutory deadline (October 15, 2021), then any rezoning to accommodate the regional housing needs allocation (RHNA), including for lower-income households, shall be completed no later than one year from the statutory deadline. Otherwise, the local government's housing element will no longer comply with State Housing Element Law, and HCD may revoke its finding of substantial compliance pursuant to Government Code section 65585, subdivision (i).

Public participation in the development, adoption and implementation of the housing element is essential to effective housing planning. Throughout the housing element

process, the City should continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available and considering and incorporating comments where appropriate.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB) 1 Sustainable Communities grant; the Strategic Growth Council and HCD's Affordable Housing and Sustainable Communities programs; and HCD's Permanent Local Housing Allocation consider housing element compliance and/or annual reporting requirements pursuant to Government Code section 65400. With a compliant housing element, the City meets housing element requirements for these and other funding sources.

For your information, some general plan element updates are triggered by housing element adoption. HCD reminds the City to consider timing provisions and welcomes the opportunity to provide assistance. For information, please see the Technical Advisories issued by the Governor's Office of Planning and Research at: [http://opr.ca.gov/docs/OPR\\_Appendix\\_C\\_final.pdf](http://opr.ca.gov/docs/OPR_Appendix_C_final.pdf) and [http://opr.ca.gov/docs/Final\\_6.26.15.pdf](http://opr.ca.gov/docs/Final_6.26.15.pdf).

HCD is committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions or need additional technical assistance, please contact Colin Cross, of our staff, at [colin.cross@hcd.ca.gov](mailto:colin.cross@hcd.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul McDougall". The signature is stylized and cursive.

Paul McDougall  
Senior Planning Manager

Enclosure



## APPENDIX CITY OF DOWNEY

The following changes are necessary to bring the City's housing element into compliance with Article 10.6 of the Government Code. Accompanying each recommended change, we cite the supporting section of the Government Code.

Housing element technical assistance information is available on HCD's website at <http://www.hcd.ca.gov/community-development/housing-element/housing-element-memos.shtml>. Among other resources, the housing element section contains HCD's latest technical assistance tool, *Building Blocks for Effective Housing Elements (Building Blocks)*, available at <http://www.hcd.ca.gov/community-development/building-blocks/index.shtml> and includes the Government Code addressing State Housing Element Law and other resources.

### **A. Housing Needs, Resources, and Constraints**

1. *Affirmatively further[ing] fair housing in accordance with Chapter 15 (commencing with Section 8899.50) of Division 1 of Title 2...shall include an assessment of fair housing in the jurisdiction. (Gov. Code, § 65583, subd. (c)(10)(A).)*

Local Data and Knowledge and Other Relevant Factors: The element is revised to add conclusions from the City's public survey, as well as a brief history of development patterns and a profile of certain planning actions the City is undertaking. However, this information and other information should be related to the assessment of fair housing. For example, the element discusses patterns of varying socio-economic concentrations but should complete an analysis with trends and how local data and knowledge and other relevant factors relate to the data and explanations of patterns. Please see HCD's prior review for additional information.

Site Inventory: The element is revised to describe how certain areas of the City have disproportionate needs. However, the element generally does not evaluate identified sites and Affirmatively Furthering Fair Housing (AFFH). An analysis should address the number of units and income categories of identified sites with respect to location and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies). For more information, please refer to HCD's prior review.

Strategies, Actions, Metrics and Milestones: The element must add or modify programs based on a complete analysis and ensure metrics and milestones are provided for each action undertaken. Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Current program actions include Program 5.2 (Affirmatively Furthering Fair Housing), which consists of actions such as outreach,

public awareness, and pursuing funding. This is not adequate to satisfy the requirement for specific and meaningful actions. Program actions should be proactive, facilitate meaningful change, and respond directly to the contributing factors to fair housing issues that were identified. Furthermore, the element still must include metrics and milestones to target meaningful outcomes and evaluate progress on programs, actions, and fair housing results.

2. *An inventory of land suitable and available for residential development, including vacant sites and sites having realistic and demonstrated potential for redevelopment during the planning period to meet the locality's housing need for a designated income level, and an analysis of the relationship of zoning and public facilities and services to these sites. (Gov. Code, § 65583, subd. (a)(3).)*

Realistic Capacity: The element is revised to claim that the conservative estimate in the corridor residential overlay accounts for the possibility of mixed-use development. However, the element still does not clarify whether the overlay will continue to allow 100 percent nonresidential development; nor does it assess the likelihood of such development and incorporate it into its assumptions for realistic capacity. The element must be revised to include analysis and adjust for the likelihood of 100 percent nonresidential development. For more information, please refer to HCD's prior review.

Nonvacant Sites: As noted in the prior review, the element must include an analysis to demonstrate the potential for additional development on nonvacant sites. The analysis should consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City's past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. In response, the element now includes some discussion of factors used to determine potential for additional development. However, the element should still include analysis of recent experience in converting existing uses and how that experience relates to factors and identified sites. The analysis should also address the extent existing uses impede additional development.

In addition, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households. As a reminder, this reliance triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.

Small Sites: The response-to-comments document submitted alongside the element claims that "lot consolidation assumptions in the inventory are limited". However, the inventory still contains many parcels less than half an acre in size, and element is revised to affirm that these sites are anticipated to consolidate, noting the sites "are included because the multiple parcels function as one site" (p. 4-25). The element must

be revised to provide analysis demonstrating the potential for lot consolidation. For more information, please refer to HCD's prior review.

Accessory Dwelling Units (ADUs): Program 1.4 is revised to commit to ADU monitoring by production and affordability, and to commit to additional action should ADU production fall short of numbers assumed in the element. However, the revised element assumes 106 ADUs per year will be constructed during the planning period, for a total of 848 ADUs. The element's analysis and programs do not support this assumption. Based on numbers reported in the element, the City is averaging 44 ADUs per year. To include a realistic estimate of the potential for ADUs, the element must reduce the number of ADUs assumed per year or include additional analysis and programs to demonstrate the likelihood of these ADU assumptions.

Infrastructure: The element now generally describes infrastructure capacity, but it should clarify sufficient total water and sewer capacity (existing and planned) to accommodate the regional housing need allocation and include a program if necessary.

Electronic Sites Inventory: For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element> for a copy of the form and instructions. The City can reach out to HCD at [sitesinventory@hcd.ca.gov](mailto:sitesinventory@hcd.ca.gov) for technical assistance.

Zoning for a Variety of Housing Types (Emergency Shelters): The element now lists development standards and includes a program to address spacing requirements as a constraint. However, parking requirements also appear to be a constraint and do not comply with statutory requirements. The element should add or modify programs to address this constraint.

- An analysis of potential and actual governmental constraints upon the maintenance, improvement, or development of housing for all income levels, including the types of housing identified in paragraph (1) of subdivision (c), and for persons with disabilities as identified in the analysis pursuant to paragraph (7), including land use controls, building codes and their enforcement, site improvements, fees and other exactions required of developers, and local processing and permit procedures... (Gov. Code, § 65583, subd. (a)(5).)*

Land-Use Controls: The element now lists multifamily parking requirements and concludes parking requirements are based on unit type and size and are not considered a significant constraint. However, parking requirements exceeding two spaces per unit are a constraint on development, particularly for studio and one-bedroom units. Also, the City requires the spaces to be in a garage which impacts development costs. The element should add or modify programs to address this constraint.

4. *Analyze any special housing needs such as elderly; persons with disabilities, including a developmental disability; large families; farmworkers; families with female heads of households; and families and persons in need of emergency shelter. (Gov. Code, § 65583, subd. (a)(7).)*

The element is revised to state that there is a low need for farmworker housing in Downey. However, the element must still provide an estimate of the number of farmworkers based on both seasonal and permanent employment. Please see HCD's prior review for additional information.

## **B. Housing Programs**

1. *Include a program which sets forth a schedule of actions during the planning period, each with a timeline for implementation, which may recognize that certain programs are ongoing, such that there will be beneficial impacts of the programs within the planning period, that the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element through the administration of land use and development controls, the provision of regulatory concessions and incentives, and the utilization of appropriate federal and state financing and subsidy programs when available. The program shall include an identification of the agencies and officials responsible for the implementation of the various actions. (Gov. Code, § 65583, subd. (c).)*

To have a beneficial impact in the planning period and address the goals of the housing element, programs must still be revised with discrete timelines and specific commitment, as follows:

- Programs 2.3 (Affordable Housing Development) and 2.4 (Affordable Housing Technical Assistance) should include proactive outreach with developers with a discrete timeline (e.g., annual).
  - Program 3.1 (Lot Consolidation) should commit to specific incentives
  - Program 3.5 (Special Needs Housing) should modify the timeline earlier in the planning period (e.g., within one year).
2. *Identify actions that will be taken to make sites available during the planning period with appropriate zoning and development standards and with services and facilities to accommodate that portion of the city's or county's share of the regional housing need for each income level that could not be accommodated on sites identified in the inventory completed pursuant to paragraph (3) of subdivision (a) without rezoning, and to comply with the requirements of Government Code section 65584.09. Sites shall be identified as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobilehomes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. (Gov. Code, § 65583, subd. (c)(1).)*

As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.

3. *Address and, where appropriate and legally possible, remove governmental and nongovernmental constraints to the maintenance, improvement, and development of housing, including housing for all income levels and housing for persons with disabilities. The program shall remove constraints to, and provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities. (Gov. Code, § 65583, subd. (c)(3).)*

As noted in Findings A3, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.

4. *Promote and affirmatively further fair housing opportunities and promote housing throughout the community or communities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability, and other characteristics protected by the California Fair Employment and Housing Act (Part 2.8 (commencing with Section 12900) of Division 3 of Title 2), Section 65008, and any other state and federal fair housing and planning law. (Gov. Code, § 65583, subd. (c)(5).)*

As noted in Finding A1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs.



HCD Findings from 02/18/22	Summary of City Edits/Responses
<p>A.1 AFFH Local Data and Knowledge and Other Relevant Factors                      The element is revised to add conclusions from the City’s public survey, as well as a brief history of development patterns and a profile of certain planning actions the City is undertaking. However, this information and other information should be related to the assessment of fair housing. For example, the element discusses patterns of varying socio-economic concentrations but should complete an analysis with trends and how local data and knowledge and other relevant factors relate to the data and explanations of patterns. Please see HCD’s prior review for additional information.</p>	<p>The AFFH analysis is edited, and the local knowledge section is broken up and the different parts of the discussion are placed in the most relevant analysis sections:</p> <ul style="list-style-type: none"> <li>• Redlining: added to the end of the segregation/integration and disproportionate needs analysis with connections made between redlining practices and concentrations of renter households</li> <li>• Transition from industrial roots: added to the end of the disproportionate needs analysis with connections made between the pattern of deindustrialization and the concentration of renter households and higher environmental pollution burdens.</li> <li>• Public survey: added to the cost burden discussion as evidence of cost burden being a major concern for residents.</li> <li>• Geographic location: added to the end of the income section with connections made between the City’s location and its mix of income levels (higher and LMI) and its diversity.</li> </ul>
<p>A.1 AFFH Site Inventory                      The element is revised to describe how certain areas of the City have disproportionate needs. However, the element generally does not evaluate identified sites and Affirmatively Furthering Fair Housing (AFFH). An analysis should address the number of units and income categories of identified sites with respect to location and how that affects the existing patterns for all components of the assessment of fair housing (e.g., segregation and integration, access to opportunity). The element should also discuss whether the distribution of sites improves or exacerbates conditions. If sites exacerbate conditions, the element should identify further program actions that will be taken to mitigate this (e.g., anti-displacement strategies). For more information, please refer to HCD’s prior review.</p>	<p>Table 3.12 has been added and it presents site inventory capacity by income with respect to location and how that affects the existing patterns for all components of the assessment of fair housing. The discussion following the table highlights where the distribution of sites improves or exacerbates conditions. Program 5.2 in the Housing Plan (Chapter 6) includes program actions (updated to respond to the Department’s comments) to address displacement risk and disproportionate housing need through housing mobility strategies and new housing choices and affordability in areas of opportunity strategies.</p>
<p>A.1 AFFH Strategies, Actions, Metrics and Milestones                      The element must add or modify programs based on a complete analysis and ensure metrics and milestones are provided for each action undertaken. Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Current program actions include Program 5.2 (Affirmatively Furthering Fair Housing), which consists of actions such as outreach public awareness, and pursuing funding. This is not adequate to satisfy the requirement for specific and meaningful actions. Program actions should be proactive, facilitate meaningful change, and respond directly to the contributing factors to fair housing issues that were identified. Furthermore, the element still must include metrics and milestones to target meaningful outcomes and evaluate progress on programs, actions, and fair housing results.</p>	<p>Program 5.2 is edited to ensure that the action items listed include specific metrics and quantifiable milestones. The programs are focused on contributing factors related to displacement risk and disproportionate housing need:</p> <ul style="list-style-type: none"> <li>• Inadequate supply/production of affordable/special needs housing</li> <li>• Displacement of residents due to regional economic pressures</li> <li>• High land and development costs in the region</li> <li>• Land use and zoning laws</li> </ul> <p>New action items are added including one to address environmental disparities, affirmatively marketing the Housing Choice voucher as a way to increase participation by residents and property owners/manager.</p> <p>Many other programs in the Element address displacement risk and disproportionate housing need – the list is edited to include the specific actions and milestones or metrics for assessing progress – the timeframes are located under those specific programs.</p>
<p>A.2 Sites Inventory Realistic Capacity                      The element is revised to claim that the conservative estimate in the corridor residential overlay accounts for the possibility of mixed-use development. However, the element still does not clarify whether the overlay will continue to allow 100 percent nonresidential development; nor does it assess the likelihood of such development and incorporate it into its assumptions for</p>	<p>The discussion is edited to add that the residential overlay will allow 100 percent nonresidential development.</p>

HCD Findings from 02/18/22	Summary of City Edits/Responses
<p>realistic capacity. The element must be revised to include analysis and adjust for the likelihood of 100 percent nonresidential development. For more information, please refer to HCD’s prior review.</p>	<p>Because residential developments currently are not permitted by zoning regulations in most commercial zones (except for senior housing), the City of Downey does not have trends it can point to assure the Department of the development potential. Instead, a combination of site selection methodology (choosing only 7 percent of available overlay sites) and aggressive programmatic action requiring minimum densities for stand alone and mixed-use developments, as well as codifying incentives that will be used to catalyze development. Residential and mixed-use sites will require a minimum density of 30 units per acre. The City recognizes its responsibility under state law to maintaining adequate sites and will continue refining the sites inventory by doing direct outreach to property owners in the new residential overlay zone as part of the General Plan update and Zoning Code amendments and gauge interest in redevelopment. The City will add any residential overlay properties not currently included into the sites inventory if redevelopment interest is expressed. The new sites will be grouped into sites that meet the shortfall requirements of sites and those that do not (but are still considered opportunity sites). The City will remove/replace sites in the inventory as requested by owners to maintain adequate sites throughout the planning period as required by law. This action will be initiated along with the General Plan and Zoning updates.</p> <p>Details and actions have been added to the residential overlay discussion in Chapter 4 and under Programs 1.1 and 1.3.</p>
<p><b>A.2 Sites Inventory Nonvacant Sites</b>                      As noted in the prior review, the element must include an analysis to demonstrate the potential for additional development on nonvacant sites. The analysis should consider factors including the extent to which existing uses may constitute an impediment to additional residential development, the City’s past experience with converting existing uses to higher density residential development, the current market demand for the existing use, an analysis of any existing leases or other contracts that would perpetuate the existing use or prevent redevelopment of the site for additional residential development, development trends, market conditions, and regulatory or other incentives or standards to encourage additional residential development on these sites. In response, the element now includes some discussion of factors used to determine potential for additional development. However, the element should still include analysis of recent experience in converting existing uses and how that experience relates to factors and identified sites. The analysis should also address the extent existing uses impede additional development. In addition, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households. As a reminder, this reliance triggers requirements to make findings based on substantial evidence that the existing use is not an impediment and will likely discontinue in the planning period.</p>	<p>Chapter 4 has been updated to add a section “Existing Uses on Non-Vacant Sites”. Recent experience in converting existing uses and how that experience relates to factors and identified sites is addressed. City staff has indicated that the demand for housing in Downey is high even for sites developed with or zoned for non-residential uses. The summary of recent projects where residential development is currently occurring shows that there are a variety of existing uses that are being recycled and replaced with housing, ranging from small-scale commercial, offices, and parking lots. The trends seen in Downey are also occurring in the general region due to the high demand for housing.</p>
<p><b>A.2 Sites Inventory Small Sites</b>                      The response-to-comments document submitted alongside the element claims that “lot consolidation assumptions in the inventory are limited”. However, the inventory still contains many parcels less than half an acre in size, and element is revised to affirm that these sites are anticipated to consolidate, noting the sites “are included because the multiple parcels function as one site” (p. 4-25). The element must be revised to provide analysis demonstrating the potential for lot consolidation. For more information, please refer to HCD’s prior review.</p>	<p>Lot consolidation assumptions in the sites inventory are minimal. Due to the City’s historical parcelization pattern, the inclusion of small sites in the inventory is expected. Nonetheless, to adhere to state law and Department guidance, most small sites are not used to meet the lower income RHNA and as such no lot consolidation is assumed. A new section, “Small Site Lot Consolidation” is added to Chapter 4 and lists all the sites that assume lot consolidation and the reason that assumption was made.</p>

HCD Findings from 02/18/22	Summary of City Edits/Responses
	<p>Program 3.1 is included to address lot consolidation. The program has been edited to indicate the type of incentives the City will offer to encourage lot consolidation as a way of adding more residential units to a project. Incentives will include deferring fees specifically for consolidation, providing flexible development standards such as setback requirements, reduced/adjusted parking and increased heights, lot coverage or floor area ratio.</p>
<p>A.2 Sites Inventory Accessory Dwelling Units (ADUs)                      Program 1.4 is revised to commit to ADU monitoring by production and affordability, and to commit to additional action should ADU production fall short of numbers assumed in the element. However, the revised element assumes 106 ADUs per year will be constructed during the planning period, for a total of 848 ADUs. The element’s analysis and programs do not support this assumption. Based on numbers reported in the element, the City is averaging 44 ADUs per year. To include a realistic estimate of the potential for ADUs, the element must reduce the number of ADUs assumed per year or include additional analysis and programs to demonstrate the likelihood of these ADU assumptions.</p>	<p>ADU estimates are adjusted downward and are based on the average of ADU permits issued in 2019 (20), 2020 (53), and 2021 (117). Since 2019, there has been a 485 percent increase in ADU permits with an annual average of 63 ADUs.</p>
<p>A.2 Sites Inventory Infrastructure                      The element now generally describes infrastructure capacity, but it should clarify sufficient total water and sewer capacity (existing and planned) to accommodate the regional housing need allocation and include a program if necessary.</p>	<p>According to the Public Works Department, the City’s water supply system and sanitary sewer collection system have the capacity to meet the added demands to accommodate the regional housing need allocation. Additional information has been added to the infrastructure discussion.</p> <p>Program 1.1 has been updated to indicate that the General Plan and zoning update and its associated environmental review will include all necessary technical studies including a thorough infrastructure assessment and mitigation program. The Timeframe is updated to add: <i>Complete an infrastructure assessment and mitigation program as part of the General Plan update and Zoning Code amendments within three years of Housing Element adoption</i></p>
<p>A.2 Sites Inventory Electronic Sites Inventory                      For your information, pursuant to Government Code section 65583.3, the City must submit an electronic sites inventory with its adopted housing element. The City must utilize standards, forms, and definitions adopted by HCD. Please see HCD’s housing element webpage at <a href="https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element">https://www.hcd.ca.gov/community-development/housing-element/index.shtml#element</a> for a copy of the form and instructions. The City can reach out to HCD at <a href="mailto:sitesinventory@hcd.ca.gov">sitesinventory@hcd.ca.gov</a> for technical assistance.</p>	<p>Noted</p>
<p>A.2 Zoning for a Variety of Housing Types (Emergency Shelters)                      The element now lists development standards and includes a program to address spacing requirements as a constraint. However, parking requirements also appear to be a constraint and do not comply with statutory requirements. The element should add or modify programs to address this constraint.</p>	<p>Program 3.5 is modified to add an action item related to the City’s parking requirements for emergency shelters. Specifically, the City will modify or remove the parking requirements related to spaces per beds to reflect demonstrated need, provided that the standards do not require more parking for emergency shelters than for other residential or commercial uses within the same zone, as required by law.</p>
<p>3. Land-Use Controls                      The element now lists multifamily parking requirements and concludes parking requirements are based on unit type and size and are not considered a significant constraint. However, parking requirements exceeding two spaces per unit are a constraint on development, particularly for studio and one-bedroom units. Also, the City requires the spaces to be in a garage which impacts development costs. The element should add or modify programs to address this constraint.</p>	<p>Program 1.3 is updated to add an action item related to the City’s parking requirements for multi-family housing particularly for smaller unit sizes (bedrooms).</p>
<p>4. The element is revised to state that there is a low need for farmworker housing in Downey. However, the element must still provide an estimate of the number of farmworkers based on both seasonal and permanent employment. Please see HCD’s prior review for additional information.</p>	<p>HCD’s prior review asked for “permanent and seasonal farmworkers at a county level (e.g., USDA Agricultural Census).” As a result, the following was added (in addition to a local estimate based on census and SCAG profile data): In 2017, the Census of Agriculture from</p>

HCD Findings from 02/18/22	Summary of City Edits/Responses
	<p>the US Department of Agriculture (USDA) documented that out of California’s approximate 377,500 agricultural workers, less than one percent (3,266) are located within Los Angeles County.</p> <p>The Element is updated to add the following: “The 2017 U.S. Census of Agriculture also reported that of the 3,266 farmworkers in Los Angeles County, 1,749 (54 percent) worked 150 days or more, and 1,517 (46 percent) worked less than 150 days.” There is no City level data available.</p>
<p>B.1 To have a beneficial impact in the planning period and address the goals of the housing element, programs must still be revised with discrete timelines and specific commitment, as follows:</p> <ul style="list-style-type: none"> <li>• Programs 2.3 (Affordable Housing Development) and 2.4 (Affordable Housing Technical Assistance) should include proactive outreach with developers with a discrete timeline (e.g., annual). Start immediate – annual</li> <li>• Program 3.1 (Lot Consolidation) should commit to specific incentives</li> <li>• Program 3.5 (Special Needs Housing) should modify the timeline earlier in the planning period (e.g., within one year).</li> </ul>	<ul style="list-style-type: none"> <li>• Programs 2.3 and 2.4 are updated with additional actions and specific timeframes.</li> <li>• Program 3.1 is updated to specify the incentives to be adopted.</li> <li>• Program 3.5 is updated to change the timeframe from three years to within one year of Housing Element Adoption.</li> </ul>
<p>B.2 As noted in Finding A2, the element does not include a complete site analysis, therefore, the adequacy of sites and zoning were not established. Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p>	<p>Program 1.1 is revised:</p> <ul style="list-style-type: none"> <li>• Revised ADU estimates</li> <li>• Additional actions to address infrastructure constraints,</li> <li>• A more detailed description of actions and timeframes</li> </ul>
<p>B.3 As noted in Findings A3, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<p>Programs 3.1 (Lot Consolidation) and 3.5 (Special Needs Housing Law) have been revised.</p>
<p>B.4 As noted in Finding A1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs.</p>	<p>Program 5.2 is edited to ensure that the action items listed include specific metrics and quantifiable milestones. The programs are focused on contributing factors related to displacement risk and disproportionate housing need:</p> <ul style="list-style-type: none"> <li>• Inadequate supply/production of affordable/special needs housing</li> <li>• Displacement of residents due to regional economic pressures</li> <li>• High land and development costs in the region</li> <li>• Land use and zoning laws</li> </ul> <p>An action item to address environmental disparities is also added: “Adopt an Environmental Justice Element with a focus on identifying steps that can be taken to address Census Tracts with a “Disadvantaged Community” designation”</p> <p>Many other programs in the Element address displacement risk and disproportionate housing need – the list is edited to include the specific actions – the timeframes are located under those specific programs.</p>

HCD Comments from October 2022	Response
<p><b>Site Inventory:</b> Minimal locational analysis - add a geographic analysis</p>	<p>Table 3.13 has been added to Chapter 3. The table shows the distribution of sites by census tracts and key components of the assessment of fair housing. The discussion following the table has been revised to reflect the additional data. Placed based strategies have been added/modified.</p>
<p><b>Strategies, Actions, Metrics and Milestones:</b> The element must add or modify programs based on a complete analysis and ensure metrics and milestones are provided for each action undertaken. Goals and actions must significantly seek to overcome contributing factors to fair housing issues. Depends on complete analysis</p> <ul style="list-style-type: none"> <li>- Generally, no metrics with AFFH outcomes (people assisted and where)</li> <li>- No significant place based or displacement actions</li> <li>- minimal new opportunity actions beyond RHNA and ADUs (no AFFH metric)</li> </ul>	<p>Program 5.2 has been revised to clarify/add/modify the program actions for displacement and placed-based strategies including adding metrics with AFFH outcomes.</p>
<p><b>Site Inventory:</b> Realistic Capacity: How often is 100% non-residential occurring? Add analysis of potential for residential development on sites that allow 100% non-residential uses.</p>	<p>Table 4.3 has been added to support both the use of non-vacant sites and sites that allow 100% non-residential uses. In addition, the City has committed to adding incentives in the Downtown Downey Specific Plan area where most of the existing (no rezoning) sites are located. The associated discussion has been augmented and Program 1.3 has been revised to add a program action that commits the City to removing the Site Plan review requirement for mixed use developments in the Downtown Downey Specific Plan and to require only an administrative review for stand-alone residential projects or commercial uses with a residential component.</p>
<p><b>Site Inventory:</b> Nonvacant Sites: Add discussion of recent trends to support redevelopment of non-vacant sites including trends.</p>	<p>Table 4.3 has been added to support both the use of non-vacant sites and sites that allow 100% non-residential uses. In addition, the City has committed to adding incentives in the Downtown Downey Specific Plan area where most of the existing (no rezoning) sites are located. The associated discussion has been augmented and Program 1.3 has been revised to add a program action that commits the City to removing the Site Plan review requirement for mixed use developments in the Downtown Downey Specific Plan and to require only an administrative review for stand-alone residential projects or commercial uses with a residential component.</p>
<p><b>Zoning for a Variety of Housing Types (Emergency Shelters):</b> Program leaves out limits to staff and should read (see blue changes)</p> <p>“Modify or remove the parking requirements related to spaces per beds to reflect sufficient parking to accommodate all staff <del>demonstrated need</del>, provided that the standards do not require more parking for emergency shelters than for other residential or commercial uses within the same zone.”</p>	<p>Program 3.5 has been revised to reflect the Department’s suggested wording.</p>
<p><b>Land-Use Controls:</b> The element now lists multifamily parking requirements and concludes parking requirements are based on unit type and size and are not considered a significant constraint. However, parking requirements exceeding two spaces per unit are a constraint on development, particularly for studio and one-bedroom units. Also, the City requires the spaces to be in a garage which impacts development costs. The element should add or modify programs to address this constraint.</p>	<p>Program 1.3 has been revised to add a commitment to modify parking standards, including garage requirements, for multifamily units:</p> <p><i>“Update off-street parking requirements for multi-family units to better reflect demonstrated need and take into account unit sizes (bedrooms). As part of the update, modify or remove garage requirements for multi-family units to ensure that parking is not a constraint, particularly for studio and one-bedroom units.”</i></p>



<p><b>Program Revisions:</b> Based on the results of a complete sites inventory and analysis, the City may need to add or revise programs to address a shortfall of sites or zoning available to encourage a variety of housing types.</p>	<p>Program 1.3 has been revised to add a program action that commits the City to removing the Site Plan review requirement for mixed use developments in the Downtown Downey Specific Plan and to require only an administrative review for stand-alone residential projects or commercial uses with a residential component.</p>
<p><b>Program Revisions:</b> As noted in Findings A3, the element requires a complete analysis of potential governmental and nongovernmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs and address and remove or mitigate any identified constraints.</p>	<ul style="list-style-type: none"> <li>• Program 1.3 has been revised to add a commitment to modify parking standards, including garage requirements, for multifamily units</li> <li>• Program 3.5 has been revised to reflect the Department’s suggested wording for modifying the emergency shelter parking requirements.</li> </ul>
<p><b>Program Revisions:</b> As noted in Finding A1, the element does not contain programs that satisfy the AFFH requirements for specific and meaningful actions to overcome fair housing issues. Based on a complete analysis, the element must add or revise programs</p>	<p>Program 5.2 has been revised to clarify/add/modify the program actions for displacement and placed-based strategies including adding metrics with AFFH outcomes.</p>

# **Appendix B: Sites Inventory Table**



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

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information (Site Type)	Optional Information2	Optional Information3
DOWNEY	10224 LA REINA AVE	90241	6252-021-011		LDR	R3	1	8.9	0.18	Residential, 1	YES - Current	NO - Privately-Owned	Pending Project	N/A	0	0	3	3 AP/PP 10224 La Reina Av	over 50 years	1.83	
DOWNEY	10303 DOWNEY AVE	90241	6252-021-017		LDR	CP R3	1	8.9	0.41	Residential, 1	YES - Current	NO - Privately-Owned	Pending Project	N/A	0	0	6	6 AP/PP 10303 & 10221 Downey Av	over 50 years	2.67	
DOWNEY	10221 DOWNEY AVE	90241	6252-021-016		LDR	CP R3	1	8.9	0.41	Residential, 1	YES - Current	NO - Privately-Owned	Pending Project	N/A	0	0	6	6 AP/PP 10303 & 10221 Downey Av	over 50 years	2.67	
DOWNEY	10361 Foster Rd	90242	8051-001-004		LDR	R1 S000	1	8.9	2.35	vacant	YES - Current	NO - Privately-Owned	Pending Project	N/A	0	0	38	38 AP/PP 10361 Foster Rd. riverbed project	no data	0.00	
DOWNEY	12850 Woodruff Av	90242	6283-024-010		NC MDR	C2 R3	18	24	2.64	vacant	YES - Current	NO - Privately-Owned	Pending Project	N/A	2	0	26	28 AP/PP 12850 Woodruff Av	no data	0.00	
DOWNEY	7224 FLORENCE AVE	90240	6229-001-005		MDR	R3	18	24	0.72	Residential, 6	YES - Current	NO - Privately-Owned	Pending Project	N/A	0	0	12	12 AP/PP 7224 Florence Av	over 50 years	1.50	
DOWNEY	11269 GARFIELD AVE	90242	6234-008-901		CM	SP			2.24	vacant	YES - Current	YES - County-Owned	Pending Project	N/A	100	0	0	100 AP/PP Vet Commons Project	no data	0.00	
DOWNEY	11282 GARFIELD AVE	90242	6245-016-926		CM	SP			13.11	RLA campus	YES - Current	YES - County-Owned	Available	N/A	300	0	300	600 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	7300 FLORES ST	90242	6245-016-933		CM	SP			10.82	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	20 to 29 years	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-935		CM	SP			1.07	vacant	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-938		CM	SP			0.09	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	7700 IMPERIAL HWY	90242	6245-016-913		CM	SP			12.15	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	30 to 39 years	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-916		CM	SP			0.03	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	7400 IMPERIAL HWY	90242	6245-016-917		CM	SP			4.93	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	30 to 39 years	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-927		CM	SP			0.01	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-936		CM	SP			3.04	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-937		CM	SP			3.04	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-939		CM	SP			0.09	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-918		CM	SP			0.13	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	11012 GARFIELD AVE	90280	6245-016-929		CM	SP			4.40	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	7500 AMIGOS AVE	90242	6245-016-930		CM	SP			27.60	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	30 to 39 years	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-931		CM	SP			1.99	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-001		CM	SP			0.42	RLA campus	YES - Current	NO - Privately-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	7500 IMPERIAL HWY	90242	6245-016-915		CM	SP			9.25	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6245-016-934		CM	SP			83.43	RLA campus	YES - Current	YES - County-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6234-005-903		CM	SP			0.00	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	11200 GARFIELD AVE	90280	6234-006-008		CM	SP			0.01	RLA campus	YES - Current	NO - Privately-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	over 50 years	0.35	
DOWNEY	11022 VULCAN ST	90280	6234-004-038		CM	SP			0.00	RLA campus	YES - Current	NO - Privately-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	over 50 years	2.33	
DOWNEY	Imperial Highway and Gardendale St.	90242	6234-005-904		CM	SP			0.04	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6234-005-905		CM	SP			0.00	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	Imperial Highway and Gardendale St.	90242	6234-005-906		CM	SP			0.04	RLA campus	YES - Current	YES - Other Publicly-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	10920 GARFIELD AVE	90280	6234-005-014		CM	SP			0.02	RLA campus	YES - Current	NO - Privately-Owned	Available	N/A	0	0	0	0 Rancho Los Amigos South Campus SP	no data	0.00	
DOWNEY	11020 PARAMOUNT BLVD	90241	6251-039-025	A	MU	DDSP	20	40	0.12	car wash	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	4	0	0	4 DDSP Dist 1 site	no data	0.00	
DOWNEY	11024 PARAMOUNT BLVD	90241	6251-039-026	A	MU	DDSP	20	40	0.46	car wash	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	14	0	0	14 DDSP Dist 1 site	40 to 49 years	4.80	
DOWNEY	10926 PARAMOUNT BLVD	90241	6251-038-013		MU	DDSP	20	40	0.59	restaurant	YES - Current	NO - Privately-Owned	Available	N/A	18	0	0	18 DDSP Dist 1 site	over 50 years	2.22	
DOWNEY	10890 PARAMOUNT BLVD	90241	6251-038-025		MU	DDSP	20	40	0.25	small office and pkgng	YES - Current	NO - Privately-Owned	Available	N/A	0	3	4	7 DDSP Dist 1 site small	40 to 49 years	1.48	
DOWNEY	10900 PARAMOUNT BLVD	90241	6251-038-024		MU	DDSP	20	40	0.34	party rentals shop	YES - Current	NO - Privately-Owned	Available	N/A	0	5	5	10 DDSP Dist 1 site small	over 50 years	0.98	
DOWNEY	10928 COLLEGE AVE	90241	6251-038-010	B	MU	DDSP	20	40	0.13	YES	YES - Current	NO - Privately-Owned	Available	N/A	4	0	0	4 DDSP Dist 2 site	over 50 years	2.56	
DOWNEY	8029 3RD ST	90241	6251-038-012	B	MU	DDSP	20	40	0.23	YES	YES - Current	NO - Privately-Owned	Available	N/A	7	0	0	7 DDSP Dist 2 site	over 50 years	3.87	
DOWNEY	8033 3RD ST	90241	6251-038-011	B	MU	DDSP	20	40	0.15	YES	YES - Current	NO - Privately-Owned	Available	N/A	4	0	0	4 DDSP Dist 2 site	over 50 years	1.11	
DOWNEY	8151 3RD ST	90241	6254-004-028		MU	DDSP	8	40	0.67	home loan bank	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	20	0	0	20 DDSP Dist 2 site	40 to 49 years	0.34	
DOWNEY	8109 2ND ST 1ST FLR	90241	6254-003-005		MU	DDSP	8	40	0.16	dentist office	YES - Current	NO - Privately-Owned	Available	N/A	0	3	2	5 DDSP Dist 2 site small	40 to 49 years	0.47	
DOWNEY	8111 2ND ST	90241	6254-003-006		MU	DDSP	8	40	0.16	tailor shop and pkgng	YES - Current	NO - Privately-Owned	Available	N/A	0	3	2	5 DDSP Dist 2 site small	over 50 years	2.88	
DOWNEY	8105 2ND ST	90241	6254-003-020		MU	DDSP	8	40	0.09	chiropractor office	YES - Current	NO - Privately-Owned	Available	N/A	0	1	2	3 DDSP Dist 2 site small	over 50 years	0.68	
DOWNEY	11016 MYRTLE ST	90241	6254-003-004		MU	DDSP	8	40	0.08	small healing center	YES - Current	NO - Privately-Owned	Available	N/A	0	1	1	2 DDSP Dist 2 site small	over 50 years	1.03	
DOWNEY	8103 3RD ST	90241	6254-004-009		MU	DDSP	8	40	0.11	small office	YES - Current	NO - Privately-Owned	Available	N/A	0	1	2	3 DDSP Dist 2 site small	over 50 years	2.29	
DOWNEY	10930 MYRTLE ST	90241	6254-004-010		MU	DDSP	8	40	0.09	Residential, 1	YES - Current	NO - Privately-Owned	Available	N/A	0	1	2	3 DDSP Dist 2 site small	over 100 years	2.48	
DOWNEY	3rd St. and Civic Center Dr.	90241	6254-018-008	C	MU	DDSP	20	40	0.42	parking	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	13	0	0	13 DDSP Dist 3 site	over 50 years	50.21	
DOWNEY	3rd St. and Civic Center Dr.	90241	6254-018-027	C	MU	DDSP	20	40	0.24	parking	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	7	0	0	7 DDSP Dist 3 site	over 50 years	60.37	
DOWNEY	3rd St. and Civic Center Dr.	90241	6254-017-011	D	MU	DDSP	20	40	0.47	medical office parking lot	YES - Current	NO - Privately-Owned	Available	N/A	14	0	0	14 DDSP Dist 3 site	over 50 years	94.02	
DOWNEY	8355 3RD ST	90241	6254-017-023	D	MU	DDSP	20	40	0.18	medical office maybe closed	YES - Current	NO - Privately-Owned	Available	N/A	5	0	0	5 DDSP Dist 3 site	over 50 years	0.35	
DOWNEY	8327 3RD ST	90241	6254-018-019	E	MU	DDSP	20	40	0.17	parking and lawn	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	5	0	0	5 DDSP Dist 3 site	30 to 39 years	25.97	
DOWNEY	8331 3RD ST	90241	6254-018-020	E	MU	DDSP	20	40	0.26	one unit and large lawn part office	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	8	0	0	8 DDSP Dist 3 site	over 50 years	2.94	
DOWNEY	8347 3RD ST	90241	6254-017-020	E	MU	DDSP	20	40	0.24	Residential, 3	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	7	0	0	7 DDSP Dist 3 site	over 50 years	3.00	
DOWNEY	8339 3RD ST	90241	6254-018-021	E	MU	DDSP	20	40	0.27	small mortgage office and Residen	YES - Current	NO - Privately-Owned	Available	Used in Prior Housing El	8	0	0	8 DDSP Dist 3 site	over 50 years	2.07	
DOWNEY	8313 3RD ST	90241	6254-018-024		MU	DDSP	20	40	0.57	BANK, PARKING	YES - Current	NO - Privately-Owned	Available	N/A	17	0	0	17 DDSP Dist 3 site	over 50 years	1.44	
DOWNEY	8232 3RD ST	90241	6254-011-003		MU	DDSP	20	40	0.23	older small office	YES - Current	NO - Privately-Owned	Available	N/A	0	3	4	7 DDSP Dist 3 site small	over 50 years	3.36	
DOWNEY	8221 3RD ST	90241	6254-007-013		MU	DDSP	20	40	0.43	empty office bldg	YES - Current	NO - Privately-Owned	Available	N/A	0	7	6	13 DDSP Dist 3 site small	over 50 years	0.27	
DOWNEY	11027 DOWNEY AVE	90241	6254-011-008		MU	DDSP	20	40	0.13	small older shop	YES - Current	NO - Privately-Owned	Available	N/A	0	2	2	4 DDSP Dist 3 site small	over 50 years	0.96	
DOWNEY	10818 DOWNEY AVE	90241	6254-015-002		MU	DDSP	20	40	0.27	Salon and pkgng	YES - Current	NO - Privately-Owned									

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Consolidated Sites	General Plan Designation (Current)	Zoning Designation (Current)	Minimum Density Allowed (units/acre)	Max Density Allowed (units/acre)	Parcel Size (Acres)	Existing Use/Vacancy	Infrastructure	Publicly-Owned	Site Status	Identified in Last/Last Two Planning Cycle(s)	Lower Income Capacity	Moderate Income Capacity	Above Moderate Income Capacity	Total Capacity	Optional Information (Site Type)	Optional Information2	Optional Information 3
DOWNEY	8321 FIRESTONE BLVD	90241	6254-020-014		MU	DDSP	40	75	0.23	low scale commercial small store	YES - Current	NO - Privately-Owned	Available	N/A	0	6	7	13	DDSP Dist 5 site small	over 50 years	2.10
DOWNEY	8152 FIRESTONE BLVD	90241	6255-001-012		MU	DDSP	40	75	0.30	small offices and shops and parking	YES - Current	NO - Privately-Owned	Available	N/A	0	8	9	17	DDSP Dist 5 site small	over 50 years	1.60
DOWNEY	13038 BELLFLOWER BLVD	90242	6281-006-024		LDR	R1 5000	1	8.9	0.70	Residential, 2	YES - Current	NO - Privately-Owned	Available	N/A	0	0	6	6	underutilized R1	over 50 years	2.00
DOWNEY	13042 STANBRIDGE AVE	90242	6282-007-061		LDR	R1 5000	1	8.9	0.34	Residential, 1	YES - Current	NO - Privately-Owned	Available	N/A	0	0	3	3	underutilized R1	over 50 years	1.09
DOWNEY	8121 CONRAD ST	90242	6259-010-047		LMDR	R2	9	17	0.19	backyard	YES - Current	NO - Privately-Owned	Available	N/A	0	0	3	3	underutilized R2	over 50 years	5.00
DOWNEY	8118 ORANGE ST	90242	6259-010-045		LMDR	R2	9	17	0.74	Residential, 6	YES - Current	NO - Privately-Owned	Available	N/A	0	0	13	13	underutilized R2	over 50 years	4.00
DOWNEY	11804 DOWNEY AVE	90241	6255-027-064		LMDR	R2	9	17	0.74	Residential, 1	YES - Current	NO - Privately-Owned	Available	N/A	0	0	13	13	underutilized R2	over 50 years	2.96
DOWNEY	8123 CONRAD ST	90242	6259-010-046		LMDR	R2	9	17	0.88	Residential, 6	YES - Current	NO - Privately-Owned	Available	N/A	0	0	15	15	underutilized R2	over 50 years	5.00
DOWNEY	9834 TWEEDY LN	90240	6360-011-010		LMDR	R2	9	17	0.32	Residential, 1	YES - Current	NO - Privately-Owned	Available	N/A	0	0	5	5	underutilized R2	over 50 years	1.19
DOWNEY	9838 TWEEDY LN	90240	6360-011-009		LMDR	R2	9	17	0.32	Residential, 3	YES - Current	NO - Privately-Owned	Available	N/A	0	0	5	5	underutilized R2	over 50 years	1.00
DOWNEY	Bangle Rd. and Guatemala Ave.	90242	6366-017-011		LDR	R1 6000	1	8.9	0.12	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	1	1	vacant R1	no data	0.00
DOWNEY	Bangle Rd. and Guatemala Ave.	90242	6366-017-012		LDR	R1 6000	1	8.9	0.16	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	1	1	vacant R1	no data	0.00
DOWNEY	13019 CORNUTA AVE	90241	6281-003-044		LDR	R1 5000	1	8.9	0.25	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	2	2	vacant R1	no data	0.00
DOWNEY	Leahy Ave. and Adenmoor Ave.	90242	6281-006-042		LDR	R1 5000	1	8.9	0.16	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	1	1	vacant R1	no data	0.00
DOWNEY	8337 FONTANA ST	90241	6255-027-063		LMDR	R2	9	17	1.24	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	21	21	vacant R2	no data	356.76
DOWNEY	8435 FONTANA ST	90241	6255-027-065		LMDR	R2	9	17	0.57	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	10	10	vacant R2	no data	0.00
DOWNEY	8132 ORANGE ST	90242	6259-010-044		LMDR	R2	9	17	0.31	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	5	5	vacant R2	no data	0.00
DOWNEY	Orange St. and Montgomery St.	90242	6259-010-026		LMDR	R2	9	17	0.23	vacant	YES - Current	NO - Privately-Owned	Available	N/A	0	0	4	4	vacant R2	40 to 49 years	13.88



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

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Optional Information (site type)	Building Age	Land/Improvement Ratio
																				Optional Information2	Optional Information3
DOWNEY	12515 PARAMOUNT BLVD	90242	6245-019-002	4	0	0	0	0 Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 Rezone LI multi parcel	over 50 years	1.64		
DOWNEY	12517 1/2 PARAMOUNT BLVD	90242	6245-019-028	4	0	0	0	0 Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 Rezone LI multi parcel	over 50 years	7.01		
DOWNEY	12517 PARAMOUNT BLVD	90242	6245-019-029	4	0	0	0	0 Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 Rezone LI multi parcel	over 50 years	0.80		
DOWNEY	11911 RIVES AVE	90242	6246-012-003	11	0	0	0	0 Shortfall of Sites	0.359 MDR	R3O	MDR	R3O	18	40	11 Non-Vacant	Residential, 2	MDR/R3 Rezone LI multi parcel	over 50 years	1.00		
DOWNEY	12511 PARAMOUNT BLVD	90242	6245-019-001	4	0	0	0	0 Shortfall of Sites	0.114 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 Rezone LI multi parcel	over 50 years	1.87		
DOWNEY	11905 RIVES AVE	90242	6246-012-015	6	0	0	0	0 Shortfall of Sites	0.183 MDR	R3O	MDR	R3O	18	40	6 Non-Vacant	Residential, 1	MDR/R3 Rezone LI multi parcel	over 50 years	0.81		
DOWNEY	7214 FLORENCE AVE	90240	6229-001-008	11	0	0	0	0 Shortfall of Sites	0.353 MDR	R3	MDR	R3	18	40	11 Vacant	vacant	MDR/R3 Rezone LI multi parcel	over 50 years	30.55		
DOWNEY	7218 FLORENCE AVE	90240	6229-001-009	6	0	0	0	0 Shortfall of Sites	0.174 MDR	R3	MDR	R3	18	40	6 Vacant	vacant	MDR/R3 Rezone LI multi parcel	no data	0.00		
DOWNEY	7846 STEWART AND GRAY RD	90241	6246-002-003	17	0	0	0	0 Shortfall of Sites	0.529 MDR	R3	MDR	R3	18	40	17 Non-Vacant	Residential, 4	MDR/R3 rezone LI stand alone	over 50 years	3.80		
DOWNEY	8325 GARDENDALE ST	90242	6263-033-014	16	0	0	0	0 Shortfall of Sites	0.508 MDR	R3	MDR	R3	18	40	16 Non-Vacant	Residential, 4	MDR/R3 rezone LI stand alone	over 50 years	1.54		
DOWNEY	7044 STEWART AND GRAY RD	90241	6232-020-004	4	0	0	40	Shortfall of Sites	1.324 LDR	R1	MDR	R3	1	8.7	44 Non-Vacant	Truck storage or parking	MDR/R3 rezone LI stand alone from LDR per own	over 50 years	2.70		
DOWNEY	7238 FLORENCE AVE	90240	6229-001-003	0	0	4	3	Shortfall of Sites	0.204 MDR	R3	MDR	R3	18	40	7 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.40		
DOWNEY	7234 FLORENCE AVE	90240	6229-001-004	0	0	3	3	Shortfall of Sites	0.184 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.23		
DOWNEY	7648 STEWART AND GRAY RD	90241	6246-012-033	0	0	2	2	Shortfall of Sites	0.125 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.70		
DOWNEY	7650 STEWART AND GRAY RD	90241	6246-012-034	0	0	2	2	Shortfall of Sites	0.128 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.47		
DOWNEY	7654 STEWART AND GRAY RD	90241	6246-012-036	0	0	2	2	Shortfall of Sites	0.134 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	2.46		
DOWNEY	7618 STEWART AND GRAY RD	90241	6246-013-013	0	0	3	3	Shortfall of Sites	0.182 MDR	R3O	MDR	R3O	18	40	6 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.47		
DOWNEY	7624 STEWART AND GRAY RD	90241	6246-012-014	0	0	2	3	Shortfall of Sites	0.157 MDR	R3O	MDR	R3O	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	3.28		
DOWNEY	7652 STEWART AND GRAY RD	90241	6246-012-035	0	0	2	2	Shortfall of Sites	0.134 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	0.90		
DOWNEY	12519 PARAMOUNT BLVD	90242	6245-019-027	0	0	2	2	Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.69		
DOWNEY	7632 STEWART AND GRAY RD	90241	6246-012-012	0	0	2	3	Shortfall of Sites	0.153 MDR	R3O	MDR	R3O	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.25		
DOWNEY	7644 STEWART AND GRAY RD	90241	6246-012-031	0	0	2	2	Shortfall of Sites	0.133 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.16		
DOWNEY	7612 STEWART AND GRAY RD	90241	6246-013-015	0	0	3	3	Shortfall of Sites	0.178 MDR	R3O	MDR	R3O	18	40	6 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.35		
DOWNEY	7962 2ND ST	90241	6251-018-005	0	0	2	3	Shortfall of Sites	0.149 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.19		
DOWNEY	10558 PARAMOUNT BLVD	90241	6251-033-010	0	0	5	5	Shortfall of Sites	0.332 MDR	R3	MDR	R3	18	40	10 Non-Vacant	small older office building	MDR/R3 small Rezone	over 50 years	2.17		
DOWNEY	10545 WESTERN AVE	90241	6251-034-011	0	0	2	1	Shortfall of Sites	0.109 MDR	R3	MDR	R3	18	40	3 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	2.33		
DOWNEY	10541 WESTERN AVE	90241	6251-034-022	0	0	2	2	Shortfall of Sites	0.114 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.50		
DOWNEY	8066 7TH ST	90241	6251-035-006	0	0	2	3	Shortfall of Sites	0.158 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.31		
DOWNEY	8060 7TH ST	90241	6251-035-007	0	0	2	2	Shortfall of Sites	0.126 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.03		
DOWNEY	8048 7TH ST	90241	6251-035-009	0	0	2	2	Shortfall of Sites	0.126 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	2.86		
DOWNEY	10446 DOWNEY AVE	90241	6252-019-003	0	0	3	3	Shortfall of Sites	0.196 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.99		
DOWNEY	10456 DOWNEY AVE	90241	6252-019-010	0	0	8	7	Shortfall of Sites	0.468 MDR	R3	MDR	R3	18	40	15 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	1.02		
DOWNEY	10232 WESTERN AVE	90241	6252-021-018	0	0	2	3	Shortfall of Sites	0.172 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	6.21		
DOWNEY	10332 WESTERN AVE	90241	6252-022-008	0	0	2	3	Shortfall of Sites	0.170 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.64		
DOWNEY	8217 7TH ST	90241	6252-025-002	0	0	1	1	Shortfall of Sites	0.055 MDR	R3	MDR	R3	18	40	2 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.61		
DOWNEY	10538 LA REINA AVE	90241	6252-025-017	0	0	4	3	Shortfall of Sites	0.207 MDR	R3	MDR	R3	18	40	7 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	4.00		
DOWNEY	10547 LA REINA AVE	90241	6252-026-002	0	0	2	2	Shortfall of Sites	0.131 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.29		
DOWNEY	7th St. and Downey Ave.	90241	6253-001-029	0	0	3	3	Shortfall of Sites	0.186 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 1	MDR/R3 small Rezone	11 to 19	0.60		
DOWNEY	10633 LA REINA AVE	90241	6253-002-002	0	0	2	2	Shortfall of Sites	0.124 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	1.55		
DOWNEY	10603 LA REINA AVE	90241	6253-002-008	0	0	4	3	Shortfall of Sites	0.205 MDR	R3	MDR	R3	18	40	7 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 100 years	1.91		
DOWNEY	10602 WESTERN AVE	90241	6253-002-010	0	0	2	2	Shortfall of Sites	0.123 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.90		
DOWNEY	10508 DOWNEY AVE	90241	6253-013-007	0	0	2	3	Shortfall of Sites	0.167 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.99		
DOWNEY	10518 DOWNEY AVE	90241	6253-013-009	0	0	2	3	Shortfall of Sites	0.167 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.67		
DOWNEY	10522 DOWNEY AVE	90241	6253-013-010	0	0	2	3	Shortfall of Sites	0.171 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.67		
DOWNEY	12519 1/2 PARAMOUNT BLVD	90242	6245-019-026	0	0	2	2	Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.79		
DOWNEY	7730 STEWART AND GRAY RD	90241	6246-012-004	0	0	2	2	Shortfall of Sites	0.135 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.24		
DOWNEY	7646 STEWART AND GRAY RD	90241	6246-012-032	0	0	2	2	Shortfall of Sites	0.133 MDR	R3O	MDR	R3O	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.75		
DOWNEY	8335 GARDENDALE ST	90242	6263-033-019	0	0	2	2	Shortfall of Sites	0.113 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.96		
DOWNEY	7956 2ND ST	90241	6251-018-004	0	0	2	3	Shortfall of Sites	0.154 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.92		
DOWNEY	10416 WESTERN AVE	90241	6252-023-016	0	0	2	2	Shortfall of Sites	0.115 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.10		
DOWNEY	10547 DOWNEY AVE	90241	6252-025-001	0	0	2	2	Shortfall of Sites	0.130 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.63		
DOWNEY	10506 WESTERN AVE	90241	6252-026-013	0	0	2	3	Shortfall of Sites	0.157 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.99		
DOWNEY	8101 7TH ST	90241	6252-026-022	0	0	2	2	Shortfall of Sites	0.114 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.67		
DOWNEY	8136 6TH ST	90241	6253-003-008	0	0	2	2	Shortfall of Sites	0.138 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 100 years	0.93		
DOWNEY	10726 LA REINA AVE	90241	6253-004-014	0	0	2	2	Shortfall of Sites	0.139 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	1.38		
DOWNEY	8417 5TH ST	90241	6253-007-026	0	0	3	3	Shortfall of Sites	0.173 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.65		
DOWNEY	8423 5TH ST	90241	6253-007-032	0	0	3	3	Shortfall of Sites	0.172 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.33		
DOWNEY	10608 DOWNEY AVE	90241	6253-012-002	0	0	2	2	Shortfall of Sites	0.140 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	2.20		
DOWNEY	8061 7TH ST	90241	6251-034-013	0	0	2	2	Shortfall of Sites	0.124 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	6.48		
DOWNEY	10238 WESTERN AVE	90241	6252-022-001	0	0	2	3	Shortfall of Sites	0.166 MDR	R3	MDR	R3	18	40	5 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.76		
DOWNEY	10410 WESTERN AVE	90241	6252-023-017	0	0	2	2	Shortfall of Sites	0.121 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.81		
DOWNEY	10541 LA REINA AVE	90241	6252-026-004	0	0	2	2	Shortfall of Sites	0.131 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00		
DOWNEY	10603 DOWNEY AVE	90241	6253-001-007	0	0	3	3	Shortfall of Sites	0.185 MDR	R3	MDR	R3	18	40	6 Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 100 years	1.01		
DOWNEY	10733 LA REINA AVE	90241	6253-003-002	0	0	2	2	Shortfall of Sites	0.128 MDR	R3	MDR	R3	18	40	4 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	2.90		
DOWNEY	10721 NEW ST	90241	6253-004-005	0	0	4	3	Shortfall of Sites	0.207 MDR	R3	MDR	R3	18	40	7 Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00		
DOWNEY																					

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Optional Information (site type)	Optional Information2	Optional Information3
DOWNEY	7th St. and Downey Ave.	90241	6253-001-028	0	0	3	3	Shortfall of Sites	0.186	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 1	MDR/R3 small Rezone	no data	3.85
DOWNEY	8114 7TH ST	90241	6253-002-009	0	0	2	1	Shortfall of Sites	0.083	MDR	R3	MDR	R3	18	40	3	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	4.00
DOWNEY	8132 6TH ST	90241	6253-003-009	0	0	2	2	Shortfall of Sites	0.138	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.68
DOWNEY	10710 WESTERN AVE	90241	6253-003-018	0	0	2	2	Shortfall of Sites	0.139	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.73
DOWNEY	10720 LA REINA AVE	90241	6253-004-013	0	0	4	3	Shortfall of Sites	0.207	MDR	R3	MDR	R3	18	40	7	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.93
DOWNEY	8411 5TH ST	90241	6253-007-025	0	0	3	3	Shortfall of Sites	0.174	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.42
DOWNEY	8403 5TH ST	90241	6253-007-031	0	0	3	3	Shortfall of Sites	0.181	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	1.50
DOWNEY	10612 DOWNEY AVE	90241	6253-012-003	0	0	2	2	Shortfall of Sites	0.140	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.66
DOWNEY	10624 DOWNEY AVE	90241	6253-012-012	0	0	3	3	Shortfall of Sites	0.182	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	3.20
DOWNEY	10512 DOWNEY AVE	90241	6253-013-008	0	0	2	3	Shortfall of Sites	0.166	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.68
DOWNEY	12116 DOWNEY AVE	90242	6258-006-033	0	0	4	5	Shortfall of Sites	0.275	MDR	R3	MDR	R3	18	40	9	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.27
DOWNEY	8738 IMPERIAL HWY	90242	6263-002-010	0	0	3	2	Shortfall of Sites	0.164	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	7.00
DOWNEY	8740 IMPERIAL HWY	90242	6263-002-012	0	0	4	3	Shortfall of Sites	0.212	MDR	R3	MDR	R3	18	40	7	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.85
DOWNEY	8724 LYNDORA ST	90242	6263-006-018	0	0	2	2	Shortfall of Sites	0.119	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	8708 LYNDORA ST	90242	6263-006-021	0	0	2	2	Shortfall of Sites	0.120	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	8363 GARDENDALE ST	90242	6263-033-018	0	0	4	5	Shortfall of Sites	0.287	MDR	R3	MDR	R3	18	40	9	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.97
DOWNEY	11027 OLD RIVER SCHOOL RD	90241	6229-019-013	0	0	3	2	Shortfall of Sites	0.150	MDR	R3O	MDR	R3O	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.76
DOWNEY	12649 LAKEWOOD BLVD	90242	6263-002-027	0	0	3	3	Shortfall of Sites	0.197	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.66
DOWNEY	8703 LYNDORA ST	90242	6263-006-010	0	0	2	1	Shortfall of Sites	0.094	MDR	R3	MDR	R3	18	40	3	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.54
DOWNEY	7218 FLORENCE AVE	90240	6229-001-006	0	0	4	3	Shortfall of Sites	0.218	MDR	R3	MDR	R3	18	40	7	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	2.00
DOWNEY	11029 OLD RIVER SCHOOL RD	90241	6229-019-014	0	0	3	2	Shortfall of Sites	0.151	MDR	R3O	MDR	R3O	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 100 years	4.00
DOWNEY	12425 DUNROBIN AVE	90242	6283-001-004	0	0	2	2	Shortfall of Sites	0.117	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	12421 DUNROBIN AVE	90242	6283-003-005	0	0	2	2	Shortfall of Sites	0.117	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.67
DOWNEY	9449 NANCE AVE	90241	6284-003-020	0	0	3	3	Shortfall of Sites	0.192	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.89
DOWNEY	9209 ELM VISTA DR	90242	6284-020-005	0	0	2	1	Shortfall of Sites	0.107	MDR	R3	MDR	R3	18	40	3	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	9217 ELM VISTA DR	90242	6284-020-006	0	0	2	3	Shortfall of Sites	0.152	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.65
DOWNEY	11943 ADENMOOR AVE	90242	6284-020-020	0	0	2	2	Shortfall of Sites	0.140	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.04
DOWNEY	11944 ADENMOOR AVE	90242	6284-020-029	0	0	2	2	Shortfall of Sites	0.139	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.93
DOWNEY	9203 WASHBURN RD	90242	6284-022-009	0	0	2	2	Shortfall of Sites	0.123	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.65
DOWNEY	9211 WASHBURN RD	90242	6284-022-010	0	0	2	2	Shortfall of Sites	0.125	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.60
DOWNEY	12403 DUNROBIN AVE	90242	6283-003-020	0	0	2	2	Shortfall of Sites	0.138	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	11941 ADENMOOR AVE	90242	6284-020-021	0	0	2	3	Shortfall of Sites	0.141	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.06
DOWNEY	11938 ADENMOOR AVE	90242	6284-020-026	0	0	2	2	Shortfall of Sites	0.137	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.32
DOWNEY	8718 LYNDORA ST	90242	6263-006-019	0	0	2	2	Shortfall of Sites	0.121	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.11
DOWNEY	8712 LYNDORA ST	90242	6263-006-020	0	0	2	2	Shortfall of Sites	0.125	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	4.00
DOWNEY	8702 LYNDORA ST	90242	6263-006-022	0	0	2	1	Shortfall of Sites	0.094	MDR	R3	MDR	R3	18	40	3	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	2.02
DOWNEY	7214 FLORENCE AVE	90240	6229-001-007	0	0	5	4	Shortfall of Sites	0.292	MDR	R3	MDR	R3	18	40	9	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.82
DOWNEY	7363 DINWIDDIE ST	90241	6229-019-004	0	0	5	4	Shortfall of Sites	0.274	MDR	R3O	MDR	R3O	18	40	9	Non-Vacant	SFR and store	MDR/R3 small Rezone	over 50 years	2.40
DOWNEY	12433 DUNROBIN AVE	90242	6283-003-003	0	0	2	2	Shortfall of Sites	0.117	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	0.91
DOWNEY	11242 PANGBORN AVE	90241	6284-002-012	0	0	5	5	Shortfall of Sites	0.312	MDR	R3	MDR	R3	18	40	10	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	3.34
DOWNEY	11937 ADENMOOR AVE	90242	6284-020-023	0	0	2	2	Shortfall of Sites	0.138	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.23
DOWNEY	11935 ADENMOOR AVE	90242	6284-020-024	0	0	2	3	Shortfall of Sites	0.152	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.75
DOWNEY	9202 ELM VISTA DR	90242	6284-022-001	0	0	2	2	Shortfall of Sites	0.140	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.48
DOWNEY	9308 ELM VISTA DR	90242	6284-023-029	0	0	3	3	Shortfall of Sites	0.196	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 1	MDR/R3 small Rezone	over 50 years	1.74
DOWNEY	9661 IMPERIAL HWY	90242	6283-003-001	0	0	6	4	Shortfall of Sites	0.325	MDR	R3	MDR	R3	18	40	10	Non-Vacant	psychic office	MDR/R3 small Rezone	over 50 years	21.52
DOWNEY	9445 NANCE AVE	90241	6284-003-019	0	0	3	3	Shortfall of Sites	0.193	MDR	R3	MDR	R3	18	40	6	Non-Vacant	Residential, 2	MDR/R3 small Rezone	over 50 years	0.83
DOWNEY	11939 ADENMOOR AVE	90242	6284-020-022	0	0	2	3	Shortfall of Sites	0.141	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.05
DOWNEY	11936 ADENMOOR AVE	90242	6284-020-025	0	0	2	3	Shortfall of Sites	0.153	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.23
DOWNEY	11940 ADENMOOR AVE	90242	6284-020-027	0	0	2	3	Shortfall of Sites	0.141	MDR	R3	MDR	R3	18	40	5	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.89
DOWNEY	11942 ADENMOOR AVE	90242	6284-020-028	0	0	2	2	Shortfall of Sites	0.141	MDR	R3	MDR	R3	18	40	4	Non-Vacant	Residential, 1	MDR/R3 small Rezone	20 to 29 years	1.23
DOWNEY	12524 COLUMBIA WAY	90242	6256-005-011	32	0	0	0	Shortfall of Sites	1.057	MU	CM	MU	MU	30	32	Non-Vacant	older indust/street sweeper bu	MU GP Rezone LI	over 50 years	1.19	
DOWNEY	12651 LAKEWOOD BLVD	90242	6263-002-039	17	0	0	0	Shortfall of Sites	0.557	MU	C1	MU	MU	30	17	Non-Vacant	offices and pkgng	MU GP Rezone LI	over 50 years	7.36	
DOWNEY	12739 LAKEWOOD BLVD	90242	6263-004-011	17	0	0	0	Shortfall of Sites	0.553	MU	C1	MU	MU	30	17	Non-Vacant	small office and parking	MU GP Rezone LI	40 to 49 years	1.23	
DOWNEY	12510 COLUMBIA WAY	90242	6256-005-009	29	0	0	0	Shortfall of Sites	0.980	MU	CM	MU	MU	30	29	Non-Vacant	older indust/commercial use b:	MU GP Rezone LI	over 50 years	10.07	
DOWNEY	13101 LAKEWOOD BLVD	90242	6266-001-035	24	0	0	0	Shortfall of Sites	0.810	MU	C2	MU	MU	30	24	Non-Vacant	older strip center	MU GP Rezone LI	30 to 39 years	0.96	
DOWNEY	Imperial Highway and Ardis Ave.	90242		24	0	0	0	Shortfall of Sites	0.809	MU	SPM2	MU	MU	30	24	Vacant	vacant	MU GP Rezone LI	no data	0.00	
DOWNEY	12717 LAKEWOOD BLVD	90242	6263-003-010	0	0	3	3	Shortfall of Sites	0.198	MU	R1 5000	MU	MU	30	6	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	2.67	
DOWNEY	12725 LAKEWOOD BLVD	90242	6263-004-003	0	0	4	4	Shortfall of Sites	0.276	MU	R3	MU	MU	30	8	Non-Vacant	Residential, 4	MU GP Rezone small	over 50 years	0.79	
DOWNEY	13032 BLODGETT AVE	90242	6263-014-002	0	0	2	2	Shortfall of Sites	0.138	MU	R1 5000	MU	MU	30	4	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	2.22	
DOWNEY	8930 PRISCILLA ST	90242	6263-014-006	0	0	2	2	Shortfall of Sites	0.149	MU	R1 5000	MU	MU	30	4	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	1.80	
DOWNEY	13044 BLODGETT AVE	90242	6263-014-004	0	0	2	2	Shortfall of Sites	0.138	MU	R1 5000	MU	MU	30	4	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	1.24	
DOWNEY	8922 PRISCILLA ST	90242	6263-014-005	0	0	2	2	Shortfall of Sites	0.138	MU	R1 5000	MU	MU	30	4	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	1.18	
DOWNEY	8946 PRISCILLA ST	90242	6263-014-017	0	0	3	2	Shortfall of Sites	0.151	MU	R1 5000	MU	MU	30	5	Non-Vacant	Residential, 1	MU GP Rezone small	over 50 years	2.89	
DOWNEY	12961 LAKEWOOD BLVD	90242	6263-014-018	0	0	5	4														



Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/ Nonvacant	Description of Existing Uses	Optional Information (site type)	Optional Information2	Optional Information3
DOWNEY	9530 IMPERIAL HWY	90242	6283-002-037	88	0	0	0	0 Shortfall of Sites	2.917	CM	C2	CM	C2	30		88	Non-Vacant	diner, liquor store, misc office	Res Overlay Imperial Hwy.	over 50 years	0.26
DOWNEY	8045 IMPERIAL HWY	90242	6259-019-031	0	0	6	7	Shortfall of Sites	0.422	GC	C2	GC	C2	30		13	Non-Vacant	older commercial bldg and parking	Res Overlay Imperial Hwy. small	over 50 years	5.00
DOWNEY	8742 IMPERIAL HWY	90242	6263-001-009	0	0	4	4	Shortfall of Sites	0.282	GC	C2	GC	C2	30		8	Non-Vacant	older commercial phone repair	Res Overlay Imperial Hwy. small	over 50 years	2.65
DOWNEY	8845 IMPERIAL HWY	90242	6261-014-051	0	0	6	6	Shortfall of Sites	0.400	GC	C2	GC	C2	30		12	Non-Vacant	car wash	Res Overlay Imperial Hwy. small	30 to 39 years	4.00
DOWNEY	8806 IMPERIAL HWY	90242	6263-001-007	0	0	4	4	Shortfall of Sites	0.257	GC	C2	GC	C2	30		8	Non-Vacant	older commercial and parking	Res Overlay Imperial Hwy. small	over 50 years	2.20
DOWNEY	8630 IMPERIAL HWY	90242	6263-009-037	0	0	3	3	Shortfall of Sites	0.197	GC	C1	GC	C1	30		6	Non-Vacant	laundromat, donuts and large parking	Res Overlay Imperial Hwy. small	over 50 years	2.07
DOWNEY	8642 IMPERIAL HWY	90242	6263-009-038	0	0	2	2	Shortfall of Sites	0.132	GC	C1	GC	C1	30		4	Non-Vacant	taco drive through and parking	Res Overlay Imperial Hwy. small	over 50 years	2.56
DOWNEY	8304 IMPERIAL HWY	90242	6263-042-015	0	0	6	5	Shortfall of Sites	0.353	NC	C1	NC	C1	30		11	Non-Vacant	pizza and laundromat building	Res Overlay Imperial Hwy. small	40 to 49 years	0.98
DOWNEY	7347 IMPERIAL HWY	90242	6233-035-027	0	0	5	4	Shortfall of Sites	0.316	NC	C2	NC	C2	30		9	Non-Vacant	small fast mexican drive through	Res Overlay Imperial Hwy. small	over 50 years	5.63
DOWNEY	9841 IMPERIAL HWY	90242	6283-016-023	0	0	6	5	Shortfall of Sites	0.365	NC	C2	NC	C2	30		11	Non-Vacant	burger restaurant and parking	Res Overlay Imperial Hwy. small	over 50 years	3.02
DOWNEY	8800 IMPERIAL HWY	90242	6263-001-008	0	0	2	2	Shortfall of Sites	0.127	GC	C2	GC	C2	30		4	Non-Vacant	Small commercial use	Res Overlay Imperial Hwy. small	over 50 years	1.90
DOWNEY	8628 IMPERIAL HWY	90242	6263-009-036	0	0	5	4	Shortfall of Sites	0.302	GC	C1	GC	C1	30		9	Non-Vacant	commercial medical bldg and parking	Res Overlay Imperial Hwy. small	over 50 years	4.24
DOWNEY	12441 WOODRUFF AVE	90241	6283-016-029	0	0	3	3	Shortfall of Sites	0.200	NC	C2	NC	C2	30		6	Non-Vacant	auto service	Res Overlay Imperial Hwy. small	over 50 years	0.94
DOWNEY	10001 PARAMOUNT BLVD	90240	6360-010-003	21	0	0	0	Shortfall of Sites	0.695	GC	C2	GC	C2	30		21	Non-Vacant	vacant older supermarket bldg	Res Overlay Paramount Blvd.	over 50 years	0.54
DOWNEY	10033 PARAMOUNT BLVD	90240	6360-010-021	11	0	0	0	Shortfall of Sites	0.379	GC	C2	GC	C2	30		11	Non-Vacant	Shopping Centers (Neighborhood)	Res Overlay Paramount Blvd.	30 to 39 years	1.11
DOWNEY	9901 PARAMOUNT BLVD	90240	6360-010-011	69	0	0	0	Shortfall of Sites	2.312	GC	C2	GC	C2	30		69	Non-Vacant	older commercial strip centers	Res Overlay Paramount Blvd.	over 50 years	0.43
DOWNEY	10001 PARAMOUNT BLVD	90240	6360-010-023	43	0	0	0	Shortfall of Sites	1.425	GC	C2	GC	C2	30		43	Non-Vacant	parking lot	Res Overlay Paramount Blvd.	over 50 years	0.00
DOWNEY	11917 PARAMOUNT BLVD	90242	6246-001-027	6	0	0	0	Shortfall of Sites	0.201	NC	C1	NC	C1	30		6	Non-Vacant	strip commercial and parking	Res Overlay Paramount Blvd.	30 to 39 years	0.81
DOWNEY	11915 PARAMOUNT BLVD	90242	6246-001-030	10	0	0	0	Shortfall of Sites	0.321	NC	C1	NC	C1	30		10	Non-Vacant	strip commercial and parking	Res Overlay Paramount Blvd.	30 to 39 years	0.96
DOWNEY	11850 PARAMOUNT BLVD	90241	6255-019-031	24	0	0	0	Shortfall of Sites	0.786	NC	C1	NC	C1	30		24	Non-Vacant	small commercial uses and parking	Res Overlay Paramount Blvd.	over 50 years	2.90
DOWNEY	12800 PARAMOUNT BLVD	90242	6260-011-028	4	0	0	0	Shortfall of Sites	0.125	GC	C2	GC	C2	30		4	Non-Vacant	older strip center mix commercial	Res Overlay Paramount Blvd.	over 50 years	0.86
DOWNEY	12800 PARAMOUNT BLVD	90242	6260-011-029	8	0	0	0	Shortfall of Sites	0.260	GC	C2	GC	C2	30		8	Non-Vacant	older strip center mix commercial	Res Overlay Paramount Blvd.	over 50 years	0.86
DOWNEY	12800 PARAMOUNT BLVD	90242	6260-011-027	4	0	0	0	Shortfall of Sites	0.135	GC	C2	GC	C2	30		4	Non-Vacant	older strip center mix commercial	Res Overlay Paramount Blvd.	over 50 years	0.82
DOWNEY	7972 BURNS AVE	90241	6247-004-036	22	0	0	0	Shortfall of Sites	0.722	Office	C2	Office	C2	30		22	Non-Vacant	small store with large unmain	Res Overlay Paramount Blvd.	over 50 years	2.83
DOWNEY	10243 PARAMOUNT BLVD	90241	6251-003-001	21	0	0	0	Shortfall of Sites	0.705	GC	C2	GC	C2	30		21	Non-Vacant	bank and parking	Res Overlay Paramount Blvd.	over 50 years	3.00
DOWNEY	11543 PARAMOUNT BLVD	90241	6247-006-013	20	0	0	0	Shortfall of Sites	0.651	Office	C1	Office	C1	30		20	Non-Vacant	empty church for lease	Res Overlay Paramount Blvd.	over 50 years	1.48
DOWNEY	10240 PARAMOUNT BLVD	90241	6251-030-028	55	0	0	0	Shortfall of Sites	1.829	GC	C2	GC	C2	30		55	Non-Vacant	bank and parking	Res Overlay Paramount Blvd.	over 50 years	1.56
DOWNEY	12848 PARAMOUNT BLVD	90242	6260-011-065	16	0	0	0	Shortfall of Sites	0.522	GC	C2	GC	C2	30		16	Non-Vacant	older strip center mix commercial	Res Overlay Paramount Blvd.	40 to 49 years	0.56
DOWNEY	12000 PARAMOUNT BLVD	90242	6259-003-016	24	0	0	0	Shortfall of Sites	0.806	Office	C1	Office	C1	30		24	Non-Vacant	strip commercial and parking	Res Overlay Paramount Blvd.	40 to 49 years	0.69
DOWNEY	10032 PARAMOUNT BLVD	90240	6361-021-021	21	0	0	0	Shortfall of Sites	0.693	GC	C2	GC	C2	30		21	Non-Vacant	older comm bldg various tenants	Res Overlay Paramount Blvd.	over 50 years	1.07
DOWNEY	9920 PARAMOUNT BLVD	90240	6361-021-050	48	0	0	0	Shortfall of Sites	1.584	GC	C2	GC	C2	30		48	Non-Vacant	Auto zone and vacant land	Res Overlay Paramount Blvd.	20 to 29 years	1.96
DOWNEY	11933 PARAMOUNT BLVD	90242	6246-001-009	0	0	2	2	Shortfall of Sites	0.145	NC	C1	NC	C1	30		4	Non-Vacant	small older commercial use	Res Overlay Paramount Blvd. small	over 50 years	0.72
DOWNEY	12145 PARAMOUNT BLVD	90242	6246-007-004	0	0	6	5	Shortfall of Sites	0.370	Office	C2	Office	C2	30		11	Non-Vacant	older single office or commercial	Res Overlay Paramount Blvd. small	over 50 years	1.23
DOWNEY	12215 PARAMOUNT BLVD	90242	6246-007-018	0	0	5	5	Shortfall of Sites	0.337	Office	C2	Office	C2	30		10	Non-Vacant	small seafood restaurant	Res Overlay Paramount Blvd. small	30 to 39 years	1.20
DOWNEY	12151 PARAMOUNT BLVD	90242	6246-007-019	0	0	2	3	Shortfall of Sites	0.166	Office	C2	Office	C2	30		5	Non-Vacant	older single office or commercial	Res Overlay Paramount Blvd. small	over 50 years	0.28
DOWNEY	12159 PARAMOUNT BLVD	90242	6246-007-021	0	0	5	5	Shortfall of Sites	0.341	Office	C2	Office	C2	30		10	Non-Vacant	small market and parking	Res Overlay Paramount Blvd. small	over 50 years	1.60
DOWNEY	12155 PARAMOUNT BLVD	90242	6246-007-022	0	0	2	3	Shortfall of Sites	0.173	Office	C2	Office	C2	30		5	Non-Vacant	older single office or commercial	Res Overlay Paramount Blvd. small	over 50 years	1.33
DOWNEY	12105 PARAMOUNT BLVD	90242	6246-008-024	0	0	5	5	Shortfall of Sites	0.323	Office	C2	Office	C2	30		10	Non-Vacant	older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	2.22
DOWNEY	7962 BURNS AVE	90241	6247-004-034	0	0	3	3	Shortfall of Sites	0.193	Office	C2	Office	C2	30		6	Non-Vacant	small misc industrial commercial	Res Overlay Paramount Blvd. small	over 50 years	9.00
DOWNEY	11555 PARAMOUNT BLVD	90241	6247-006-014	0	0	5	4	Shortfall of Sites	0.285	Office	C1	Office	C1	30		9	Non-Vacant	church office	Res Overlay Paramount Blvd. small	over 50 years	1.55
DOWNEY	12207 PARAMOUNT BLVD	90242	6246-007-013	0	0	2	3	Shortfall of Sites	0.170	Office	C2	Office	C2	30		5	Non-Vacant	older single office or commercial	Res Overlay Paramount Blvd. small	over 50 years	2.38
DOWNEY	12073 PARAMOUNT BLVD	90242	6246-008-003	0	0	4	4	Shortfall of Sites	0.264	Office	C2	Office	C2	30		8	Non-Vacant	older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	0.63
DOWNEY	12119 PARAMOUNT BLVD	90242	6246-008-007	0	0	3	3	Shortfall of Sites	0.192	Office	C2	Office	C2	30		6	Non-Vacant	older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	2.18
DOWNEY	11851 PARAMOUNT BLVD	90241	6247-019-010	0	0	2	3	Shortfall of Sites	0.172	NC	C1	NC	C1	30		5	Non-Vacant	small restaurant and barber shop	Res Overlay Paramount Blvd. small	over 50 years	5.20
DOWNEY	13049 PARAMOUNT BLVD	90242	6245-035-015	0	0	6	5	Shortfall of Sites	0.369	GC	C2	GC	C2	30		11	Non-Vacant	Tire shop and open parking/storage	Res Overlay Paramount Blvd. small	over 50 years	6.18
DOWNEY	12063 PARAMOUNT BLVD	90242	6246-008-001	0	0	3	3	Shortfall of Sites	0.196	Office	C2	Office	C2	30		6	Non-Vacant	older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	1.81
DOWNEY	12065 PARAMOUNT BLVD	90242	6246-008-002	0	0	3	3	Shortfall of Sites	0.195	Office	C2	Office	C2	30		6	Non-Vacant	older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	1.96
DOWNEY	12115 PARAMOUNT BLVD	90242	6246-008-006	0	0	3	3	Shortfall of Sites	0.196	Office	C2	Office	C2	30		6	Non-Vacant	for sale older single office and parking	Res Overlay Paramount Blvd. small	over 50 years	0.63
DOWNEY	11425 PARAMOUNT BLVD	90241	6247-004-033	0	0	5	5	Shortfall of Sites	0.332	Office	C2	Office	C2	30		10	Non-Vacant	commercial health center and parking	Res Overlay Paramount Blvd. small	over 50 years	1.16
DOWNEY	11437 PARAMOUNT BLVD	90241	6247-005-015	0	0	4	3	Shortfall of Sites	0.225	Office	C2	Office	C2	30		7	Non-Vacant	auto repair	Res Overlay Paramount Blvd. small	over 50 years	5.00
DOWNEY	8019 STEWART AND GRAY RD	90241	6255-019-032	0	0	6	5	Shortfall of Sites	0.360	NC	C1	NC	C1	30		11	Non-Vacant	Mexican fast food restaurant and parking	Res Overlay Paramount Blvd. small	40 to 49 years	5.88
DOWNEY	13033 PARAMOUNT BLVD	90242	6245-035-016	0	0	8	7	Shortfall of Sites	0.496	GC	C2	GC	C2	30		15	Non-Vacant	auto shop	Res Overlay Paramount Blvd. small	over 50 years	2.22
DOWNEY	11943 PARAMOUNT BLVD	90242	6246-001-014	0	0	8	6	Shortfall of Sites	0.478	NC	C1	NC	C1	30		14	Non-Vacant	strip commercial and parking	Res Overlay Paramount Blvd. small	over 50 years	0.84
DOWNEY	10811 PARAMOUNT BLVD	90241	6251-022-042	0	0	6	6	Shortfall of Sites	0.384	Office	CP	Office	CP	30		12	Non-Vacant	older unmaintained surface parking	Res Overlay Paramount Blvd. small	over 50 years	20.76
DOWNEY	12040 PARAMOUNT BLVD	90242	6259-003-054	0	0	6	5	Shortfall of Sites	0.367	Office	C1	Office	C1	30		11	Non-Vacant	strip commercial and parking	Res Overlay Paramount Blvd. small	over 50 years	3.47
DOWNEY	13000 PARAMOUNT BLVD	90242	6260-001-034	0	0	2	2	Shortfall of Sites	0.136	GC	C2	GC	C2	30		4	Non-Vacant	liquor store and parking	Res Overlay Paramount Blvd. small	over 50 years	0.43
DOWNEY	13006 PARAMOUNT BLVD	90242	6260-001-079	0	0	5	4	Shortfall of Sites	0.309	GC	C2	GC	C2	30		9	Non-Vacant	party supply store and parking	Res Overlay Paramount Blvd. small	over 50 years	5.81
DOWNEY	11849 PARAMOUNT BLVD	90241	6247-019-011	0	0	2	3	Shortfall of Sites	0.161	NC	C1	NC	C1								

Jurisdiction Name	Site Address/Intersection	5 Digit ZIP Code	Assessor Parcel Number	Very Low-Income	Low-Income	Moderate-Income	Above Moderate-Income	Type of Shortfall	Parcel Size (Acres)	Current General Plan Designation	Current Zoning	Proposed General Plan (GP) Designation	Proposed Zoning	Minimum Density Allowed	Maximum Density Allowed	Total Capacity	Vacant/Nonvacant	Description of Existing Uses	Optional Information (site type)	Optional Information2	Optional Information3
DOWNEY	12130 LAKEWOOD BLVD	90242	6256-004-051	0	0	0	0	0 Shortfall of Sites	2.480 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.71	
DOWNEY	8960 APOLLO WAY	90242	6256-004-909	0	0	0	0	0 Shortfall of Sites	20.519 MU	SP	MU	SP	SP	30		0 Vacant	vacant	SP site Downey Landing	1 to 10 years	0.00	
DOWNEY	12400 CLARK AVE	90241	6256-004-910	0	0	0	0	0 Shortfall of Sites	12.765 MU	SP	MU	SP	SP	30		0 Non-Vacant	Government Parcel	SP site Downey Landing	11 to 19	0.00	
DOWNEY	8925 APOLLO WAY	90242	6256-017-002	0	0	0	0	0 Shortfall of Sites	6.582 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	0.90	
DOWNEY	8810 APOLLO WAY	90242	6256-017-025	0	0	0	0	0 Shortfall of Sites	3.818 MU	SP	MU	SP	SP	30		0 Non-Vacant	Athletic & Amusement Facilitie	SP site Downey Landing	1 to 10 years	0.87	
DOWNEY	12106 LAKEWOOD BLVD	90242	6256-004-030	0	0	0	0	0 Shortfall of Sites	4.944 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.64	
DOWNEY	12030 LAKEWOOD BLVD	90242	6256-004-046	0	0	0	0	0 Shortfall of Sites	1.146 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.62	
DOWNEY	12006 LAKEWOOD BLVD	90242	6256-004-052	0	0	0	0	0 Shortfall of Sites	3.917 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.53	
DOWNEY	9001 APOLLO WAY	90242	6256-017-003	0	0	0	0	0 Shortfall of Sites	11.585 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	0.59	
DOWNEY	8901 APOLLO WAY	90242	6256-017-015	0	0	0	0	0 Shortfall of Sites	1.447 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	1.15	
DOWNEY	8900 APOLLO WAY	90242	6256-017-017	0	0	0	0	0 Shortfall of Sites	1.468 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	0.98	
DOWNEY	8990 APOLLO WAY	90242	6256-017-018	0	0	0	0	0 Shortfall of Sites	2.425 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	2.08	
DOWNEY	8830 APOLLO WAY	90242	6256-017-024	0	0	0	0	0 Shortfall of Sites	6.417 MU	SP	MU	SP	SP	30		0 Non-Vacant	Theaters	SP site Downey Landing	1 to 10 years	0.45	
DOWNEY	8830 APOLLO WAY	90242	6256-017-026	0	0	0	0	0 Shortfall of Sites	2.441 MU	SP	MU	SP	SP	30		0 Non-Vacant	Restaurants, Cocktail Lounges	SP site Downey Landing	1 to 10 years	1.91	
DOWNEY	12126 LAKEWOOD BLVD	90242	6256-004-039	0	0	0	0	0 Shortfall of Sites	1.350 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	1.03	
DOWNEY	9343 IMPERIAL HWY	90242	6256-004-053	0	0	0	0	0 Shortfall of Sites	28.526 MU	SP	MU	SP	SP	30		0 Non-Vacant	Hospitals	SP site Downey Landing	11 to 19	0.03	
DOWNEY	12050 LAKEWOOD BLVD	90242	6256-004-912	0	0	0	0	0 Shortfall of Sites	14.179 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.00	
DOWNEY	8855 APOLLO WAY	90242	6256-017-001	0	0	0	0	0 Shortfall of Sites	4.378 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	over 50 years	0.36	
DOWNEY	8960 APOLLO WAY	90242	6256-017-004	0	0	0	0	0 Shortfall of Sites	3.301 MU	SP	MU	SP	SP	30		0 Non-Vacant	Parking Lots (Commercial Use)	FSP site Downey Landing	1 to 10 years	14.54	
DOWNEY	8960 APOLLO WAY	90242	6256-017-013	0	0	0	0	0 Shortfall of Sites	1.878 MU	SP	MU	SP	SP	30		0 Non-Vacant	Parking lot	SP site Downey Landing	1 to 10 years	16.36	
DOWNEY	12036 LAKEWOOD BLVD	90242	6256-004-045	0	0	0	0	0 Shortfall of Sites	1.241 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	2.29	
DOWNEY	12136 LAKEWOOD BLVD	90242	6256-004-050	0	0	0	0	0 Shortfall of Sites	1.570 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	11 to 19	0.34	
DOWNEY	8801 APOLLO WAY	90242	6256-017-012	0	0	0	0	0 Shortfall of Sites	1.284 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	1.06	
DOWNEY	8901 APOLLO WAY	90242	6256-017-014	0	0	0	0	0 Shortfall of Sites	1.620 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	2.08	
DOWNEY	8890 APOLLO WAY	90242	6256-017-019	0	0	0	0	0 Shortfall of Sites	1.434 MU	SP	MU	SP	SP	30		0 Non-Vacant	Stores	SP site Downey Landing	1 to 10 years	1.41	
DOWNEY	8960 APOLLO WAY	90242	6256-017-023	0	0	0	0	0 Shortfall of Sites	6.523 MU	SP	MU	SP	SP	30		0 Non-Vacant	Commercial with parking areas	SP site Downey Landing	1 to 10 years	0.71	
DOWNEY	11136 DOLLISON DR	90241	8019-005-013	92	0	46	46	Shortfall of Sites	6.143 GC	SP	GC	SP	SP	30	184 Non-Vacant		Auto, Recreation EQPT, Constr.	SP site Florence/I-5	30 to 39 years	6.58	
DOWNEY	9021 FIRESTONE BLVD	90241	6285-031-062	175	0	175	524	Shortfall of Sites	0.300 GC	SP	GC	SP	SP	30	874 Non-Vacant		commercial center (mall)	SP site Stonewood	over 50 years	0.13	
DOWNEY	9041 FIRESTONE BLVD	90241	6285-031-087	0	0	0	0	0 Shortfall of Sites	2.093 GC	SP	GC	SP	SP	30		0 Non-Vacant	parking lots only	SP site Stonewood	no data	13.01	
DOWNEY	179 STONEWOOD ST	90241	6285-031-092	0	0	0	0	0 Shortfall of Sites	0.294 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	over 50 years	0.08	
DOWNEY	206 STONEWOOD ST	90241	6285-031-096	0	0	0	0	0 Shortfall of Sites	1.242 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.12	
DOWNEY	203 STONEWOOD ST	90241	6285-031-097	0	0	0	0	0 Shortfall of Sites	1.799 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.13	
DOWNEY	400 STONEWOOD ST	90241	6285-031-105	0	0	0	0	0 Shortfall of Sites	2.180 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	30 to 39 years	0.58	
DOWNEY	9253 FIRESTONE BLVD	90241	6285-031-085	0	0	0	0	0 Shortfall of Sites	0.924 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	20 to 29 years	0.42	
DOWNEY	147 STONEWOOD ST	90241	6285-031-090	0	0	0	0	0 Shortfall of Sites	0.705 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	30 to 39 years	0.61	
DOWNEY	9046 STONEWOOD ST	90241	6285-031-091	0	0	0	0	0 Shortfall of Sites	0.307 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	30 to 39 years	0.08	
DOWNEY	100 STONEWOOD ST	90241	6285-031-093	0	0	0	0	0 Shortfall of Sites	2.289 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	over 50 years	0.15	
DOWNEY	136 STONEWOOD ST	90241	6285-031-094	0	0	0	0	0 Shortfall of Sites	0.254 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	over 50 years	0.10	
DOWNEY	9030 CECELIA ST	90241	6285-031-068	0	0	0	0	0 Shortfall of Sites	0.307 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.41	
DOWNEY	9245 FIRESTONE BLVD	90241	6285-031-082	0	0	0	0	0 Shortfall of Sites	8.414 GC	SP	GC	SP	SP	30		0 Non-Vacant	Sears store and parking lot	SP site Stonewood	over 50 years	0.70	
DOWNEY	103 STONEWOOD ST	90241	6285-031-089	0	0	0	0	0 Shortfall of Sites	0.532 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.08	
DOWNEY	9051 STONEWOOD ST	90241	6285-031-098	0	0	0	0	0 Shortfall of Sites	0.686 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	over 50 years	0.09	
DOWNEY	403 STONEWOOD ST	90241	6285-031-100	0	0	0	0	0 Shortfall of Sites	0.948 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.12	
DOWNEY	306 STONEWOOD ST	90241	6285-031-102	0	0	0	0	0 Shortfall of Sites	0.274 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	30 to 39 years	0.32	
DOWNEY	9041 FIRESTONE BLVD	90241	6285-031-106	0	0	0	0	0 Shortfall of Sites	1.613 GC	SP	GC	SP	SP	30		0 Non-Vacant	parking lots only	SP site Stonewood	no data	12.64	
DOWNEY	300 STONEWOOD ST	90241	6285-031-078	0	0	0	0	0 Shortfall of Sites	1.461 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	40 to 49 years	0.23	
DOWNEY	121 STONEWOOD ST	90241	6285-031-095	0	0	0	0	0 Shortfall of Sites	0.198 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	no data	0.05	
DOWNEY	404 STONEWOOD ST	90241	6285-031-099	0	0	0	0	0 Shortfall of Sites	0.522 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	over 50 years	0.09	
DOWNEY	274 STONEWOOD ST	90241	6285-031-101	0	0	0	0	0 Shortfall of Sites	0.241 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	40 to 49 years	0.07	
DOWNEY	9135 FIRESTONE BLVD	90241	6285-031-103	0	0	0	0	0 Shortfall of Sites	2.252 GC	SP	GC	SP	SP	30		0 Non-Vacant	commercial center (mall)	SP site Stonewood	30 to 39 years	0.42	
DOWNEY	9041 FIRESTONE BLVD	90241	6285-031-104	0	0	0	0	0 Shortfall of Sites	32.723 GC	SP	GC	SP	SP	30		0 Non-Vacant	parking lots only	SP site Stonewood	no data	34.25	