

2023, HCD issued the City a letter indicating that this most recent 4th Draft of the Housing Element (Attachment 4.e) meets the statutory requirements of State Housing Element Law. However, HCD indicated that the Housing Element cannot be found in substantial compliance until the City has completed the necessary re-zoning, which is currently underway as part of the comprehensive Zoning Code update.

Given that changes have been made since the Planning Commission and City Council approved the Housing Element in January 2022, HCD requires re-adoption of the Housing Element. All revisions that have occurred since the City Council approved the Housing Element in January 2022 are shown in the redlined version of the Draft Housing Element provided in Attachment 7, and a clean, non-redlined version is provided in Attachment 4.e. On August 7, 2023, the Planning Commission conducted a public hearing on the re-adoption of the 4th Draft of the 2021-2029 Housing Element, and then continued the item to their meetings on August 21, 2023 and September 18, 2023. On September 18, 2023, the Planning Commission finalized a list of recommendations for nine (9) additional revisions to the 4th Draft of the Housing Element (Attachment 3) and adopted a Resolution recommending the City Council re-adopt the revised 2021-2029 Housing Element (Attachment 2).

DISCUSSION

The City Council has already adopted a Housing Element for the 6th Cycle. Changes to the Housing Element required by HCD have been incorporated into the 4th Draft of the Housing Element and can be categorized into three (3) main sections: Additional Analysis, Housing Element Sites Inventory, and Changes to Programs. For example, HCD required additional analysis, documentation, and justification on methodology and assumptions used, and greater commitments and more specificity on program timelines. ECONorthwest prepared a memo (Attachment 4.a) detailing the updates (as shown in the redlined version in Attachment 7) incorporated into the current Draft that has been deemed acceptable by HCD.

The Planning Commission's nine (9) recommended revisions to the 4th Draft of the 2021-2029 Housing Element include amendments to the Sites Inventory, Housing Element Programs, as well as nuanced language changes that are intended to enhance clarity and accuracy. Those nine (9) recommended revisions are summarized on Attachment 3. Staff's concerns with those recommendations are set forth on the second page of the Planning Commission Staff report, found at Attachment 4.

The most substantial recommended revisions are to Housing Element Programs 27 and 29. Housing Element Program 27 (Reduce Development Constraints for Affordable Housing) is recommended to be revised to exclude the CBD and EMC zones from a requirement to allow 100 percent residential projects in commercial zones. Housing Element Program 29 (Development Streamlining) is recommended to be revised to reflect the retention of the Residential Planned Development Permit (RPD) process, exempting projects with six (6) or less residential units.

Based on public comments received regarding the Housing Element the City has requested technical assistance from HCD (Attachment 8) regarding whether use permits could be required for developments on properties in the sites inventory and whether use permits could be required for uses permitted by right. HCD provided a technical assistance letter (Attachment 9) that indicated that use permits could not be required for developments listed in the sites inventory nor could they be required for developments that were permitted by right. Use permits would encompass conditional use permits, planned unit development permits, or any other discretionary local government review or approval, except design review. In addition, the City requested that HCD verify whether the Planning Commission's recommended revisions would alter the substantial compliance status HCD had previously provided for the 4th Draft of the 2021-2029 Housing Element, and if the recommended revisions would necessitate additional review by HCD or further analysis by staff. Staff has yet to receive guidance from HCD.

If an additional review is required, HCD would have 60 days to complete their review and determine if the revised Housing Element is in substantial compliance with State Housing Element Law. Depending on HCD's compliance determination at the completion of their review, additional revisions to the Housing Element may be required, which would then necessitate additional public review periods as well as review by both the Planning Commission (depending upon the scope of the revisions) and City Council for re-adoption of the Housing Element. This would further extend the timeline for the City to receive HCD certification for the 2021-2029 Housing Element.

The Planning Commission's recommended revisions are being presented to the City Council for consideration. Highlighted language in the draft resolution (Attachment 1) requires direction from the Council; specifically, as to whether or not to accept or modify the Planning Commission's recommendations, or to adopt, without further revision, the 4th Draft of the 2021-2029 Housing Element that HCD previously reviewed and determined as meeting the statutory requirements of State Housing Element Law, as reported in a May 25, 2023 letter from HCD to the City. If the City Council re-adopts the Housing Element as submitted, the document will be submitted to HCD and pending completion of the required zone changes, HCD can then certify the City's Housing Element.

It is recommended that the Council adopt the Housing Element as approved by HCD to expedite their review process and reduce/limit the City's exposure to future Builder's Remedy projects. Time is of the essence to obtain Housing Element certification to reduce any risk of future applications submitted under the Builder's Remedy.

PUBLIC NOTICE:

On Thursday, September 28, 2023, a legal notice advertising the public hearing was placed in the Pasadena Star-News and Alhambra Press.

PUBLIC COMMENT:

The official public comment period for the 4th Draft of the Housing Element was from March 8 to March 15, 2023. A total of 14 written public comments were received from nine (9) different individuals. The 4th Draft of the Housing Element submitted to and deemed acceptable by HCD included detail on key themes from public comments in Chapter 1, and amendments in response to public comments in various sections.

Following the Planning Commission's adoption of Resolution No. 23-19, recommending the City Council re-adopt the 2021-2029 Housing Element with nine (9) additional recommended changes to the 4th Draft of the Housing Element, a 7-day public review period was held between September 21-28, 2023. A total of nine (9) written public comments were received from seven (7) different individuals (Attachment 5). A summary the public comments received is included in Attachment 6.

No public comment letters were received specifically for this meeting prior to the agenda being finalized. All comment letters received prior to this meeting have been posted on the project website at www.alhambrahousingelement.com and are available for public review.

ENVIRONMENTAL REVIEW:

An Initial Study/Negative Declaration was previously adopted for this project. The readoption will not result in any new, additional, or substantially different environmental impacts. Pursuant to State CEQA Guidelines Section 15162(a)(1), no subsequent Negative Declaration is required as the project does not include changes in the project that would be substantial or result in any new impacts, or be a substantial increase beyond what was identified in the Negative Declaration previously approved.

ATTACHMENT:

1. City Council Resolution No. R2M23-50
2. Planning Commission Resolution No. 23-19
3. Matrix of Planning Commission Comments (updated for the 10/09/23 meeting)
4. Planning Commission staff report, dated September 18, 2023, including:
 - a. Memo from ECONorthwest, dated July 5, 2023
 - b. Written comments from Planning Commissioners
 - c. Matrix of Commissioner Comments (updated for the 9/18/23 meeting)
 - d. Letters from HCD, Dated December 2, 2021; April 8, 2022; October 10, 2022; May 25, 2023
 - e. Draft 2021-2029 Housing Element (Draft 4, dated April 16, 2023, reviewed by HCD – *Letter Version*)
5. Public Comments from 7-day Review Period (September 21-28, 2023)
6. Matrix of Public Comments from 7-day Review Period (September 21-28, 2023)
7. Draft 2021-2029 Housing Element (Draft 4, dated April 16, 2023, reviewed by HCD – *Redlined Version*)
8. Letter from City of Alhambra requesting HCD Technical Assistance, dated August 24, 2023
9. Letter from HCD providing Technical Assistance, dated October 4, 2023

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CITY COUNCIL RESOLUTION NO. R2M23-50

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RESOLUTION NO. R2M23-50

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF ALHAMBRA, CALIFORNIA APPROVING GENERAL PLAN AMENDMENT GPA-22-01 READOPTING THE 2021-2029 HOUSING ELEMENT OF THE ALHAMBRA GENERAL PLAN (DRAFT 4), AND DIRECTING STAFF TO SUBMIT THE READOPTED HOUSING ELEMENT TO THE STATE OF CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT FOR CERTIFICATION

THE CITY COUNCIL OF THE CITY OF ALHAMBRA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. FINDINGS OF FACT. The City Council does hereby make the following findings of fact:

- A. Pursuant to state law, cities are required to prepare a Housing Element as a component of their General Plan and to revise it regularly on a schedule set forth in the law;
- B. In accordance with state law, the City of Alhambra's Community Development Department initiated an amendment to the Housing Element of the General Plan and prepared a proposed revision to the Housing Element for the 6TH Cycle Housing Element covering the 2021-2029 planning period, in accordance with Government Code Sections 65580 et seq., which replaces the Housing Element that covered the prior period from 2013 to 2021;
- C. On July 13, 2020, the City retained ECONorthwest for professional consulting services to prepare the 2021-2029 Housing Element of the Alhambra General Plan;
- D. California Government Code Section 65583 requires that the Housing Element contain (i) an assessment of the City's housing needs and an analysis of the resources and constraints, both governmental and non-governmental, relevant to the meeting of these needs; (ii) an inventory of land suitable and available for residential development and an analysis of the development potential of such sites; (iii) a statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing; and (iv) programs that set forth a schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element Update;
- E. The City of Alhambra has been assigned a Regional Housing Needs Assessment (RHNA) of 6,825 new housing units for the 6th Cycle planning period (2021-2029), including 1,774 very low income units, 1,036 low income units, 1,079 moderate income units, and 2,936 above moderate income units;
- F. The Housing Element sets forth the housing policies for the City, facilitating the preservation and development of housing, and established programs to accommodate the City's share of the regional housing need in Southern California;

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- G. Based on underutilized uses (e.g., parking lots, single-story buildings, uses with marginal economic viability), age of structures, improvement-to-land ratio, lot size, ratio of allowed to existing density, and in-place value compared to recent residential site transaction value, coupled with the significant demand for housing, market conditions supportive of redevelopment, and Housing Element programs to encourage redevelopment on non-vacant sites with greater density housing, the existing uses on sites identified in the site inventory to accommodate lower income RHNA are likely to be discontinued during the planning period, and therefore do not constitute an impediment to additional residential development during the period covered by the Housing Element;
- H. The Draft 2021-2029 Housing Element was available for a public review period that took place from August 26, 2021 to September 26, 2021. A total of 19 written comments were submitted during the public comment review period and considered as part of the Housing Element update, as well as additional community input received throughout the project;
- I. The 6th Cycle Housing Element covering the 2021 to 2029 planning period was prepared based on input received from the public, Planning Commission and City Council. A total of 2 community meetings, 5 Town Hall meetings, 4 Planning Commission meetings, and 4 City Council meetings were held after notice to the public;
- J. After consideration of public comment, input from the Planning Commission on September 20, 2021, and City Council on September 27, 2021, the City of Alhambra transmitted the Draft 2021-2029 Housing Element to the California Department of Housing and Community Development (HCD) for review on October 5, 2021;
- K. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated December 2, 2021, and stated that the Draft Housing Element addressed many statutory requirements, however revisions would be necessary to comply with State Housing Law;
- L. The Draft Housing Element was revised to address the revisions from HCD as identified in their correspondence dated December 2, 2021;
- M. The 6th Cycle of the Housing Element was due October 15, 2021, and cities are required to adopt a compliant housing element within 120 days of the statutory deadline;
- N. In accordance with CEQA, updated Housing Elements are subject to environmental review and an Initial Study was prepared for the updated Housing Element determining that the above referenced project will not have a significant effect on the environment;
- O. The Initial Study/Negative Declaration was circulated for public review from December 17, 2021 through January 15, 2022;
- P. The Notice of the Planning Commission Public Hearing and Notice of Intent to Adopt a Negative Declaration was posted on the project website and emailed to interested parties on December 16, 2021, and published in the Pasadena Star News on December 17, 2021, in accordance with CEQA;

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- Q. On January 3, 2022, the Planning Commission of the City of Alhambra (“Planning Commission”) conducted a duly public hearing and received public comment on the Draft Housing Element. Pursuant to Assembly Bill AB 361, members of the Planning Commission may teleconference or video into the meeting due to the fact that we are in the midst of the COVID-19 pandemic;
- R. The Planning Commission is an advisory body to the City Council with regard to the approval of General Plan Amendments. At the public hearing on January 3, 2022, the Planning Commission took action to recommend the City Council approve General Plan Amendment GPA-22-01 adopting the 2021-2029 Housing Element with additional recommendations to replace the 2013-2021 Housing Element, approve the Negative Declaration, and direct staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification;
- S. The Notice of the City Council of the City of Alhambra (“City Council”) Public Hearing schedule for January 24, 2022 was posted on the project website and emailed to interested parties on January 14, 2022 and published in the Pasadena Star News on January 14, 2022, in accordance with CEQA;
- T. On January 24, 2022, the City Council continued the public hearing in order for additional information be incorporated into the Housing Element for City Council’s consideration;
- U. At a Special Meeting on January 31, 2022, the City Council continued its January 24, 2022 Public Hearing. The City Council conducted a duly public hearing and received public comment on the Draft Housing Element. Pursuant to Assembly Bill AB 361, members of the City Council may teleconference or video into the meeting due to the fact that we are in the midst of the COVID-19 pandemic. At this hearing, the City Council considered the staff report, staff and consultant presentation, and public testimony, and adopted Resolution No. R2M22-7 approving General Plan Amendment GPA-22-01 adopting the 2021-2029 Housing Element of the Alhambra General Plan, approved the Negative Declaration, and directed staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification;
- V. On February 8, 2022, the 2021-2029 Housing Element was transmitted to the HCD for review for their 2nd review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated April 8, 2022, and stated that the Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- W. The Housing Element was revised to address the revisions from HCD as identified in their correspondence dated April 8, 2022;
- X. On August 11, 2022, the revised 2021-2029 Housing Element was transmitted to the HCD for review for their 3rd review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated October 19, 2022, and stated that the draft revised Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- Y. The draft revised Housing Element was revised again to address the revisions from HCD as identified in their correspondence dated October 19, 2022;

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- Z. The 4th Draft of the revised 2021-2029 Housing Element was available for a public review period that took place from March 8, 2023 to March 15, 2023. A total of 9 written comments were submitted during the public comment review period and considered as part of the housing element update process, as well as additional community input received throughout the project;
- AA. On April 13, 2023, the revised 2021-2029 Housing Element was transmitted to the HCD for review for their 4th review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated May 25, 2023, and stated that the draft revised Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- BB. On August 7, 2023, the Planning Commission conducted a duly public hearing on the draft revised Housing Element, received public comment, and closed the public testimony portion of the hearing. At the public hearing on August 7, 2023, the Planning Commission continued the public hearing to August 21, 2023;
- CC. On August 21, 2023, the Planning Commission conducted a duly public hearing and reopened the public testimony portion of the public hearing to receive additional public testimony on the draft revised Housing Element. After additional public comment was provided, the Planning Commission closed the public testimony portion of the hearing and began their deliberations. Given that deliberations were not concluded, the Planning Commission continued the public hearing to September 5, 2023;
- DD. Due to a lack of quorum at the regular meeting on September 5, 2023, this matter was continued to the next regular meeting of the Planning Commission on September 18, 2023;
- EE. The Planning Commission is an advisory body to the City Council with regard to the approval of General Plan Amendments. At the public hearing on September 18, 2023, the Planning Commission took action to approve Resolution No. 23-19 recommending that City Council approve General Plan Amendment GPA No. 22-19 adopting the revised 2021-2029 Housing Element to replace the 2013-2021 Housing Element and direct staff to submit the revised Housing Element to the State of California Department of Housing and Community Development for certification;
- FF. The Planning Commission's recommendation to the City Council to adopt the 4th Draft of the revised 2021-2029 Housing Element with the additional recommendations of the Planning Commission to be incorporated into the final Housing Element,
- GG. The 6th Cycle Housing Element covering the 2021 to 2029 planning period was prepared based on input received from the public, Planning Commission, and City Council. A total of 2 community meetings, 5 Town Hall meetings, 7 Planning Commission meetings, and 4 City Council meetings were held after notice to the public;
- HH. The 4th Draft of the revised 2021-2029 Housing Element and the Planning Commission's additional recommendations to be incorporated into the final Housing Element, were available for a public review period that took place from September 21, 2023 to September 28, 2023. A total of 9 written comments were submitted during the public comment review period and considered as part

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of the housing element update process, as well as additional community input received throughout the project;

- II. On October 9, 2023, the City Council conducted a duly public hearing on the 4th Draft of the revised 2021-2029 Housing Element, which supersedes all previously adopted Housing Elements;
- JJ. At this hearing, the City Council considered the staff report, staff and consultant presentation, and public testimony; and
- KK. The documents that constitute the record of proceedings for General Plan Amendment No. 22-1 upon which the decision of the City Council is based are located within the Community Development Department.

SECTION 2. CALIFORNIA ENVIRONMENTAL QUALITY ACT. Based upon the Initial Study/Negative Declaration prepared for the project, the City Council further finds and determines as follows:

- A. An Initial Study/Negative Declaration was previously adopted by the City Council for this project on January 31, 2022. The readoption will not result in any new, additional, or substantially different environmental impacts. Pursuant to State CEQA Guidelines Section 15162(a)(1), no subsequent Negative Declaration is required as the project does not include changes in the project that would be substantial or result in any new impacts, or be a substantial increase beyond what was identified in the Negative Declaration previously approved.

SECTION 3. GENERAL PLAN AMENDMENT. Based on the foregoing facts, the City Council hereby determines as follows:

- A. The General Plan Amendment for the 2021-2029 Housing Element is consistent with all other goals, policies, and programs of the Alhambra General Plan and complies with the requirements of State Law;
- B. The General Plan amendment promotes the public health, safety, and general welfare of the Alhambra community. The 2021-2029 Housing Element is a policy-level document that will guide the development of a wide variety of housing types within the City and provides a strategy to address existing and future housing needs while furthering the State's mandate for housing to address the housing crisis in California; and
- C. The City Council, based upon the findings set forth herein, recommends the City Council of the City of Alhambra approve General Plan Amendment GPA-22-01 adopting the 2021-2029 Housing Element of the Alhambra General Plan and direct staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification.

SECTION 4. ADDITIONAL RECOMMENDATIONS REVIEWED BY THE CITY COUNCIL. The City Council considered specific recommendations of the Planning Commission, as contained in Planning Commission Resolution No. 23-19 adopted on September 18, 2023 and

[the City Council readopts the 2021-2029 Housing Element without the recommendations of the Planning

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Commission.]

[OR]

[the City Council finds that the specific recommendations listed below be incorporated into the 2021-2029 Housing Element to be submitted to the State of California Department of Housing and Community Development.]

[COUNCIL TO PROVIDE DIRECTION ON WHICH, IF ANY, TO INCLUDE]

A. Residential Planned (RPD) Permit Process.

Retain the RPD permit process, exempting projects with six (6) or less residential units.

B. Addition of Sites to the Sites Inventory.

Include the property at 400 S. Atlantic Boulevard (APN No. 5344-002-044) in Appendix A (“Sites Inventory”).

C. Constraints on Development – Environmental.

Revise the sentence on Page 116 as follows: “Sites with potential environmental constraints (without consideration of contamination status) are noted in the detailed inventory appendix and electronic inventory database”

D. Characterization of Community Sentiment.

- a. Revise the following on Page 66: “It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. ~~However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.”~~
- b. Revise the following on Page 67: “~~Some segments of the community are active opponents to development.~~ Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This may serve[[s]] as an extra delay for even small development projects that meet all codes and standards. Combined, these factors may have result[[ed]] in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production. The role of the Planning Commission in

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approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. ~~However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production.~~ The city should reconsider the type and scale of developments that are subject to Planning Commission approval.

- c. Revise the following on Page 112: “Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. ~~Communities with strong opposition to development can often use these processes to further prohibit development.”~~
- d. Delete the following on Page 186: “~~Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.~~”
- e. Revise the following included in Program 28 as follows: “Community input into planning and approval processes is a necessary and important function. ~~However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint.~~ One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”

E. 100% Residential Units in Commercial Zones.

Revise the sentence included in Program 27 as follows: “Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects.

F. 20% Affordable Housing by Right on Lower-Income Sites.

- a. Revise the sentence on Page 205 as follows: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that are suitable for residential development and that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[c)].”

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- b. Revise Program 18 as follows: “Subject to suitability for residential development as provided in Government Code Section 65583.2, the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.”

G. The Villages Project.

- a. Revise the sentence included in Program 40 as follows: “Because the project referred to as the “The Villages at the Alhambra” represents a ~~sizable~~ significant share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”
- b. Revise the sentence on Page 245 as follows: “Alternatively, the project would could still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units subject to any such sites being suitable for residential development under Government Code Section 65583.2.”

H. Development Standards.

- a. Modify the paragraph on Page 88 referring to “Height Limits” to reflect that the height limit and step back is in reference to the City’s existing zoning code for the R2 and R3 zones.
- b. Modify the paragraph on Page 88 referring to commercial zones as follows: “Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. For areas outside of the CBD or EMC zone, this may ~~[[This]]~~ constrain~~[[s]]~~ the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones other than the CBD or EMC zone.”
- c. Revise Program 27 as follows: “Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses.”

I. Other Comments/Recommendations.

Eliminate the entire paragraph discussing Historic Preservation under the “Growth Controls and Local Ordinances” on page 95.

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SECTION 5. NOW THEREFORE, BE IT RESOLVED, that the foregoing recitals are true and correct and made part of this resolution; and that the City Council of the City of Alhambra, California, hereby approves the following related to General Plan Amendment GPA-22-01:

- A. Resolution No. R2M23-50, a Resolution of the City Council of the City of Alhambra approving General Plan Amendment GPA-22-01 readopting the 2021-2029 Housing Element of the Alhambra General Plan (4th Draft), and directing staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification.

PASSED, APPROVED, AND ADOPTED THIS 9TH day of October, 2023.

Ross Maza, Mayor

ATTEST:

Lauren Myles, City Clerk

APPROVED AS TO FORM:

JOSEPH M. MONTES, City Attorney

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES) ss.
CITY OF ALHAMBRA)

I, Lauren Myles, City Clerk Planning Commission Secretary of the City of Alhambra, do hereby certify that forgoing Resolution No. R2M23-50 was duly adopted by the City Council of the City of Alhambra at a regular meeting held on the 9th day of October, 2023, and that the same was adopted by the following vote:

AYES:
NOES:
ABSENT:

Lauren Myles, City Clerk

ATTACHMENT 2

PLANNING COMMISSION RESOLUTION NO. 23-19

ATTACHMENT 2

RESOLUTION NO. 23-19

A RESOLUTION OF THE PLANNING COMMISSION OF THE CITY OF ALHAMBRA, CALIFORNIA RECOMMENDING THAT THE CITY COUNCIL OF THE CITY OF ALHAMBRA APPROVE GENERAL PLAN AMENDMENT GPA NO. 22-1 READOPTING THE 2021-2029 HOUSING ELEMENT OF THE ALHAMBRA GENERAL PLAN AND DIRECT STAFF TO SUBMIT THE HOUSING ELEMENT TO THE STATE OF CALIFORNIA DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT FOR CERTIFICATION

THE PLANNING COMMISSION OF THE CITY OF ALHAMBRA DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. FINDINGS OF FACT. The Planning Commission does hereby make the following findings of fact:

- A. Pursuant to state law, cities are required to prepare a Housing Element as a component of their General Plan and to revise it regularly on a schedule set forth in the law;
- B. State Housing Law (Government Code Sections 65580 et seq.) requires that the City of Alhambra, adopt a Housing Element for the eight-year period 2021-2029 to accommodate the City of Alhambra's Regional Housing Need Allocation (RHNA) of 6,825 housing units comprised of 1,774 very-low-income units, 1,036 low-income units, 1,079 moderate-income units, and 2,936 above moderate-income units;
- C. In accordance with state law, the City of Alhambra's Community Development Department initiated an amendment to the Housing Element of the General Plan and prepared a proposed revision to the Housing Element for the 6th Cycle Housing Element covering the 2021-2029 planning period, in accordance with Government Code Sections 65580 et seq., which replaces the Housing Element that covered the prior period from 2013 to 2021;
- D. On July 13, 2020, the City retained ECONorthwest for professional consulting services to prepare the 2021-2029 Housing Element of the Alhambra General Plan;
- E. California Government Code Section 65583 requires that the Housing Element contain (i) an assessment of the City's housing needs and an analysis of the resources and constraints, both governmental and non-governmental, relevant to the meeting of these needs; (ii) an inventory of land suitable and available for residential development and an analysis of the development potential of such sites; (iii) a statement of the community's goals, quantified objectives, and policies relative to the maintenance, preservation, improvement, and development of housing; and (iv) programs that set forth a schedule of actions the local government is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the Housing Element Update;

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- F. The Housing Element sets forth the housing policies for the City, facilitating the preservation and development of housing, and establishing programs to accommodate the City's share of the regional housing need in Southern California;
- G. Based on underutilized uses (e.g., parking lots, single-story buildings, uses with marginal economic viability), age of structures, improvement-to-land-ratio, lot size, ratio of allowed to existing density, and in-place value compared to recent residential transaction value, coupled with the significant demand for housing, market conditions supportive of redevelopment, and Housing Element programs to encourage redevelopment on non-vacant sites with greater density housing, the existing uses on sites identified in the site inventory to accommodate lower income RHNA are likely to be discontinued during the planning period and therefore do not constitute an impediment to additional residential development during the planning period covered by the Housing Element.
- H. The 6th Cycle of the Housing Element was due October 15, 2021, and cities were required to adopt a compliant Housing Element within 120 days of the statutory deadline;
- I. After consideration of public comment, input from the Planning Commission on September 20, 2021, and City Council on September 27, 2021, the City of Alhambra transmitted the Draft 2021-2029 Housing Element to the California Department of Housing and Community Development (HCD) for review on October 5, 2021;
- J. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through written correspondence dated December 2, 2021, and stated that the Draft Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- K. The Draft Housing Element was revised to address the revisions from HCD as identified in their correspondence dated December 2, 2021;
- L. In accordance with CEQA, updated Housing Elements are subject to environmental review, and an Initial Study was prepared for the updated Housing Element determining that the above-referenced project will not have a significant effect on the environment;
- M. The Initial Study/Negative Declaration was circulated for public review from December 17, 2021 through January 15, 2022;
- N. The Notice of the Planning Commission Public Hearing and Notice of Intent to Adopt a Negative Declaration was posted on the project website and emailed to interested parties on December 16, 2020, and published in the Pasadena Star News on December 17, 2021, in accordance with CEQA;
- O. On January 3, 2022, the Planning Commission conducted a duly public hearing and received public comment on the Draft Housing Element. Pursuant to Assembly Bill 361, members of the Planning Commission may teleconference or video into the meeting due to the fact that we are in the midst of the COVID-19 pandemic;

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- P. The Planning Commission is an advisory body to the City Council with regard to the approval of General Plan Amendments. At the public hearing on January 3, 2022, the Planning Commission took action to approve Resolution No. 22-03 recommending that City Council approve General Plan Amendment GPA No. 22-1 adopting the 2021-2029 Housing Element to replace the 2013-2021 Housing Element, approved the Negative Declaration, and directed staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification;
- Q. On January 31, 2022, the City Council conducted a duly noticed public hearing and approved Resolution No. R2M-22-7, adopting the 6th cycle 2021-2029 Housing Element to replace the 2013-2021 Housing Element and directed staff to transmit the 2021-2029 Housing Element to the California Department of Housing and Community Development (HCD);
- R. On February 8, 2022, the 2021-2029 Housing Element was transmitted to the HCD for review for their 2nd review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated April 8, 2022, and stated that the Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- S. The Housing Element was revised to address the revisions from HCD as identified in their correspondence dated April 8, 2022;
- T. On August 11, 2022, the revised 2021-2029 Housing Element was transmitted to the HCD for review for their 3rd review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated October 19, 2022, and stated that the draft revised Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;
- U. The draft revised Housing Element was revised again to address the revisions from HCD as identified in their correspondence dated October 19, 2022;
- V. The 4th Draft of the revised 2021-2029 Housing Element was available for a public review period that took place from March 8, 2023 to March 15, 2023. A total of 9 written comments were submitted during the public comment review period and considered as part of the housing element update process, as well as additional community input received throughout the project;
- W. On April 13, 2023, the revised 2021-2029 Housing Element was transmitted to the HCD for review for their 4th review. Pursuant to Government Code Section 65585, subdivision (b), HCD reported the results of its review through a written correspondence dated May 25, 2023, and stated that the draft revised Housing Element addressed many statutory requirements, however, revisions would be necessary to comply with State Housing Law;

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- X. On August 7, 2023, the Planning Commission conducted a duly public hearing on the draft revised Housing Element, received public comment, and closed the public testimony portion of the hearing. At the public hearing on August 7, 2023, the Planning Commission continued the public hearing to August 21, 2023;
- Y. On August 21, 2023, the Planning Commission conducted a duly public hearing and reopened the public testimony portion of the public hearing to receive additional public testimony on the draft revised Housing Element. After additional public comment was provided, the Planning Commission closed the public testimony portion of the hearing and began their deliberations. Given that deliberations were not concluded, the Planning Commission continued the public hearing to September 5, 2023;
- Z. Due to a lack of quorum at the regular meeting on September 5, 2023, this matter was continued to the next regular meeting of the Planning Commission on September 18, 2023;
- AA. The Planning Commission is an advisory body to the City Council with regard to the approval of General Plan Amendments. At the public hearing on September 18, 2023, the Planning Commission took action to approve Resolution No. 23-19 recommending that City Council approve General Plan Amendment GPA No. 22-19 adopting the revised 2021-2029 Housing Element to replace the 2013-2021 Housing Element and direct staff to submit the revised Housing Element to the State of California Department of Housing and Community Development for certification;
- BB. The 6th Cycle Housing Element covering the 2021 to 2029 planning period was prepared based on input received from the public, Planning Commission, and City Council. A total of 2 community meetings, 5 Town Hall meetings, 7 Planning Commission meetings, and 4 City Council meetings were held after notice to the public; and
- CC. The documents that constitute the record of proceedings for General Plan Amendment No. 22-1 upon which the decision of the Planning Commission is based are located within the Community Development Department.

SECTION 2. CALIFORNIA ENVIRONMENTAL QUALITY ACT. Based upon the Initial Study/Negative Declaration previously prepared for the project, the Planning Commission further finds and determines as follows:

- A. An Initial Study and Negative Declaration were previously prepared in compliance with the California Environmental Quality Act;
- B. The Initial Study and Negative Declaration were posted on the project website, made available at the Alhambra Civic Center Library and Alhambra City Hall, and notification sent to interested parties on December 16, 2021, and published in the Pasadena Star News on December 17, 2021, in accordance with CEQA. The public review period was open from December 17, 2021 through January 15, 2022.

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- C. On January 3, 2022, the Planning Commission determined that the 2021-2029 Housing Element would not have any significant environmental impacts and recommended that the City Council adopt a Negative Declaration.
- D. On January 31, 2022, the City Council determined that the 2021-2029 Housing Element would not have any significant environmental impacts and adopted a Negative Declaration; and
- E. The proposed adoption of the revised 2021-2029 Housing Element is exempt from the California Environmental Quality Act (CEQA) pursuant to Guidelines Section 15162, since it will not trigger new or additional impact beyond those previously identified as part of a Negative Declaration previously adopted by the City Council.

SECTION 3. GENERAL PLAN AMENDMENT. Based on the foregoing facts, the Planning Commission hereby determines as follows:

- A. The General Plan Amendment for the revised 2021-2029 Housing Element is consistent with all other goals, policies, and programs of the Alhambra General Plan and complies with the requirements of State Law.
- B. The General Plan amendment promotes the public health, safety, and general welfare of the Alhambra community. The revised 2021-2029 Housing Element is a policy-level document that will guide the development of a wide variety of housing types within the City and provides a strategy to address existing and future housing needs while furthering the State's mandate for housing to address the housing crisis in California.
- C. The Planning Commission, based upon the findings set forth herein, recommends that the City Council of the City of Alhambra approve General Plan Amendment GPA No. 22-1 adopting the revised 2021-2029 Housing Element of the Alhambra General Plan and direct staff to submit the revised Housing Element to the State of California Department of Housing and Community Development for certification.

SECTION 4. PLANNING COMMISSION RECOMMENDATIONS:

The Planning Commission recommends that the City Council adopt the following additional recommended changes Element (additions are underlined, deletions are stricken) and that these additional recommendations be incorporated into the final Housing Element as part of the readoption of the 2021-2029 Housing. The City Council approves the following changes to the following topics as recommended by the Planning Commission:

A. Residential Planned (RPD) Permit Process.

Retain the RPD permit process, exempting projects with six (6) or less residential units.

B. Addition of Sites to the Sites Inventory.

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Include the property at 400 S. Atlantic Boulevard (APN No. 5344-002-044) in Appendix A (“Sites Inventory”).

C. Constraints on Development – Environmental.

Revise the sentence on Page 116 as follows: “Sites with potential environmental constraints (without consideration of contamination status) are noted in the detailed inventory appendix and electronic inventory database”

D. Characterization of Community Sentiment.

- a. Revise the following on Page 66: “It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. ~~However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.”~~
- b. Revise the following on Page 67: “~~Some segments of the community are active opponents to development.~~ Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This may serve[[s]] as an extra delay for even small development projects that meet all codes and standards. Combined, these factors may have result[[ed]] in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production. The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. ~~However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production.~~ The city should reconsider the type and scale of developments that are subject to Planning Commission approval.
- c. Revise the following on Page 112: “Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the

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responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. ~~Communities with strong opposition to development can often use these processes to further prohibit development.~~”

- d. Delete the following on Page 186: ~~“Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.”~~
- e. Revise the following included in Program 28 as follows: “Community input into planning and approval processes is a necessary and important function. ~~However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint.~~ One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”

E. 100% Residential Units in Commercial Zones.

Revise the sentence included in Program 27 as follows: “Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects.

F. 20% Affordable Housing by Right on Lower-Income Sites.

- a. Revise the sentence on Page 205 as follows: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that are suitable for residential development and that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[c)].”
- b. Revise Program 18 as follows: “Subject to suitability for residential development as provided in Government Code Section 65583.2, the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income

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RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City's two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley."

G. The Villages Project.

- a. Revise the sentence included in Program 40 as follows: "Because the project referred to as the "The Villages at the Alhambra" represents a ~~sizable~~ significant share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law."
- b. Revise the sentence on Page 245 as follows: "Alternatively, the project would could still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units subject to any such sites being suitable for residential development under Government Code Section 65583.2."

H. Development Standards.

- a. Modify the paragraph on Page 88 referring to "Height Limits" to reflect that the height limit and step back is in reference to the City's existing zoning code for the R2 and R3 zones.
- b. Modify the paragraph on Page 88 referring to commercial zones as follows: "Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. For areas outside of the CBD or EMC zone, this may ~~[[This]]~~ constrain~~[[s]]~~ the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones other than the CBD or EMC zone."
- c. Revise Program 27 as follows: "Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses."

I. Other Comments/Recommendations.

Eliminate the entire paragraph discussing Historic Preservation under the "Growth Controls and Local Ordinances" on page 95.

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SECTION 5. NOW THEREFORE, BE IT RESOLVED, by the Planning Commission of the City of Alhambra, California, hereby approves the following:

- A. Resolution No. 23-19, a Resolution of the Planning Commission of the City of Alhambra recommending that the City Council of the City of Alhambra approve General Plan Amendment GPA No. 22-1 adopting the revised 2021-2029 Housing Element of the Alhambra General Plan, and direct staff to submit the Housing Element to the State of California Department of Housing and Community Development for certification.

PASSED, APPROVED AND ADOPTED THIS 18th DAY OF SEPTEMBER 2023.



CHRIS OLSON, PRESIDENT
PLANNING COMMISSION

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ATTEST:



ANDREW HO, SECRETARY
PLANNING COMMISSION

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)
CITY OF ALHAMBRA)

I, Andrew Ho, Planning Commission Secretary of the City of Alhambra, do hereby certify that the foregoing Resolution was duly adopted by the Planning Commission of the City of Alhambra at a regular meeting thereof, held on the 18th day of September, 2023, by the following vote of the Planning Commission:

AYES: GRIJALVA, HO, JUAREZ, TSUJII, GARCIA, OLSON

NOES: MOJARRO,

RECUSED: PHAM

ABSENT: GARDEA



ANDREW HO, SECRETARY
PLANNING COMMISSION

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MATRIX OF PLANNING COMMISSION COMMENTS
(UPDATED FOR OCTOBER 9, 2023)

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Planning Commission Comments & Recommendations on Housing Element Draft #4

Comment No. **Commissioner**

1. ELIMINATION OF THE RESIDENTIAL PLANNED DEVELOPMENT (RPD) PERMIT PROCESS		
1	Olson	<p>Page 6 of the staff report states that Alhambra’s Residential Planned Development process was identified by HCD as a <u>considerable</u> constraint upon housing development. I have been unable to find any evidence supporting that statement in the letters sent by HCD to the City of Alhambra in response to prior submissions of the draft Housing Element. The proposed elimination of the RPD permit process is an extreme measure to streamline approval for housing development in the city. To remove this process from public review entirely, for all residential development in Alhambra, directly contradicts HCD’s statement that public input is important. While minor and routine changes, especially for projects that are small in scale, may be approved by staff, I strongly object to the complete elimination of Planning Commission review – and consequent opportunity for public input on residential development.</p>
2	Garcia	<p>Edits relating to Elimination of Residential Planned Development Permits: Complete elimination of residential projects in residential zones from the Planning Commission is unsupported by the record. Instead, the record supports possible elimination of RPDs in small scale projects. The Examples provided on pages 109-110 do not support elimination of RPDs, instead they demonstrate that factors outside of the Planning Commission’s control impacted the timeline for a particular project far more than the Planning Commission’s deliberations.</p>
3	Garcia	<p>Page 89: “Among the most important factors in a city’s administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects <u>to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use.</u> This <u>may add[[s]]</u> additional time, cost, and uncertainty to <u>small scale developments in R2 zones</u> that can be a constraint on development. Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.”</p>

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4	Garcia	Page 109-110: Delete “Findings Examples” section in its entirety.
5	Garcia	<p>Page 224 (pdf 302): Program 28: “Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”</p>
6	Garcia	<p>Page 113: “The city works to process permits concurrently and typical timelines for approval reported by the city are not considered overly constraining on development. The city’s review processes are generally typical, with a few exceptions. First, requiring full Planning Commission approval for all variances can add to approval times. An initial variance can often be approved administratively. Second, as previously evaluated, the city’s Residential Planned Development (RPD) permit <u>may</u> add[[s]] uncertainty, time, and discretionary approval that is a constraint on <u>small scale</u> development in <u>R2 zones</u>. The city’s zoning code audit found Alhambra’s development review processes to be burdensome and over reliant on discretionary review. Subjective findings could lead to a protracted review process or denial of a project based on interpretation. Additional costs and uncertainty can negatively impact developer interest in the community, limiting affordable and market-rate housing production and perpetuate under-supply and lack of affordability.”</p>

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7	Garcia	Page 224: Program 29 “The City’s Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. The constraints analysis identified the RPD as a <u>significant potential</u> constraint on <u>small scale</u> development in <u>R2 zones</u> . The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects. It will also maintain consistency with the Housing Crisis Act and utilize the state’s standard preliminary application checklist to facilitate project review. Within the first two years of the planning period the city will: Eliminate the Residential Planned Development Permit process” ”
8	Gardea	With regards the elimination of Residential Planned Development Permit process, is there or were in the past a discussion with Planning Commission about the determination of eliminating the RPD included in the HE?
9	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #D: "The Outright Removal of the Residential Planned Development (RPD) Process is Unwarrented and Unsupportetd and Should be Rescinded".

PC Recommendation on August 21, 2023:

Retain the RPD permit process, exempting projects with 6 or less residential units.

VOTE: 8-1

Ayes: Gardea, Grijalva, Ho, Juarez, Mojarro, Olson, Garcia, Wang

Noes: Tsujii

Absent: Pham

2. ADDITION OF SITES TO THE SITES INVENTORY

10	Garcia	Add 5344-002-044 (former Wondries lot) to Site Inventory
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11	Olson	Appendix A, the Housing Sites Inventory, begins on page 282 of the staff report for Agenda Item 4. It does not include the property at 400 S. Atlantic (APN #5344-002-044), the former site of Bob Wondries Ford, which has been vacant for 6 months. This 2.5-acre site could accommodate the development of 108 housing units at 48 units/acre (the same density that is proposed for the two sites located on South Atlantic between W. Beacon and W. Mission). It is located on a major transit corridor, and directly across the street from William Northrup Elementary School, serving grades K-8. The Housing Sites Inventory should be amended to include this site.
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PC Recommendation on September 18, 2023:

Include the property at 400 S. Atlantic Boulevard (APN No. 5344-002-044) in Appendix A (“Sites Inventory”).

VOTE: 7-0

Ayes: Grijalva, Ho, Juarez, Mojarro, Olson, Tsujii, Garcia

Noes: None

Absent: Gardea

Recusal: Pham

3. DELETION OF SITES FROM THE SITE INVENTORY

12	Gardea	The capacity analysis should be revised to exclude the Villages from the Site Analysis and Inventory. The zoning code should include a provision that would be reflective of State law concerning affordable housing projects. Site clean up and implementation of hazardous materials remediation measures may not occur within this housing element cycle to make the site suitable for residential development.
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PC Recommendation on September 18, 2023:

Reject request to amend the draft Housing Element to delete sites, including The Villages project, from the Site Analysis and Site Inventory.

VOTE: 7-0

Ayes: Grijalva, Ho, Juarez, Mojarro, Tsujii, Garcia, Olson

Noes: None

Absent: Gardea

Recusal: Pham

4. CONSTRAINTS ON DEVELOPMENT - ENVIRONMENTAL

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13	Olson	Page 68 of the staff report states that HCD requested greater analysis of potential environmental constraints against housing production in Alhambra, and that said analysis was completed using SCAG’s Housing Element Parcel Tool (HELPR), with a finding of no major constraints . It should be noted that the tool used by SCAG does not address either soil or groundwater contamination. Both have previously been identified as significant liabilities in Alhambra’s Industrial and Professional Office zones, which were designated as part of a Superfund site in 1984. The cost of mitigation of soil and groundwater contamination (PCE, TCE, perchlorate, and nitrate) through soil removal and barriers to vapor intrusion should be considered an environmental constraint. The information provided on page 68 regarding environmental constraints is incorrect and should be removed from the document.
14	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #E: "The Finding That There Are No Environmental Constraints on Any Parcels in Alhambra Is Factually Incorrect".
15	Garcia	Page 116: “Sites with potential environmental constraints (<u>without consideration of contamination status</u>) are noted in the detailed inventory appendix and electronic inventory database.

PC Recommendation on September 18, 2023:

Revise the sentence on Page 116 as follows: “Sites with potential environmental constraints (without consideration of contamination status) are noted in the detailed inventory appendix and electronic inventory database”

VOTE: 7-0

Ayes: Grijalva, Ho, Juarez, Mojarro, Tsujii, Garcia, Olson

Noes: None

Absent: Gardea

Recusal: Pham

5. CHARACTERIZATION OF COMMUNITY SENTIMENT

16	Garcia	Edits relating to Characterization of Community Sentiment: The following edits are requested on the basis that they are not supported by the record, unnecessary, and improper for inclusion in the Housing Element. A stated goal of HCD is to bolster public participation and promote public involvement. The edits proposed below are intended to further this policy goal.
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17	Garcia	Page 66 : “It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.”
18	Garcia	Page 67: “Some segments of the community are active opponents to development. Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This <u>may</u> serve[[s]] as an extra delay for even small development projects that meet all codes and standards. Combined, these factors <u>may</u> have result[[ed]] in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production. The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval.
19	Garcia	Page 112: “Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. Communities with strong opposition to development can often use these processes to further prohibit development.”
20	Garcia	Page 186: “Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production”

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21	Garcia	<p>Page 224 (pdf 302): Program 28: "Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies."</p>
22	Olson	<p>Pages 82 and 83 of the report refer to Community Influence on New Housing Development as a constraint. This section summarizes the Planning Commission's role in approving all residential development as being too easily influenced by community input and opposition, suggesting that the city should therefore limit the role of the Commission. This is supported by a statement on page 82 that refers to the "weaponization" of the public process. The recommendation that the Planning Commission's role in review and approval of residential projects be limited because too much influence is exerted by community input denies the intelligence, training, experience, and judgment of Commissioners. While much public input may be anti-development, my experience has been that Commissioners have demonstrated the capacity to weigh all of the evidence presented, listen to comments from staff, counsel, residents, property owners, and developers, and make reasoned and thoughtful decisions.</p>
23	Grijalva	<p>Reference to Ron Sahu's comment letter submitted August 7, 2023; #F: "Unsupported and Inaccurate Statements That Are Simply Attachks on Community Members and Citizens Should be Eliminated from the Housing Element."</p>

PC Recommendation on September 18, 2023:

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Revise the draft Housing Element consistent with Commissioner comments #16-21 under topic #5.

a. ~~Revise the following on Page 66: "It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development."~~

b. ~~Revise the following on Page 67: "Some segments of the community are active opponents to development. Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This may serve[[s]] as an extra delay for even small development projects that meet all codes and standards. Combined, these factors may have result[[ed]] in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production. The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval."~~

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c. ~~Revise~~ the following on Page 112: "Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. ~~Communities with strong opposition to development can often use these processes to further prohibit development.~~"

d. ~~Delete~~ the following on Page 186: "~~Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.~~"

e. ~~Revise~~ the following included in Program 28 as follows: "Community input into planning and approval processes is a necessary and important function. ~~However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint.~~ One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies."

- VOTE:** 6-1
- Ayes:** Grijalva, Juarez, Mojarro, Tsujii, Garcia, Olson
- Noes:** Ho
- Absent:** Gardea
- Recusal:** Pham

6. PARCELS 30 ACRES OR MORE

24	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #H: "Provisions In the Housing Element That Only Apply to a Single Parcel (Villages) Are Blatant Favoratism and Should Be Stricken."
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25	Olson	Page 96 of the report includes a chart that refers to specific provisions for the Office Professional Zone. Multiple references are made in the chart to sites of 30 acres or more. There is only one site in the city that is 30 acres in size. As such, these considerations (floor area ratio, front yard size, rear yard size, side yard size, distance between buildings, lot coverage, and minimum dwelling size) are inappropriately given to one parcel owner.
26	Garcia	All references to the special treatment of parcels of 30 acres or more should be removed as improper subject matter for the Housing Element. Page 80: Remove all carve outs for lots of 30 acres or more.

PC Recommendation on September 18, 2023:

Reject request to amend the draft Housing Element to delete references to parcels of 30 acres or more, as described in comments #24-26 under topic #6.

- VOTE:** 6-1
Ayes: Grijalva, Ho, Juarez, Tsujii, Garcia, Olson
Noes: Mojarro
Absent: Gardea
Recusal: Pham

7. 100% RESIDENTIAL UNITS IN COMMERCIAL ZONES

27	Olson	Page 104 of the report includes a summary of the constraints of housing development in commercial zones. It states, "With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones." I strongly object to the implementation of Program 21, as it will produce very few units of residential housing while simultaneously conflicting with the General Plan goal of creating vibrant and walkable commercial districts.
28	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #K: "The Requirement to Have 100% Residential in Commercial Zones Is Unnecessary and Highly Detrimental to the City's General plan and Common Sense and Should Be Revised."
29	Garcia	Page 223: Program 27: "Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects"

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PC Recommendation on September 18, 2023:

Revise the sentence included in Program 27 as follows: “Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects.”

VOTE: 5-2

Ayes: Grijalva, Juarez, Mojarro, Garcia, Olson

Noes: Ho, Tsujii

Absent: Gardea

Recusal: Pham

8. 20% AFFORDABLE HOUSING BY RIGHT ON LOWER-INCOME SITES

30	Olson	Page 221 of the report refers to the goal of identifying adequate sites in the city to provide for all types of housing. Within this section, Policy 3.3 states “The city shall allow housing developments with at least 20% affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with California Government Code Section 65583.2(c).” This policy is flawed because it references only one element of that code section, ignoring the requirement of Code Section 65583.2(a) and 65583.2(b) that address suitability and environmental constraints. These are key considerations for <u>all types of housing</u> . The proposal to justify “by-right” affordable or market-rate housing on land that is known to be contaminated should be stricken from the Housing Element. To allow this to remain in the document is to invite significant legal and financial liability for toxic tort lawsuits against the City of Alhambra.
31	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #J: "The Housing Element Improperly Misquotes Government Code Section (c) and Policy 3.3 Should be Reworded to Not Be Misleading
32	Garcia	Page 205: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that <u>are suitable for residential development and that</u> have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[[c]]].”

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33	Garcia	Page 217: Program 18: <u>“Subject to suitability for residential development as provided in Government Code Section 65583.2, the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.”</u>
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PC Recommendation on September 18, 2023:

Revise the draft Housing Element consistent with Commissioner comments #32-33 under topic #8.

a. Revise the sentence on Page 205 as follows: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that are suitable for residential development and that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[[c)].”

b. Revise Program 18 as follows: “Subject to suitability for residential development as provided in Government Code Section 65583.2, the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.”

VOTE: 7-0

Ayes: Grijalva, Ho, Juarez, Mojarro, Tsujii, Garcia, Olson

Noes: None

Absent: Gardea

Recusal: Pham

9. THE VILLAGES PROJECT

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34	Olson	Page 250 of the report refers to Housing Element Maintenance. Among the statements made on this page is that the “Villages at the Alhambra” represents a sizable share of progress toward RHNA. In fact, the 571 units proposed for the Professional Office Zone represent only 8.3% of Alhambra’s RHNA allocation of 6,825 units. Moreover, as currently proposed under the Housing Element, Alhambra’s total sites equal 7,642. This exceeds the city’s RHNA allocation by 817 units. I ask that the sentence referencing the “sizable share of progress toward RHNA” be stricken as inaccurate.
35	Tsuji	Does SB35 mean that the Village can go through a by-right approval process? Which cycle was this site identified as a previously non-vacant site?
36	Tsuji	Where did the 70% capacity assumption come from for the lowered development potential for the Villages site?
37	Garcia	Page 234: Program 40: “Because the project referred to as the “The Villages at the Alhambra” represents a sizable share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”
38	Garcia	Page 245: “Alternatively, the project would <u>could</u> still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units <u>subject to any such sites being suitable for residential development under Government Code Section 65583.2.</u> ”
39	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #1: "The Draft 4 Housing Element Is Factually Incorrect That the Villages' Units Are Required to Meet RHNA Obligations."

PC Recommendation on September 18, 2023:

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Revise the draft Housing Element consistent with Commissioner comments #37-38 under topic #9.

a. Revise the sentence included in Program 40 as follows: “Because the project referred to as the “The Villages at the Alhambra” represents a ~~sizeable~~ significant share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”

b. Revise the sentence on Page 245 as follows: “Alternatively, the project would could still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units subject to any such sites being suitable for residential development under Government Code Section 65583.2.”

VOTE: 6-1
Ayes: Grijalva, Ho, Juarez, Tsujii, Garcia, Olson
Noes: Mojarro
Absent: Gardea
Recusal: Pham

10. DEVELOPMENT STANDARDS

40	Garcia	Edits relating to Development Standards: The following edits are requested to reflect the Planning Commission’s view as to certain edits in the Zoning Code (to date). Height limits are used to resolve potential conflict between adjacent uses that are not as intense as proposed uses. Similarly, maintenance of commercial frontage as a commercial use has been repeatedly emphasized as a policy goal for the City.
41	Garcia	Page 88: “The city’s development standards include minimum setbacks, height limits, maximum floor area ratios (FARs) and lot coverage and minimum size for dwelling units, open space, and minimum parking requirements. We found that collectively, the city’s development standards will make it difficult to reach maximum allowed densities and place additional financial burden on development. Height limits, open space and parking requirements are the greatest constraint.

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42	Garcia	Height Limits. The city uses a graduated height limit where height defaults to a lower zone within 50 feet of a lower zone. For example, a high-density parcel adjacent to a low-density zone would have the area within 50 feet of the low-density zone limited to only two stories or 25 feet. This condition impacts a large share of high-density land in Alhambra. Combined with minimum unit sizes and FAR, height limits will prohibit development from reaching maximum densities in zones that will have increased density under the city's rezoning program.
43	Garcia	Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. <u>For areas outside of the CBD or EMC zone, this may [[This]] constrain[[s]] the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones other than the CBD or EMC zone.</u>
44	Garcia	Page 223: Program 27: "Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses."

PC Recommendation on September 18, 2023:

Revise the draft Housing Element consistent with Commissioner comments #42-44 under topic #10.

- a. ~~Modify~~ the paragraph on Page 88 referring to "Height Limits" to reflect that the height limit and step back is in reference to the City's existing zoning code for the R2 and R3 zones.
- b. ~~Modify~~ the paragraph on Page 88 referring to commercial zones as follows: "Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. For areas outside of the CBD or EMC zone, this may [[This]] constrain[[s]] the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones other than the CBD or EMC zone."
- c. ~~Revise~~ Program 27 as follows: "Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses."

VOTE: 7-0

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Ayes: Grijalva, Ho, Juarez, Mojarro, Tsujii, Garcia, Olson
Noes: None
Absent: Gardea
Recusal: Pham

11. OTHER COMMENTS/RECOMMENDATIONS

45	Tsujii	When was the Land Availability Assessment conducted? Why wasnt the Wondries Toyota considered at that time?
46	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #G: "The Housing Element Self-Servingly and Selectively Misrepresents The Findings Presented in the Code Analysis Memo."
47	Olson	The section entitled Growth Controls and Local Ordinances lists on page 111 the development of a local historic preservation program as a <u>possible</u> constraint on housing production. As the document states, the development of Alhambra’s historic preservation program is still in process. No specific directions or details are offered in the proposed Housing Element to planners or policy makers on methods to avoid these <u>possible</u> constraints, or even a description of how they might be represented in Alhambra. The recommendation asserts that, if “too comprehensive,” a preservation ordinance might “limit redevelopment potential.” This lack of specificity renders the guidance unhelpful and will likely have an unnecessarily chilling impact on preservation planning. In fact, there are many examples of state and federal tax incentives for historic preservation that enable creation of housing at all income levels, as well as the creation of affordable housing through adaptive reuse of historic commercial, residential, and public buildings. I ask that the paragraph on Historic Preservation at the top of page 111 be stricken from the document as unsupported and misleading.

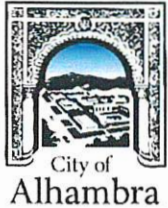
PC Recommendation on September 18, 2023:

Eliminate the entire paragraph discussing Historic Preservation under the “Growth Controls and Local Ordinances” on page 95.

VOTE: 6-1
Ayes: Grijalva, Ho, Juarez, Mojarro, Garcia, Olson
Noes: Tsujii
Absent: Gardea
Recusal: Pham

ATTACHMENT 4

PLANNING COMMISSION STAFF REPORT
SEPTEMBER 18, 2023



AGENDA REPORT
September 18, 2023
General Plan Amendment-22-01

TO: City of Alhambra Planning Commission

FROM: Andrew Ho, Director of Community Development *AH*
 Vanessa Reynoso, Deputy Director of Community Development *VR*

SUBJECT: Public Hearing for the Readoption of General Plan Amendment GPA-22-01 for the 2021-2029 Housing Element of the Alhambra General Plan

PROPOSAL:

A public hearing for the Planning Commission to make a recommendation to the City Council for the Readoption of the City of Alhambra's 2021-2029 General Plan Housing Element Update.

BACKGROUND:

This agenda item is requesting that the Planning Commission make a recommendation to the City Council concerning the adoption of the fourth revision of the Housing Element. The Planning Commission previously reviewed and the Council previously adopted a Housing Element in January 2022. Since that time, staff has submitted several revisions to HCD staff, received written comments, and engaged in multiple phone conversations with HCD staff to clarify their comments and discuss what may be acceptable to HCD for certification.

HCD staff has indicated that they would certify the current draft before the Planning Commission. Accordingly, if the Planning Commission wishes to make a recommendation that the current draft be adopted by the Council, staff believes there is a high probability that HCD will certify that document if adopted by the Council.

If the Commission wishes to recommend revisions to the document for the Council's consideration, the Commission should do so. If the Council adopts one or more of those revisions, staff is uncertain as to whether or not HCD will certify the revised Housing Element, or send back additional comments, after a sixty-day (60) review period.

SUMMARY:

The Planning Commission held a public hearing on the readoption of the updated Housing Element on August 7, 2023. At that meeting, the Planning Commission voted to continue the public hearing prior to engaging in their deliberations. In order to facilitate the Planning Commission's deliberations, staff requested that the Planning Commission email their comments to staff so that they could be included in the staff report and agenda materials for the continued public hearing so that the Commissioners and public had additional time to evaluate those comments. Five Commissioners submitted comments, which were consolidated into a matrix grouped by topic (11 topics total) to help facilitate Commission deliberation. In light of Commissioner's comments,

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staff also provided the following additional information to assist the Commission in their discussions:

Statements about constraints on development—A required component of the housing element is an analysis of constraints on development. In discussions with HCD staff, they appear to be concerned about a comprehensive portrayal of all constraints. They also appear to view the City's entitlement processes for housing, as well as previous public opposition to housing development in the City as constraints. Thus, elimination of language that speaks to these issues may be problematic for HCD staff. To the extent that any such statements were included in the original draft adopted by the Council, deletion at this time of such statements could be problematic—although to what degree is unknown.

Proposed elimination of the RPD process—This proposal arose out of multiple phone interactions with HCD. If the City were to retain the RPD process in its current form, staff does not believe that HCD will approve the Housing Element. If the City were to revise the scope of the RPD process, so that it applies to a lesser universe of projects, the outcome is uncertain. However, to the extent that the RPD were to only apply to multi-family projects, or multi-family projects of a certain size, State law will restrict the discretion currently existing in the RPD process.

First, certain multi-family projects would be exempt from the RPD process. SB 35 projects, for example. Also, projects that are by-right projects because they have been listed in the current and prior housing element site inventories and propose 20% or more affordable units.

Second, for projects that meet the requirements of the Housing Accountability Act (“HAA”) (i.e. two or more units and they meet all objective City criteria), such projects cannot be denied unless they create a specific, adverse impact on public health or safety based upon existing written standards, and there is no feasible method to mitigate the impacts. Absent that, the project cannot be denied or conditioned in a way that would result in lower density, which is defined to include an impact on the ability of the project to provide housing. Note further that the current RPD requires 10 findings. At least 8 of those are subjective. So, denying for any of those findings would be inconsistent with the HAA.

Addition of sites to the site inventory—Provided that the proposed sites otherwise meet the State law requirements for inclusion in the housing inventory, on its face this would not seem to be problematic—but HCD may still require revisions to the document if they do not agree that the proposed site meets the State law requirements.

Deletion of sites from the site inventory—Staff believes that deletion of sites would be problematic, absent the addition of substitute sites, or more upzoning throughout the City. In discussions with HCD staff, HCD is certifying housing elements that not only meet a city's RHNA numbers, but also have a buffer, to address situations where particular sites do not develop to the full density listed in the Housing Element.

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Elimination of commercial property as sites for housing—The commercial properties are proposed to be available for housing in order to provide sufficient capacity to meet the RHNA requirements. Eliminating this would require identifying additional sites for housing development, or upzoning other areas of the City.

Because this new information was not available previously, the Planning Commission allowed additional public testimony on this item at the August 21, 2023, Planning Commission meeting—including by those members of the public who may have already spoken on this item. This is consistent with prior Planning Commission and City Council precedent. Following all public comment received, the Planning Commission closed the public testimony portion of the hearing.

On August 21, 2023, the Planning Commission began discussion and deliberations on 1 of the 11 topics included in the comment summary matrix provided in the attachments. Specifically, the Planning Commission discussed the elimination of the Residential Planned Development (RPD) Permit and ultimately voted 8-1 to make a recommendation to the City Council that Housing Element be amended to no longer reflect the complete elimination of the RPD permit but to retain the process exempting project with 6 or less residential units. This recommendation has already been incorporated into the Resolution.

The Planning Commission did not finalize their deliberations at the August 21st meeting and continued the matter to September 5th, 2023. However, due to a lack of quorum on September 5th, this matter was continued to this evening.

NEXT STEPS:

The goal of tonight's meeting is to finalize discussions on the remaining 10 topics identified in the matrix summary of comments from Commissioners. After deliberations, it would be appropriate for the Planning Commission to make a recommendation to the City Council concerning the readoption of the 2021-2029 Housing Element. If the Planning Commission wishes to make any additional recommendations to the City Council, it would be appropriate to provide them at this time. The final Resolution, including all of the Commission's recommendations, will be forwarded to the City Council and this matter will be noticed for a public hearing before the City Council on October 9, 2023.

ENVIRONMENTAL STATUS:

An Initial Study/Negative Declaration was previously adopted for this project. The readoption will not result in any new, additional, or substantially different environmental impacts. Pursuant to State CEQA Guidelines Section 15162(a)(1), no subsequent negative declaration is required as the project does not include changes in the project that would be substantial or result in any new impacts, or be a substantial increase beyond what was identified in the Negative Declaration previously approved.

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PUBLIC NOTICE:

On July 27, 2023, a legal notice advertising the public hearing was placed in the Pasadena Star News and Alhambra Press.

PUBLIC COMMENT:

The official public comment period for the 4th Draft of the Housing Element was from March 8, 2023, to March 15, 2023. A total of 14 written public comments were received from 9 different individuals during the official comment period. Greater detail summarizing key themes from public comments and how public comment has been integrated into the Draft is now incorporated into the Housing Element, which has been deemed acceptable by HCD. No public comment letters were received specifically for this meeting prior to the agenda being finalized. All comment letters received prior to this meeting have been posted on the project and are available for public review.

RECOMMENDED ACTION:

Staff recommends the following:

1. Adopt Resolution No. 23-19, recommending that the City Council adopt a Resolution to readopt the 2021-2029 Housing Element of the City of Alhambra General Plan.

ATTACHMENTS:

1. Resolution No. 23-19
2. Memo from ECONorthwest, dated July 5, 2023
3. Written comments from Planning Commissioners
4. Matrix of Commissioner Comments (updated for the 9/18/23 meeting)
5. Letters from HCD, Dated December 2, 2021, April 8, 2022, October 10, 2022, May 25, 2023
6. Draft 2021-2029 Housing Element (Draft 4, dated April 16, 2023, reviewed by HCD)

ATTACHMENT 4.A

DATE: July 5, 2023
TO: Vanessa Reynoso, City of Alhambra
FROM: Chris Blakney, ECONorthwest
SUBJECT: Summary of Changes to Draft Housing Element Update

This memorandum summarizes changes made to The City of Alhambra's Housing Element Update adopted on January 31, 2022 in response to three rounds of review from HCD and comments from the public. The current version of the Housing Element Update dated April 14, 2023 has gone through mandatory public review processes and had received a letter of substantial compliance from HCD. The final step in the update process is readoption by City Council. This memo is organized into three sections: additional analysis, Housing Element sites inventory, and changes to programs.

Additional Analysis

Additional analysis was provided in response to HCD comments to provide further justification for assumptions used, document existing conditions, and to explore conditions in greater detail where HCD determined additional inquiry was warranted.

Public Comment Summary. Greater detail summarizing public comments, how public comment was integrated into the Housing Element, and the addition of summarized comments received through public review drafts.

Extremely Low-Income Housing Need. Additional analysis documenting extremely low-income housing need.

Estimate of Housing Units in Need of Rehabilitation. HCD requested additional analysis documenting the number of housing units in need of rehabilitation. This analysis was completed consultation with the Code Enforcement Division.

Cost Analysis for Risk of Affordable Housing at Risk of Conversion. HCD requires an analysis of the cost of replacement as a part of the assessment of housing at risk of converting to market rate. This analysis has been added.

Timing of Approvals as a Constraint. HCD asked for greater detail on the timing and process of project approvals. This analysis has been added.

Group Home and Emergency Shelter Allowance and Approvals. HCD requested greater detail on where group home and emergency shelters are allowed and the process for approvals. This analysis has been added.

Impact Fee Schedule. Additional detail on the City's impact fees has been added.

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Analysis of the RPD Process. Alhambra's Residential Planned Development (RPD) was identified by HCD as a considerable constraint. Additional analysis giving two project examples of the RPD process was added.

Development Review Timelines. The typical number of months for approvals for steps in the development review process have been added to the analysis.

Analysis of Environmental Constraints. HCD requested greater analysis of potential environmental constraints. This analysis was completed using SCAG's Housing Element Parcel Tool and found no major constraints.

Infrastructure System Capacity. HCD requested an expanded analysis of Water and Sewer system capacity as a potential constraint on development. This analysis was added.

Fair Housing Community Input. HCD requested greater detail and documentation of the input received in the analysis of fair housing. This analysis was added.

Fair Housing Analysis. Considerable new analysis was provided to expand on the assessment of Affirmatively Furthering Fair Housing. This work included:

- Analysis of Dissimilarity and Isolation indices in Alhambra and the broader Los Angeles County region.
- Analysis of persons with disabilities in Alhambra and the broader Los Angeles County region.
- Analysis of households by family status including protected classes like female headed households with children.
- An analysis of the presence of housing problems by race and tenure in Alhambra and the broader Los Angeles County region.
- Expanded analysis of cost burdened households by tenure.
- Expanded analysis of overcrowding by tenure.
- An analysis of local and regional trends in homelessness.
- An analysis of historic redlining
- An analysis of local barriers to fair housing, including historic land use and development patterns.
- An analysis of homeownership and lending trends and access to banking.
- An analysis of historic investment patterns in parks and public infrastructure made by the City.
- An expanded analysis of Alhambra's site inventory in the context of cost burdening, overcrowding, TCAC opportunity scores, displacement risk, low-mod population concentration, and racially and ethnically concentrated areas of poverty.

ATTACHMENT 4.A

Contributing Factors to Barriers to Fair Housing. Based on the preceding additional analysis, the Housing Element included a broad new section identifying factors contributing to barriers to fair housing and identification of meaningful actions and outcomes. This section served as the basis for new programs to address fair housing issues.

Review of Previous Housing Element. HCD requested a brief summary of the effectiveness of programs in Alhambra's 5th Cycle Housing Element in addressing special housing need. This summary was added to the analysis.

Site Analysis and Inventory

This section summarizing changes to underlying analysis and assumptions in the Housing Element site inventory analysis. Some of these changes resulted in a change in the number of units included in the inventory's capacity analysis. These changes were all subtractive, meaning that there were no new additions made to the site inventory.

Analysis of Development Patterns on Non-Residential Uses. HCD requested additional analysis of the development pattern on non-residential sites because a share of the inventory is located on sites that also allow commercial uses. This analysis was added.

Assumed Capacity of the Villages Site. The current draft included a reduction in the amount of capacity assumed for future potential development of the Villages to account for a lower likelihood of development. The element also now includes a provision to revise the capacity analysis if the Villages project is not approved by mid-cycle.

ADU Capacity. HCD determined that the site inventory had an overreliance on ADUs, despite demonstrated trends. The number of ADU's assumed in the capacity analysis was reduced from 600 to 480.

Development Trends on Non-Vacant Sites. HCD requested greater detail in the evaluation of development trends in non-vacant sites. The Element now included a broad section giving project examples of different redevelopment projects over the last decade on non-vacant sites.

Removal of Sites. In response to public comment the site NV.506 (17-21 S Cordova Street) was removed from the inventory.

Changes to Programs

This section summarizes amendments to programs and the addition of new programs in response to new analysis and comment from HCD and the public. Because programs are numbered and organized by type, program reference numbers have changed for some programs. Where a program was included in the existing adopted element, its previous program reference number is provided in parentheses.

Program 1. Housing Rehabilitation Program (Program 1). An addition of a quantifiable target of two minor and one major renovation over the planning period.

Program 5: Inclusionary Housing Requirement for Residential Development (Program 5). The addition of a provision identifying an in-lieu fee as an alternative to providing inclusionary

ATTACHMENT 4.A

units. The addition of a provision requiring developers to make a good faith effort to make units available to the public.

Program 9: Meeting Special Housing Needs (New Program). A new program identifying a range of actions to accommodate special housing need.

Program 10: Local Hire Program (New Program). A new program that directs the city to develop a proposal for a Local Hire Program for subsidized affordable housing projects.

Program 11: Workforce Housing Program (New Program). A new program that directs the city to develop a proposal for a workforce housing program in coordination with local major employers.

Program 13: Cooperation with Affordable Housing Developers and Providers (Program 10). The addition of a commitment to notify affordable housing developers of the city's site inventory annually.

Program 14: Expand Affordable Housing Funding (Program 11). The addition of a commitment to study sources of funding alternatives and to submit at least one grant application per year.

Program 15: Update Density Bonus Ordinance (Program 12). The addition of a commitment to bring density bonus program in compliance with AB2097.

Program 18: Rezone Sites Used in Previous Housing Element (Program 15). The addition of a commitment to bring density bonus program in compliance with AB2097.

Program 19: Rezone and Upzone Strategies to Meet RHNA Targets (Program 16). Addition of a provision that commits the city to future rezoning if it's feasibility study in Program 20 (Program 17) determines it is necessary.

Program 21: Adopt the Comprehensive Zoning Code Update (Program 18). Addition of a provision to fix previous errors in the General Plan Land Use Map.

Program 22: Prioritize Affordable Housing Production on City-Owned Land (Program 19). Addition of. A broad range of actions to facilitate development and redevelopment on city-owned sites.

Program 25: Lot Consolidation and Assemblage (Program 22). Addition of actions to facilitate lot consolidation including flexible development standards and exploring opportunities for acquisition and assemblage.

Program 26: Accessory Dwelling Unit Program (Program 23). Addition of a commitment to affordability tracking and a mid-cycle review. Revision of annual production target from 75 to 60 ADUs per year.

Program 27: Reduce Development Constraints for Affordable Housing (Program 24). Commitment to a broad range of actions to reduce development constraints in coordination with other programs and commitments.

ATTACHMENT 4.A

Program 29: Development Streamlining (Program 26). Addition of a broad range of actions to improve development streamlining. The most significant of these actions is the complete elimination of the City's RPD permit.

Program 30: Affirmatively Furthering Fair Housing (Program 27). Addition of a broad range of actions based on new analysis of fair housing issues.

Program 32: Providing New Housing Choice in R-1 Zones (New Program). A new program that commits the city to adopting an SB9 ordinance.

Program 33: Establish a Target for Increasing Housing Production in R-1 Zones (New Program). A new program that sets a goal of 20 building permits per year in R-1 zones.

Program 34: AFFH Monitoring and Review (New Program). A new program that directs the city to conduct an annual assessment of AFFH progress as a part of the annual progress reporting.

Program 35: Place-Based Community Improvements (New Program). A new program that directs the city to make investments in parks improvements in lower and moderate resource areas.

Program 36: Place Based Community Improvements—Emery Park (New Program). A new program that directs the city to continue to provide recreational activities and programs at Emery Park.

Program 37: Place-Based Community Improvements—Streetscape and Right-of-Way (New Program). A new program that directs the cities to create a strategy for place-based public safety improvement.

Program 38: Place-Based Community Improvements—Valley Boulevard (New Program). A new program that directs the city to invest in multimodal improvements along Valley Boulevard.

Program 40: Housing Element Maintenance (Program 30). Addition of a provision to revisit capacity estimates if development does not occur on The Villages Site.

**COMMENTS & RECOMMENDATIONS SUBMITTED ON THE PROPOSED
READOPTIION OF THE 6th CYCLE (2021-2029) HOUSING ELEMENT OF THE
ALHAMBRA GENERAL PLAN**

GPA-22-01

By Chris Olson

Planning Commissioner

August 14, 2023

The following recommendations are offered in response to the staff report for Item 4 on the agenda of the August 7, 2023 Planning Commission meeting, which proposed readoption of the Alhambra Housing Element:

1. Page 6 of the staff report states that Alhambra's Residential Planned Development process was identified by HCD as a considerable constraint upon housing development. I have been unable to find any evidence supporting that statement in the letters sent by HCD to the City of Alhambra in response to prior submissions of the draft Housing Element. The proposed elimination of the RPD permit process is an extreme measure to streamline approval for housing development in the city. To remove this process from public review entirely, for all residential development in Alhambra, directly contradicts HCD's statement that public input is important. While minor and routine changes, especially for projects that are small in scale, may be approved by staff, I strongly object to the complete elimination of Planning Commission review – and consequent opportunity for public input on residential development.
2. Page 68 of the staff report states that HCD requested greater analysis of potential environmental constraints against housing production in Alhambra, and that said analysis was completed using SCAG's Housing Element Parcel Tool (HELPR), with a finding of **no major constraints**. It should be noted that the tool used by SCAG does not address either soil or groundwater contamination. Both have previously been identified as significant liabilities in Alhambra's Industrial and Professional Office zones, which were designated as part of a Superfund site in 1984. The cost of mitigation of soil and groundwater contamination (PCE, TCE, perchlorate, and nitrate) through soil removal and barriers to vapor intrusion should be considered an environmental constraint. The information provided on page 68 regarding environmental constraints is incorrect and should be removed from the document.
3. Pages 82 and 83 of the report refer to Community Influence on New Housing Development as a constraint. This section summarizes the Planning Commission's role in approving all residential development as being too easily influenced by community input and opposition, suggesting that the city should therefore limit the role of the Commission. This is supported by a statement on page 82 that refers to the "weaponization" of the public process. The recommendation that the Planning Commission's role in review and approval of residential projects be limited because too much influence is exerted by

ATTACHMENT 4.B

community input denies the intelligence, training, experience, and judgment of Commissioners. While much public input may be anti-development, my experience has been that Commissioners have demonstrated the capacity to weigh all of the evidence presented, listen to comments from staff, counsel, residents, property owners, and developers, and make reasoned and thoughtful decisions.

4. Page 96 of the report includes a chart that refers to specific provisions for the Office Professional Zone. Multiple references are made in the chart to sites of 30 acres or more. There is only one site in the city that is 30 acres in size. As such, these considerations (floor area ratio, front yard size, rear yard size, side yard size, distance between buildings, lot coverage, and minimum dwelling size) are inappropriately given to one parcel owner.
5. Page 104 of the report includes a summary of the constraints of housing development in commercial zones. It states, "With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones." I strongly object to the implementation of Program 21, as it will produce very few units of residential housing while simultaneously conflicting with the General Plan goal of creating vibrant and walkable commercial districts.
6. The section entitled Growth Controls and Local Ordinances lists on page 111 the development of a local historic preservation program as a possible constraint on housing production. As the document states, the development of Alhambra's historic preservation program is still in process. No specific directions or details are offered in the proposed Housing Element to planners or policy makers on methods to avoid these possible constraints, or even a description of how they might be represented in Alhambra. The recommendation asserts that, if "too comprehensive," a preservation ordinance might "limit redevelopment potential." This lack of specificity renders the guidance unhelpful and will likely have an unnecessarily chilling impact on preservation planning. In fact, there are many examples of state and federal tax incentives for historic preservation that enable creation of housing at all income levels, as well as the creation of affordable housing through adaptive reuse of historic commercial, residential, and public buildings. I ask that the paragraph on **Historic Preservation** at the top of page 111 be stricken from the document as unsupported and misleading.
7. Page 221 of the report refers to the goal of identifying adequate sites in the city to provide for all types of housing. Within this section, Policy 3.3 states "The city shall allow housing developments with at least 20% affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with California Government Code Section 65583.2(c)." This policy is flawed because it references only one element of that code section,

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ignoring the requirement of Code Section 65583.2(a) and 65583.2(b) that address suitability and environmental constraints. These are key considerations for all types of housing. The proposal to justify “by-right” affordable or market-rate housing on land that is known to be contaminated should be stricken from the Housing Element. To allow this to remain in the document is to invite significant legal and financial liability for toxic tort lawsuits against the City of Alhambra.

8. Page 250 of the report refers to Housing Element Maintenance. Among the statements made on this page is that the “Villages at the Alhambra” represents a sizable share of progress toward RHNA. In fact, the 571 units proposed for the Professional Office Zone represent only 8.3% of Alhambra’s RHNA allocation of 6,825 units. Moreover, as currently proposed under the Housing Element, Alhambra’s total sites equal 7,642. This exceeds the city’s RHNA allocation by 817 units. I ask that the sentence referencing the “sizable share of progress toward RHNA” be stricken as inaccurate.
9. Appendix A, the Housing Sites Inventory, begins on page 282 of the staff report for Agenda Item 4. It does not include the property at 400 S. Atlantic (APN #5344-002-044), the former site of Bob Wondries Ford, which has been vacant for 6 months. This 2.5-acre site could accommodate the development of 108 housing units at 48 units/acre (the same density that is proposed for the two sites located on South Atlantic between W. Beacon and W. Mission). It is located on a major transit corridor, and directly across the street from William Northrup Elementary School, serving grades K-8. The Housing Sites Inventory should be amended to include this site.

Edits to Housing Element: Requested edits are shown in underline for additions, and ~~strikethroughs~~ or ~~[[bracketed text]]~~ for deletions. All page numbers reference the page number of the Housing Element document:

1. **Edits relating to Characterization of Community Sentiment:** The following edits are requested on the basis that they are not supported by the record, unnecessary, and improper for inclusion in the Housing Element. A stated goal of HCD is to bolster public participation and promote public involvement. The edits proposed below are intended to further this policy goal.
 - Page 66 : “It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. ~~However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.”~~
 - Page 67: ~~“Some segments of the community are active opponents to development.~~ Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This may ~~serve~~ ~~[[s]]~~ as an extra delay for even small development projects that meet all codes and standards. Combined, these factors may have ~~result~~ ~~[[ed]]~~ in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production.

...

The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. ~~However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production.~~ The city should reconsider the type and scale of developments that are subject to Planning Commission approval.

- Page 112: “Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can

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be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. ~~Communities with strong opposition to development can often use these processes to further prohibit development.”~~

- Page 186: ~~“Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production”~~
- Page 224 (pdf 302): Program 28: “Community input into planning and approval processes is a necessary and important function. ~~However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint.~~ One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”

2. Edits relating to Development Standards: The following edits are requested to reflect the Planning Commission’s view as to certain edits in the Zoning Code (to date). Height limits are used to resolve potential conflict between adjacent uses that are not as intense as proposed uses. Similarly, maintenance of commercial frontage as a commercial use has been repeatedly emphasized as a policy goal for the City.

- Page 88: “The city’s development standards include minimum setbacks, height limits, maximum floor area ratios (FARs) and lot coverage and minimum size for dwelling units, open space, and minimum parking requirements. We found that collectively, the city’s development standards will make it difficult to reach maximum allowed densities and place additional financial burden on development. ~~Height limits, open space and parking requirements are the greatest constraint.~~

~~Height Limits. The city uses a graduated height limit where height defaults to a lower zone within 50 feet of a lower zone. For example, a high density parcel adjacent to a low density zone would have the area within 50 feet of the low density zone limited to only two stories or 25 feet. This condition impacts a large share of high density land in Alhambra. Combined with minimum unit sizes and FAR, height limits will prohibit development from reaching maximum densities in zones that will have increased density under the city’s rezoning program.~~

ATTACHMENT 4.B

Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. For areas outside of the CBD or EMC zone, this may [[This]] constrain[[s]] the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones other than the CBD or EMC zone.”

- Page 223: Program 27: “Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects”
- Page 223: Program 27: “Amend the zoning code to allow Low-Barrier Navigation Centers by-right in ~~all~~ R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses.”

3. Edits relating to Elimination of Residential Planned Development Permits: Complete elimination of residential projects in residential zones from the Planning Commission is unsupported by the record. Instead, the record supports possible elimination of RPDs in small scale projects. The Examples provided on pages 109-110 do not support elimination of RPDs, instead they demonstrate that factors outside of the Planning Commission’s control impacted the timeline for a particular project far more than the Planning Commission’s deliberations.

- Page 89: “Among the most important factors in a city’s administrative code, from the perspective of the development community, is certainty. Reducing the number of actions ~~and decisionmakers involved~~ in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use. This may add[[s]] additional time, cost, and uncertainty to small scale developments in R2 zones that can be a constraint on development. ~~Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.”~~
- Page 109-110: Delete “Findings Examples” section in its entirety.
- Page 110: “RPD Summary: Among the most important factors in a city’s administrative code, from the perspective of the development community, is certainty. Reducing the number of actions ~~and decisionmakers involved~~ in making planning approvals, while maintaining opportunities for public input, is desirable. ~~The project examples and findings summarized above demonstrate that through~~ Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use. This may add[[s]] additional time, cost, and uncertainty to small scale developments in R2 zones that can be a constraint on development. ~~Overreliance on discretionary review and failure to apply objective~~

ATTACHMENT 4.B

~~standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.~~

- Page 113: “The city works to process permits concurrently and typical timelines for approval reported by the city are not considered overly constraining on development. The city’s review processes are generally typical, with a few exceptions. First, requiring full Planning Commission approval for all variances can add to approval times. An initial variance can often be approved administratively. Second, as previously evaluated, the city’s Residential Planned Development (RPD) permit may add[[s]] uncertainty, time, and discretionary approval that is a constraint on small scale development in R2 zones. ~~The city’s zoning code audit found Alhambra’s development review processes to be burdensome and over-reliant on discretionary review.~~ Subjective findings could lead to a protracted review process or denial of a project based on interpretation. Additional costs and uncertainty can negatively impact developer interest in the community, limiting affordable and market-rate housing production and perpetuate under-supply and lack of affordability.”
- Page 224: Program 29 “The City’s Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. The constraints analysis identified the RPD as a significant potential constraint on small scale development in R2 zones. The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects. It will also maintain consistency with the Housing Crisis Act and utilize the state’s standard preliminary application checklist to facilitate project review. Within the first two years of the planning period the city will:

~~Eliminate the Residential Planned Development Permit process”~~

- 4. Edits relating to 30 acres or more:** All references to the special treatment of parcels of 30 acres or more should be removed as improper subject matter for the Housing Element.
 - Page 80: Remove all carve outs for lots of 30 acres or more.
- 5. Clarifying Edits:** The following edits are intended to clarify assertions, conclusions or statements.
 - Page 116: “Sites with potential environmental constraints (without consideration of contamination status) are noted in the detailed inventory appendix and electronic inventory database.
 - Page 205: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that are suitable for

ATTACHMENT 4.B

residential development and that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[c]].”

- Page 217: Program 18: “Subject to suitability for residential development as provided in Government Code Section 65583.2, the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.”
- Page 234: Program 40: ~~“Because the project referred to as the “The Villages at the Alhambra” represents a sizable share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”~~
- Page 245: “Alternatively, the project ~~would~~ could still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units subject to any such sites being suitable for residential development under Government Code Section 65583.2.”

6. Site Inventory: Add 5344-002-044 (former Wondries lot) to Site Inventory

ATTACHMENT 4.B

From: [Antonio Gardea](#)
To: [Reynoso, Vanessa](#)
Subject: Re: Housing Element Comments/Recommendations
Date: Monday, August 14, 2023 8:16:06 PM
Attachments: [attachment-1.png](#)
[attachment-5.png](#)

Vanessa,

I appreciate the opportunity to provide input on both the Housing Element and the Zoning Code. I value the effort and thoughtful approach to both and would not want to unnecessarily jeopardize HCD's certification of the Housing Element by asking for specific revisions to the zoning code. However, some changes might help balance the community's desire for a gradual transition as our city evolves. As new development takes place, care should be taken that projects in Alhambra serve the City's overall quality of life goals. My main concern is the long term vision of the Villages project site and having future development right-sized in context of the surroundings and not grant incentives for rapid revitalization of the site. The community should benefit from development of the site in the immediate term and not in some distant future that is uncertain. On a separate note, less desirable, unsustainable uses should no longer be allowed.

Housing Element

- The capacity analysis should be revised to exclude the Villages from the Site Analysis and Inventory. The zoning code should include a provision that would be reflective of State law concerning affordable housing projects. Site clean up and implementation of hazardous materials remediation measures may not occur within this housing element cycle to make the site suitable for residential development.
- Program 29 Development Streamlining. Regarding local processing and permit procedures, HCD's 12/2/21 review letter states, "Specifically, the analysis should address approval procedures and findings for the Residential Planned Development permit including the number of public hearings, approval findings and any other discretionary approval procedures." The RPD land use entitlement requirement should be revised, not completely eliminated. The RPD permit should be aligned with CEQA and necessary for projects that are either six (6) dwelling units or more (Class 3 exemption), or located on sites greater than five (5) acres (Class 32 exemption). Keeping the RPD permit ensures that the public and Commission have the opportunity to review the project. The Commission struggled with adoption of development standards that were inequitable and conferred greater development rights, in terms of square footage, to projects developed as time passed. I suggest that the RPD requirement be added to the medium and high density residential land use designations of the General Plan.

Zoning Code

- The Commission was asked to review height limits in the Industrial zone, specifically when adjacent to residential and limited these heights and stories (Comments #22 & 24). The limits of the industrial zone should apply to the PO Zone. The specific clauses in the development standards for the urban residential uses (the Villages site) should be omitted from the PO zone.
- Car washes and self storage buildings create voids in the urban fabric by occupying areas that could otherwise be used productively and lack direct economic benefits to the community. The single-purpose buildings are typically car-centric uses, housed within sites and buildings that are hostile to pedestrians.
 - Automobile Washing should be prohibited in the CMU zone. The Valley Blvd Specific Plan did not allow these types of uses throughout the corridor.
 - Personal Storage should be a prohibited use in the industrial (I) zone.
- Planned Development Overlay District appears to waive development standards for sites that are one acre or more. The overlay should be applicable to larger sites, I recommend that the minimum should be five acres.
- Flexible development standards (20% variance) on lots 20,000 square feet in size or larger seems excessive. I recommend reducing this to ten percent.

Again, thank you for giving me the opportunity to provide my feedback on these important documents.

On Tuesday, August 8, 2023 at 11:00:13 AM PDT, Reynoso, Vanessa <vreynoso@cityofalhambra.org> wrote:

Good morning, Commissioners

As a follow-up to last night's meeting, I just want to remind everyone that if you plan on submitting specific comments/recommendations on the Housing Element, please email them to me **no later than Noon on**

ATTACHMENT 4.B

Monday, August 14 to be included in the staff report for the regular meeting on August 21. A bullet/list format would be helpful.

Feel free to reach out if you have any questions. Thank you.

Vanessa.



Vanessa Reynoso | Deputy Director
Community Development Department
111 S. First St. | Alhambra, CA 91801
T: 626-570-5033

www.cityofalhambra.org



City Hall Hours:

M-TH 7:00 am-5:30 pm; Closed on Friday

ATTACHMENT 4.B

From: [Kent Tsujii](#)
To: [Reynoso, Vanessa](#)
Subject: Re: Housing Element Comments/Recommendations
Date: Monday, August 14, 2023 8:38:47 PM
Attachments: [attachment-1.png](#)
[attachment-5.png](#)

Vanessa,

Apologies for not getting these questions/comments in earlier. Please see below

- When was the Land Availability Assessment conducted? Why wasn't the Wondries Toyota considered at that time?
- Does SB35 mean that the Village can go through a by-right approval process? Which cycle was this site identified as a previously non-vacant site?
- Where did the 70% capacity assumption come from for the lowered development potential for the Villages site?

Thank you for doing such a great job on the housing element. I think my questions are more geared toward so the public can understand why the Villages is forced to still be allowed to be considered in the housing element as a potential site. And why other sites (like wonderies) were not considered (ie due to unknown potential site availability?).

On Tue, Aug 8, 2023 at 11:00 AM Reynoso, Vanessa <vreynoso@cityofalhambra.org> wrote:

Good morning, Commissioners

As a follow-up to last night's meeting, I just want to remind everyone that if you plan on submitting specific comments/recommendations on the Housing Element, please email them to me **no later than Noon on Monday, August 14** to be included in the staff report for the regular meeting on August 21. A bullet/list format would be helpful.

Feel free to reach out if you have any questions. Thank you.

Vanessa.



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ATTACHMENT 4.B

From: [Karla Grijalva](#)
To: [Reynoso, Vanessa](#)
Subject: Re: Housing Element Comments/Recommendations
Date: Monday, August 14, 2023 12:54:07 PM
Attachments: [attachment-1.png](#)
[attachment-5.png](#)

Vanessa,

After reviewing public comments transmitted by email on August 7 at 3:43pm, I would like to recommend to discuss Ron Sahitem's public comments related to the Housing Element document. Particularly, comments D thru K. The comments are important for the re-adoption of the HE.

I would also like to highlight the significance for the Housing Element (HE) document to be redacted in an objective way, as it is a public document. When the document references the City of Alhambra's community participation it should be pointed out with neutrality. We can discuss on our Thursday's call.

With regards the elimination of Residential Planned Development Permit process, is there or were in the past a discussion with Planning Commission about the determination of eliminating the RPD included in the HE?

All best,

Karla Grijalva

On Tue, Aug 8, 2023 at 11:00 AM Reynoso, Vanessa <vreynoso@cityofalhambra.org> wrote:

Good morning, Commissioners

As a follow-up to last night's meeting, I just want to remind everyone that if you plan on submitting specific comments/recommendations on the Housing Element, please email them to me **no later than Noon on Monday, August 14** to be included in the staff report for the regular meeting on August 21. A bullet/list format would be helpful.

Feel free to reach out if you have any questions. Thank you.

Vanessa.



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Dr. Ranajit (Ron) Sahu, Consultant

Resident of Alhambra (311 North Story Place, Alhambra, CA 91801)

Board Member, Grassroots Community Group of Alhambra (GRA)

ex-Member, Planning Commission, City of Alhambra, 2019-2023

Email: ronsahu@hotmail.com

Phone: 702.683.5466

Comments Submitted at the Public Hearing for the Readoption of General Plan Amendment GPA-22-01 for the 2021-2029 Housing Element of the Alhambra General Plan, August 7, 2023 Planning Commission Meeting, Agenda Item 4

Dear President Wang, Vice-President Garcia, and Commissioners:

Thank you for allowing me, a resident of Alhambra since 1988, residing at the address noted above to submit these written comments for Agenda Item #4, the readoption of the City's Housing Element. I am submitting these comments on my behalf as well as on the behalf of the Grassroots Community Group of Alhambra (GRA).

A. Request to Keep Hearing Open Until After August 7, 2023

1. First, as a procedural matter, **I request that the Hearing for Item #4 be held open for public comments and not closed until such time as the Hearing for the closely related Agenda Item #5 (Zoning Code Update) is closed.** Both items are related and this will allow for a more efficient and proper consideration of any public comments and Commission deliberations on these two related items.

I note that this Agenda Item #4, unlike its sister Agenda Item #5 was not anticipated to be on the calendar for August 7. While an extension of time to allow development of proper public comments for Agenda Item #5 was discussed at the City Council, resulting in the continuance of the public hearing for that item to subsequent Planning Commission meetings, there was no opportunity for requesting a similar extension for Agenda Item #4. As one of the attachments to these comments (email exchange between myself and Director Ho, at Attachment A) makes clear, both Agenda Items #4 and #5 are related (“...packaging Housing Element and Zoning Code together would make sense since they are related to each other...”). I agree. Logically, therefore, the Hearing schedules for these related items should be consistent and therefore the Hearing for Agenda Item #4 should be held open and close at the same time as that for #5.

As a practical matter, holding the Hearing open will allow for proper, additional public comments (a key and important requirement by the California Department of Housing and Community Development, HCD, the approving authority for the Housing Element – as I will note later) to be submitted for the Commissions considerations. Factually, these comments are being drafted well past midnight on Sunday, August 6 and on the day of the Hearing on August 7, 2023.

ATTACHMENT 4.B

B. Additional Materials Submitted as Support and for the Record

2. Along with these written comments, I am also submitting the following additional materials and/or the links to the City's website where these documents may be found – for distribution to each Commissioner, and staff.

(i) Attachment A – a copy of an e-mail exchange between myself and Director Andrew Ho, of the Alhambra Community Development Department, dated August 4, 2023;

(ii) Attachment B – a pdf copy of “redline” comparison between the Housing Element text of January 2022 – when the Planning Commission last recommended adoption to the City Council – and the current language in the Commission's Agenda Package for the August 7, 2023 meeting. It is my opinion that this comparison – which shows language that is removed from the prior (January 2022) text in red while also showing new language that has been added into the current text in green – is helpful for the Commission as it was for me, in not only understanding public comments but also in recommending a number of changes as part of the readoption;

(iii) Attachment C – as referenced in these comments, a copy of the December 7, 2020 Code Analysis Memo, available at <https://www.alhambrcodeupdate.com/documents>;

(iv) Attachment D – as referenced in these comments, a copy of the March 2021 Zoning Code Update and Survey Results, available at <https://www.alhambrcodeupdate.com/documents>; and

(v) Attachment E – collectively the copies of 4 letters received from the State of California Department of Housing and Community Development (HCD) dated December 2, 2021, April 8, 2022, October 10, 2022, May 25, 2023. Available at <https://www.alhambrahousingelement.com/project-documents>

C. Housing Element Text Revisions Should Address Unsupported, Unnecessary, and Misleading Statements

3. I should note at the outset that these comments on the Housing Element should NOT materially alter the Draft 4 Housing Element which has received approval from the HCD via its May 25, 2023 letter. I and GRA have no intentions of reopening the HCD-approved Housing Element in any material sense. Nonetheless, these comments are important to set the public record straight and to specifically call out text and language that is included in the Draft 4 Housing Element that is: (i) without support; (ii) unnecessary – i.e., not required by HCD, and, in fact, counter to HCD's admonition for proper balancing of public input and comments; or (iii) misleading and outright false.

4. In the comments below, I refer to pdf page numbers in the 1613-page Agenda package for the August 7, 2023 meeting, for ease of reference. I also cite to pdf page numbers for the other documents provided as Attachments, when relevant.

D. The Outright Removal of the Residential Planned Development (RPD) Process Is Unwarranted and Unsupported and Should be Rescinded.

5. In Attachment 2 in the Housing Element Agenda Item #4 on pdf page 68, it states: “Analysis of the RPD Process. Alhambra’s Residential Planned Development (RPD) was identified by HCD as a considerable constraint. Additional analysis giving two project examples of the RPD process was added.” (underline emphasis added). **Based on a careful review of the record including the comment letters received from the HCD, the emphasized text is without any foundation, at best misleading, and, actually false.**

Crucially, pertaining to the RPD, on pdf page 71, the summary provided by our consultant states that for “Program 29: Development Streamlining” the Housing Element adds a broad range of actions to improve “development streamlining.” It goes on states “The most significant of these actions is the complete elimination of the City’s RPD permit.” (emphasis added)

See also pdf page 302 that confirms the complete elimination language for the RPD:

“The City’s Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. ~~The constraints analysis identified the RPD as a significant constraint on development.~~ The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects....~~Eliminate the Residential Planned Development Permit process....~~” (emphasis added in underline and Requested text to be struck from the text is shown in strike-out)

The record simply does not at all justify the elimination of the RPD, period. It misleads by stating that the HCD identified it as a “considerable constraint” when there is absolutely no indication of such “identification” by the HCD in any of the 4 HCD’s own comment letters received on the Housing Element – which I am providing for ease of reference by Commissioners.

In addition, the RPD discussion on pdf page 168, quoted below, shows that while further adjustments to the RPD (which were already in place beginning in 2020) may be in order, there is no contemplation of wholesale elimination, as was proposed by Staff, noted above:

“To mitigate this constraint, the City should reconsider which developments are subject to Planning Commission approval. The city has started down this path. In early 2020, the city began implementing RPD requirements of the Code to allow administrative review of permit applications in the R-1 zone rather than a RPD permit process, subject to Design Review Board and Planning Commission discretionary review. This update is a step towards right-sizing the discretionary review with the scale of change in the built environment. Additional efforts to ameliorate development uncertainty and risk especially for projects small in scale should be considered as a way to better meet the community’s housing needs. As a part of the city’s comprehensive zoning code update, it will be exploring how the number of projects that require discretionary review can be reduced through new design standards and requirements in the Code.” (emphasis added)

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I agree that “right-sizing” the RPD makes sense. I also agree that, doing this for “projects small in scale” may also be proper. In other words, additional, thoughtful, adjustments may be entirely proper. But, that is NOT what the Housing Element does. It gets rid of the RPD altogether – for all residential housing, regardless of type, size, or impact, in any zone. That means getting rid of Planning Commission (and Council) oversight other than by appeal, and reverting sole authority for approvals to Staff/Community Development Director. The case for this extreme action is NOT supported, and nor was it requested or demanded by the HCD. If Staff, in their zealously to obtain HCD approval of the Housing Element proposed this extreme elimination of reasonable checks and balances including public input – which HCD emphasizes as a critical need – that decision needs to be revisited. **Thus, the RPD should be reinstated, with any fine-tuning justified by actual project experience.**

In further justifying the need to eliminate the RPD, staff, on pdf pages 187 and 188 provide just TWO example projects of the supposed impediment of the Planning Commission’s discretionary approval in delaying projects. Presumably, these two example projects were selected as the best projects to make the case for elimination of the RPD. For the benefit of the Commission, I excerpt these, with my yellow highlights. Plain review of these examples confirms that neither of these example Projects is at all helpful to support the case for elimination of the RPD on the basis that this would make approvals more streamlined (i.e., get rid of public comment) and faster and that that the Planning Commission’s actions were the cause of delays. Quite the contrary in fact.

In the first example (Project 1 below), the matter was heard at the fourth meeting (i.e., a two-month delay) because Staff did not properly notice the project in the first two meetings and the third meeting ended well past midnight. How is this the Planning Commission’s fault? It is simply breathtaking and illogical to conclude that this example should justify the elimination of the Planning Commission’s review and that would avoid delay.

PROJECT 1: 234 Marguerita Ave & 234 S Curtis Ave
Project Description: Proposed 11-unit condo project in an R-3 zone. Project replacing six existing units to be demolished. Project is in the R-3 zone with a maximum allowed density of 30 units/ac.
Filing Date: 8/23/2019 Approval Date: 8/3/2020
Project Summary: This Residential Planned Development Permit met all objective zoning code requirements and was even proposed under max density. The project was placed on the Planning Commission agenda four times, although, no discussions were held on the first two meetings due to rare circumstances relating to public noticing and technical issues. The third meeting of July 16, 2020 was a special meeting. Because of two other items needing to be discussed first, the PC did not get to this item until 11:14 PM. At 1:00 AM, the Commissioners still had not begun Commissioner deliberations, so the item was continued to a fourth meeting of August 3, 2020.

The second project example (excerpted in the two boxes subsequently) is even less helpful to Staff’s point. As my highlighted text shows, the project was brought before the Planning Commission by staff four full months after the application was filed. Since the Planning Commission does not control the timing of when items are brought before it, how is this four month delay the Planning Commission’s fault? And, when it did make it to the Planning Commission, after hearing public input, the matter was decided expeditiously, within a month,

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including the Christmas holidays. That shows prompt action, as opposed to delay, by the Planning Commission.

PROJECT 2 510 N. 3 rd Street
Project Description: Proposed four unit apartment project in a three-story structure. The project is located in the R-3 zone with a maximum allowed density of 24 units/ac.
Filing Date: 8/16/2018 Planning Commission Denial Date: 1/7/2019 Ultimate Approval Date: 5/16/2020
Project Summary:

The project had two planning commission meetings, the first on December 3, 2018, roughly four months after application filing. The second meeting was held 1/7/2019 where the application was denied by the planning commission. Concerns and findings from the Planning Commission included:

- **Height.** Findings that the proposed three-story height was incompatible with the neighboring one-story residence to the north. Both properties are zoned R-3 with a three-story maximum height.
- **Shade and shadow.** Recommendation that a shade and shadow study would be needed to evaluate the impact on the residence to the north. The city does not have shade and shadow standards.
- **Architectural Style.** Findings that the proposed architectural style was incompatible with the existing development on the street.

Three members of the public also spoke against the project, highlighting similar concerns over height, shadow, architectural character, and parking impacts.

The project was denied by the Planning Commission and appealed to the City Council. A summary of City Council Meetings include:

- **March 25, 2019.** Council expressed concerns similar to the Planning Commission. The item was continued to April 22, 2019.
- **April 22, 2019:** Appellant requested continuance to May 13, 2019
- **May 13, 2019:** Council again expressed concerns similar to the Planning Commission. The item was again continued to May 28, 2019.
- **May 28, 2019:** After public comment and discussion, the City Council continued the item to July 8, 2019, and asked the appellant to conduct three meetings with neighbors to address issues of height, design, and privacy.
- **July 8, 2019:** The appellant requested continuance to September 9, 2019, as he needed more time to complete the neighbor meetings.
- **July 31, 2019:** After several meetings with neighbors the appellant decided to withdraw the appeal after unsuccessful negotiations on height limit.

Project Outcome:

The initial RPD was denied on 1/7/2019 by the Planning Commission by a vote of 2-Ayes; 5-Noes; 2 absences. A revised resubmitted 5-unit project was ultimately approved on 5/16/2020 administratively under SB35.

Perhaps the second Project example is provided to support the notion that the RPD process failed simply because the project was denied. In which case, the only goal for eliminating the RPD must mean that every project, regardless of merit, should ONLY BE APPROVED – and that is what is intended by vesting approval authority with staff and not with the Planning Commission. Of course, that means removing all public input on projects – both large and small – altogether. That

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is beyond the pale and Alhambra should be ashamed for suggesting anything remotely so irrational in the Housing Element. It also directly flies in the face of the HCD's admonition that public input is important.

Thus, the Housing Element's text below at pdf page 188 does NOT "demonstrate" that the RPD process is not working:

"Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decision-makers involved in making planning approvals, while maintaining opportunities for public input, is desirable. The project examples and findings summarized above demonstrate that through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development."

As noted above, I note that eliminating the RPD means that all approvals for housing of ANY type in ANY zone will be done at the staff level – effectively making this a "minor approval. But, how that will result in faster approvals is not clear. Not only does the second example above show that staff took 4 months to just bring the matter before the commission, even the Code Analysis Memo, which obtained feedback from just nine so-called "code users – i.e., developers and other hand-selected vested interests - provided the following feedback (see Attachment C, the Code Analysis Memo, pdf page 53) about the planning commission but also staff. The highlights are mine. While, as expected, there are mainly non-specific gripes about the Planning Commission, the very first item notes that the Planning Commission seems to be doing fine. And, as I have noted prior, I agree with some of the other bullets that minor and routine changes should not come before the Commission.

But, the same code users also note that staff is overworked and that staff review takes a long time. So, how does eliminating the RPD improve the speed of approvals (while obliterating any public input), when there is clear evidence (example Project 2 above and the Code Analysis Memo excerpt below, Attachment C) that staff delays are considerable?

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Planning Commission

- Currently most items go through Planning Commission without a problem. Things like liquor licenses and changes of use should go to Planning Commission. Staff should be able to tell an applicant whether the Planning Commission will approve it or not.
- Too many things have to go to Planning Commission and the Design Review Board. Some of those items can go to staff. For example, a roof needed repair. There were no changes to it except the materials. The roofline was the same. It was the same color. The project had to go to the Planning Commission. The process was too difficult. You want to make the process easy so that you encourage upkeep and you want people to get a permit so they are doing it correctly.
- The Planning Commission doesn't always know their role. It would be helpful to clarify.
- Routine things should not have to go through Planning Commission. Government is to serve the people, not give them a headache.
- Not all projects need to go to Planning Commission. For many projects, it's the design that needs review. That is resolved by the Design Review Board.
- Without a doubt, there are many decisions currently made by the Planning Commission or City Council that could be made by staff.
- A change in use that is allowed should not have to go to the Design Review Board and Planning Commission just because it's "more intense" than the previous use.

Staff

- Staff review takes too long. Staff is overworked. Had a client moving into a retail space. The Fire Department said they couldn't look at it for six weeks. There has to be some sort of fast track for a certain level of project or when it's done by a reputable company.
- Rules have to be clear. The City should hire innovative and flexible staff to use regulations to make more internal decision.
- City employees are very helpful.
- Just finished a large construction project and the City was great.
- Staff will discourage applicants from asking for modifications to standards, even if the requested modifications make the project better, because they don't want to cause issues. Staff doesn't want to bring something to Planning Commission that might fail.
- City staff tries to be supportive when they can.
- City staff is afraid to bring anything to City Council other than what is allowed, but the current rules don't always make sense.

Based on the above, and the fact that the HCD NEVER asked for the RPD to be eliminated, the Housing Element should be revised to reinstate the RPD, including HCD's own requirement for public input, as a proper check-and-balance in discretionary project review.

E. The Finding That There Are No Environmental Constraints on Any Parcels in Alhambra Is Factually Incorrect

6. Also in Attachment 2 of the Agenda Item #4, on pdf page 68 (Summary of changes to the Housing Element), it states: “Analysis of Environmental Constraints. HCD requested greater analysis of potential environmental constraints. This analysis was completed using SCAG’s Housing Element Parcel Tool and found no major constraints.” (underline emphasis added). **The emphasized text is misleading and plainly in error since it is factually incorrect. It should be corrected or removed.**

The most significant environmental contamination issue in the City in the Industrial (I) and Professional Office (PO) zones, including in the specific single PO parcel greater than 30 acres, (previously the Villages project) is surface soil and groundwater (Superfund) contamination, as the Housing Element at pdf pages 194-195 itself makes clear. Yet, this summary, relying on a SCAG tool called HELPR (see pdf page 194), which does not specifically address this type of contamination, leaves the impression that there are “no major constraints.” Here are the factors the HELPR considers (see pdf page 194): fire hazard areas; 3 ft. sea-level rise inundation area; FEMA 100-year flood plain area; Alquist-Priolo earthquake fault zone; liquefaction susceptibility zones; landslide hazard zones; California protected areas; river or wetland areas; wildlife habitat zones; 6 ft. sea-level rise inundation areas; locations with rare plants and animals; and NCPP/HCP reserve areas. Clearly the most important environmental constraints, namely soil and groundwater contamination are NOT addressed.

I ask that this summary statement therefore be revised to be accurate and not mislead.

F. Unsupported and Inaccurate Statements That Are Simply Attacks on Community Members and Citizens Should be Eliminated from the Housing Element

7. In a number of instances, the Housing Element, without any support whatsoever, makes unwarranted and scurrilous statements about community members and citizens – implying that there is significant opposition to development altogether. That has not been my experience while I was on the Planning Commission for 4 years – where most projects were approved. That a couple of notable projects were denied because of significant flaws, and justifiably so, does not make public concern the same as dogmatic and reflexive opposition. I urge the Planning Commission to review the survey of public opinions that was conducted in 2021 both at a public workshop as well as online – specifically with regards to the questions pertaining to housing. A plain review of the survey results confirms that there was widespread support for affordable housing (see Attachment D, the Workshop and Survey Input Summary Response to Question 26 at pdf page 13 of that document as well as the detailed responses to that question beginning pdf page 61). While there were concerns regarding aspects of development such as design compatibility, building bulk and massing, privacy with neighbors and neighborhood character (see responses to Questions 12-15 on pdf pages 8 and 9 of Attachment D) – these are completely legitimate aspects for development in a dense urban setting – and which strengthen and not weaken the need for discretionary approval. What this survey does not support is the false narrative of an anti-development mentality in the community. I discuss specific examples of such offensive and unsupported language below.

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In each instance I ask that the Housing Element text in ~~strikeout~~ be removed, since there is no support for such statements.

(i) on pdf page 144:

“It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. ~~However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.~~” (requested unsupported ~~strikeout~~ text to be removed)

The ~~strikeout~~ above is speculative (“...can be weaponized...”) and without any foundation in fact since almost all proposed new developments in the City have been and continue to be approved, balancing the needs of developers and citizens.

(ii) on pdf page 145:

“~~Some segments of the community are active opponents to development.~~ Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This serves as an extra delay for even small development projects that meet all codes and standards. Combined, these factors have resulted in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production.” (emphasis in underline, ~~strikeout~~ text requested to be removed)

Again, the first sentence has no support. In any community, there are opponents to some developments. The text generalizes this and implies that there are delays for “even small development projects” and this is the “likely” a constraint for housing production. As I have noted prior, almost all projects that have come before the planning commission, including the last many years, have been approved. The fact that a few undeserving project were rightfully rejected does not justify the first sentence. It should be struck. It is illogical to expect that unless every project is approved, that there must be a problem with the process. Poor projects can and should expect opposition as part of the public process.

I note that the HCD itself, in its May 25, 2023 approval letter emphasizes the importance of public input (see HCD Letter May 25, 2023 on pdf page 66; and also provided in Attachment E for reference):

“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 must continue to engage the community, including

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organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and a link must be emailed to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD."

Yet, in spite of this, the Housing Element expects ALL public input to be supportive of ALL projects, and to misconstrue any concern and opposition as impediment. This is unacceptable and an insult to the citizens of Alhambra.

(iii) again, on pdf page 145:

"The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. ~~However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production.~~ The city should reconsider the type and scale of developments that are subject to Planning Commission approval." (strikeout text requested to be removed)

Like the other examples above, the sentence that I have requested to be struck above, is without ANY basis. To the contrary, the development of the Housing Element clearly (i.e., the interviews with just 9 hand-picked code users (see <https://www.alhambrcodeupdate.com/documents>, under City of Alhambra Zoning Code, included as Attachment C) is the very epitome of "abnormal and out-measured influence" of a handful of vested interests who want complete control of the zoning process to suit their own, narrow, objectives. Thus, the sentence above, is the height of chutzpah and should be struck.

(iv) as another example of unsupported statements, I quote from pdf page 167 below:

"Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. ~~Reducing the number of actions and decisionmakers~~ Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development. (emphasized text in underline. Strikeout text requested to be removed)

The Housing Element's bias for only considering the "perspective of the development community" as opposed to the entire range of stakeholders is blindingly obvious in the first sentence. The fact is that "Reducing the number of actions...." is incompatible with "...maintaining opportunities for public review..." Paying lip service to public review is not sufficient. The HCD letter quoted above (included in Attachment E) highlights the importance of public review. It cannot be meaningfully done by "Reducing the number of actions and decisionmakers..." In addition, there is no credible evidence presented by Staff that the RPD "...adds additional time, cost, and uncertainty..." As I have shown in the RPD elimination discussion prior, the two examples provided in the Housing Element to demonstrate the failure of the RPD are pitiful and actually prove the opposite – that the RPD, in its current form, provides an important check-and-balance function and is NOT an impediment to housing development.

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(v) As yet another example, which is blatantly untrue and contradicted by other discussion in the Housing Element itself, on pdf page 264, should be removed. It now states:

~~“Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.”~~

The record makes it clear that this statement and any others like it could be further from the truth. As I noted elsewhere, the community workshop and survey (Attachment D) made the point that affordable housing was the most important use that Alhambra is not getting its fair share of. I excerpt from the survey, the two following presentations of the results, provided in Attachment D at pdf pages 13 (the word cloud) and also pdf page 61 (the actual survey response, where the highest response to Question 26 was affordable housing (highlighted in yellow below).

QUESTION 26

Uses: Are there certain uses that Alhambra isn't getting their 'fair share' of as compared to other areas? (Word cloud response)



(The word cloud above is from the public workshop, refer to the Appendix B for additional responses)

26	Word cloud	Uses: Are there certain uses that Alhambra isn't getting their 'fair share' of as compared to other areas? (Word cloud response)	Affordable housing 11
			affordable and accessible housing for persons under 65 y.o., entertainment, open spaces, adaptive reuse (e.g. Old Town Pasadena meets Alhambra), dog park; social services for low-income, disabled and homeless; art/design spaces (either to exhibit or create), hotels 1
			Art 1
			Arts and Culture 1
			Attractive housing, attractive mixed use 1
			Basketball courts 1
			Beautiful landscaping 1
			Better planning of neighborhoods 1
			bike lanes 6

Further, the fact that affordable housing was an important community desire is reinforced in the Staff Report accompanying the January 3, 2022 Housing Element item when it was last adopted by the Planning Commission. See excerpt below, and my yellow highlighting.

“Public Comment

Over the course of the project, the City received a total of 46 written comment letters/emails commenting on various aspects of the Housing Element (Attachments 5 & 6). Of the total 47 comment letters, 19 were submitted during the official public

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review comment period on the Draft Housing Element that took place from August 26, 2021 to September 26, 2021. The remaining 28 comment letters were provided either prior to or after the comment period. Based on comments received, the City learned that (1) preserving single family neighborhoods and affordable housing is of importance; (2) there is mixed- support and concern about housing developments on East Main Street; (3) there is preference for development in downtown area and along corridors; (4) there is community support for ADU's; (5) there is mixed-support for solutions that add housing to new areas or upzone existing zones; and (6) there is a desire to support development on city owned sites.” (pdf page 47 from the January 3, 2022 Planning Commission Agenda, when the Housing Element was last recommended for approval prior to this request to readopt.)

Therefore, in light of overwhelming contrary evidence, the language in Section 3.3 on pdf page 264 and any other similar misrepresentations of the community's desire for affordable housing, should be expunged from the Housing Element.

G. The Housing Element Self-Servingly and Selectively Misrepresents The Findings Presented in the Code Analysis Memo

8. As I have alluded to earlier, the Housing Element text mentions a “Code Analysis Memo (2020) by Miller Planning Associates (see, for example, pdf pages 145-146). This is available at <https://www.alhambrcodeupdate.com/documents>, under the heading “City of Alhambra Zoning Code.” I have provided this in Attachment C to these comments. Pages 145-146 state:

“...These findings were summarized in the Code Analysis Memo (2020) by Miller Planning Associates. Where relevant, these findings help inform the constraints analysis of the Housing Element with respect to land use controls and development standards. ~~Key findings of the City's zoning code audit include:~~

~~§ General complexity in the code that could be simplified~~

~~§ Unclear presentation of allowed uses, definitions, and rules of measurement~~

~~§ Insufficient form and design-related standards~~

~~— § Potentially onerous parking requirements that may limit development to maximum densities~~

~~§ An outdated approach to land use regulation~~

~~§ Overreliance on discretionary review~~

~~§ Unclear and inconsistent review and approval procedures”~~

(strikeout text requested to be removed)

I urge the members of the Planning Commission to review the entirety of the Code User's comments as summarized in the document itself that I have provided as Attachment C (almost 15 pages long, covering several topics). Even a cursory review of the Code Analysis Memo shows that the “Key findings...” above do not convey the full range of opinions expressed in the Memo

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itself and are therefore misleading and skewed to reach a pre-determined conclusion. For that reason, and unless significantly modified to present the complete picture, the above list of “Key findings...” should be removed from the Housing Element text.

H. Provisions In the Housing Element That Only Apply to A Single Parcel (Villages) Are Blatant Favoritism and Should Be Stricken

9. It should be a matter of common agreement that the Housing Element (and the Zoning Code Update, for that matter) SHOULD NOT contain special provisions that only benefit a single parcel and landowner. Yet, this bedrock principle is repeatedly violated in the text of the Housing Element. In example after example, I note below, special provisions are unashamedly allowed for just one single parcel – namely the one and only 30 acre+ PO zoned parcel in Alhambra – otherwise known as the Villages project site. See, for example:

(i) pdf page 153, including footnote 19;

(ii) pdf page 158, which contains the table below – in which I have highlighted (in yellow) each instance where this single parcel has special and egregiously lenient requirements not afforded to any other parcel.

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Office Professional (PO Zone)	
Maximum density	Not listed, N/A
Maximum building height	5 stories, 55 feet (if adjacent to a residential zone or use, 3 stories, 40 feet) 1, 2
Maximum floor area ratio	Lot area less than 19,999 sf: 0.45 Lot area between 20,000 and 39,999 sf: 0.6 Lot area between 40,000 and 59,999 sf: 1.0 Lot area 60,000 sf and over: 1.5 Urban residential uses if included on a site with a minimum size of 30 acres: 3.28
Maximum building length	Not listed
Front yard	20 feet for buildings up to two stories or 26 feet in height. 25 feet for buildings higher than 26 feet. Projections to within 10 feet of the front property line may be permitted for up to 25% of the front building length. The front yard shall be maintained in landscaping. Urban residential uses if included on a site with a minimum size of 30 acres: 10 feet from back of curb.
Rear yard	10 feet for the first story up to 14 feet in height, 30 feet for the second story up to 26 feet in height and 40 feet thereafter. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Side yard	5 feet for the first 30 feet from the front property line. 10 feet if adjacent to a residential zone or public right-of-way. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Minimum distance between buildings	6 feet or 3 feet for urban residential uses if included on a site with a minimum size of 30 acres
Maximum lot coverage	75% (for urban residential uses included on a site with a minimum size of 30 acres)
Minimum dwelling unit size for urban residential uses included on a site with a minimum size of 30 acres	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 860 square feet Three-bedroom unit: 920 square feet
Minimum habitable space for each dwelling occupant	Not listed

¹ Where a rear lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (MC 23.42.040(D))

² Where an interior side lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (AMC 23.42.040(E))

³ Wherever a rear lot line or an interior side lot line of a parcel which does not generally require a rear or side yard abuts any portion of a residential zone, there shall be provided on the lot, along that portion of the lot line, a yard with a minimum width equal to the side yard which would be required on the lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(A))

⁴ Wherever the rear lot line of a parcel which does not generally require a rear yard abuts the rear lot line of a residential zone, there shall be provided on the former lot, along the abutting portion of its rear lot line, a rear yard with a minimum depth equal to that which would be required on the former lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(B))

These and any other instances of special provisions for just this one parcel are not appropriate in the Housing Element and should be removed.

I realize that removing these provisions may elicit the threat that the City is “taking” back previously granted entitlements to the owners of this parcel. Setting aside the sordid and under-

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handed history of how these special entitlements were granted to just this one parcel in the entire City to begin with, I remind the Commissioners not to be cowed by that rationale and any implied threats. I remind Commissioners that all zoning restrictions, by nature, involve “taking” or constraining the rights of owners. Thus, in the examples shown in the table above, one can construe limiting the Floor Area Ratio for parcels less than 19,999 square feet to just 0.45 as a “taking” away of the rights of those property owners to not have FARs greater than 0.45. And, so on. There is nothing special about these entitlements other than the fact that the owners have waited two years (since roughly 2006) to effectuate them. To the extent owners of this parcel have made investments relying on these special and unwarranted entitlements which are now improper, that is simply a business risk that they have borne. Some business risks work out. Others do not.

The City, as part of the update of the Housing Element (and corresponding portions of the Zoning Code), should not be perpetuating such inappropriate considerations for just one parcel/landowners.

I. The Draft 4 Housing Element Is Factually Incorrect That the Villages’ Units Are Required to Meet RHNA Obligations

10. Also, pertaining to the Villages, on pdf page 312, the following text, inserted in Draft 4 of the Housing Element, should be removed because it is false as a matter of arithmetic. I have highlighted the offending text in yellow for additional emphasis:

~~“Because the project referred to as the “The Villages at the Alhambra” represents a sizable share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”~~

It is easy to show why this text, and the yellow highlight is untrue. Below, I excerpt the tables contained in pdf page 343.

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Figure 146. Summary of Potential Candidate Nonvacant Sites
Source: ECONorthwest

	Sites	Parcels	Theoretical Capacity
In Model	1,299	2,742	23,470
On Potential Candidate Sites included in inventory	509	1,113	8,983
Share of Model	39%	41%	38%
Counted Capacity	5,556		
Share of Site Capacity	62%		
Share of Model Capacity	24%		

Zone	Lower	Moderate	Above Mod.	Total
CBD/P	249	84	170	502
CPD	753	208	425	1,386
EMC	110	32	65	207
PO	274	94	204	571
Valley	689	223	470	1,389
IPD	140	31	54	225
R-2	23	61	344	428
R-3	123	222	512	871
Total	2,360	954	2,243	5,556

Adequacy of Site Inventory

Once proposed zoning amendments are in place for sites in the inventory to be rezoned, the city can meet or exceed its RHNA for the 2021-2029 planning period. Figure 147 summarizes the sites inventory and RHNA status. Detailed information for each site is included in Appendix A.

Figure 147. Site Capacity by Source and Income Level. RHNA Surplus/Shortfall
Source: ECONorthwest

Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above Mod. Income	
Proposed Projects	94	106	33	693	926
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	113	214	11	142	480
New Sites	1,543	831	951	2,237	5,562
Total Sites	1,802	1,331	1,120	3,389	7,642
2021-2029 RHNA	1,774	1,036	1,079	2,936	6,825
Surplus/Shortfall	28	295	41	453	817

^A Includes capacity from increases in allowed density on existing sites

Note that the entirety of the PO zone (including the Villages) is contributing 571 units across all types of housing classes as shown in the upper table I have highlighted. The lower table shows that we have demonstrated that we have an excess (i.e., surplus or buffer) of 817 units above and beyond our RHNA requirement of 6,825 units across all housing classes. Setting aside any considerations of whether this is a proper allocation for Alhambra, the lower table shows that even if the entirety of the PO zone (and its 571 units) were NOT accounted for, we would still have a surplus (i.e., 817 is greater than 571, as a matter of basic arithmetic). Therefore, we do not need the Villages project at all. Thus, the language I have asked to be removed, i.e., that the Villages "...represents a sizable share of progress towards RHNA..." is simply false. It should be removed.

J. The Housing Element Improperly Misquotes Government Code Section 65583.2(c) and Policy 3.3 Should be Reworded to Not Be Misleading

11. The Housing Element on pdf page 283 states:

Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2(c).

I have previously provided comments on this egregious misimpression of the Code Section 65583.2(c) without also addressing the preceding sections (a) and (b). My comments on this are contained in the August 7, 2023 Agenda Package beginning pdf page 1393 and continuing on through pdf page 1435 at a prior Planning Commission meeting. I will not repeat the entirety of those comments for reasons of economy but note, in summary, that there is no requirement for “by-right” approval for ANY housing in ANY state policy without first assessing the SUITABILITY of the land upon which the housing is to be built and where families and children will then reside. Plainly, not properly addressing environmental cleanup and liabilities, beyond what is required by perfunctory and incomplete state agency approvals (such as by the California Regional Water Quality Control Board or the California Department of Toxics Substances Control) – which do not absolve the City from significant legal liabilities for later toxic tort suits – is the very epitome of not recognizing or addressing suitability, the predicate to allowing any sort of “by-right,” carte blanche approvals.

Thus, this Policy should be properly reworded by the Commission to include references to the entirety of Code Section 65583.2, specifically recognizing suitability before proceeding to approvals of any kind, much less “by-right.”

K. The Requirement to Have 100% Residential in Commercial Zones Is Unnecessary and Highly Detrimental to the City’s General Plan and Common Sense and Should Be Revised

12. My final comment pertains to commercial zones, as discussed on pdf page 166:

“Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. ~~Program 21 will remove this requirement and allow 100% residential uses in commercial zones.~~”

The City’s General Plan and every sensible approach to a vibrant commercial district recognizes that this is not possible if there is street-facing housing on the first floor in commercial areas, which is what 100% residential in commercial zones would imply. Yet, the Housing Element, in a misguided attempt to appease the HCD, contains this requirement. At best, the additional potential housing production based on this requirement (as opposed to say, 90% residential uses) would mean a few tens fewer units – a drop in the bucket compared to the 6,825 units under RHNA.

ATTACHMENT 4.B

Therefore, it makes no sense to keep this dogmatic requirement. I ask the City to go back to the HCD, citing public comment, to fix this so as to encourage vibrant commercial districts in Alhambra, without this highly restrictive requirement.

L. Conclusions

The Housing Element does not properly balance the need for streamlining with the legitimate interests for ALL stakeholders in our densely urban City. It skews inappropriately to removing prudent checks and balances and inappropriately removes public input into decisions that affect everyday lives of citizens – which the HCD itself recognizes is not proper.

The Housing Element should only contain factual and supported statements.

It should not brazenly favor just a single parcel as it now does in numerous instances.

It should not vilify, with no support, unspecified numbers of citizens who have the mere temerity to question or voice opposition to inappropriate developments, as though every single development, no matter how undeserving, should only merit approval without question.

These comments request corrections on these matters. I stress that none of these materially alter the commitments the City has made to the HCD with regards to its 6th-cycle RHNA obligations, regardless of the merits of those obligations.

In conclusion, I ask the Planning Commission, as part of its readoption of the Housing Element, to carefully consider each of the comments provided in this document; to review, as needed, the underlying documents and citations, to publicly deliberate, and to then make common sense changes I have requested as part of the readoption of the Housing Element. Together, we need to make the Housing Element something that all of us here in Alhambra, can be proud of. We are not there yet.

Respectfully,



(Ranajit “Ron” Sahu)

ATTACHMENT 4.C

Planning Commission Comments & Recommendations on Housing Element Draft #4

Comment No. **Commissioner**

1. ELIMINATION OF THE RESIDENTIAL PLANNED DEVELOPMENT (RPD) PERMIT PROCESS		
1	Olson	Page 6 of the staff report states that Alhambra’s Residential Planned Development process was identified by HCD as a <u>considerable</u> constraint upon housing development. I have been unable to find any evidence supporting that statement in the letters sent by HCD to the City of Alhambra in response to prior submissions of the draft Housing Element. The proposed elimination of the RPD permit process is an extreme measure to streamline approval for housing development in the city. To remove this process from public review entirely, for all residential development in Alhambra, directly contradicts HCD’s statement that public input is important. While minor and routine changes, especially for projects that are small in scale, may be approved by staff, I strongly object to the complete elimination of Planning Commission review – and consequent opportunity for public input on residential development.
2	Garcia	Edits relating to Elimination of Residential Planned Development Permits: Complete elimination of residential projects in residential zones from the Planning Commission is unsupported by the record. Instead, the record supports possible elimination of RPDs in small scale projects. The Examples provided on pages 109-110 do not support elimination of RPDs, instead they demonstrate that factors outside of the Planning Commission’s control impacted the timeline for a particular project far more than the Planning Commission’s deliberations.
3	Garcia	Page 89: “Among the most important factors in a city’s administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects <u>to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use.</u> This <u>may add[[s]] additional time, cost, and uncertainty to small scale developments in R2 zones</u> that can be a constraint on development. Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.”
4	Garcia	Page 109-110: Delete “Findings Examples” section in its entirety.

ATTACHMENT 4.C

5	Garcia	<p>Page 224 (pdf 302): Program 28: “Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”</p>
6	Garcia	<p>Page 113: “The city works to process permits concurrently and typical timelines for approval reported by the city are not considered overly constraining on development. The city’s review processes are generally typical, with a few exceptions. First, requiring full Planning Commission approval for all variances can add to approval times. An initial variance can often be approved administratively. Second, as previously evaluated, the city’s Residential Planned Development (RPD) permit <u>may add[[s]] uncertainty, time, and discretionary approval that is a constraint on small scale development in R2 zones.</u> The city’s zoning code audit found Alhambra’s development review processes to be burdensome and over reliant on discretionary review. Subjective findings could lead to a protracted review process or denial of a project based on interpretation. Additional costs and uncertainty can negatively impact developer interest in the community, limiting affordable and market-rate housing production and perpetuate under-supply and lack of affordability.”</p>
7	Garcia	<p>Page 224: Program 29 “The City’s Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. The constraints analysis identified the RPD as a <u>significant potential constraint on small scale development in R2 zones.</u> The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects. It will also maintain consistency with the Housing Crisis Act and utilize the state’s standard preliminary application checklist to facilitate project review. Within the first two years of the planning period the city will: Eliminate the Residential Planned Development Permit process”</p>

ATTACHMENT 4.C

8	Gardea	With regards the elimination of Residential Planned Development Permit process, is there or were in the past a discussion with Planning Commission about the determination of eliminating the RPD included in the HE?
9	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #D: "The Outright Removal of the Residential Planned Development (RPD) Process is Unwarrented and Unsupportetd and Should be Rescinded".

PC Recommendation on August 22, 2023:
 Retain the RPD permit process, exempting projects with 6 or less residential units.
VOTE: 8-1
Ayes: Gardea, Grijalva, Ho, Juarez, Mojarro, Olson, Garcia, Wang
Noes: Tsujii
Absent: Pham

2. ADDITION OF SITES TO THE SITES INVENTORY

10	Garcia	Add 5344-002-044 (former Wondries lot) to Site Inventory
11	Olson	Appendix A, the Housing Sites Inventory, begins on page 282 of the staff report for Agenda Item 4. It does not include the property at 400 S. Atlantic (APN #5344-002-044), the former site of Bob Wondries Ford, which has been vacant for 6 months. This 2.5-acre site could accommodate the development of 108 housing units at 48 units/acre (the same density that is proposed for the two sites located on South Atlantic between W. Beacon and W. Mission). It is located on a major transit corridor, and directly across the street from William Northrup Elementary School, serving grades K-8. The Housing Sites Inventory should be amended to include this site.

3. DELETION OF SITES FROM THE SITE INVENTORY

12	Gardea	The capacity analysis should be revised to exclude the Villages from the Site Analysis and Inventory. The zoning code should include a provision that would be reflective of State law concerning affordable housing projects. Site clean up and implementation of hazardous materials remediation measures may not occur within this housing element cycle to make the site suitable for residential development.
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ATTACHMENT 4.C

4. CONSTRAINTS ON DEVELOPMENT - ENVIRONMENTAL		
13	Olson	Page 68 of the staff report states that HCD requested greater analysis of potential environmental constraints against housing production in Alhambra, and that said analysis was completed using SCAG’s Housing Element Parcel Tool (HELPR), with a finding of no major constraints . It should be noted that the tool used by SCAG does not address either soil or groundwater contamination. Both have previously been identified as significant liabilities in Alhambra’s Industrial and Professional Office zones, which were designated as part of a Superfund site in 1984. The cost of mitigation of soil and groundwater contamination (PCE, TCE, perchlorate, and nitrate) through soil removal and barriers to vapor intrusion should be considered an environmental constraint. The information provided on page 68 regarding environmental constraints is incorrect and should be removed from the document.
14	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #E: "The Finding That There Are No Environmental Constraints on Any Parcels in Alhambra Is Factually Incorrect".
15	Garcia	Page 116: “Sites with potential environmental constraints (<u>without consideration of contamination status</u>) are noted in the detailed inventory appendix and electronic inventory database.
5. CHARACTERIZATION OF COMMUNITY SENTIMENT		
16	Garcia	Edits relating to Characterization of Community Sentiment: The following edits are requested on the basis that they are not supported by the record, unnecessary, and improper for inclusion in the Housing Element. A stated goal of HCD is to bolster public participation and promote public involvement. The edits proposed below are intended to further this policy goal.
17	Garcia	Page 66 : “It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.”

ATTACHMENT 4.C

18	Garcia	<p>Page 67: “Some segments of the community are active opponents to development. Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This <u>may</u> serve[[s]] as an extra delay for even small development projects that meet all codes and standards. Combined, these factors <u>may</u> have result[[ed]] in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production.</p> <p>The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval.</p>
19	Garcia	<p>Page 112: “Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. Communities with strong opposition to development can often use these processes to further prohibit development.”</p>
20	Garcia	<p>Page 186: “Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production”</p>
21	Garcia	<p>Page 224 (pdf 302): Program 28: “Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints-analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.”</p>

ATTACHMENT 4.C

22	Olson	Pages 82 and 83 of the report refer to Community Influence on New Housing Development as a constraint. This section summarizes the Planning Commission’s role in approving all residential development as being too easily influenced by community input and opposition, suggesting that the city should therefore limit the role of the Commission. This is supported by a statement on page 82 that refers to the “weaponization” of the public process. The recommendation that the Planning Commission’s role in review and approval of residential projects be limited because too much influence is exerted by community input denies the intelligence, training, experience, and judgment of Commissioners. While much public input may be anti-development, my experience has been that Commissioners have demonstrated the capacity to weigh all of the evidence presented, listen to comments from staff, counsel, residents, property owners, and developers, and make reasoned and thoughtful decisions.
23	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #F: "Unsupported and Inaccurate Statements That Are Simply Attachks on Community Members and Citizens Should be Eliminated from the Housing Element."
6. PARCELS 30 ACRES OR MORE		
24	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #H: "Provisions In the Housing Element That Only Apply to a Single Parcel (Villages) Are Blatant Favoratism and Should Be Stricken."
25	Olson	Page 96 of the report includes a chart that refers to specific provisions for the Office Professional Zone. Multiple references are made in the chart to sites of 30 acres or more. There is only one site in the city that is 30 acres in size. As such, these considerations (floor area ratio, front yard size, rear yard size, side yard size, distance between buildings, lot coverage, and minimum dwelling size) are inappropriately given to one parcel owner.
26	Garcia	All references to the special treatment of parcels of 30 acres or more should be removed as improper subject matter for the Housing Element. Page 80: Remove all carve outs for lots of 30 acres or more.
7. 100% RESIDENTIAL UNITS IN COMMERCIAL ZONES		
27	Olson	Page 104 of the report includes a summary of the constraints of housing development in commercial zones. It states, “With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones.” I strongly object to the implementation of Program 21, as it will produce very few units of residential housing while simultaneously conflicting with the General Plan goal of creating vibrant and walkable commercial districts.
28	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #K: "The Requirement to Have !00% Residential in Commercial Zones Is Unnecessary and Highly Detrimental to the City's General plan and Common Sense and Should Be Revised."

ATTACHMENT 4.C

29	Garcia	Page 223: Program 27: “Revise commercial zones other than the CBD or EMC to allow 100 percent residential projects”
8. 20% AFFORDABLE HOUSING BY RIGHT ON LOWER-INCOME SITES		
30	Olson	Page 221 of the report refers to the goal of identifying adequate sites in the city to provide for all types of housing. Within this section, Policy 3.3 states “The city shall allow housing developments with at least 20% affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with California Government Code Section 65583.2(c).” This policy is flawed because it references only one element of that code section, ignoring the requirement of Code Section 65583.2(a) and 65583.2(b) that address suitability and environmental constraints. These are key considerations for <u>all types of housing</u> . The proposal to justify “by-right” affordable or market-rate housing on land that is known to be contaminated should be stricken from the Housing Element. To allow this to remain in the document is to invite significant legal and financial liability for toxic tort lawsuits against the City of Alhambra.
31	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #J: "The Housing Element Improperly Misquotes Government Code Section (c) and Policy 3.3 Should be Reworded to Not Be Misleading
32	Garcia	Page 205: “Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that <u>are suitable for residential development and that</u> have been counted in previous housing element cycles, consistent with Government Code Section 65583.2[[[c]]].”
33	Garcia	Page 217: Program 18: “ <u>Subject to suitability for residential development as provided in Government Code Section 65583.2</u> , the City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.”
9. THE VILLAGES PROJECT		
34	Olson	Page 250 of the report refers to Housing Element Maintenance. Among the statements made on this page is that the “Villages at the Alhambra” represents a sizable share of progress toward RHNA. In fact, the 571 units proposed for the Professional Office Zone represent only 8.3% of Alhambra’s RHNA allocation of 6,825 units. Moreover, as currently proposed under the Housing Element, Alhambra’s total sites equal 7,642. This exceeds the city’s RHNA allocation by 817 units. I ask that the sentence referencing the “sizable share of progress toward RHNA” be stricken as inaccurate.

ATTACHMENT 4.C

35	Tsujii	Does SB35 mean that the Village can go through a by-right approval process? Which cycle was this site identified as a previously non-vacant site?
36	Tsujii	Where did the 70% capacity assumption come from for the lowered development potential for the Villages site?
37	Garcia	Page 234: Program 40: “Because the project referred to as the “The Villages at the Alhambra” represents a sizable share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.”
38	Garcia	Page 245: “Alternatively, the project would <u>could</u> still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units <u>subject to any such sites being suitable for residential development under Government Code Section 65583.2.</u> ”
39	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #1: "The Draft 4 Housing Element Is Factually Incorrect That the Villages' Units Are Required to Meet RHNA Obligations."
10. DEVELOPMENT STANDARDS		
40	Garcia	Edits relating to Development Standards: The following edits are requested to reflect the Planning Commission’s view as to certain edits in the Zoning Code (to date). Height limits are used to resolve potential conflict between adjacent uses that are not as intense as proposed uses. Similarly, maintenance of commercial frontage as a commercial use has been repeatedly emphasized as a policy goal for the City.
41	Garcia	Page 88: “The city’s development standards include minimum setbacks, height limits, maximum floor area ratios (FARs) and lot coverage and minimum size for dwelling units, open space, and minimum parking requirements. We found that collectively, the city’s development standards will make it difficult to reach maximum allowed densities and place additional financial burden on development. Height limits, open space and parking requirements are the greatest constraint.
42	Garcia	Height Limits. The city uses a graduated height limit where height defaults to a lower zone within 50 feet of a lower zone. For example, a high-density parcel adjacent to a low-density zone would have the area within 50 feet of the low-density zone limited to only two stories or 25 feet. This condition impacts a large share of high-density land in Alhambra. Combined with minimum unit sizes and FAR, height limits will prohibit development from reaching maximum densities in zones that will have increased density under the city’s rezoning program.

ATTACHMENT 4.C

43	Garcia	Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. <u>For areas outside of the CBD or EMC zone, this may</u> [[This]] constrain[[s]] the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones <u>other than the CBD or EMC zone.</u> "
44	Garcia	Page 223: Program 27: "Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all R2 and R3 residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses."
11. OTHER COMMENTS/RECOMMENDATIONS		
45	Tsuji	When was the Land Availability Assessment conducted? Why wasnt the Wondries Toyota considered at that time?
46	Grijalva	Reference to Ron Sahu's comment letter submitted August 7, 2023; #G: "The Housing Element Self-Servingly and Selectively Misrepresents The Findings Presented in the Code Analysis Memo."
47	Olson	The section entitled Growth Controls and Local Ordinances lists on page 111 the development of a local historic preservation program as a <u>possible</u> constraint on housing production. As the document states, the development of Alhambra's historic preservation program is still in process. No specific directions or details are offered in the proposed Housing Element to planners or policy makers on methods to avoid these <u>possible</u> constraints, or even a description of how they might be represented in Alhambra. The recommendation asserts that, if "too comprehensive," a preservation ordinance might "limit redevelopment potential." This lack of specificity renders the guidance unhelpful and will likely have an unnecessarily chilling impact on preservation planning. In fact, there are many examples of state and federal tax incentives for historic preservation that enable creation of housing at all income levels, as well as the creation of affordable housing through adaptive reuse of historic commercial, residential, and public buildings. I ask that the paragraph on Historic Preservation at the top of page 111 be stricken from the document as unsupported and misleading.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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December 2, 2021

Vanessa Reynoso, Deputy Director
Community Development Department
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Vanessa Reynoso:

RE: City of Alhambra's 6th Cycle (2021-2029) Draft Housing Element

Thank you for submitting the City of Alhambra's (City) draft housing element received for review on October 5, 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. In addition, HCD considered comments from Henry Fung; Paul Talbot; Our Future LA; Alexander M. DeGood-Cox; Castle Nicholson; Abundant Housing LA and YIMBY Law 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.

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 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).

ATTACHMENT 4.D

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 will meet housing element requirements for these and other funding sources.

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.

HCD appreciates the dedication and hard work the housing element team provided during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions, please contact Gerlinde Bernd, of our staff, at Gerlinde.Bernd@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

ATTACHMENT 4.D

APPENDIX CITY OF ALHAMBRA

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. Review and Revision

Review the previous element to evaluate the appropriateness, effectiveness, and progress in implementation, and reflect the results of this review in the revised element. (Gov. Code, § 65588 (a) and (b).)

As part of the review of programs in the past cycle, the element must provide an evaluation of the effectiveness of goals, policies, and related actions in meeting the housing needs of special needs populations (e.g., elderly, persons with disabilities, large households, female headed households, farmworkers, and persons experiencing homelessness). Programs should be revised depending on the outcomes of a complete evaluation of effectiveness of prior programs. For additional information and sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/getting-started/review-revise.shtml>.

B. Housing Needs, Resources, and Constraints

1. *Affirmatively further[ing] fair housing (AFFH) 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).)*

Enforcement and Outreach: The element generally describes the outreach efforts related to the recent Analysis of Impediments to Fair Housing Choice (AI), various data sources (p. 111) and surveys. However, the element could also summarize the results of those outreach efforts to better formulate goals and actions. In addition, the analysis must address compliance with existing fair housing laws as well as any past or current fair housing lawsuits, findings, settlements, judgements, or complaints.

Integration and Segregation: While the element provides analysis utilizing dissimilarity and isolation indices, it should utilize additional data sources to evaluate patterns and trends within the City, specifically for race, disability, and familial status. For example, the City could utilize the HCD affirmatively furthering fair housing (AFFH) Data Viewer. In addition, the element should analyze dissimilarities at a regional scale (comparing city-wide data to regional level data) for disability and familial status.

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Disproportionate Housing Needs, Including Displacement: The element includes some local data on cost burdened households (overpayment) and overcrowding. However, the element must also evaluate patterns and trends within the City and at a regional scale for overpayment, overcrowding and housing conditions and should address impacts on protected characteristics and access to opportunity for persons experiencing homelessness.

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.

Contributing Factors: The element must list and prioritize contributing factors to fair housing issues. While the element lists some fair housing issues, it generally does not list and prioritize contributing factors. Contributing factors create, contribute to, perpetuate, or increase the severity of fair housing issues and are fundamental to developing 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.

Sites Inventory and AFFH: The element discusses that most sites to accommodate housing for lower-income households is identified in moderate or high resource areas, but it should also address the number of units and impact of those units on existing patterns for all income groups (e.g., lower, moderate, and above-moderate) to better evaluate whether sites foster inclusive communities. In addition, this analysis should address the other components of the fair housing assessment (e.g., segregation and integration and disproportionate housing needs, including displacement risk).

Goals, Priorities, Metrics, and Milestones: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions accordingly. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have appropriate metrics and milestones and must address housing mobility enhancement, new housing choices and affordability in high opportunity areas, place-based strategies for community preservation and revitalization and displacement protection. For further guidance, please visit HCD's Affirmatively Furthering Fair Housing in California webpage at <https://www.hcd.ca.gov/community-development/affh/index.shtml>.

2. *Include an analysis of population and employment trends and documentation of projections and a quantification of the locality's existing and projected needs for all income levels, including extremely low-income households. (Gov. Code, § 65583, subd. (a)(1).)*

Extremely Low-Income (ELI) Households: While the element reports some numerical information for extremely low-income households, it must still identify their projected housing needs and analyze existing housing needs. This is particularly important given the unique and

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disproportionate housing needs of ELI households. For example, the element should analyze tenure, cost burden, overcrowding and other household characteristics then examine trends and the availability of resources to determine the magnitude of gaps in housing needs. The projected housing need for ELI households can be calculated by using available census data to determine the number of very low-income households that qualify as ELI households or presume that 50 percent of the regional housing need allocation (RHNA) for very low-income households qualify as ELI households.

For additional information, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/extremely-low-income-housing-needs.shtml>.

3. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Conditions: The element identifies the age of the housing stock, but it should also include an estimate of the number of units in need of rehabilitation and replacement. For example, the analysis could include estimates from a recent windshield survey or sampling, estimates from the code enforcement agency, or information from knowledgeable organizations.

4. *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 toward the (RHNA): The City's RHNA may be reduced by the number of new units pending, approved, permitted, or built since July 1, 2021 by demonstrating availability and affordability based on rents, sale prices or other mechanisms ensuring affordability (e.g., deed restrictions). The element lists and describes several projects that represent 1,163 units (p. 167) but it still must demonstrate the affordability of these units as described above and address any inconsistency between the project listings and descriptions. In addition, the element must demonstrate the availability of these units in the planning period or remove sites or units as appropriate. This is particularly important given the recent denial of The Villages at The Alhambra that represents over two-thirds of the listed number of units.

Parcel Listing: The element lists parcels by various factors such as size and zoning. However, the listing must also include sites by general plan designation.

Realistic Capacity: The element assumes 90 percent of maximum allowable densities to calculate residential capacity on identified sites and lists several examples of recent developments, but it should also list those sites by affordability (e.g., deed restricted, market rate). In addition, if future sites with anticipated zoning allow 100 percent non-residential uses, the element should include an analysis to account for the likelihood of 100 percent non-residential uses occurring on identified sites. The analysis should be based on factors such as development trends, performance standards or other relevant factors. For example, the element could analyze all recent development activity in

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comparable non-residential zones, how often residential development occurs and adjust residential capacity calculations, policies, and programs accordingly.

Nonvacant Sites: The element explains, among several other indicators, that the potential of additional development on nonvacant sites is based on (1) age of improvements, (2) redevelopment indicators (land to improvement value ratio), (3) residential redevelopment factors and (4) existing uses. While the inventory lists the value for redevelopment indicators, it should also list the value for the other indicators. In addition, the element should expand the discussion of redevelopment trends to support these assumptions and adjust calculations if appropriate.

In addition, the housing element relies upon nonvacant sites to accommodate more than 50 percent of the RHNA for lower income households. For your information, the housing element 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 a significant number of sites at less than a half-acre. These sites are not eligible absent a demonstration that sites of equivalent size and affordability were successfully developed during the prior planning period or unless other evidence is provided. The element lists recent projects from throughout the broader area, but the listing does not address the projects' affordability or relationship to the inventory. The element also states the necessity for lot consolidation and the inventory indicates which sites might have potential for consolidation. However, the element should include analysis to demonstrate the potential for consolidation. For example, the analysis could describe the conditions rendering parcels suitable and ready for lot consolidation, common ownership or information from the owners of each aggregated site. Based on the outcomes of this analysis, the element should add or modify programs.

Environmental Constraints: While the element generally describes a few environmental conditions within the City (p. 101), it must include a discussion relative to identified sites and describe any known environmental or other conditions that could impact housing development on identified sites in the planning period.

Infrastructure: The element mentions the urban water management plan and sewer collection system. However, it must also clarify sufficient total water and sewer capacity (existing and planned) to accommodate the regional housing need.

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.) Local governments are required to immediately deliver the housing element to water and sewer service providers. The element should discuss compliance with these requirements and if necessary, include a program to establish a written procedure by a date early in the planning period. For additional information and sample cover memo, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/other-requirements/priority-for-water-sewer.shtml>.

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Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Accessory Dwelling Units (ADUs): The element assumes 75 ADUs per year for a potential buildout of 600 units within the planning period. According to HCD records, the City has permitted an average of 16 units per year since 2018, which is far less than the 75 units assumed in the element. The trends used in the element appear inconsistent with HCD records and, further, do not support an assumption of 75 ADUs per year. To support assumptions for ADUs in the planning period, the element should reconsider assumptions, reconcile trends with HCD records, include additional information, such as more recent permitted units and inquiries, resources and incentives, other relevant factors, and modify policies and programs as appropriate.

Zoning for a Variety of Housing Types:

- Emergency Shelters: The element mentions emergency shelters are permitted in the Valley Boulevard Corridor Specific Plan and Industrial Planned Development Zones. The element should also clarify shelters are permitted without discretionary action and address proximity to transportation and services and any conditions inappropriate for human habitability.
 - Transitional and Supportive Housing: Transitional housing and supportive housing must be permitted as a residential use in all zones allowing residential uses and only subject to those restrictions that apply to other residential dwellings of the same type in the same zone. The element explains these uses are considered a residential use but then also indicates the uses are subject to a conditional use permit (CUP) if for seven or more persons, unlike other residential uses. The element should either demonstrate compliance with Government Code section 65583, subdivision (a)(5) or add or revise programs for compliance.
5. *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 impacts as potential constraints on a variety of housing types. The analysis should analyze land use controls independently and cumulatively with other factors. The analysis should specifically address requirements related to multifamily parking requirements, including

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garages. 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.

Fees and Other Exactions: The element lists development fees for single family, multifamily and mixed-use development but it should also incorporate impact fees and evaluate impacts as potential constraints on housing cost and supply.

Local Processing and Permit Procedures: While the element briefly describes some local processing and permit procedures (p. 100), it must evaluate the processing and permit procedures' impacts as potential constraints on housing supply, affordability, timing, and approval certainty. Specifically, the analysis should address approval procedures and findings for the Residential Planned Development permit including the number of public hearings, approval findings and any other discretionary approval procedures.

Constraints on Housing for Persons with Disabilities: Group homes for seven or more persons appear to be excluded from some zones allowing residential uses and are subject to a CUP. The element should evaluate these requirements as constraints and include programs as appropriate.

Zoning, Development Standards and Fees: The element must clarify compliance with new transparency requirements for posting all zoning, development standards and fees on the City's website and add a program to address these requirements, if necessary.

6. *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 be revised to include analysis of requests to develop housing at densities below those anticipated in the sites inventory and the length of time between receiving approval for a housing development and submittal of an application for building permits. The analysis must address any potential hinderances on the construction of a locality's share of the regional housing need.

7. *Analyze existing assisted housing developments that are eligible to change to non-low-income housing uses during the next ten years due to termination of subsidy contracts, mortgage prepayment, or expiration of use restrictions. (Gov. Code, § 65583, subd. (a)(9) through 65583(a)(9)(D).)*

The element identifies assisted housing developments with funding sources that expire during the planning period (p. 49), but it must also provide an analysis. The analysis of "at-risk" units must include the following:

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- Listing of each development by project name and address;
- Type of governmental assistance received;
- Earliest date of change from low-income use;
- Total number of elderly and non-elderly units;
- Estimated total cost for producing, replacing and preserving the units at-risk;
- Identification of public and private non-profit corporations known to the City to have the legal and managerial capacity to acquire and manage at-risk units; and
- Identification and consideration of use of federal, state and local financing and subsidy programs.

For additional information and sample analysis, see the Building Blocks at <http://www.hcd.ca.gov/community-development/building-blocks/housing-needs/assisted-housing-developments.shtml> and for more information on identifying units at-risk, see the California Housing Partnership Corporation at <http://www.chpc.net>.

C. 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 and specific commitment. Programs that should be revised with discrete timelines include Programs 1 (Housing Rehabilitation), 10 (Cooperation with Affordable Housing Developers), 11 (Expand Affordable Housing Funding), 20 (Adaptive Reuse), 24 (Reduce Development Constraints for Affordable Housing) and 25 (Housing Production Education). Programs to revised with specific commitment include:

- *Program 19 (City-owned Land):* The Program should consider steps beyond “inventory and assess” and include a schedule of actions to facilitate development.
- *Program 22 (Lot Consolidation and Assemblage):* The Program should go beyond exploring actions or exploring acquisition opportunities and identify and implement actions by a specified date. The Program should also include a specific date for adopting incentives.
- *Program 23 (ADUs):* The element should include subsequent actions (e.g., rezone) within a specified time if ADUs are not permitted as assumed in the element.
- *Program 24 (Reduce Development Constraints for Affordable Housing):* The element identifies several constraints such as development standards (p. 78), RPD (p. 79) and emergency shelter development standards (p. 88). In response, Program 24 lists

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standards that “may” be revised. However, this Program should include specific commitments to amend standards and procedure as noted in the element.

- *Program 26 (Development Streamlining):* The Program should consider a timeline earlier in the planning period (e.g., 1-2 years) and actions beyond “explore” to streamline procedures.

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 B4, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was 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 16 (Rezone and Upzone Strategies) should be amended to ensure compliance with all by-right requirements pursuant to Government Code section 65583.2, subdivisions (h) & (i).

3. *The housing element shall contain programs which assist in the development of adequate housing to meet the needs of extremely low-, very low-, low- and moderate-income households. (Gov. Code, § 65583, subd. (c)(2).)*

While the element includes programs to assist in the development of very low-, low-, and moderate-income households, it must also include a program(s) to assist in the development of housing for ELI and all special needs households (e.g., elderly, homeless, farmworkers, persons with disabilities, female-headed households). Program actions could include proactive outreach and assistance to non-profit service providers and developers, prioritizing some funding for housing developments affordable to ELI and special needs households and offering financial incentives or regulatory concessions to encourage a variety of housing types.

4. *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 B5 and B6, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that

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analysis, the City may need to revise or add programs to address and remove or mitigate any identified constraints.

- 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 B1, 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.

D. Quantified Objectives

Establish the number of housing units, by income level, that can be constructed, rehabilitated, and conserved over a five-year time frame. (Gov. Code, § 65583, subd. (b)(1 & 2).)

While the element includes quantified objectives for construction, rehabilitation and conservation, it must also address these objectives for extremely low-income households.

E. 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).)

While the element includes a general summary of the public participation process, it must also summarize the public comments and describe how they were considered and incorporated into the element.

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
DIVISION OF HOUSING POLICY DEVELOPMENT**

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April 8, 2022

Jessica Binnquist, City Manager
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Jessica Binnquist:

RE: City of Alhambra's 6th Cycle (2021-2029) Adopted Housing Element

Thank you for submitting the City of Alhambra's (City) housing element adopted on January 31, 2022 and received for review on February 8, 2022. Pursuant to Government Code section 65585, subdivision (h), the California Department of Housing and Community Development (HCD) is reporting the results of its review. In addition, HCD considered comments from Henry Fung; Californians for Homeownership, Abundant Housing LA, YIMBY Law and Josh Albrekston pursuant to Government Code section 65585, subdivision (c).

The adopted element addresses many statutory requirements from HCD's December 2, 2022 review; 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.

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 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).

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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 will meet housing element requirements for these and other funding sources.

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.

HCD appreciates the dedication and hard work the housing element team provided during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions, please contact Gerlinde Bernd, of our staff, at Gerlinde.Bernd@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

Enclosure

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APPENDIX CITY OF ALHAMBRA

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).)*

Enforcement and Outreach: As noted in the prior review, the element could summarize the results of various outreach efforts to better formulate goals and actions. Instead, the element now explains input from residents is important but the only briefly describes that input. The element should consider this outreach in greater detail, particularly related to the various assessments of fair housing and formulation of policies and program.

Disproportionate Housing Needs, Including Displacement: The element now includes some analysis on overpayment, overcrowding and housing conditions but should also address impacts on protected characteristics and access to opportunity for persons experiencing homelessness.

Other Relevant Factors: The element now includes some information related to past redlining and inequities in financing availability but should also still analyze historical land use, historical land use, zoning, governmental and nongovernmental spending, including transportation investments and demographic trends. The element should particularly utilize this information to complement the data and evaluation related to the various components of the assessment of fair housing (e.g., segregation and integration, disparities in access to opportunity).

Sites Inventory and Affirmatively Furthering Fair Housing (AFFH): While the element included data on the number of regional housing need allocation (RHNA) units by income category relative to some socio-economic concentrations, the analysis should discuss the magnitude of the impact including the number of units by income group relative to locations or neighborhoods within the City, including any isolation of the RHNA and then address whether sites exacerbate or improve segregation and integration. HCD will send a sample table under separate cover.

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Contributing Factors to Fair Housing Issues: Based on the outcomes of a complete analysis, the element should re-assess and prioritize contributing factors to fair housing issues.

Goals, Priorities, Metrics, and Milestones: Based on the outcomes of a complete analysis, the element must be revised to add or modify goals and actions accordingly. Goals and actions must specifically respond to the analysis and to the identified and prioritized contributing factors to fair housing issues and must be significant and meaningful enough to overcome identified patterns and trends. Actions must have appropriate specific commitment, metrics, milestones and be specifically targeted toward AFFH outcomes.

2. *Include an analysis and documentation of household characteristics, including level of payment compared to ability to pay, housing characteristics, including overcrowding, and housing stock condition. (Gov. Code, § 65583, subd. (a)(2).)*

Housing Conditions: The element now includes some information on code enforcement and estimates a number of cases per year but should still include a City-wide estimate of the number of units in need of rehabilitation and replacement.

3. *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 toward the RHNA: The element now includes information on the availability and affordability of pending projects. In addition, in response to HCD's finding regarding The Villages at the Alhambra, the element now commits to reclassify the project as a potential nonvacant redevelopment, as well as assess its realistic capacity within the planning period. However, the element should assess its availability in the planning period now and programs should be modified to make alternative sites available within 180 days if the project is not approved as assumed in the inventory if its not approved within 2 years.

Parcel Listing: The element must still list parcels by general plan designation as noted in the prior review.

Realistic Capacity: HCD prior review found the element should account for the likelihood of 100 percent nonresidential uses occurring on identified sites. In response, the element now appears to explain that 100 percent nonresidential uses is highly likely in nonresidential zones. As a result, the calculation of capacity should account for this likelihood.

Nonvacant Sites: While the sites inventory now includes various values for indicators or assumptions regarding redevelopment potential, the element should still expand the discussion of redevelopment trends to support redevelopment assumptions and adjust calculations or the inventory if appropriate. Please see HCD's prior review for additional information.

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In addition, for your information, the element relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which 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. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.

Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Accessory Dwelling Units (ADUs): The element assumes 75 ADUs per year for a potential buildout of 600 units within the planning period. According to HCD records, the City has permitted an average of 16 units per year since 2018, which is far less than the 75 units assumed in the element. In response, the element now explains the City maintains its own records. However, the City should reconcile its records with HCD's. In addition, the City assumptions are strongly reliant on applications received in 2021 (231) which is later converted into permits using a conversion factor based on past trends that do not appear annualized. The element should include analysis of this conversion factor and apply an appropriate annual conversion factor based on the outcomes of that analysis.

4. *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).)*

Local Processing and Permit Procedures: HCD's prior review found the element should specifically address approval procedures and findings for the Residential Planned Development (RPD) permit including the number of public hearings, approval findings and any other discretionary approval procedures. In response, the element concludes the process adds time, cost and uncertainty to development. However, the element should specifically analyze the procedure as noted in the prior review to better formulate appropriate policies and programs.

Constraints on Housing for Persons with Disabilities: HCD's finding found group homes for seven or more persons are excluded from several residential zones and subject to a conditional use permit. In response, the element notes the zoning code should be amended to permit larger group homes where multifamily is allowed. However, the element did not contain specific commitment to make this amendment. Further, the

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element should still address the exclusion of these uses from several zones, including lower density zones and specifically commit to amend procedures to promote objectivity and approval certainty.

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).)*

As noted in the prior review, to have a beneficial impact in the planning period and address the goals of the housing element, programs must be revised with discrete timelines and specific commitment. While some programs were revised, the following programs should still be revised:

- *Program 22 (City-owned land):* The Program could include additional steps beyond evaluating opportunities at the Alhambra Golf Course and how often the City will look for additional opportunities.
 - *Program 26 (ADUs):* The element should include subsequent actions (e.g., rezone) within a specified time if ADUs are not permitted as assumed in the element.
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 A3, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was 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.*

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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 A4, the element requires a complete analysis of potential governmental and non-governmental constraints. Depending upon the results of that analysis, the City may need to revise or add programs to 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.

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).)

While the element now includes a general summary of the public participation process, including how some comments were incorporated into the element, some comments, including those considered by HCD in this review, are worthy of consideration as part of housing element update. For example, Program 33 (Housing Element Maintenance) could be expanded to include identified sites, AFFH and other topics and to make specific commitment to adjustments within a specified time period.

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October 10, 2022

Vanessa Reynoso, Deputy Director
Community Development Department
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Vanessa Reynoso:

RE: City of Alhambra's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the City of Alhambra's (City) revised draft housing element received on August 11, 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. In addition, HCD considered comments from Henry Fung; Californians for Homeownership, Abundant Housing LA, YIMBY Law and Josh Albrekston pursuant to Government Code section 65585, subdivision (c).

The revised draft element addresses many statutory requirements from HCD's April 8, 2022 review; however, further revisions will be necessary to comply with State Housing Element Law (Article 10.6 of the Gov. Code), as follows:

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).)*

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... (Gov. Code, § 65583, subd. (c)(5).)

Goals, Actions, Metrics, and Milestones: While the element includes many potentially meaningful programs to affirmatively further fair housing (AFFH), generally, programs must include numeric targets in terms of housing outcomes (e.g., number of units by income group, number of persons assisted). Currently, programs describe metric types (e.g., number of cases, number of units, dollars collected) but should also have a numeric target in terms of outcomes. In

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addition, the element should consider additional actions to: (1) increase new housing choices and affordability in higher opportunity or higher income areas such as targeting zoning for missing middle types, (2) address displacement risk and (3) specific objectives related to place-based strategies to improve community revitalization (e.g., rehabilitation, street and mobility improvements, parks, community amenities).

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).)*

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... (Gov. Code, § 65583, subd. (c)(1).)

Parcel Listing: As stated in HCD's prior review, the element must still list parcels by general plan designation.

Nonvacant Sites: While the element discusses recent trends relative to identified sites, it should still evaluate those trends relative to assumptions in the inventory. Specifically, the element utilizes a residential redevelopment factor of 2.5 to 3 times increased capacity for sites identified toward the regional housing need allocation (RHNA) based on existing zoning. However, the analysis of development trends does appear to support these assumptions. Further, the element should include discussion of the existing uses and any conditions that impeded additional development in the planning period. For example, the element could discuss utilization of parking and whether that use impedes additional development. Also, the City should consider and address public comments regarding the potential of redevelopment on some identified sites and finally, the element should include a program to re-evaluate the effectiveness of identified nonvacant sites in facilitating additional housing development and take measures (e.g., rezoning), as appropriate within a specified time (e.g., within six months)

In addition, the element still relies on nonvacant sites to accommodate 50 percent or more of the housing needs for lower-income households, which 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. While the resolution of adoption includes the appropriate findings, any changes to the analysis should be reflected in future re-adoption of the element.

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Electronic Sites Inventory Form: Pursuant to Government Code section 65583.3, subdivision (b), the City must utilize standards, forms, and definitions adopted by HCD when preparing the sites inventory. Please see HCD's housing element webpage at <https://www.hcd.ca.gov/community-development/housing-element/index.shtml> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance. Please note, upon adoption of the housing element, the City must submit an electronic version of the sites inventory with its adopted housing element to sitesinventory@hcd.ca.gov.

Accessory Dwelling Units (ADUs): The element notes the accuracy of the City's ADU records but still must reconcile those numbers with HCD records, particularly for reporting years 2018 and 2020. In addition, while the element notes the uptick in recent applications, it still is assuming almost double the number of recently permitted ADUs and the element should rescale the assumptions to an appropriate assumption (50-60 ADUs per year). In addition, Program 26 (ADU) commits to adding site capacity if ADUs are not tracking within 25 percent of assumed capacity once in the planning period. However, the Program should consider a much higher benchmark (e.g., 75 percent) and commit to take appropriate action, if necessary, every two years.

Programs: As noted above, the element does not include a complete site analysis; therefore, the adequacy of sites and zoning was 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 22 (City-Owned land) should include numeric objectives, including affordability, consistent with assumptions in the inventory and a specific schedule of actions to facilitate development on the Alhambra Golf Course beyond conducting an evaluation. Steps may include discrete timing for making the site available, facilitating entitlements, and issuing building permits as well as a numeric objective, including affordability, consistent with assumptions in the inventory.

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... (Gov. Code, § 65583, subd. (c)(3).)*

To address constraints on the development of housing, the element should be revised, as follows:

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- *Program 9 (Meeting Special Housing Needs)*: The Program should not be limited to “family care homes” and commit to amend zoning and procedures for all groups for seven or more persons in all residential zones with objectives standards to promote approval certainty.
 - *Program 27 (Reduce Development Constraints)*: The Program commits to establish appropriate development standards to achieve realistic densities but should instead commit to development standards to facilitate achieving maximum densities.
 - *Program 29 (Development Streamlining)*: The Program should go beyond drafting a proposal to improve the planning review process and specifically commit to revise the process. In addition, the Program should go beyond developing objective design standards and specifically commit to establish standards. Finally, standards should not be limited to design standards but also development standards to better address subjective standards and approval findings.
4. *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).)*

While the element now includes a general summary of the public participation process and has amended Program 33 to address public feedback, many comments should still be considered and incorporated as appropriate. Examples include commitment to AFFH by allowing missing middle in higher resource or higher income neighborhoods, small sites feasibility, approvals on industrial (IPD) sites, local hire program requirements as a constraint, inclusionary feasibility and how it relates to density bonus law, discretionary review reform, development standards, or mid cycle rezones in the event identified sites are not effective in facilitating additional housing development.

The element will meet the statutory requirements of State Housing Element Law once it has been revised and re-adopted to comply with the above requirements.

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 this statutory deadline, then any rezoning for identified sites in prior planning periods or to accommodate the RHNA, including for lower-income households (Programs 18 and 19),

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shall be completed no later than one year from the statutory deadline. Otherwise, HCD cannot find the element in compliance until the rezoning is complete.

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. Please be aware, any revisions to the element must be posted on the local government's website and to email a link to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

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 will meet housing element requirements for these and other funding sources.

HCD appreciates the dedication and hard work the housing element team provided during the review. We are committed to assisting the City in addressing all statutory requirements of State Housing Element Law. If you have any questions, please contact Connor Finney, of our staff, at Connor.Finney@hcd.ca.gov.

Sincerely,



Paul McDougall
Senior Program Manager

**DEPARTMENT OF HOUSING AND COMMUNITY DEVELOPMENT
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May 25, 2023

Vanessa Reynoso, Deputy Director
Community Development Department
City of Alhambra
111 South First Street
Alhambra, CA 91801

Dear Vanessa Reynoso:

RE: City of Alhambra's 6th Cycle (2021-2029) Revised Draft Housing Element

Thank you for submitting the City of Alhambra's (City) revised draft housing element that was received for review on April 13, 2023. 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 meets the statutory requirements of State Housing Element Law, including as described in HCD's October 10, 2022 review. However, the housing element cannot be found in substantial compliance until the City has completed necessary rezones as described below. The housing element will substantially comply with State Housing Element Law (Gov. Code, § 65580 et seq.) when the necessary rezoning is complete and the element is adopted, submitted to, and approved by HCD, in accordance with Government Code section 65585.

For your information, pursuant to Assembly Bill 1398 (Chapter 358, Statutes of 2021), since the City failed to adopt a compliant housing element within one year from the statutory deadline, the element cannot be found in substantial compliance until rezones to make prior sites available or accommodate a shortfall of sites pursuant to Government Code section 65583, subdivision (c)(1)(A) and Government Code section 65583.2, subdivision (c) are completed. Once the City completes the rezones, a copy of the resolution or ordinance should be transmitted to HCD. HCD will review the documentation and issue correspondence identifying the updated status of the City housing element compliance.

As a reminder, 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/planning-and-community-development/housing-elements> for a copy of the form and instructions. The City can reach out to HCD at sitesinventory@hcd.ca.gov for technical assistance.

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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 must continue to engage the community, including organizations that represent lower-income and special needs households, by making information regularly available while considering and incorporating comments where appropriate. Please be aware, any revisions to the element must be posted on the local government's website and a link must be emailed to all individuals and organizations that have previously requested notices relating to the local government's housing element at least seven days before submitting to HCD.

Several federal, state, and regional funding programs consider housing element compliance as an eligibility or ranking criteria. For example, the CalTrans Senate Bill (SB1) 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.

HCD appreciates the hard work, cooperation, and responsiveness the City's housing element team provided throughout the housing element review and update. The team's commitment to housing and community development is commendable. If HCD can provide assistance in implementing the housing element, please contact Connor Finney, of our staff, at Connor.Finney@hcd.ca.gov

Sincerely,



Paul McDougall
Senior Program Manager

City of Alhambra

2021-2029 Housing Element

Letter Version

April 14, 2023

Prepared for: City of Alhambra

DRAFT

Version 4: HCD Substantial Compliance for Readoption



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List of Acronyms

HCD	California State Department of Housing and Community Development
HNA	Housing Needs Assessment
HUD	U.S. Department of Housing and Urban Development
RHNA	Regional Housing Needs Assessment
SCAG	Southern California Association of Governments
CHAS	Comprehensive Housing Affordability Strategy
ACS	American Community Survey
AMI	Area Median Income
LAHSA	Los Angeles Homeless Services Authority
LA CADA	Los Angeles Centers for Alcohol and Drug Abuse
CAPER	Consolidated Annual Progress Report
ADU	Accessory Dwelling Unit
JADU	Junior Accessory Dwelling Unit
FAR	Floor Area Ratio
AI	Analysis of Impediments
AFFH	Affirmatively Furthering Fair Housing
AAGR	Average Annual Growth Rate

Chapter 1: Introduction

Community Context

Alhambra remains a unique community with a small town feel in an urban setting. Often referred to as the “Gateway to the San Gabriel Valley,” it is situated on the western edge of the San Gabriel Valley. It shares a western boundary with Los Angeles and the northern terminus of the Long Beach Freeway (I-710). It is bordered by South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. In the south, the San Bernardino freeway (I-10) traverses the city from east to west.

Housing in Alhambra originally consisted almost entirely of single-family homes. However, as the city grew, and vacant land became increasingly limited, higher-density housing was necessary to accommodate a growing population. During the 1960s, modern apartment buildings began to replace single-family residential structures, and now nearly half of the housing stock in the city consists of multi-family housing (44 percent). Today, Alhambra is a built-out community with very little vacant land. Residential land uses account for 52 percent of the city’s current land area.

Role of the Housing Element

The 2021 Housing Element is the guiding document for Alhambra’s housing policy direction. Grounded in the principals of the General Plan, The Housing Element ensures that the city establishes policies, procedures, and incentives in its land use planning and development activities that result in the maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in Alhambra. Consistent with the General Plan, this Housing Element focuses on strong and stable residential neighborhoods and the recycling of land to higher densities in areas designated for high-density residential. With this Housing Element, the city is amplifying its commitment to provide a range of housing types that are suitable for the needs of all of its residents and provide equitable access to the resources the community has to offer.

Summary of State Housing Legislation

Background

The Housing Element of the General Plan identifies and analyzes the city’s existing and projected housing needs and contains a detailed outline and plan of the city’s goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. The Housing Element is one of the seven mandatory General Plan elements. The Housing Element identifies ways in which housing needs of current and future residents can be met.

State Requirements

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element of the General Plan. Specifically, Government Code Section

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65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years.

The California Legislature has determined that a primary housing goal for the State is ensuring every resident has a decent home and suitable living environment. Section 65580 of the Government Code describes the goals in detail:

- A. The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
- B. The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.
- C. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of the government.
- D. Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community.
- E. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors; examine community goals set forth in the general plan; and to cooperate with other local governments and the State in addressing regional housing needs.
- F. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

Relationship to Other General Plan Elements

The Alhambra General Plan was updated and adopted in 2019. It includes six chapters covering seven mandated elements. This Housing Element Update represents the eighth element of the Alhambra General Plan. The Housing Element is the primary blueprint for the city's housing policies, programs, and resources, but other elements of the General plan influence housing. For example, both the Land Use and Circulation Elements set policies that impact how and where housing can be met.

Table 1. General Plan Elements and Chapters

Mandated General Plan Element	Alhambra General Plan Chapter
Land Use	Land Use and Community Design Covers Land Use
Circulation	Mobility Covers Circulation
Open Space	Quality of Life Covers Open Space and Environmental Justice
Conservation	Resources Covers Conservation
Safety	Infrastructure and Services Covers Conservation
Noise	Health & Safety Covers Safety, Noise, and Environmental Justice

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Environmental Justice	Addressed in Health and Safety Section
Housing	N/A

The programs and policies in the Housing Element are directly related to, and build upon, the General Plan. All elements of the General Plan must maintain internal consistency. In the adoption process, the city will identify policies in other General Plan elements that require amendment to maintain internal consistency. In the future, as other elements of the General Plan are updated and revised, the Housing Element will also be reviewed to ensure General Plan consistency is maintained.

Public Participation

Public engagement is a critical part of the City of Alhambra's 6th Cycle Housing Element Update. Under State law, local governments are directed to be diligent in soliciting input from as many segments of the community as possible. Beyond requirements, this step is essential in the information gathering process so that the city's programs and policies reflect the values of the community, within the context of city's planning targets.

Early on, community engagement focused on disseminating information about the project. This included advertising the project, discussing the schedule, discussing what the project entails, and a large educational component. As the Housing Element is regulated by the State, it was important to educate the public about the lay of the land, rules and regulations the city is bound to, and consequences of failing to secure a certified Housing Element on time. Given that housing development can be a contentious topic, public education about the RHNA (how it is calculated, and the options available to the city to accommodate it) are important.

The latter half of the Housing Element Update focused on soliciting information from the public to ensure that draft products met their needs, goals, and desires for housing in the community—within the bounds of the Housing Element regulations set forth by the State.

The following community engagement tools were used for both information dissemination and solicitation.

- A standalone project website was developed to post information about the project, updates, calendar dates, surveys, and previous presentation materials. Community members could sign up for the project distribution list and solicit comments to the project mailbox.
- Project fliers were created for printing and posting at community-based organizations and at City Hall to build exposure for community members with challenging internet access.
- Project information was distributed to curated lists of community organizations and existing media including:
 - The city's "Alhambra Announcements" Newsletter and the Alhambra Chamber of Commerce's "Around Alhambra" Newsletter.
 - Publication in the city Parks and Leisure Guide.
 - An email distribution list established for the city's parallel zoning code update.

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- Over the course of the project the city's marketing team promoted over 100 mentions on the city's Social Media platforms.
- Two public study sessions in Fall 2020 with the City Council and Planning Commission.
- Two community workshops focusing on housing needs and suitability of housing policy alternatives.
- An interactive live survey and online survey posted to the project website, offered in Spanish, English, and Traditional Chinese.
- Five community town hall meetings in April 2021, one in each Council District and sponsored by the representative Councilor.
- Planning Commission and City Council study sessions in May 2021, August 2021 and September 2021, respectively.

Impact of COVID-19

While every effort was made to ensure that the Housing Element Update process was inclusive and open, COVID-19 and the prohibition of in-person gatherings nonetheless impacted public participation. Relying on a mostly digital method of public engagement required the following enhancements to traditional public participation:

- Expanded time between notice periods and meetings, as well as multiple notices.
- Clearly crafted instructions for accessing call-in and videoconferencing links.
- Call-in options for all videoconferences to assist residents without computer access.
- Allowing public comment through email or video conferencing chat functions.
- Recording and promptly posting meeting materials so they are available to the public

Summary of Comments from Outreach

The city received comments in both oral and written formats, in addition to responses to an online survey that was made available in English, Spanish, and Traditional Chinese. An initial set of comments were collected and received prior to drafting the housing element. These comments supported the initial development of the housing element. An additional set of comments were also received during the 60-day public review period. A summary of major themes from comments received is provided below:

- While most residents expressed that they were at least somewhat satisfied with their housing situation, most also reported affordability as a top concern. Residents are concerned about increases in home prices and rents. They expressed a desire to located more affordable housing near reliable transit.
- The city has had a parallel project to explore the future of the East Main Corridor. This topic dominated many of the conversations throughout the update process. Alhambra contrasting community perspectives about East Main. One contingent does not want to allow housing at all on East Main. This was driven by preference for an "Old Town Alhambra" commercial district on East Main Corridor. Another contingent discussed that the East Main area is among the highest resource areas of Alhambra and not allowing housing would be exclusionary.

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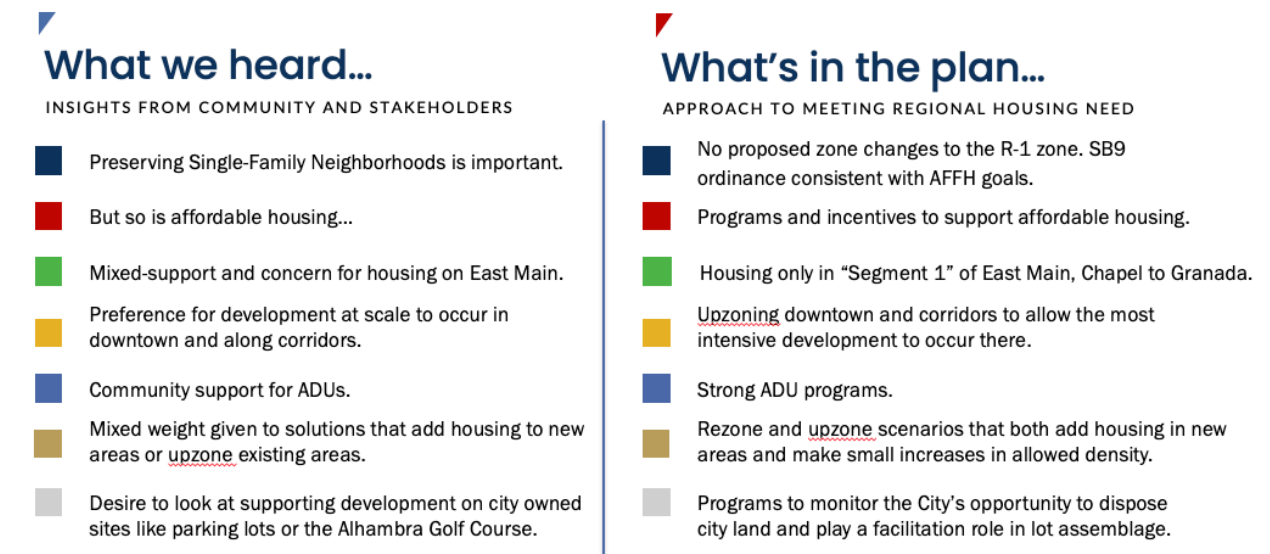
- Concerns that development projects that are allowed and appropriate are being halted.
- Residents expressed concerns over scale and density, specifically that large projects threatened the character of the community and could block territorial and mountain views. This echoed a call for targeted historic preservation.
- Enthusiasm for the City to develop a plan to reflect a mixture of housing types, affordability, and diversity of residents as reflective of the region. This paralleled with survey results that supported a broad range of housing types. Middle housing types and mid-rise housing showed the strongest support. There was a general aversion to high-rise development.
- Residents expressed a desire to locate new capacity broadly across the city. Valley Boulevard was often referenced as an underutilized asset for potential housing. Other areas identified for upzoning/rezoning included Garfield Avenue, East Main Street, and the Industrial Zones in west Alhambra.
- Residents showed strong support for policies to support Accessory Dwelling Units (ADUs). This was seen as the best alternative to promote additional capacity in existing low-density areas.
- Residents and commissioners both expressed various concerns over the potential impacts of SB9 and SB10 on the R-1 zone.
- Commenters expressed some concerns about the impacts of increased population on city services, specifically systemwide water capacity and traffic.
- Support to leverage new legislation making it easier to consider housing development and capacity on church properties.
- Questions of the appropriateness to consider broad rent stabilization and just cause eviction protections as a program.
- Recommendations that the city explore the viability of an affordable housing overlay zone in targeted parts of the city.
- Concerns over broad redevelopment impacts on displacement.
- Finding in survey results that housing discrimination is still broadly present in Alhambra, and many residents that experience or witnessed housing discrimination do not know how to access resources and support.
- Concerns that infill development that does not require additional parking will result into overflow parking on existing city streets in neighborhoods.
- Support for the city to continue to look at its land assets as a resource to deliver sites for housing.
- Support for a mix of rezoning and upzoning strategies across the city to create capacity necessary to accommodate regional housing need.
- General support for the city's existing inclusionary housing program, but mixed concerns over the appropriateness of set asides, calibration of in-lieu fees, and need for offsetting incentives.
- Recommendations to explore a more comprehensive range of funding sources linked to development.

- Recommendations that the city include a full mid-cycle Housing Element review to measure the effectiveness of programs and policies.

Integration of Comments into The Housing Element

Comments received during the public outreach process were used to refine the city’s understanding of housing needs, potential for housing problems, and to formulate and refine programs in the Housing Element. Key linkages were organized and communicated back to the public at a public workshop prior to the release of the Public Review Draft (see figure 1). Comments received during the public review period were collected through the review period. The city organized these comments into a matrix representing key themes and relevant portions of the Housing Element. The city held a work session with its consultant team to determine actions and revisions where appropriate. General comments that were more questions and clarifications were responded to individually. Public review draft revisions were made prior to submitting an review draft to HCD. A summary of key linkages is included below.

Figure 1. Summary of Community Input and Housing Plan Linkage
Source: Alhambra Community Workshop #2



- Program 19 includes rezoning and upzoning strategies that considered preferences for broad distribution throughout the city. Every zone with the exception of the R-1 zone saw a change in density or housing allowance.
- A compromise between contrasting positions on East Main. The Housing Element includes rezoning a portion of East Main from Chapel to Granada at densities suitable for lower income housing. Housing was not allowed on properties east of Granada. Based on the parcellation of this segment and the character of existing buildings, this was determined the most appropriate segment for an "Old Town Alhambra" district.
- Program 26 includes a comprehensive ADU program designed to remove barriers to ADU development, provided pre-approved plans, and incentives for ADU production.
- Program 5 includes actions to monitor the effectiveness of the City’s inclusionary housing policy and adjust policies if ineffective.
- Program 40 directs the city to conduct a full mid-cycle review.

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- Program 23 directs the city to implement adaptive reuse standards to assist in the conversion of underutilized commercial and industrial buildings for housing.
- Programs for the city to play an active role in site assembly and disposition of city owned land. The city will specifically look at the Alhambra Golf Course when its existing operating lease nears expiration.
- Programs to prevent displacement through unit replacement.
- Inclusion in programs to identify new affordable housing funding sources strategies linked to development (i.e. linkage fees, transfer tax).
- A program to study the feasibility of development under proposed densities and development standards and the potential impacts of SB9 and SB10 on housing production.
- A commitment to study the feasibility and appropriateness of an affordable housing overlay zone.
- A community education program to maintain an on-going dialogue with the community on housing issue.

Additional data points and clarifications were considered throughout the Housing Element based on comments and feedback from the community, Planning Commission, and City Council.

DRAFT

Public Review and Comment

Throughout the Housing Element Update process, the City posted presentations and draft materials as they were available. This includes formal public review as required by state law. The city received feedback from many residents and interested parties. Key themes are organized below:

Key Themes

- Consideration of workforce policies that benefit local workers and the local area.
- The role of the Villages project in meeting RHNA targets.
- The risk of units in the IPD zone not being approved by City Council
- The role of tenant protection and education programs in the Housing Plan
- The prioritization of rezoning throughout the city, specifically the EMC zone
- Consideration of applying an affordable housing overlay zone
- Planning for housing in high-resource areas. Specifically affordable housing
- The role of public land in meeting affordable housing production
- The need for monitoring and implementation programs
- The role of inclusionary zoning in meeting affordable housing needs
- The need to remove barriers and streamline approvals
- Commitment to a mid-cycle review
- Promotion of place-based strategies to target investment in historically under invested areas

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- The need for a full and robust Affirmatively Furthering Fair Housing (AFFH) analysis
- Need for clarification of SB9 applicability
- The role of increasing maximum densities and amending development standards to facilitate denser development forms.
- Concerns over housing impacts on East Main Corridor
- The need to balance housing needs with historic character and existing development scale in many neighborhoods. Including higher density housing in single-family areas and high-rise development in commercial areas.
- Preference for the use of Specific Plans to guide neighborhood development in some areas.
- Resources to promote ADU production and simplification of the process with the City
- The need for a compliant impediments analysis
- Strategies to promote housing production in single-family areas and near transit
- Early feedback included a desire for more opportunities for engagement
- Desire to explore housing opportunities on city-owned land, specifically the Alhambra Golf Course
- Identification of specific sites that might not be suitable for inclusion in the sites inventory due to potential or existing uses.

When considering public comment, it is important to balance often competing opinions with the policy objectives of the City and ultimately the objective of improving housing production in accordance with the City's Regional Housing Need. To incorporate feedback received during the public review process, the City held several work sessions and discussions with HCD to evaluate comments and determine changes that would be responsive as appropriate. Significant changes in response to public comment included:

- The addition of a local hire program (Program 10) to encourage the use of local workers in subsidized affordable housing projects.
- Exploration of the feasibility of including the Alhambra Golf Course in the sites inventory in the context of existing lease agreements.
- Including a commitment to create a new affordable housing overlay zone (Program 29)
- Amending the assumptions of how the Villages Project is contributing to RHNA progress.
- The addition of programs (Program 32 and Program 33) to establish a target for housing production in existing high-resource R1 areas through SB9.
- A program (Program 22) to prioritize affordable housing production on public land.
- The inclusion of mid-cycle and periodic review processes in multiple programs
- An inclusionary housing program (Program 5) and commitment to ongoing monitoring of the effectiveness of this program.
- The addition of place-based strategies to direct investment in lower and moderate resource areas and parks that are utilized by protected populations (Program 34-38).
- Commitment to create a new Specific Plan for Valley Boulevard.

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- A rezoning and upzoning strategy that increases allowed densities in all zones that currently allow housing and allows housing in most areas that do not currently allow housing.
- The addition of five town hall meetings concentrated on each council district to expand opportunities for community engagement and input.
- Removal of sites that were identified as not suitable for inclusion in the sites inventory.
- Reduction in the reliance on ADUs to meet RHNA targets.

Summary Reconciliation of RHNA Allocation and Capacity

The table below summarizes Alhambra, RHNA allocation by income category and capacity identified by type. Alhambra’s adequate sites inventory has capacity for 7,642 units.

Table 2: Site Capacity by Source and Income Level. RHNA Surplus/Shortfall

Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above Mod. Income	
Proposed Projects	94	106	33	693	926
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	113	214	11	142	480
New Sites	1,543	831	951	2,237	5,562
Total Sites	1,802	1,331	1,120	3,389	7,642
2021-2029 RHNA	1,774	1,036	1,079	2,936	6,825
Surplus/Shortfall	28	295	41	453	817

^A Includes capacity from increases in allowed density on existing sites

Chapter 2: Housing Needs Assessment

This Housing Needs Assessment (HNA) is a required section of the Alhambra Updated Housing Element. This section of the Housing Element included data on the characteristics of the city's population, economy, households, housing challenges, special needs housing, and housing stock. Each of these components is presented in a regional context, and, where relevant, in the context of other adjacent communities. This assessment serves as the basis for identifying the appropriate goals, policies, and programs for Alhambra to implement during the 2021-2029 Housing Element cycle.

Data in this analysis are derived from a variety of sources. Where appropriate, the HNA leverages the data package produced by SCAG and pre-certified by HCD. However, additional analysis was required to build a more complete picture of housing needs in Alhambra. Additional data sources are cited throughout the document and include data from the U.S. Census Bureau's American Community Survey (ACS), the U.S. Department of Housing and Urban Development (HUD), data from the City of Alhambra, and third-party data sources.

Population Characteristics DRAFT

A community's population characteristics affect the amount and type of housing needed. Factors such as population growth, age, income, and employment trends influence the type of housing needed and households' ability to afford housing. This section evaluates the various population characteristics that affect Alhambra's housing needs.

Population Growth

According to the California Department of Finance, the population in Alhambra has steadily increased over time. In 2000, Alhambra had a population of 85,757. Unlike the SCAG region, the Great Recession had an impact on Alhambra's population, reducing its population to 83,089 in 2010, while population in the rest of the region grew. Since then population in Alhambra has steadily increased to 86,792 in 2020. Over the 2000 to 2020 period, Alhambra had an annual growth rate of 0.1%, a much lower rate compared to 0.7% for the region.

Figure 2. Population Growth, Alhambra and SAG Region, 2000-2020

Source: SCAG Analysis of California Department of Finance E-5 Population and Housing Units Estimates, Pre-certified Local Housing Data

Jurisdiction	2000	2010	2020	2000-2020 Change		Annual Growth Rate
				Number	Percent	
Alhambra	85,757	83,089	86,792	1,035	1.2%	0.1%
SCAG	16,516,703	18,051,534	19,021,787	2,505,084	15%	0.7%
Alhambra share of SCAG Region	0.52%	0.46%	0.46%			

Population Forecast

While population growth in Alhambra is expected to accelerate over the next 15 years, it is expected to remain well below the regional average. SCAG’s regional forecast estimates that Alhambra will add 5,400 residents over the next 15 years, an annual average increase of 0.4%. The SCAG region is expected to grow twice that rate, at 0.8%, between 2020 and 2035.

Regional growth forecasting is completed by SCAG for the purposes of Regional Transportation Planning (RTP). The Connect SoCal RTP forecast was adopted in September 2020. The population projection covers the period from 2016 to 2045. Over this period, the City of Alhambra is expected to add 4,600 new residents, growing at an average annual rate of 0.18 percent. This rate is far lower than the regional forecast rate of 0.62 percent in the SCAG region. Among other San Gabriel Valley cities, Alhambra is projected by SCAG to have the lowest average annual growth rate (AAGR) in the region, trailing Glendale (0.22%), Monterey Park (0.22%), Pasadena (0.33%), San Gabriel (0.41%), and El Monte (0.64%).

Figure 3. Population Forecast, City of Alhambra and SCAG Region, 2016-2045

Source: SCAG Connect SoCal RTP Growth Forecast (2020)

Jurisdiction	2016	2045	2016-2045 Change	
			Number	Percent
Alhambra	86,600	91,200	4,600	0.18%
SCAG	18,832,000	22,504,000	3,672,000	0.62%

Age Characteristics

The age characteristics of a community indicate current needs and future trends for housing. Because different age groups have very different housing needs, housing demand correlates to the age of residents. For example, young adult households may choose to occupy apartments, condominiums, and small single-family homes because of affordability, location, and household size/presence of children. Middle-aged adults may prefer larger homes in which to raise families, while seniors may prefer smaller units that have lower costs, less maintenance, and are more proximate to services.

Figure 4 and Figure 5 show the age characteristics of Alhambra residents in 2018. Alhambra’s median age is 41.8 in 2018. Compared to the SCAG region, Alhambra’s residents tend to be older, with a larger population proportion being between the age of 20 to 64 years old. In 2018, Alhambra has a larger population proportion of younger residents (those age 19 years and under) than seniors (those 65 years and older). However, Alhambra’s senior population (those 65 years and older) is larger than the SCAG region’s share. This may translate into greater need for senior housing or multi-generational housing solutions like accessory dwelling units.

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Figure 4. Age Distribution Totals, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Total	Alhambra		SCAG	
	Number	Percent	Number	Percent
Median Age	41.8	-	-	-
19 and Under	16,153	19%	4,903,838	26%
20 to 65	54,499	64%	11,457,825	61%
65 and Older	14,322	17%	2,447,598	13%

Figure 5. Age Distribution, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Age Group	Alhambra		SCAG	
	Number	Percent	Number	Percent
Under 5	4,306	5%	1,193,126	6%
5 to 9	3,804	4%	1,193,271	6%
10 to 14	4,019	5%	1,244,937	7%
15 to 19	4,024	5%	1,272,504	7%
20 to 24	5,806	7%	1,370,418	7%
25 to 29	7,423	9%	1,487,672	8%
30 to 34	6,461	8%	1,361,873	7%
35 to 39	5,863	7%	1,267,296	7%
40 to 44	5,748	7%	1,241,074	7%
45 to 49	5,883	7%	1,274,771	7%
50 to 54	6,295	7%	1,257,723	7%
55 to 59	6,230	7%	1,182,327	6%
60 to 64	4,790	6%	1,014,671	5%
65 and older	14,322	17%	2,447,598	13%

Race and Ethnic Composition

Cultural preferences and needs for housing vary by racial and ethnic type. Alhambra remains a minority majority community where over 90% of the population is non-white. Alhambra has strong Asian and Hispanic community composition. The nature and extent of a community's housing needs are, to a large extent, determined by the racial/ethnic composition of its population. The size and type of housing preferred, and the neighborhood desired, often vary by a person or household's racial or ethnic background. Research has shown that some cultures (e.g. Hispanic and Asian) tend to maintain extended families within a single household.¹ This can lead to overcrowding or an increased demand for larger housing units.

Figure 6 shows that, according to the Census, more than half of Alhambra's population identified as non-Hispanic Asian in 2019. This is 3.5 times the Los Angeles County average. An additional 31% of the population identifies as Hispanic or Latino of any race. The foreign-born population fell slightly over the last five years from 42,310 residents in 2013, to 41,872 in 2018.

Figure 6. Population by Race and Ethnicity, City of Alhambra and SCAG Region, 2019

Source: American Community Survey 2019 1-year estimates

Race/ Ethnicity	Alhambra		SCAG	
	Number	Percent	Number	Percent
Hispanic/ Latino of any race	26,298	31%	8,905,824	47%
Non-Hispanic White	7,110	8%	5,681,360	30%
Non-Hispanic Black/African American	2,247	3%	1,168,071	6%
Non-Hispanic American Indian	383	0%	51,703	0%
Non-Hispanic Asian	45,165	54%	2,512,336	13%
Non-Hispanic Hawaiian/ Pacific islander	-	0%	47,749	0%
Non-Hispanic Other	959	1%	58,749	0%
Non-Hispanic Two or More Races	1,570	2%	466,859	2%
Total	83,732	100%	18,892,651	100%

Areas of Minority Concentration

A minority concentration is defined as Census block group where the proportion of non-White residents is higher than the proportion of White residents. Non-White Asians, however, comprise the majority racial/ethnic group in Alhambra and are more distributed throughout the city compared to other racial/ethnic groups. Figure 7 shows that there are still some concentrations

¹ Pew Research Center. *Second-Generation Americans: A Portrait of the Adult Children of Immigrants*, February 7, 2013, Appendix 8, <http://www.pewsocialtrends.org/2013/02/07/appendix-1-detailed-demographic-tables/>.

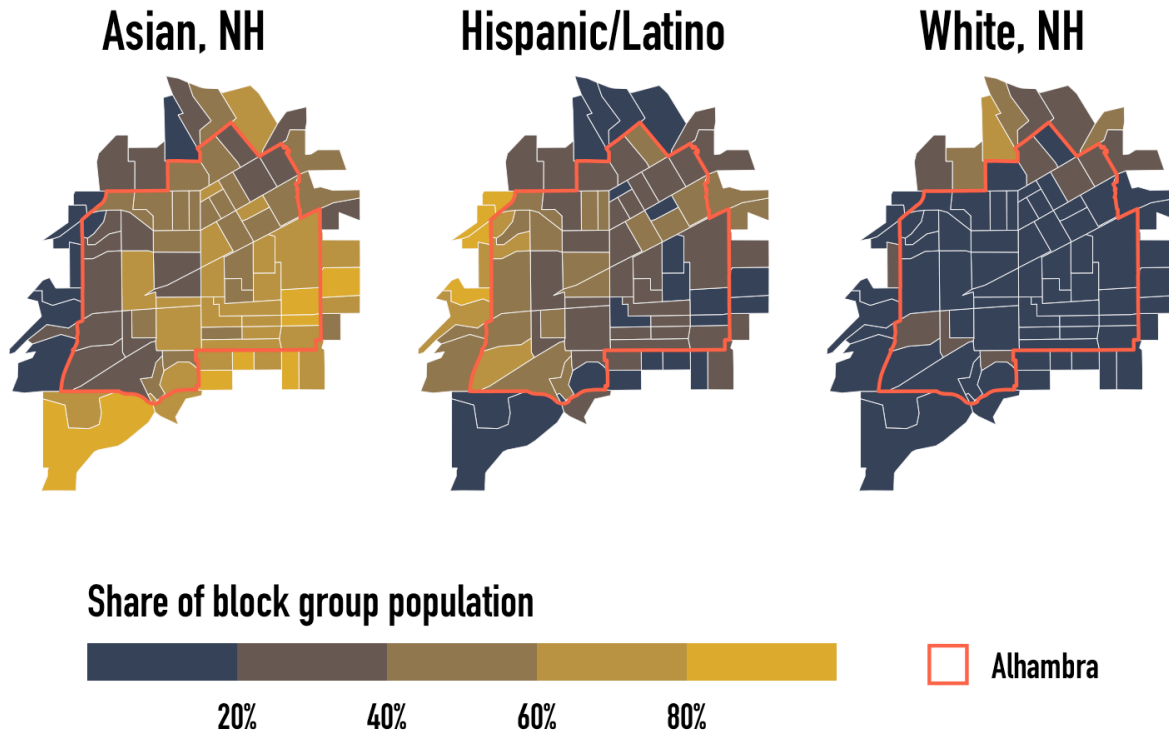
National Association of Hispanic Real Estate Professionals. *2017 State of Hispanic Homeownership Report*, 2017.

of Asian non-white residents, more specifically near the southeast corner of Alhambra. Concentrations of Hispanic/Latino residents can be found in the western portion of the city. No concentration of White or Black/African American residents exists in the city.

Figure 7. Concentrations of Asian, Hispanic/ Latino, and White Population Groups, 2018

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

Note: NH = Non-Hispanic



Economic Characteristics

Employment by Industry

Labor and employment characteristics have a direct impact upon current and future housing needs within Alhambra. Incomes associated with different jobs, as well as the number of workers in a household, determine the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and large amounts of seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

According to the Census, a total of 41,917 Alhambra residents were employed during the 2014-2018 period. As shown in Figure 8, most of Alhambra residents were employed in three industries: the Educational Services and Health Care and Social Assistance industry category; the Professional, Scientific, and Management, and Administrative, and Waste Management Services industry category; and the Arts, Entertainment, and Recreation, and Accommodation and Food Services industry category. Generally, managerial/professional positions earn higher incomes than other occupation categories. In 2018, the Information and Public Administration industries had the highest average wage of over \$60,000 annually.

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Figure 8 uses a location quotient to quantify and compare concentrations of industries in a particular area and is useful to understanding an area’s economic strengths and weaknesses. A location quotient typically compares an area’s concentration to a larger region, in this case, to the SCAG region. A location quotient greater than 1.0 indicates an area has a higher concentration of a specialized industry. Alhambra has a location quotient exceeding 1.0 in four industries: Public Administration, Educational Services and Health Care and Social Assistance; Finance, Insurance, Real Estate, and Rental and Leasing; and Other Services, Except Public Administration. These industries also offer some of the highest paying jobs within Alhambra.

Figure 8. Employment by Industry, City of Alhambra, 2018

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

Note: Location quotient compares Alhambra’s employment concentration relative to the SCAG region.

Industry	Number	Percent	Location Quotient	Average Wage
Agriculture, Forestry, Fishing and Hunting, and Mining	110	0%	0.28	\$22,500
Construction	1,768	4%	0.67	\$41,935
Manufacturing	3,521	8%	0.85	\$44,436
Wholesale Trade	1,395	3%	1.00	\$39,591
Retail Trade	3,892	9%	0.84	\$35,041
Transportation, Warehousing, and Utilities	2,364	6%	0.98	\$52,856
Information	1,207	3%	0.89	\$62,656
Finance and Insurance, and Real Estate, and Rental and Leasing	2,951	7%	1.11	\$50,488
Professional, Scientific, and Management, and Administrative, and Waste Management Services	5,123	12%	0.98	\$59,853
Educational Services and Health Care and Social Assistance	9,975	24%	1.16	\$51,048
Arts, Entertainment, and Recreation, and Accommodation and Food Services	5,110	12%	1.11	\$27,476
Other Services, Except Public Administration	2,582	6%	1.09	\$29,452
Public Administration	1,919	5%	1.26	\$61,975
Total Employment	41,917	100%	-	

Employment by Occupation

By understanding the industries in which the residents of Alhambra work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category in Alhambra is Management, in which 16,387 (39% of total) employees work. The second-most prevalent type of work is in Sales, which employs 10,815 (26% of total) in Alhambra.

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Figure 9. Employment by Occupation, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

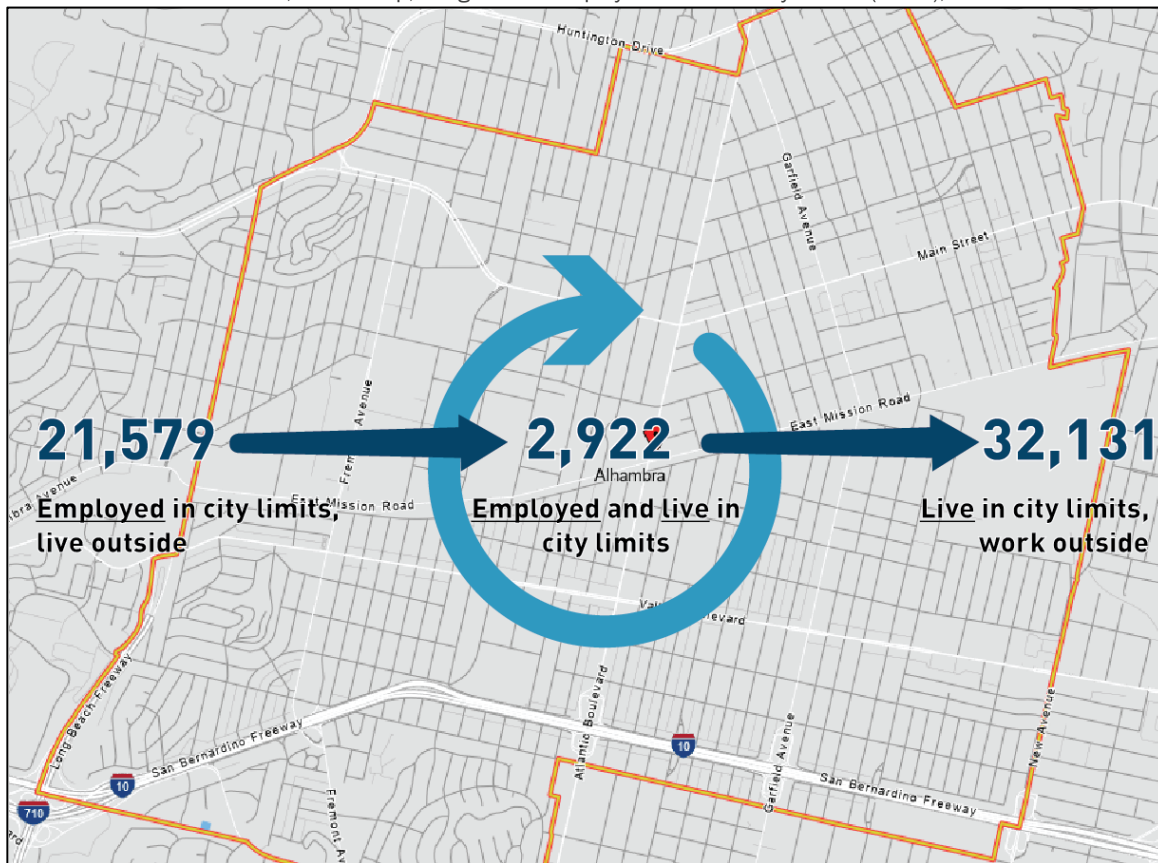
Occupation	Alhambra		
	Number	Percent	Location Quotient
Management, Business, Science, and Arts	16,387	39%	1.08
Service	7,862	19%	1.00
Sales and Office	10,815	26%	1.13
Natural Resources, Construction, and Maintenance	2,394	6%	0.69
Production, Transportation, and Material Moving	4,459	11%	0.77

Commute Patterns

Alhambra has a jobs-housing imbalance. Only about 12% of Alhambra residents (2,922) work and live in the city. This imbalance of jobs to housing impacts quality of life including how far Alhambra residents have to travel for work, increasing transportation costs, and reducing individual productivity. In general, a good balance of jobs to housing would occur where the jobs available in a community match the labor force skills, and where housing is available at prices, sizes, and locations suited to workers who wish to live in the area.

Figure 10. Job Inflow and Outflow, City of Alhambra, 2018

Source: U.S. Census Bureau, OnTheMap, Longitudinal Employer-Household Dynamics (LEHD), 2018



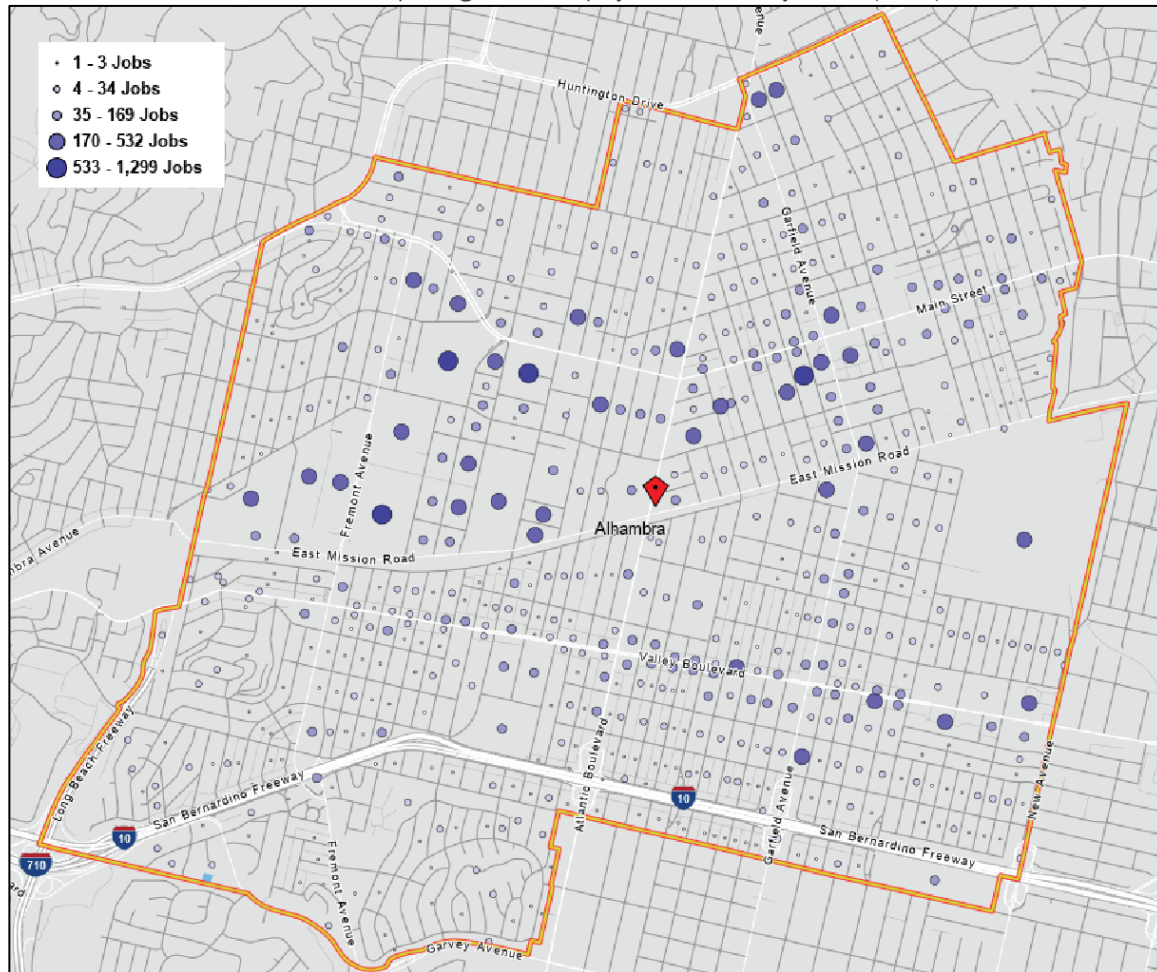
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As of 2018, there were an estimated 24,501 full- or part-time jobs in Alhambra. Of these, the most common jobs were in the following industries: Health Care and Social Assistance (20%), Retail (19%), and Accommodations and Food Services (16%). As shown in Figure 10, the vast majority (88%) of jobs in Alhambra are filled by someone who lives outside of the city. Additionally, the majority of residents living in Alhambra work outside the city.

Figure 11 shows the concentration of employment in Alhambra. Jobs are concentrated in the industrial/manufacturing zone, central business district, and along major arterials like Valley Boulevard and Main Street.

Figure 11. Employment Density, City of Alhambra, 2018

Source: U.S. Census Bureau, OnTheMap, Longitudinal Employer-Household Dynamics (LEHD), 2018



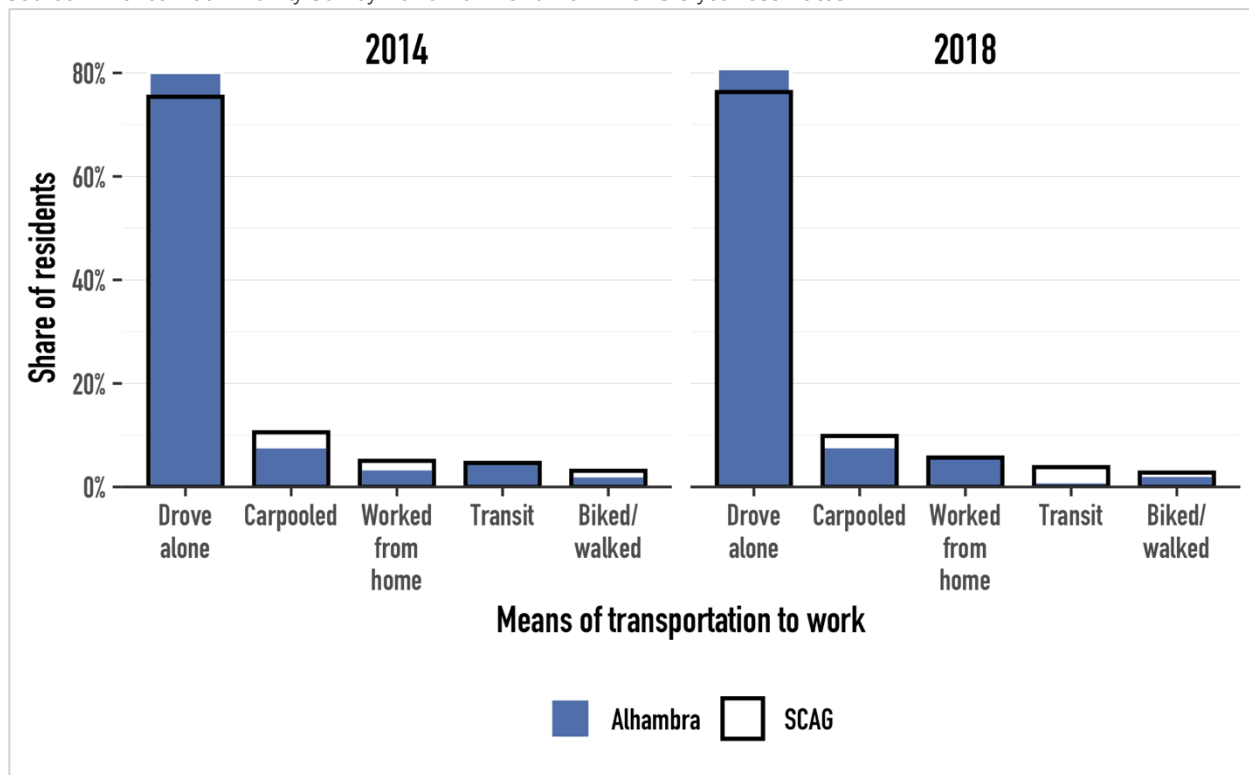
Means of Transportation to Work

The City of Alhambra has a high share of its population located in regionally-designated “High Quality Transit Areas.” Because this is one of the criteria for SCAG’s regional housing needs allocation (RHNA), it impacts Alhambra’s share of future housing needs in the region. Figure 12 shows that in 2018, about 81% of Alhambra’s residents drove alone to work, about five percent higher than the region-wide average. Approximately 8% of Alhambra residents carpooled, two percent biked or walked, and one percent used public transportation. Approximately 6% of Alhambra residents worked from home. Compared to the SCAG region, Alhambra residents use

alternative modes of transportation such as carpool, transit, bike, and walking far less to get to work.

Figure 12. Means of Transportation to Work, City of Alhambra and SCAG Region, 2014 and 2018

Source: American Community Survey 2010-2014 and 2014-2018 5-year estimates



Household Characteristics

The characteristics of a community’s households impact the type of housing needed in that community. Household type, income levels, the presence of special needs populations, and other household characteristics are all factors that affect the housing needs of a community. This section discusses the household characteristics affecting the housing needs of Alhambra residents.

Household Type and Size

A household is defined by the U.S. Census Bureau as all persons who occupy a housing unit, which may include families, single persons, and unrelated persons sharing a housing unit (such as roommates). Persons residing in group quarters such as dormitories or retirement homes are not considered households. The characteristics of a community’s households serve as important indicators of the type and size of housing needed in the city. For instance, single-person households often occupy smaller apartment units or condominiums, such as studios, one-bedroom units, or accessory dwelling units (ADUs). Married couples often prefer larger single-family homes, particularly if they have children. This underscores the need to provide a diversity of housing opportunities to provide households of different ages and types the opportunity to live in Alhambra.

Figure 13 shows the type of households in Alhambra. In 2018, there were 29,427 households in Alhambra. Alhambra continues to be a stable, family-oriented community, with 69% of all

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households identifying themselves as families. Average household size has remained stable over time at 2.86 persons. Over the 2010 and 2018 period, the number of families has decreased slightly, while the number non-family households have increased. Non-family households are generally characterized as single households or households with more than one person living together (often roommates) and unrelated to each other.

Figure 13. Household Type and Size, City of Alhambra, 2010 and 2018

Source: American Community Survey 2014-2018 5-year estimates, Decennial Census 2010

Household Types	2010		2018		Change (2010 to 2018)	
	Number	Percent	Number	Percent	Number	Percent
Families	20,774	72%	20,416	69%	-358	-2%
With Children	8,414	29%	7,429	25%	-985	-12%
With no Children	12,360	43%	12,987	44%	627	5%
Non-Families	8,030	28%	9,011	31%	981	12%
Singles	6,457	22%	6,912	23%	455	7%
Other	1,573	5%	2,099	7%	526	33%
Total Households	28,804	100%	29,427	100%	623	2%
Average Household Size	2.85	-	2.86	-	-	-

Multigenerational Households

Nationally, a growing family typology is the multigenerational household.² Estimates from the Pew Research Center suggest this market segment grew by 21.6 million households between 2000 and 2016.³ The same research found Asian and Hispanic/Latino households to be 35% to 45% more likely than average to be multigenerational. In Alhambra, the combined Asian and Hispanic/Latino share of the population is 25 percentage points higher than the SCAG average.

To approximate multigenerational households in Alhambra, we evaluated two metrics from the American Community Survey:

- The share of households with at least one grandparent and grandchild (5.2%).⁴
- The share of the population in households with non-spouse, non-child relatives (13.4%).⁵

² Defined by the Pew Research Center as households that include at least two adult generations, or grandparents and grandchildren younger than 25.

³ Pew Research Center (2018). Multigenerational Household Analysis. Retrieved from: <https://www.pewresearch.org/fact-tank/2018/04/05/a-record-64-million-americans-live-in-multigenerational-households/>

⁴ Source: U.S. Census Bureau, 2015–2019 ACS 5-year estimate, Table S1002.

⁵ Source: U.S. Census Bureau, 2015–2019 ACS 5-year estimate, Table DP02.

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The factors influencing growth in multigenerational households are social, cultural, economic, and demographic. The primary drivers include:

- **Slower Household Formation:** Young people are delaying marriage and continuing to live with supportive parents well into their 20s. This is driven in part by preference but also out of economic necessity due to rising housing costs and/or underemployment.
- **Immigration:** As mentioned above, Asian and Hispanic/Latino households have a higher likelihood of living in multigenerational households. Some of this is cultural, but economic factors also contribute.
- **Ability of Kin to Support:** In many markets, the Baby Boomers are more financially stable than previous generations and have a greater ability to support aging parents in addition to their own children. Further, an increasing number of Americans suffer from chronic illness and/or disabilities and need caregiving—much of which is provided by family members.
- **Economic Conditions:** Housing costs are increasing at a rate well above incomes. Economically-challenged households, or those on fixed-incomes, are forming multi-generational households out of necessity.

Households by Tenure

Household tenure is an important component of housing needs, as it helps to determine whether future housing should be built as ownership units or rental units. In the 2012-2016 period, only about 40% of all households in the city owned their homes, while 60% were renters. This is far below the national average of roughly 63.7% homeownership in 2016, and also below Los Angeles County's homeownership rate of about 48.4% in 2016. In the U.S., homeownership remains one of the primary ways that households are able to build equity and generate wealth. However, for many households, the high costs of housing can be a barrier to becoming homeowners.

Household Income

The ability of a household to acquire adequate housing is related to household income, whether earned or from other sources. Household income is oftentimes the crucial factor in evaluating the size and type of housing available for any given household. Household income can vary greatly across many demographic factors including race, gender, and household type. While higher-income households have more discretionary income to spend on housing, low- and moderate-income households often face limited choices in the housing they can afford.

In 2018, the median household income in Alhambra was \$57,117, lower than the Los Angeles County median of \$64,251. Figure 14 shows that, overall, the income distribution in Alhambra closely mirrors that of Los Angeles County. Compared to the County, Alhambra has more households that make less than \$49,999 annually.

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Figure 14. Household Income Distribution, City of Alhambra and Los Angeles County, 2018

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

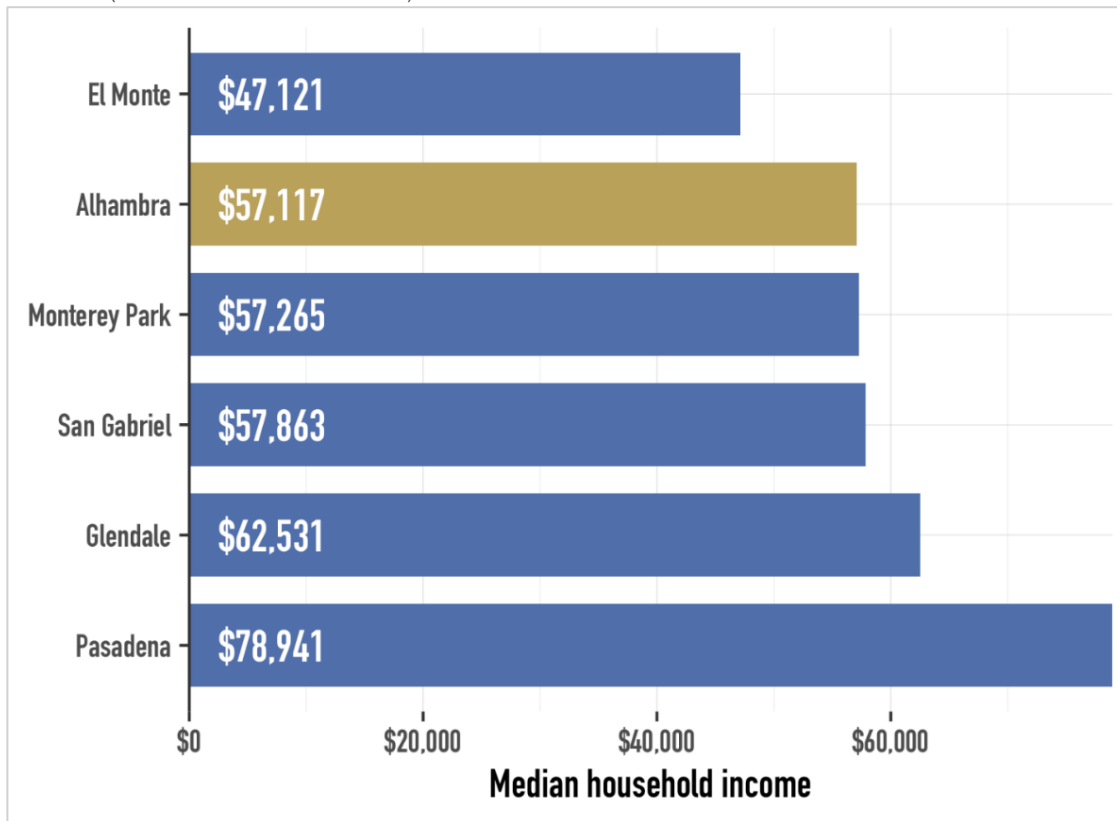
Household Income	Income Distribution	
	Alhambra	Los Angeles County
Less than \$25,000	23%	20%
\$25,000 to \$49,999	21%	20%
\$50,000 to \$74,999	16%	16%
\$75,000 to \$99,999	11%	12%
\$100,000 to \$149,999	17%	15%
\$150,000 or more	12%	17%
Median	\$57,117	\$64,251

Figure 15 below shows the median household income of several nearby cities compared to Alhambra’s median household income for 2018. The median household income in Alhambra is in-line with neighboring cities—slightly higher than El Monte, in-line with Monterey Park and San Gabriel, and lower than Glendale, Pasadena, and the SCAG region as a whole (\$67,329).

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Figure 15. Median Household Incomes in Peer Cities, 2014-2018.

Source: American Community Survey 2014-2018 5-year estimates, American Community Survey PUMS 2014-2018 5-year estimates (for the SCAG median income)



Area Median Income

To facilitate the analysis of income distribution among communities, each year the U.S. Department of Housing and Urban Development (HUD) calculates affordability and income limits for metro areas and counties across the country, based on Census data. These data are calculated as a percentage of the Area Median Income (AMI) and then adjusted for household size. California HCD further groups these households into the categories shown in Figure 16 below.

The AMI shown here comes directly from HCD and HUD and differs from the median household incomes discussed in Figure 14 and Figure 15. The differences include the year analyzed, the geography analyzed, and the household type analyzed.

- Median household income (in Figure 14 and Figure 15) is calculated using Census data, the most recent of which is 2018. It is calculated for each city specifically, and is calculated as the median of all households (of all types and sizes).
- Area median income (in Figure 16) is calculated by HUD each year; the most recent data comes from 2020. It is calculated for Los Angeles County as one geography, and is calculated for family households (where all household members are related). The standard 100% AMI for LA County is based on a family of four. HUD and HCD calculate percentages of this median, and also make adjustments based on different family sizes (not shown).

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Figure 16. HCD Income Category, Description, and Limit, 2020

Source: California Department of Housing and Community Development (HCD)

AMI Income Category	Description	Income Limit (2020)
Los Angeles County—100% Area Median Income (AMI)		\$77,300
Extremely Low-Income	Gross family income equal to 30% or less of AMI	Less than \$23,190
Very Low-Income	Gross family income between 30 and 50% of AMI	\$23,190 to \$38,650
Low-Income	Gross family income between 50 and 80% of AMI	\$38,650 to \$61,840
Moderate-Income	Gross family income between 80 and 120% of AMI	\$61,840 to \$92,760
Above Moderate-Income	Gross family income over 120% of AMI	Greater than \$92,760

Combined, the extremely low, very low, and low-income groups are referred to as “lower income.”

The Census ACS does not collect information on the number of households belonging to each of the income categories described above. However, the Comprehensive Housing Affordability Strategy (CHAS) dataset, which is developed by the U.S. Census Bureau for HUD, does provide this information. This dataset provides detailed information on housing needs by income level for different types of households in Alhambra, as well as information relating to common problems relating to the condition of the housing stock (detailed in the next section).

Figure 17 shows the distribution of Alhambra households by AMI in 2016. In 2016, the majority of Alhambra households earned low-incomes, while 45% of Alhambra households earned moderate or above-moderate incomes. Like most communities across the country, renter households in Alhambra have lower incomes than do homeowners. This is caused by a number of factors, largely relating to the ability to save up for a down-payment and get approved for a mortgage—two prerequisites for homeownership. But the high costs of housing (both rental housing and homeownership housing) in Southern California are also a big factor in renters’ inability to make the switch.

Figure 17. Income Distribution by Tenure, 2012-2016

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

Note: This figure uses the same underlying data categories as in Figure 16, but the years analyzed differ.

AMI Income Category	Total Households		Owner Households		Renter Households	
	Number	Distribution	Number	Distribution	Number	Distribution
Extremely Low-Income (30% or less)	6,135	21%	1,590	14%	4,545	26%
Very Low-Income (31% to 50%)	4,540	16%	1,200	10%	3,340	19%
Low-Income (51% to 80%)	5,430	19%	1,900	16%	3,530	20%
Moderate and Above Moderate (over 80%)	13,070	45%	7,080	60%	5,990	35%

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Total	29,175	100%	11,770	100%	17,405	100%
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Housing Problems

The CHAS dataset, developed by the Census for HUD, provides detailed information on housing needs by income level for different types of households in Alhambra, as well as information relating to common problems relating to the condition of a city's housing stock. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom).
- Overcrowded conditions (housing units with more than one person per room).
- Housing cost burden, including utilities, exceeding 30% of gross income; or
- Severe housing cost burden, including utilities, exceeding 50% of gross income.

The latest CHAS data are based on 2013-2017 ACS data, as shown in

Figure 18. The types of problems vary according to household income, type, and tenure. Some key findings include:

- Renter households experience a higher rate of housing problems, 60% compared to 37% of owner households that experienced housing problems.
- Of all households who earned less than 80% of AMI, renters are more likely to experience at least one housing problem (53%) as compared to owner households (24%).
- Overall, 51% of all households in Alhambra reported at least one housing problem.

Figure 18. Renter Households with Housing Problems, City of Alhambra

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

AMI Income Category	Renter Households with No Housing Problems		Renter Households with At Least One Housing Problem		Renter Total
	Number	Percent	Number	Percent	
Extremely Low-Income (30% or less)	415	2%	3,675	21%	4,545*
Very Low-Income (31% to 50%)	130	1%	3,210	18%	3,340
Low-Income (51% to 80%)	1,195	7%	2,335	13%	3,530
Moderate and Above Moderate (over 80%)	4,680	27%	1,305	7%	5,985
Renter Totals	6,420	37%	10,530	60%	17,405*

Notes: * Total includes 455 households where cost burden data is unavailable, and the household has no other housing problems. HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group.

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Figure 19. Owner Households with Housing Problems, City of Alhambra

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

AMI Income Category	Owner Households with No Housing Problems		Owner Households with at Least One Housing Problem		Total
	Number	Percent	Number	Percent	
Extremely Low-Income (30% or less)	215	2%	1,225	11%	1,590*
Very Low-Income (31% to 50%)	495	4%	700	6%	1,195
Low-Income (51% to 80%)	980	8%	920	8%	1,900
Moderate and Above Moderate (over 80%)	5,640	48%	1,440	12%	7,080
Owner Totals	7,335	62%	4,285	37%	11,770*

Notes: * Total includes 150 households where cost burden data is unavailable, and the household has no other housing problems. HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group.

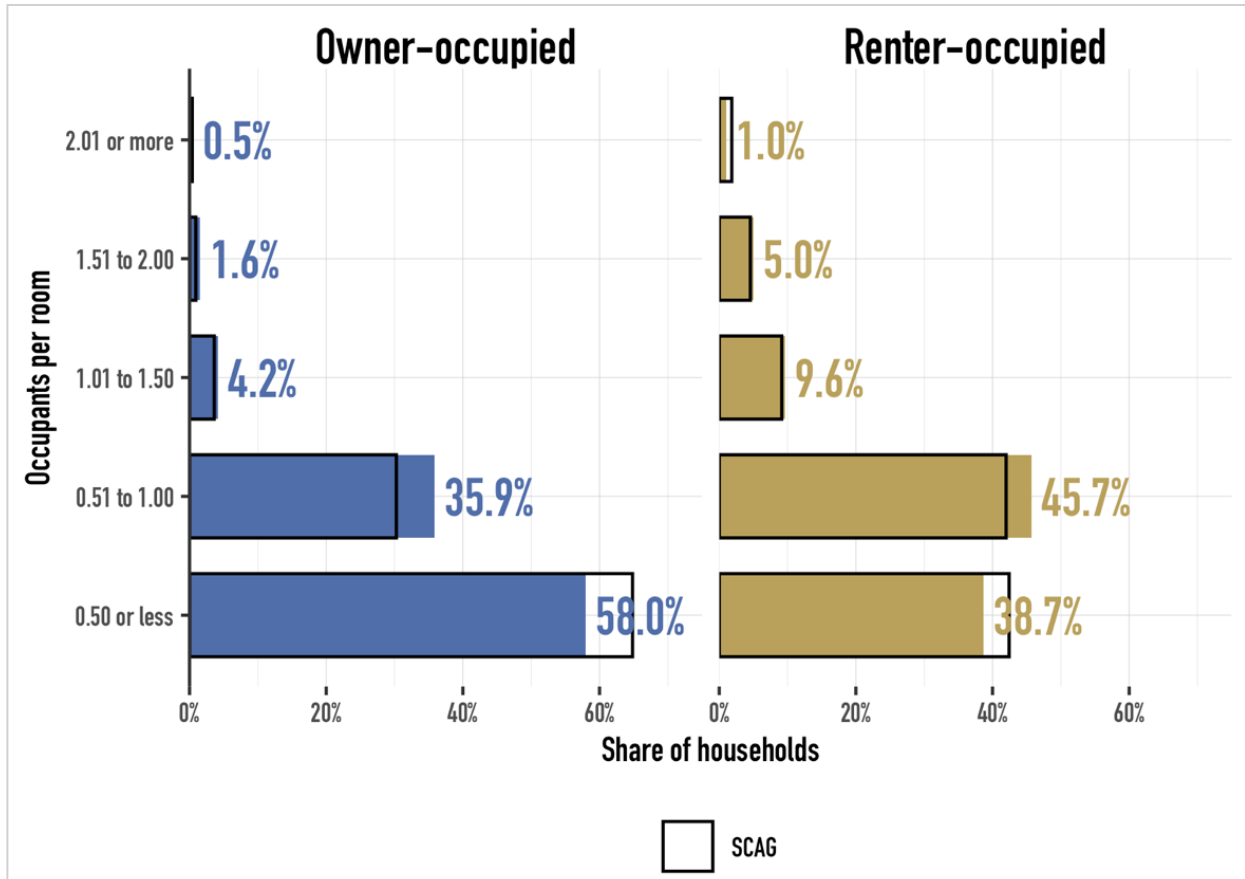
Overcrowding

Overcrowding occurs when the relatively high cost of housing either forces a household to double-up with another household or live in a smaller housing unit in order to be able to afford food and other basic needs. An overcrowded household is defined by the Census as one with more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Severely overcrowded households are households with more than 1.5 persons per room. Overcrowding can indicate that a community does not have an adequate supply of affordable housing, especially for larger families.

Figure 20 shows the prevalence of overcrowding in Alhambra by tenure. According to the Census, approximately 12% of all households in Alhambra were overcrowded (3,505 households). The incidence of overcrowding was slightly higher in Alhambra than in the SCAG region (10%). Additionally, the incidence of overcrowding is higher for renter households (16%) than owner households (6%) in Alhambra.

Figure 20. Overcrowding by Tenure, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Cost Burden

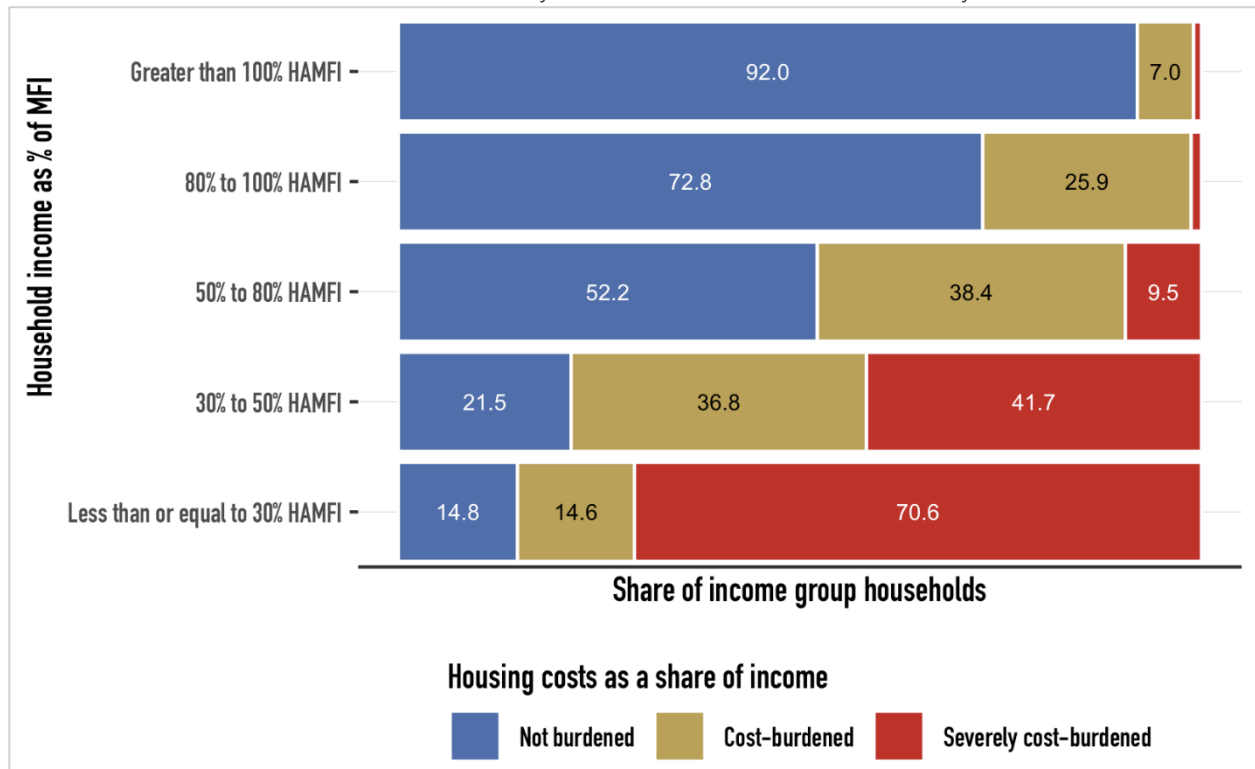
State and federal standards specify that households spending more than 30% of gross annual income on housing experience a housing cost burden. Housing cost burdens occur when housing costs increase faster than household income. When a household spends more than 30% of its income on housing costs, it has less disposable income for other necessities, including health care, food, and clothing. In the event of unexpected circumstances such as the loss of employment or serious health problems, lower-income households with a burdensome housing cost are more likely to become homeless or be forced to double-up with other households. Homeowners with a housing cost burden have the option of selling their homes and becoming renters. Renters, on the other hand, are vulnerable and subject to constant changes in the housing market.

Overall, housing cost burden in Alhambra was most prevalent among extremely low-income households (85%), while very low-income households also experienced a high rate of cost burden (79%).

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Figure 21. Cost Burden by Income, City of Alhambra

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data
 Note: HAMFI connotes Household Area Median Family Income and MFI connotes Median Family Income



While the previous figure breaks down cost burden by area-relative income, the 2018 American Community Survey also allows for the analysis of Alhambra's 17,921 renter households (for which income data are available) by spending on rent by income bracket (dollar amounts).⁶ As one might expect, the general trend is that low-income households spend a higher share of income on housing (e.g. over 50%) while high-income households are more likely to spend under 30% of income on housing.

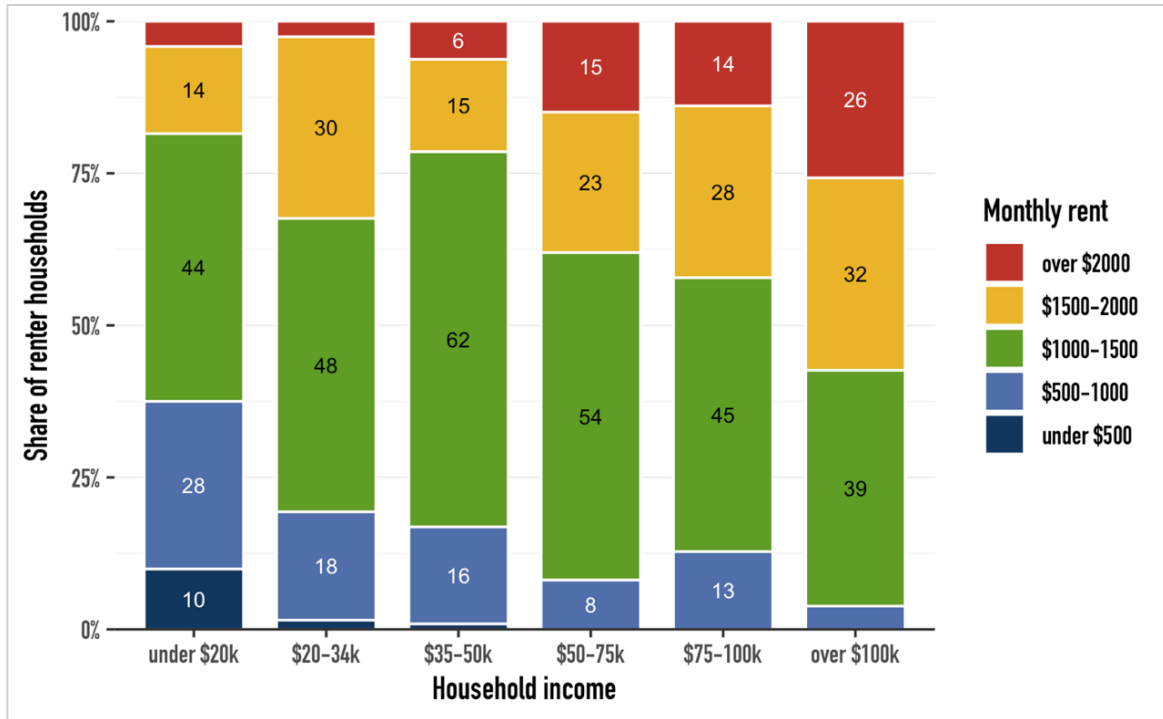
Cost burdening is a measure of housing instability and vulnerability to displacement. Policymakers typically focus on renters when assessing cost burdening. It can signal a lack of affordable housing in a region. It is less of a focus for homeowners, because a lender will assess a buyer's ability to pay for a mortgage before the household can buy a home, and because mortgage payments are typically fixed and do not fluctuate with the larger economy or housing market. While a homeowner's property taxes can go up with rising home values, they are typically a small share of overall housing costs. For these reasons, homeowners are not as vulnerable to price changes in the housing market as are renters.

⁶ This estimate of renter households differs from those shown in prior figures as it comes from 2018 American Community Survey data rather than the 2013-2017 CHAS dataset.

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Figure 22. Spending on Rent by Income, City of Alhambra, 2018

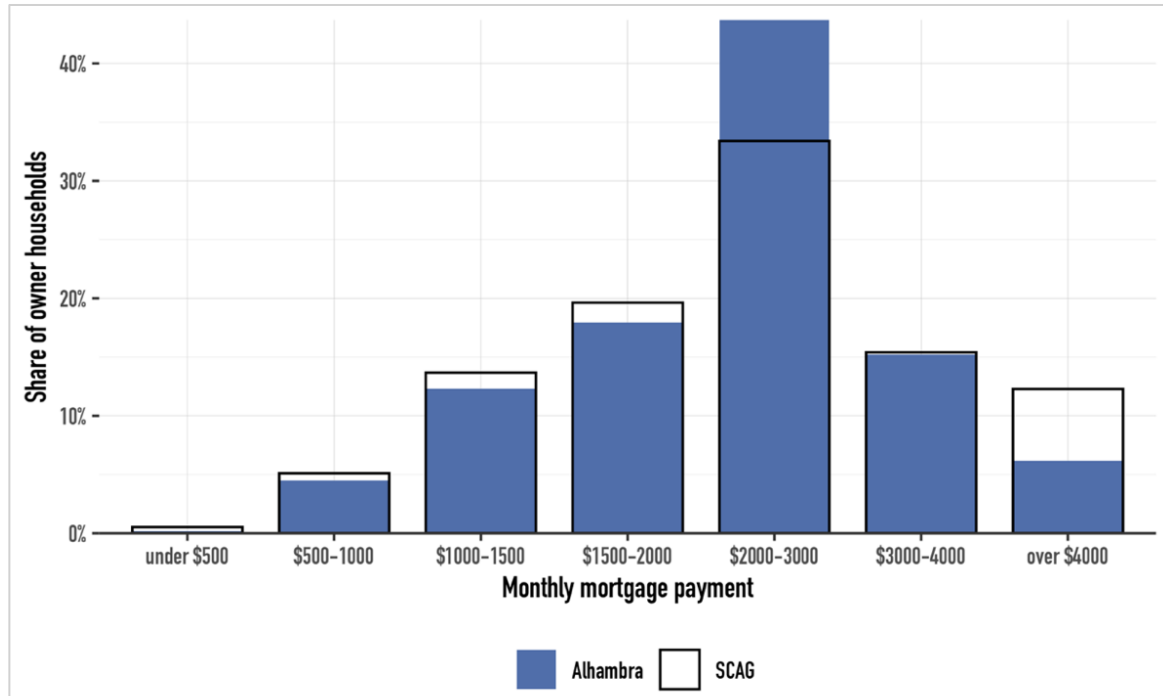
Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



In Alhambra, homeowner households make up 40% of Alhambra’s total households and 52% of the SCAG region. In both Alhambra and the SCAG region, the most commonly occurring mortgage payment in Alhambra is \$2,000-\$3,000/month. However, the SCAG region as a whole has a very high share of homeowners paying over \$4,000 per month on their mortgage payment. It is important to keep in mind that the mortgage payment is one part of total homeownership costs; other costs include taxes, insurance, and maintenance.

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Figure 23. Monthly Owner Costs for Mortgage Holders, City of Alhambra and SCAG Region, 2018
 Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Housing the extremely low-income population (below 30% of area median income) can be especially challenging. HUD's CHAS dataset provides a wealth of information on such households in Alhambra. Figure 24 provides a breakdown of extremely low-income households by race and ethnicity. Non-Hispanic Asian households⁷ account for the highest share of all extremely low-income households in Alhambra—61% of total—but they only account for 52% of all households in the city. This means they account for a disproportionately large share of households with extremely low incomes.

Figure 24. Extremely Low-Income Housing Needs, City of Alhambra, 2016

Source: SCAG Analysis of HUD CHAS, 2012-2016, Pre-Certified Local Housing Data

Demographic Indicator	Total Households		Households with Income 30% or Less	
	Number	Share	Number	Share
Non-Hispanic White	3,694	13%	714	11%
Non-Hispanic Black	594	2%	75	1%
All other Non-Hispanic races	15,248	52%	3,945	61%
Hispanic	9,620	33%	1,725	27%
Total	29,156	-	6,459	-
Renter Households	17,365	60%	4,865	75%

⁷ In Figure 24, this group is shown as "all other Non-Hispanic races," but as shown in Figure 6, the vast majority of households in this race and ethnic group identify as Asian.

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Owner Households	11,770	40%	1,595	25%
Total	29,135	-	6,460	-

Summary of Needs for Extremely Low-Income Households

State law requires that cities analyze the existing and projected housing needs for extremely low-income households (ELI). ELI households are those that earn 30 percent or less of area median income (AMI) adjusted for household size.

ELI households have a higher propensity to experience severe housing problems and have unique housing needs. Among the most common problems are cost burden and overcrowding. Both factors have an outmeasured impact on health, safety, and mobility.

ELI characteristics have been included in the preceding analysis; they are summarized here. In Alhambra, there are currently 6,135 ELI households in Alhambra. Over the next planning cycle Alhambra assumes 50 percent of VLI households (887 ELI households) will qualify as ELI households. Among all ELI households, 85.2 percent are cost burdened or severely cost burdened. An estimated 4,545 renter households (26 percent of all renters), and 1,590 owner households (14 percent of all owners) are ELI households.

Figure 25. Extremely Low-Income Housing Need Summary, City of Alhambra

Source: SCAG Analysis of HUD CHAS, 2012-2016, Pre-Certified Local Housing Data

Existing ELI Households	6,135			
Projected ELI Households	887 (assumes 50% of VLI RHNA)			
	Renter	% of Renters	Owner	% of Owners
ELI Households	4,545	26%	1,590	14%
	Renter		Owner	
ELI with Any Housing Problem	3,675		1,225	
Elderly/Senior ELI Households	1,705		1,060	
% of ELI Households Cost Burdened	85.2%			

The city currently classifies single-room occupancy (SRO) housing as part of the definition of boardinghouses in the Alhambra Zoning Ordinance. Boardinghouses are permitted outright in the R-3 zoning district. This is insufficient to assist in meeting the needs of the portion of ELI households that could utilize SRO housing. The establishment of siting regulations and expanded allowance of SRO housing is a priority of the ongoing comprehensive zoning code update that will be adopted under Program 21 in this Housing Element.

Special Housing Needs

Often some segments of the population have more difficulty finding decent, affordable housing due to differing needs for housing and specific circumstances. Special circumstances may be related to employment and income, family characteristics, disability, and household characteristics, among other factors. Consequently, certain residents in Alhambra may experience higher incidences of housing cost burden, overcrowding, or other housing problems. The special needs groups analyzed include:

- Elderly households
- People with disabilities

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- People experiencing homelessness
- Single parents
- Large households
- People living in poverty
- Farm workers

Many of these groups overlap; for example, single parents may have large households, and many elderly people have a disability of some type. The majority of these special needs groups would be assisted by an increase in affordable housing, especially housing located near public transportation and services.

Figure 26. Special Needs Groups (2014-2018)

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

Special Needs Groups	Number of People or Households	Percent of Total Households or Population
Households with Seniors (includes at least one-person age 65 or over)	9,502	32%
Senior Headed Households	6,995	24%
Seniors Living Alone	2,602	9%
Persons with Disabilities	15,892	19%
Large Households	2,936	10%
Single-Parent Household	2,001	7%
Female-Headed Households with Children	1,373	5%
Persons living in Poverty	2,305	8%
Farmworkers	93	0%
People Experiencing Homelessness	68	0%

The city’s 2020-2024 Consolidated Plan states that Alhambra has “extensive needs for supportive services, including housing, senior services, youth and childcare services, recreational activities, immigrant support services, health/medical care, counseling, employment, case management, transportation, and coordination and information/referral.”

Elderly

Many senior-headed households have special needs due to their relatively low incomes, disabilities or limitations, and dependency needs. Specifically, people aged 65 years and older often have four main concerns:

- **Housing:** Many seniors live alone and may have difficulty maintaining their homes.
- **Income:** People aged 65 and over are usually retired and living on a limited income.
- **Healthcare:** Seniors are more likely to have high healthcare costs.

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- **Transportation:** Many of the elderly—especially those with disabilities—rely on public transportation.

Figure 27 shows that an estimated 14,322 persons were age 65 and older in Alhambra in 2018. This accounted for about 17% of the city’s total residents, higher than the percentage share in the SCAG region as a whole. Comparing Alhambra to nearby peer cities, Figure 27 shows that Monterey Park has the highest share of its population that are 65 years and older. Alhambra is second to Monterey Park in terms of having the highest share of elderly population amongst the peer cities.

Figure 27. Persons Age 65 Years and Older, City of Alhambra, Peer Cities, and SCAG Region, 2018
Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Jurisdiction	Population that is Age 65 Years and Older	Percent of Population Age 65 Years and Older
Alhambra	14,322	17%
El Monte	14,511	13%
Glendale	34,318	17%
Monterey Park	12,892	21%
Pasadena	22,047	16%
San Gabriel	6,498	16%
SCAG	2,447,598	13%

While many in this cohort have the financial resources they need, many do not. Many elderly persons have limited incomes, such as small pensions, social security income benefits, or a few assets. This can make it difficult to find secure, stable, affordable housing in high cost areas. Figure 28 shows that of Alhambra's 6,995 elderly households, 40% earn less than 30% of the area median income, (compared to only 24% of elderly households in the SCAG region), and 57% earn less than 50% of the area median income (compared to 31% in the SCAG region).

Figure 28. Elderly Households by Income and Tenure, City of Alhambra
Source: HUD CHAS, 2012-2016

AMI Income Category	Owner Household	Renter Household	Total	Percent of Total Elderly Households
Extremely Low-Income (30% or less)	1,060	1,705	2,765	40%
Very Low-Income (31% to 50%)	605	585	1,190	17%
Low-Income (51% to 80%)	595	525	1,120	16%
Moderate and Above Moderate (over 80%)	1,400	520	1,920	27%
Total	3,660	3,335	6,995	100%

Note: HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group. HAMFI refers to HUD Area Median Family Income

Resources

The City of Alhambra's Parks and Recreation Department offers a Community Services Senior Division that provides services, recreation, and programs for the city's senior population (age 60+). The Joslyn Adult Recreation Center located in Alhambra is a designated Focal Point by the Los Angeles County Area Agency on Aging for the Southwest San Gabriel Valley Community Services Area. This recreational facility provides a centralized access point for people to find information and services, for themselves or their family members.

Importantly, this center also offers case management services focused on allowing Alhambra's senior population to live independently and safely for as long as possible. The center also offers food and nutrition programs including: group grocery runs, meal delivery programs, and a senior weekday lunch program. Referral services include the following:

- Referrals for medical, counseling, and mental health services;
- Referrals for free legal consultations related to estate planning, trusts, and wills;
- Referrals for in-home services, transportation, and nutrition; and
- Referrals for caregiver resources.

The 2020 Analysis of Impediments to Fair Housing report also highlights a free curb-to-curb transportation service available to Alhambra's seniors, the Senior Ride Program. Transportation is available for any service within Alhambra city limits and for medical appointments up to two miles outside of the city. The city has a fleet of vehicles, expanded in 2018, for this program. Rides can be scheduled in advance, scheduled on repeat, and are available (but not guaranteed) in emergency situations. This program is available to non-senior disabled participants as well.

The 2020 Analysis of Impediments to Fair Housing report also lists several age-restricted housing developments in Alhambra that serve seniors. These include Burke Manor, the Plaza on Main, TELACU Las Palmas Manor, 15 N. Valencia, and Wysong Plaza. In addition, the city has 12 residential care facilities that provide housing and services for adults and the elderly (5 for elderly specifically) with capacity for up to 274 individuals.

The 2020-2024 Consolidated Plan lists elderly households as a high priority population for conserving and improving existing affordable housing options, a high priority population for supporting affordable housing opportunities, and a high priority population for providing community and supportive services.

Persons with Disabilities

Physical and developmental disabilities may influence the ability to access traditionally-designed housing units and may limit a person's ability to earn income. Physical and/or developmental disabilities may deprive a person from earning income, restrict mobility, or make self-care difficult. Thus, persons with disabilities often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. Additionally, some residents may have disabilities that require living in a supportive or institutional setting.

The American Community Survey identifies six disability types: hearing disability, vision disability, cognitive disability, ambulatory disability, self-care disability, and independent living disability. The US Census and the ACS provide clarifying questions to determine persons with disabilities and differentiate disability types within the population. The ACS defines a disability as a person reporting one of the six disabilities identified by the following questions:

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- **Hearing Disability:** Is this person deaf or does he/she have serious difficulty hearing?
- **Visual Disability:** Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- **Cognitive Difficulty:** Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- **Ambulatory Difficulty:** Does this person have serious difficulty walking or climbing stairs?
- **Self-Care Difficulty:** Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions? Does this person have serious difficulty walking or climbing stairs? Does this person have difficulty dressing or bathing?
- **Independent Living Difficulty:** Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor’s office or shopping?

According to the 2018 American Community Survey, an estimated 19% of Alhambra’s residents had a disability. The majority of persons with at least one disability were aged 65 years or older (67%); disabilities are less prevalent in persons under the age of 18 (3%). Among the different types of disabilities, ambulatory difficulties were the most prevalent, about 25% of all reported disabilities, followed by independent living difficulties (23%), and then cognitive difficulties (16%).

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate. Ambulatory difficulties and independent living difficulties were most prevalent amongst residents 65 years and older.

Figure 29. Disabilities Tallied by Age and Type, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Disability Type	Age 5 to 17	Age 18 to 64	Age 65+	Total	Share of total
Hearing Difficulty	47	484	1,565	2,096	13%
Vision Difficulty	78	608	687	1,373	9%
Cognitive Difficulty	168	959	1,379	2,506	16%
Ambulatory Difficulty	53	1,136	2,859	4,048	25%
Self-Care Difficulty	71	605	1,459	2,135	13%
Independent Living Difficulty	NA	1,095	2,639	3,734	23%
Total	417	4,887	10,588	15,892	100%

Four factors—affordability, design, location, and discrimination—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.

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- Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility.
- Incorporating “barrier-free design” in all new multi-family housing is especially important to provide the widest range of choices for the disabled.
- 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 design” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group.
- Housing advocacy groups report that people with disabilities are often the victims of discrimination in the home buying market. People with disabilities, whether they work or receive disability income, are often perceived to be a greater financial risk than persons without disabilities with identical income amounts.

The Housing Element must also discuss housing needs for people with developmental disabilities, which are federally defined to mean a severe, chronic disability of an individual that:

- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 18 (Note: State of California has a manifestation age of 18 years of age; Federal is 22 years);
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and that
- Reflects the individual’s need for a combination of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The California Department of Developmental Services provides data on developmental disabilities by age and type of residence. This data is collected at the ZIP-code level and joined to the jurisdiction level by SCAG. Figure 30 shows that in Alhambra, an estimated 663 residents had a developmental disability in 2019. Approximately 51% of individuals with a developmental disability were 17 years or younger, and 49% were 18 years and older. The majority of individuals with a developmental disability resided with a parent or guardian.

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Figure 30. Developmental Disabilities by Residence and Age, City of Alhambra, 2019

Source: CA DDS Consumer Count by CA ZIP, Age Group and Residence Type, June 2019

Developmental Disabilities	Number of Individuals
Total	663
By Residence	
Home of Parent or Family Guardian	591
Independent Supported Living	27
Community Care Facility	25
Intermediate Care Facility	0
Foster Family Home	10
Other	10
By Age	
0 to 17 Years	341
18 Years and Older	321

Notes:

1. Data available in 161/197 SCAG jurisdictions.
2. Totals may not match as counts below 11 individuals are unavailable and some entries were not matched to a ZIP code, necessitating approximation.

Resources

The City of Alhambra has several resources available to people with disabilities. According to the 2020-2024 Consolidated Plan and the 2020 Analysis of Impediments to Fair Housing report, the city has three types of residential care facilities that provide supportive services, as shown in Figure 31 below.

Figure 31. State Licensed Community Care Facilities, City of Alhambra, 2019

Source: 2020 Draft Analysis of Impediments to Fair Housing

Facility Type	Number of Facilities	Capacity
Adult Day Care	4	210
Adult Residential Facilities	7	30
Residential Care Facilities for the Elderly	5	244
Total	16	484

In addition to the supportive housing available through these 16 community care facilities, the City of Alhambra refers individuals with intellectual and developmental disabilities to an organization in Monterey Park called Mentally and Educationally Retarded Citizens, Inc. (MERCIC), which can house and provide programming for up to 50 people.

In addition to these community care facilities currently available, the Consolidated plan suggests that the city will explore the use of Community Development Block Grant (CDBG) funding to provide additional case management services, while also relying on existing partnerships with community-based providers.

While the Adult Residential Facilities and the Residential Care Facilities for the Elderly provide housing, these housing units are not “permanent supportive housing” and do not offer wrap-around services intended to stabilize individuals coming out of homelessness, or exiting institutions such as jails or mental health facilities. The city’s 2020-2024 Consolidated Plan shows that there are no permanent supportive housing units in the city.

Federal Law requires the City of Alhambra to provide “reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities.” The city has procedures in place to process reasonable accommodations when requested. These procedures allow for flexibility (or waivers) in relation to land use, zoning, or building code regulations to ensure equal housing opportunities.

People Experiencing Homelessness

State law (Section 65583(a)(7)) mandates that Housing Elements address the special needs of homeless persons. “Homelessness” as defined by HUD describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
 - A supervised publicly- or privately-operated shelter designed to provide temporary living accommodations (including welfare, hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include: persons living in substandard housing (unless it has been officially condemned), persons living in overcrowded housing (for example, doubled up with others), persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge), or persons who may be at risk of homelessness (for example, people living temporarily with family or friends, youth recently released from foster care settings, parolees recently released from jails or prison, or households who are extremely low income and severely cost burdened).

HUD mandates that jurisdictions conduct a point-in-time (PIT) count on a single night in January each year to estimate the size of their population experiencing homelessness. In even-numbered years (e.g., 2018, 2020), the PIT only captures people experiencing sheltered homelessness, whereas unsheltered counts are done in odd-numbered years. The unsheltered counts are difficult and costly to do, often involving trained volunteers. Industry experts and homeless service providers often state that official PIT counts underestimate the true number of people experiencing homelessness in a given year. In Los Angeles County, the Los Angeles Homeless Services Agency (LAHSA) conducts the point-in-time counts.

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The LAHSA point-in-time count conducted in 2019 shows that approximately 68 people experienced homelessness in Alhambra. Of these people experiencing homelessness, 53 (78%) were in unsheltered conditions. This is more than twice the number of people experiencing homelessness estimated during previous Housing Element Update (30 persons). When extrapolated to the full year, it was estimated that 85 people experienced homelessness in calendar year 2019. California is known to have a chronic issue with unsheltered homelessness, in large part due to its mild weather and high costs of housing.

Figure 32. Count of People Experiencing Homelessness, City of Alhambra, 2019

Source: SCAG Analysis of City and County Homelessness Point-in-Time Counts, Pre-certified Local Housing Data

Jurisdiction	Sheltered	Unsheltered	Total
Alhambra	15	53	68
El Monte	25	434	459
Glendale	96	147	243
Monterey Park	17	82	99
Pasadena	221	321	542
San Gabriel	0	28	28

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

Resources

The city's 2020-2024 Consolidated Plan lists zero permanent supportive housing units in Alhambra for people experiencing homelessness or exiting institutions (such as hospitals, jails, or mental health facilities). Permanent supportive housing units are low-barrier housing options for individuals and families with histories of chronic, long-term homelessness who need very low (or no cost) rents and wrap-around supportive services to remain stably housed (such as mental health services, addiction treatment services, employment support services, or others). In addition, the city has no transitional housing units which are intended to provide low-barrier housing and supportive services as individuals and families come off the streets or out of institutions and prepare to enter longer term housing. According to the 2020-2024 Consolidated Plan, Alhambra residents have access to 48 year-round emergency shelter beds for households with adults and children, 533 year-round beds for adult-only households, and 30 year-round beds for unaccompanied homeless youth.

Figure 33 lists the homeless services facilities and providers available to residents of Alhambra who are experiencing homelessness. While most homeless service facilities are located in Los Angeles and other parts of the metro area, the City of Alhambra has cooperative relationships with non-profit organizations to provide information, services, and assistance for people experiencing homelessness.

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Figure 33. Homeless Facilities and Service Providers Available to Alhambra Residents, 2020

Source: 2020-2024 City of Alhambra Consolidated Plan, City of Alhambra Staff

Facility Name	Location	Services Provided
New Image Project Fresh Start	Los Angeles	Shelter facility for clients with mental health issues; target population is single women or women with children
Midnight Mission	Los Angeles	Shelter facility for up to 500 men per night
Covenant House	Los Angeles	30 bed shelter facility for homeless youth
Emmanuel Baptist Rescue Mission	Los Angeles	Shelter facility for up to 33 men per night
Salvation Army Safe Harbor	Los Angeles	Drug and alcohol rehabilitation services
Higher Goals	Los Angeles	Drug and alcohol rehabilitation services
Union Station Homeless Services	Pasadena	Homelessness outreach and rapid re-housing
Housing Rights Center	Los Angeles	Housing information and counseling such as civil rights, fair housing issues, evictions
Allen House	Santa Fe Springs	Adult residential treatment shelter through LA CADA
Alice's House	Whittier	Residential treatment center through LA CADA
Casa De Corazon	East Los Angeles	Transitional housing through CHIRP Los Angeles
Meredith's House	Pasadena	Two shelter beds

In addition, the city has funded a Homeless Outreach Services program since 2017 that provides people experiencing homelessness with information and referrals to service agencies. The outreach program is administered by the Union Station Homeless Services center in Pasadena. The Union Station Homeless Services center also facilitates an emergency hotel and motel voucher program on behalf of the City of Alhambra. The city has also contracted with the Los Angeles Centers for Alcohol and Drug Abuse (LA CADA), which is a certified substance abuse and behavioral treatment provider offering critical services across the continuum of care (outpatient, intensive outpatient, and inpatient residential programs). LA CADA also contracts with other service providers and shelters in the region, opening up a larger network of resources.

Alhambra's Homeless and Mental Evaluation Team (HOME Team) partners with LA CADA to conduct homelessness outreach, provide housing, assist in rapid-rehousing programming, and provide case management services. Alhambra also uses grant funding from Los Angeles County Measure H and from the San Gabriel Valley Council of Governments to provide emergency shelter services when LA CADA facilities are unavailable or do not meet an individual's needs.

Lastly, Los Angeles County Departments provide additional services for people experiencing homelessness in the City of Alhambra. The Department of Health Services provides a range of physical and mental healthcare services and the County Regional Occupational Program offers services such as job training and career counseling. Low income Alhambra residents are also able to receive work readiness and skills training from the federal Workforce Investment Act (WIA) program administered through the County.

Single-Parent Households

Single parents with dependent children represent another important group with special housing needs. Single-parent households often require special consideration and assistance because they tend to have lower incomes and a greater need for daycare and related facilities. Figure 34 shows that in 2018, Alhambra had 2,001 single-parent households. Of these, the majority (69%) were female-headed households.

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Figure 34. Single-Parent Households, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Jurisdiction	Single Parent Household		Female-headed Household with Children	
	Number	Percent of total Households	Number	Percent of total Households
Alhambra	2,001	7%	1,373	5%

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) and affordable childcare options are recognized as needed resources for the City of Alhambra’s population of single-parent households. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to this population.

Large Households

Large households are defined as households with five or more members. Large households are identified as a group with special needs because of the limited availability of adequately sized, affordable housing units. Large households often have lower incomes and frequently live in overcrowded smaller dwelling units, which can result in accelerated unit deterioration. Figure 35 compares the number of large households in Alhambra to that in the SCAG region. In 2018, 10% of households in Alhambra consisted of five or more persons, compared to 15% in the SCAG region.

Figure 35. Large Households, City of Alhambra, SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Number of Persons in Household	Alhambra		SCAG Region	
	Number	Percent	Number	Percent
5 Persons	1,917	7%	510,037	8%
6 Persons	651	2%	232,374	4%
7 Persons or More	368	1%	185,003	3%
Total	2,936	10%	927,414	15%

Figure 36 shows that in Alhambra in the 2012-2016 time period, large renter households were more likely to have lower incomes than large owner households. However, a greater share of large owner households experienced cost burdening compared to renter households. One potential explanation for this could be that large owner households have more children present, whereas large renter households could have more adults present to assist in paying for housing costs and reducing the rate of cost burdening. More analysis is needed to uncover these trends.

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Figure 36. Large Households by Tenure and Income Level

Source: HUD CHAS, 2012-2016. HAMFI refers to HUD Area Median Family Income

Household by Income	Owner Households		Renter Households		Total Households
	Large Related (5 or More Persons)	Total Owners	Large Related (5 or More Persons)	Total Renters	
Household Income <= 30% AMI	30 (1.8%)	1,590	185 (4.0%)	4,545	6,135
Household Income >30% to <=50%	50 (4.1%)	1,200	295 (8.8%)	3,340	4,540
Households by Cost Burdening					
% Cost Burdened >30%	165 (9.5%)	1,740	315 (8.0%)	3,940	5,680
% Cost Burdened >50%	125 (6.2%)	2,014	220 (4.5%)	4,840	6,854

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra’s population of larger households. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to this population, but these documents listed housing and community service resources that can benefit this population, in addition to others (like the city’s Housing Rehabilitation Program).

The 2020-2024 Consolidated Plan lists large family households as a high priority population for conserving and improving existing affordable housing options, and a high priority population for supporting affordable housing opportunities.

People Living in Poverty

In 2018, 2,305 households (8% of the city’s total households) were estimated to be living in poverty, defined as having an income under the Federal Poverty Line. Female-headed households with children are disproportionately affected by poverty. While female-headed households make up 27% of those in poverty, female-headed households with children make up the majority of female-headed households in poverty (about 55%). In 2018, there were an estimated 348 female-headed households with children living in poverty.

Figure 37. Households Living in Poverty, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Household Type	Number of Households	Share of Total Households
Total households below poverty level	2,305	8%
Female-headed households with children below poverty level	348	1%

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra’s population living in

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poverty. Neither the 2020 Analysis of Impediments to Fair Housing report nor the 2020 CAPER listed resources available in the city that are specific to this population, but these documents listed housing and community service resources that can benefit this population, in addition to others (like the Housing Choice Voucher Program).

The 2020-2024 Consolidated Plan lists extremely low-income⁸ households as a high priority population for the following housing and service needs:

- Conserving and improving existing affordable housing options,
- Supporting affordable housing opportunities,
- Supporting code enforcement services,
- Promoting equal housing opportunities,
- Providing community and supportive services,
- Providing for planning and administration activities, and
- Providing community facilities and infrastructure.

In addition, the 2020-2024 Consolidated Plan's Strategic Plan includes an Anti-Poverty Strategy that focuses on encouraging business growth and development to create employment opportunities. Tenets of this strategy include:

- Assistance in locating and siting potential business tenants;
- Streamlining procedures for opening new businesses;
- Modest business and utility user fees;
- Marketing programs to attract and retain businesses, residents, and customers; and
- Low-cost public transit within the city.

The 2020 CAPER stated that in FY 2019-2020, no CDBG funds were expended on economic development activities, but that this strategic plan was still in place.

Farmworkers

Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions have farmworkers living in them, they are essential to the region's economy and food supply. Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm laborers work in the fields, in processing plants, or support activities on a generally year-round basis. When workload increases during harvest periods, the labor force is supplemented by seasonal labor, often supplied by a labor contractor. For some crops, farms may employ migrant workers, defined as those whose travel distance to work prevents them from returning to their primary residence every evening.

Given the small number of persons employed in agriculture-related industries, the city can address the needs of the farm worker population through its overall affordable housing programs. Also, because Alhambra is an urban community in a metropolitan area, those persons identified as having agriculture jobs are most likely employed at plant nurseries and similar enterprises and

⁸ While households living in poverty have different income thresholds than households with extremely low incomes, the resources available would be similar.

thus are not anticipated to have the seasonal housing needs associated with crop-related farm worker jobs.

Figure 38. Farmworkers by Occupation, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Occupation	Alhambra	Share of Total Alhambra Workers	SCAG
Total Jobs: Farming, Fishing, and Forestry Occupation	93	0.22%	57,741
Full-time, Year-Round, Jobs: Farming, Fishing, and Forestry Occupation	23	0.05%	31,521

Figure 39. Employment in the Agricultural Industry, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Occupation	Alhambra	Share of Total Alhambra Workers	SCAG
Total in Farming, Agriculture, Forestry, Fishing, and Hunting	98	0.23%	73,778
Full-time, Year-Round in Agriculture, Forestry, Fishing, and Hunting	46	0.11%	44,979

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Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra’s population of farmworkers. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to the farmworker population, but these documents listed housing and community service resources that can benefit this population.

Housing Stock Characteristics

A community’s housing stock is defined as the collection of all housing units located within the jurisdiction. The characteristics of the housing stock, including growth, tenure, vacancy rates, age, type, condition, and cost are important in determining the housing need for the community. This section details the housing stock characteristics of Alhambra, in an attempt to identify how well the current housing stock meets the needs of the current and future residents of the city.

Housing Unit Growth

Alhambra is a built-out city that has experienced only minimal growth in its housing stock over the past 20 years. According to the California Department of Finance, there are 31,915 housing units in Alhambra as of 2020. This represents a 6% growth in housing units since 2000. The city’s growth rate is comparable to that of El Monte, Monterey Park, and San Gabriel, while residential development was greater in Pasadena and Glendale.

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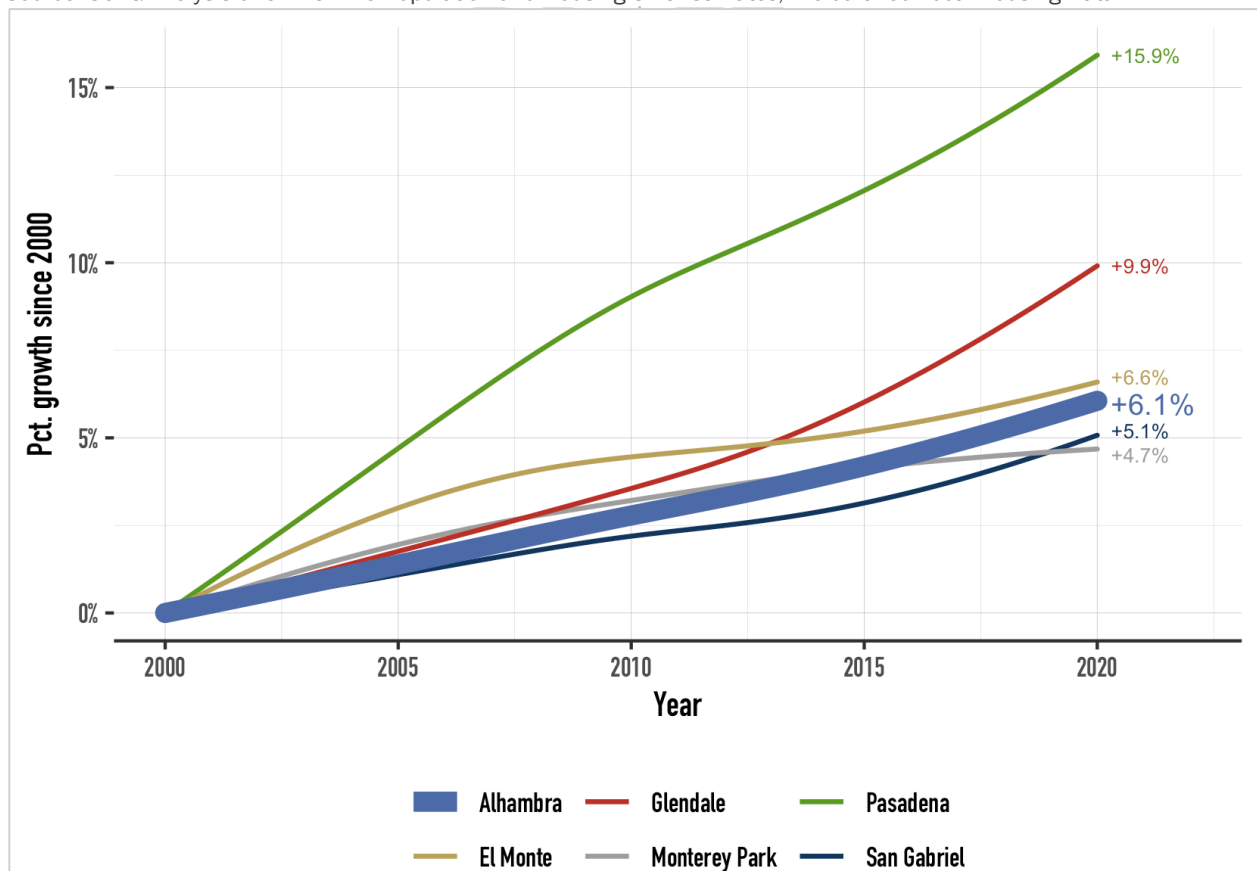
Figure 40. Housing Unit Growth, City of Alhambra and Peer Cities, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

Jurisdiction	2000	2020	Change 2000-2020	
	Number	Number	Number	Percent
Alhambra	30,045	31,865	1,820	6%
El Monte	27,758	29,588	1,830	7%
Glendale	73,713	81,019	7,306	10%
Monterey Park	20,209	21,155	946	5%
Pasadena	54,132	62,753	8,621	16%
San Gabriel	12,909	13,564	655	5%

Figure 41. Housing Unit Growth, City of Alhambra and Peer Cities, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data



Housing by Type and Tenure

Figure 42 shows that in 2020, the largest percentage of housing units in Alhambra was single-family detached (43%). Approximately 12% were single-family attached units, 12% were

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multifamily housing with two to four units, 33% were large multifamily housing with five or more units, and 0.1% were mobile home/manufactured housing.

Figure 42. Housing Type, City of Alhambra and SCAG Region, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

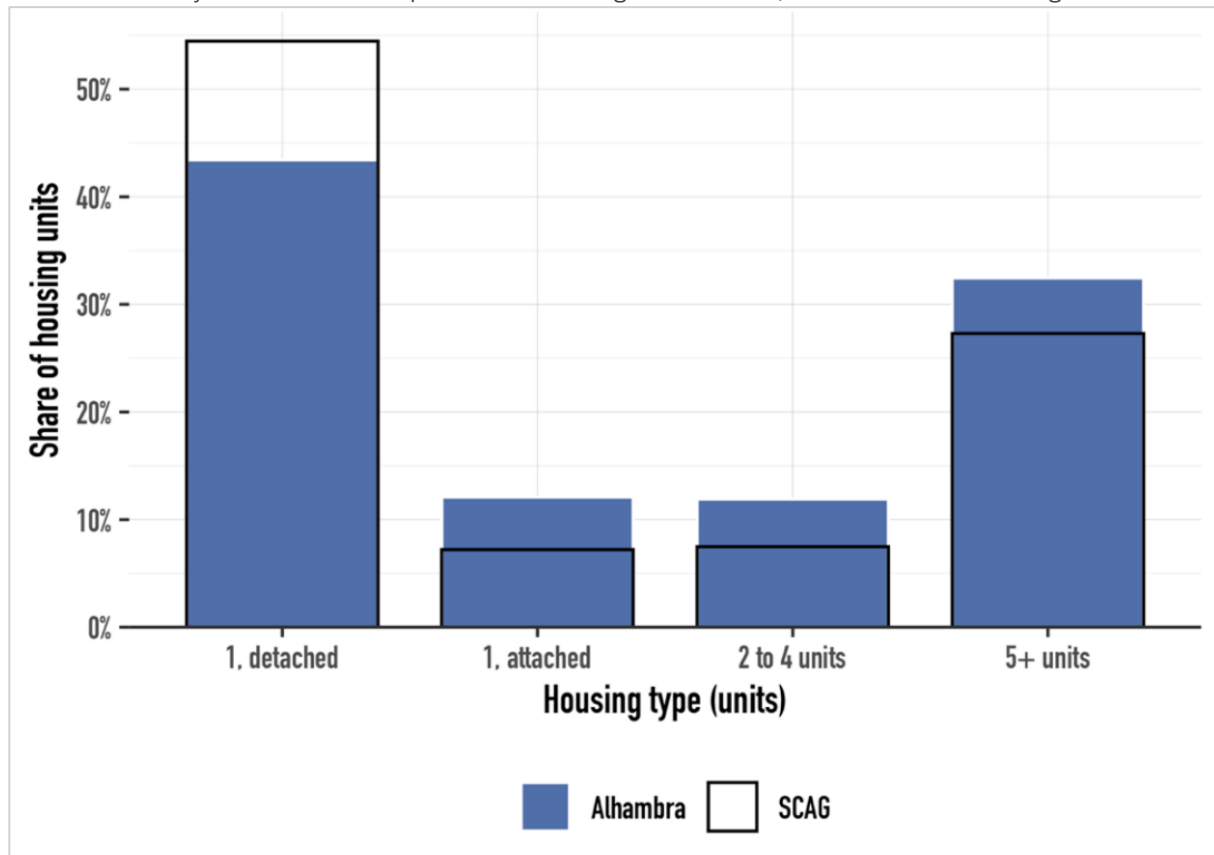


Figure 43 shows who lives in these different types of housing units in Alhambra. In 2020, the majority of renter households in Alhambra lived in large multifamily housing with five or more units (46%) and smaller multifamily with two to four units. In comparison, owner households in Alhambra live in single-family detached housing (73%), followed by single-family attached (12%), and large multifamily with 5 or more units (12%).

Figure 43. Housing Type by Tenure, City of Alhambra, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

Housing Type	Owner-Occupied Housing Units		Renter-Occupied Housing Units	
	Number	Percent	Number	Percent
Single-Family Detached	8,412	73%	4,487	25%
Single-Family Attached	1,340	12%	1,902	11%
Multifamily (2-4 units)	389	3%	3,223	18%
Multifamily (5+ units)	1,323	12%	8,262	46%
Total	11,464	100%	17,874	100%

Housing Availability and Tenure

Housing tenure and vacancy rates are important indicators of the supply and cost of housing. Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. The tenure distribution of a community's housing stock can be an indicator of several aspects of the housing market, including the affordability of units, household stability, and residential mobility among others.

In most communities, tenure distribution generally correlates with household income, composition, and age of the householder: older households, higher-income households, and larger households tend to own their homes at greater rates than do younger households, lower-income households, or smaller households.

In 2018, the majority of Alhambra households were renters (61%), while 39% of households owned their homes. In contrast, the majority of households in the SCAG region own their homes (52%), while 48% rent.

Figure 44. Housing Tenure, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Tenure Type	Alhambra		SCAG	
	Number	Percent	Number	Percent
Owner-Occupied	11,506	39%	3,150,310	52%
Renter-Occupied	17,921	61%	2,852,437	48%

Figure 45 shows tenure by household size in Alhambra. In 2018, owner-occupied units had a slightly higher average household size compared to renter-occupied units. Approximately 56% rental units were occupied by one- and two-person households compared to 51% of owner households. The average person per household in Alhambra was 2.86 in 2018, according to the Census.

Figure 45. Tenure by Household Size, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Size	Owner-Occupied Housing Units		Renter-Occupied Housing Units	
	Number	Percent	Number	Percent
1-Person	2,267	20%	4,645	26%
2-Person	3,539	31%	5,364	30%
3-Person	2,574	22%	3,696	21%
4+ Person	2,987	26%	3,987	22%
Total	11,506	100%	17,921	100%

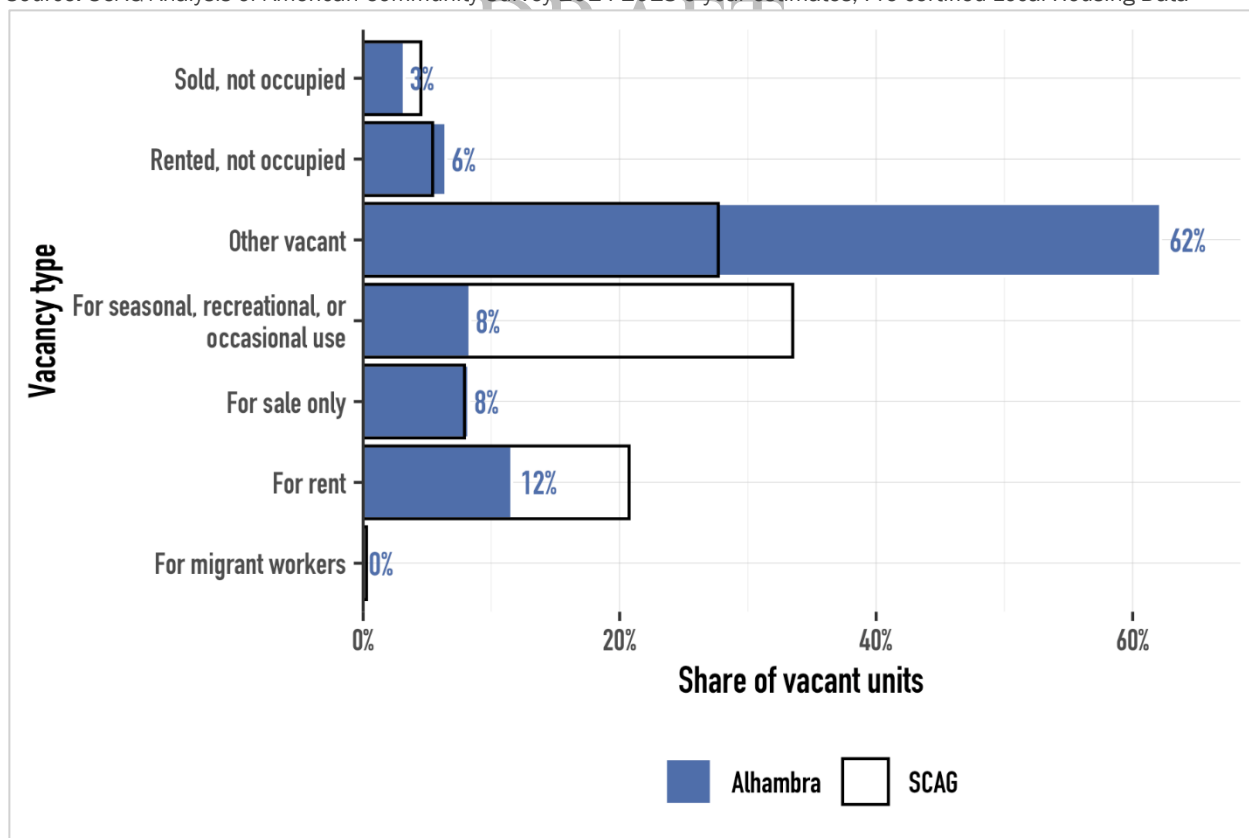
Housing Vacancy

Vacancy rates are an important housing indicator because they indicate the degree of choice available. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent but may also indicate the presence of a substantial second home market. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low of a vacancy rate can force prices up, making it more difficult for low- and moderate-income households to find housing. Vacancy rates between 2% and 3% are usually considered healthy for single-family housing, and 5% to 6% for multi-family housing. However, vacancy rates are not the sole indicator of market conditions. They must be viewed in the context of all the characteristics of the local and regional market.

According to the 2014-2018 American Community Survey, the overall vacancy rate in Alhambra was 6.0%. However, about 62% of vacant units (almost 1,240 units) were vacant for an “other reason.” Seasonally-occupied vacation homes represent about 8% of all housing units in the city, compared to about 35% in the SCAG region. Vacant rental units represent 12% of all housing units in the city. Overall the vacancy rates reflected a relatively healthy housing market.

Figure 46. Vacancy Rates by Vacancy Type, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Housing Age and Condition

Housing age can be an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage

reinvestment, depress neighboring property values, and eventually impact the quality of life in a neighborhood. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs.

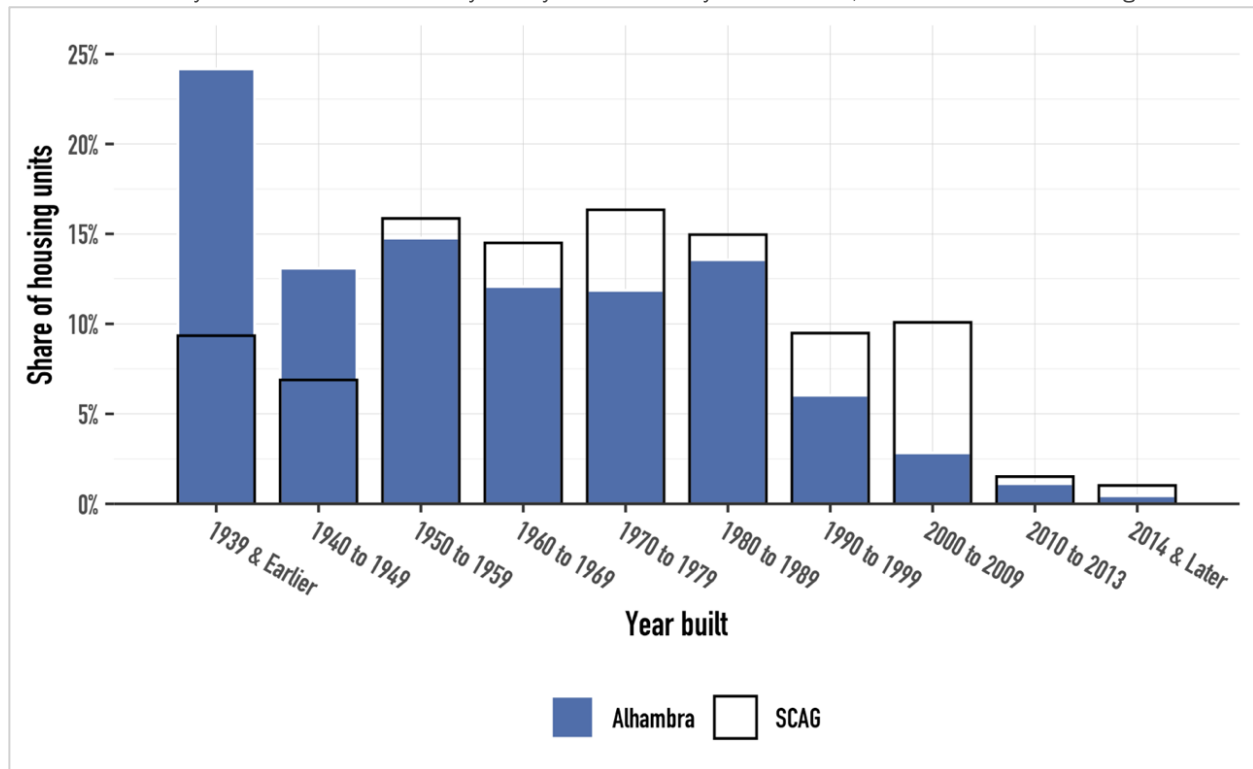
In Alhambra, approximately 76% of the housing stock may potentially require some improvements based on the age of the structure as shown in Figure 47. Approximately 52% of the housing stock in Alhambra is approaching 50 years of age or older, and is more likely to require major rehabilitation. The age of the city’s housing stock indicates a potential need for continued code enforcement, property maintenance, and housing rehabilitation programs to stem housing deterioration. Due to the fact that the majority of households in Alhambra earn low incomes, deferred maintenance could become an increasing issue.

The city allocates CDBG funds to the Code Enforcement program annually. During the 2019-2020 fiscal year, 913 code violations were investigated, of which 492 violations (53 percent) were in low- and moderate-income areas. Code enforcement staff made 506 referrals to the Housing Rehabilitation Program; all were for properties in low- and moderate-income areas.

Given the age of Alhambra’s housing stock, and that maintenance can be economically and physically difficult for some homeowners, the city offers an array of rehabilitation loans for low-income households to maintain their homes. To reach a broad range of participants in the program, flyers are distributed in three languages. City staff have emerging concerns about substandard housing among rental properties which are expected to be addressed in the 2021-2029 Housing Element.

Figure 47. Year Housing Built, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Pre-1940 Housing

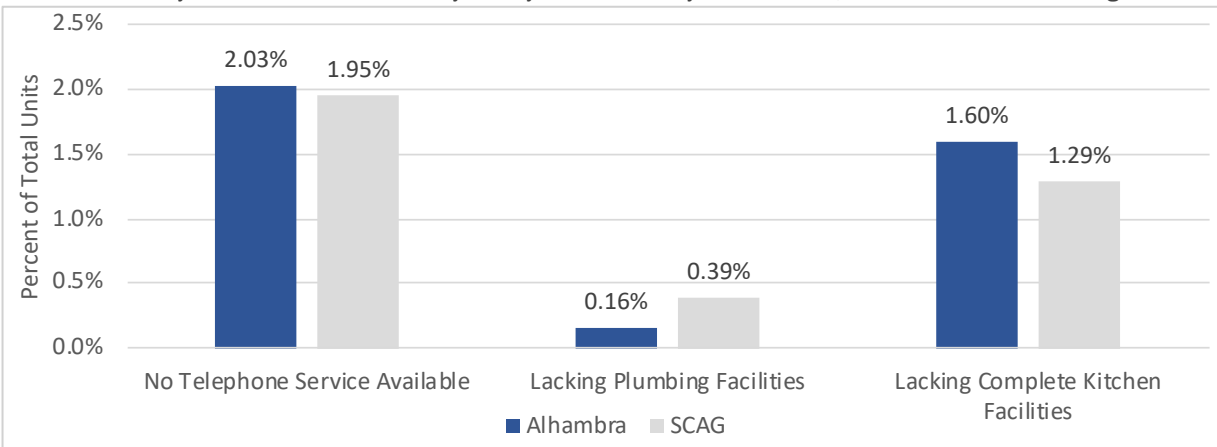
HUD may consider units substandard if they were built before 1940. Figure 47 shows that 7,589 housing units were built before 1940, approximately 24 percent of the total housing in Alhambra. Region wide, about nine percent of units were built before 1940.

Lacking Telephone Service, Plumbing, and Kitchen Facilities

A city can estimate the number of substandard housing units within its jurisdiction using a number of sources of information, such as the Census. The 2014-2018 American Community Survey reports that 597 housing units had no telephone service available, 47 housing units were lacking complete plumbing facilities, and 470 housing units were lacking complete kitchens.

Figure 48. Substandard Housing Conditions, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Estimate of Housing Units in Need of Rehabilitation

Complementing the ACS data on age and available facilities, an assessment of code enforcement activities can provide additional insight on the overall condition of the City's housing stock. Over the five-year period ending in November 2021, Alhambra's code enforcement division opened 7,342 cases, or 1,468 per year. Among those only 821 (11 percent) remain open and active. Most cases are for minor complaints unrelated to structural issues. Over time, housing units move into and out of various states of disrepair as a result of deferred maintenance, negligence, or the natural aging process. During the 2020-2021 fiscal year, the City received 125 confirmed complaints for violations with Health and Safety (H&S) issues. It also had proactive enforcement of 446 violations for a total of 571 serious H&S violations. This was up from 304 cases in 2019

Since code enforcement activity is primarily complaint-driven or reliant on proactive enforcement, it is difficult to make accurate assumptions about the overall condition of the City's housing stock based upon this data because code enforcement is not likely capturing the full range of housing units in need of repair and rehabilitation. However, code enforcement spent 1,200 hours in the field in 2021, which was more than twice the time in 2020. Given that the city saw between 300 and 600 cases over the last two years cases across all structures, and that a portion of these will be non-residential and a portion will not actually require substantial renovations, it is reasonable to assume an upper bound of 600 units annually require some form of substantial rehabilitation. The Alhambra Code enforcement division confirmed this as a reasonable estimate based on their observation of the data and field experience.

Figure 49. Code Enforcement, Health and Safety Issues in Buildings, City of Alhambra (FY 2019, 2020)

Source: City of Alhambra

Category	FY 2019-20	FY 2020-21
Complaints		
Total Confirmed Complaints, as Stand-alone H&S Issues in Buildings	129	125
Total Proactive Enforcement for Stand-alone H&S issues in Buildings	175	446
Total Confirmed and Proactive Complaints	304	571
Example Cases	2020-2021	
	Total Violations by Type ⁹	
Unsafe, substandard, or dangerous structure	189	
Unsanitary conditions	2	
Deteriorated exterior of building or structure	342	
Building or premises violation H&S	26	

Housing Cost and Affordability DRAFT

Housing costs directly impact housing accessibility for all economic segments of the community. In general, if housing supply exceeds housing demand, housing costs will decrease. If housing demand exceeds housing supply, housing costs typically increase. In Alhambra, housing costs tend to be higher than in the SCAG region as a whole. The high cost can be attributed to a low supply of homes for sale and a high demand for housing. This section summarizes the cost and affordability of the housing stock to Alhambra residents.

Homeownership Market

According to a 2020 California Association of Realtors (CAR) report, the average home on the market in November 2020 in Los Angeles County had a median price of \$664,160, which was a 12% increase from November 2019. Based on a CAR First Time Buyer Housing Affordability Index, in the third quarter of 2020, the median value of a home in the Los Angeles Metropolitan Area was \$518,500 with monthly payments (including taxes and insurance) of \$2,560. This would require a qualifying income of at least \$76,800 annually.

In comparison, these costs are much higher in Alhambra than in the Los Angeles Metropolitan Area. According to November 2020 data from Zillow, the median cost of a single-family home in Alhambra was \$771,423, up 9% from \$710,556 in 2018.

According to data provided by SCAG, between 2000 and 2018, median home sales prices in Alhambra increased 229% while prices in the SCAG region increased 151%. Prices in Alhambra have fluctuated across the regional average: they were only 86.1% of the SCAG region median in 2003 and but reached a high of 137% of the SCAG median in 2009. Despite these dramatic price increases, median home sales prices in Alhambra have consistently remained lower than some peer cities, such as Pasadena, Glendale, and San Gabriel.

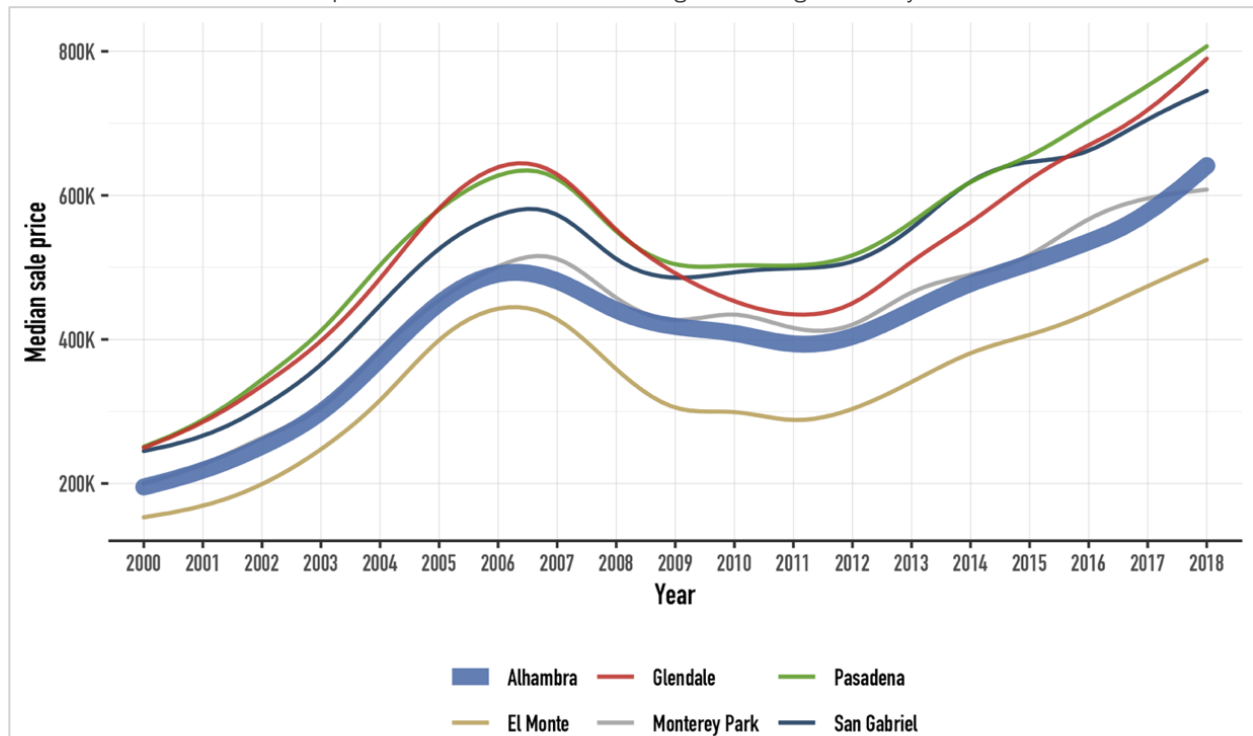
⁹ A case may have violations in multiple categories

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Figure 50. Median Home Sales Price, City of Alhambra and SCAG Region, 2000-2018

Source: SCAG Local Profiles, Core Logic/Data Quick, Pre-certified Local Housing Data

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



Rental Market

CoStar¹⁰ is one of many source providers of commercial real estate data and analytics for multifamily, retail, office, industrial, hospitality, and other real estate classes across the Country. CoStar provides insightful building-level information such as rent, vacancies, and other important information used for local market analyses. Figure 51 shows that in January 2021, the average monthly rents in Alhambra ranged from \$1,335 for a studio apartment to \$2,019 for a 3-bedroom apartment.

Figure 51. Multifamily Average Monthly Rent, City of Alhambra, 2021

Source: CoStar, January 2021.

Unit Type	Average Monthly Rent (January 2021)
Studio	\$1,335
1-bedroom	\$1,438
2-bedroom	\$1,737
3-bedroom	\$2,019

Housing Production

Figure 52 shows the number of housing permits issued per every 1,000 residents in Alhambra. Between 2000 to 2018, the number of housing permits Alhambra issued increased; the majority

¹⁰ CoStar is a private, third-party, proprietary data provider commonly used in the real estate industry. Of its residential data, CoStar focuses on multifamily properties with four or more units. While CoStar is one of the best sources for multifamily data, it has gaps and limitations. Newer buildings and those that are professionally managed are more likely to have reliable information, while smaller, older buildings may have incomplete or missing data.

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of these were for multifamily units. Permits per 1,000 Alhambra residents have been more stable in the 2000-2018 timeframe than in other neighboring cities. However, the permitting process for one large property can skew these data.

Figure 52. Housing Units Permitted Per 1,000 Residents, City of Alhambra and SCAG Region, 2000 to 2018

Source: SCAG Analysis of Core Logic/Data Quick, Pre-certified Local Housing Data
 Note: Additional detail available in SCAG 2019 Local Profiles.

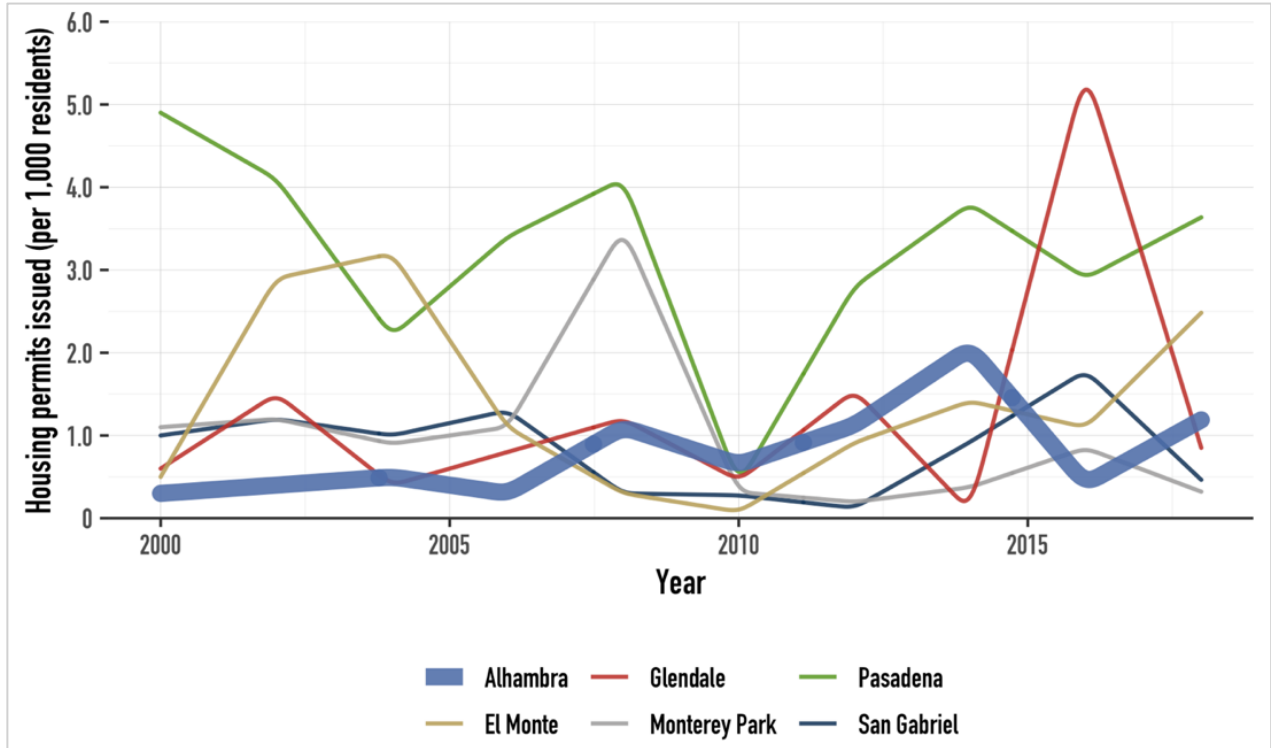
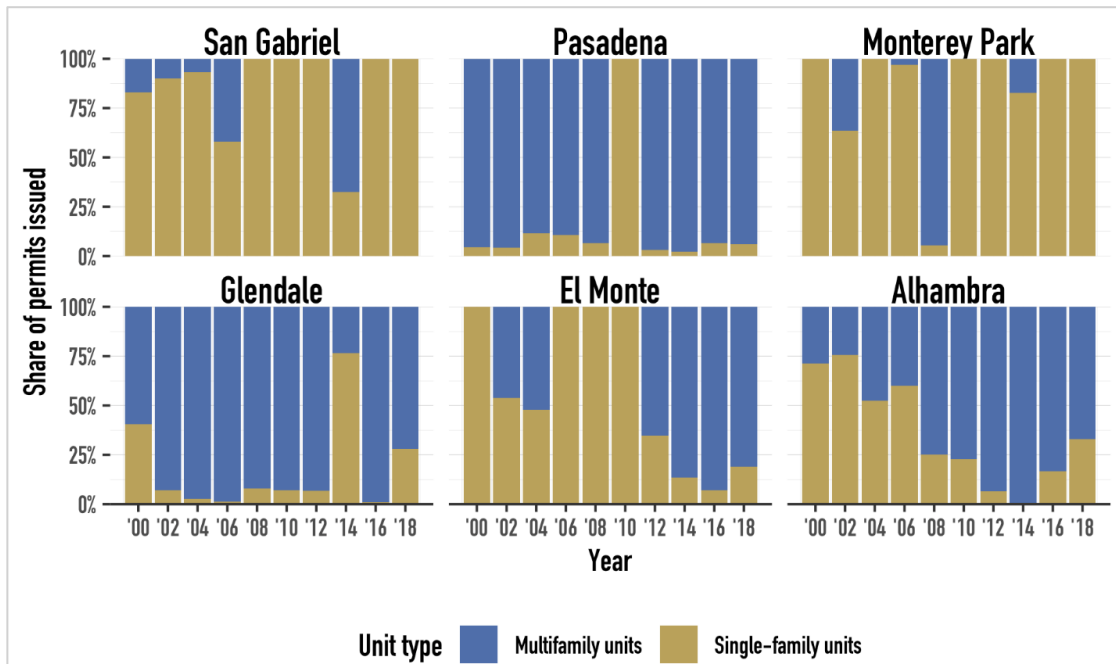


Figure 53 below shows the share of housing permits issued in Alhambra and peer cities using data provided by SCAG. Beginning at the Great Recession and the years after, the majority of housing permits have been issued for multifamily units. Similarly, Pasadena, Glendale, and El Monte have also issued the majority of their housing permits for multifamily units.

Figure 53. Share of Housing Permits Issued, City of Alhambra and Peer Cities, 2000 to 2018

Source: SCAG Analysis of Core Logic/Data Quick, Pre-certified Local Housing Data

Note: Additional detail available in SCAG 2019 Local Profiles.



Affordable Rental Housing Stock

An important component of any community’s housing inventory is the stock of housing that is affordable to households earning lower incomes. This housing can be regulated or unregulated, and is most often rental housing.

Unregulated affordable housing is affordable to lower-income households by virtue of its location, age, condition, or amenities. Typically, unregulated affordable housing units are older, smaller, and/or lower-quality, with fewer amenities, older appliances, or older appearances. Often, these properties have some deferred maintenance or capital needs. Because there is not enough regulated affordable housing across the country, unregulated affordable housing is an important part of the housing stock in a community. But because it is unregulated, the rents charged at the properties can change suddenly and can be influenced by the larger real estate market. In addition, these properties can sometimes have habitability issues if they are not well maintained by the landlord.

Regulated affordable housing often has public funding that restricts the maximum incomes of the tenants or restricts the rents that can be charged to ensure that the housing is serving low-income households. This housing is sometimes referred to as government-assisted housing, referencing the public funds at the property. These restrictions vary by the type of funding and the affordability level at the property, and typically have a limited duration—the property is affordable for a specified period of time.

This section outlines the stock of regulated affordable housing in Alhambra and those units that are at risk of losing their restrictions and “converting” to market rate. This is an important issue for cities and local governments to monitor, as units that convert to market rate can include big rent increases for tenants—putting them at risk of housing instability, homelessness, or displacement—and can cause a permanent loss to the community’s inventory of regulated affordable housing.

Assisted Housing at Risk of Conversion

State law requires the city to identify, analyze, and propose programs to preserve existing multifamily rental units that are restricted to low-income households and that will become unrestricted and possibly be lost as low-income housing (i.e., “units at risk” or “at-risk units”). State law requires the following:

1. An estimate of the number of units at risk of conversion within ten years of the Housing Element deadline,
2. An analysis of the costs of preserving and/or replacing the units at risk and a comparison of these costs,
3. An analysis of the organizational and financial resources available for preserving and/or replacing the units “at risk,” and
4. Programs for preserving the at-risk units.

The following discussion satisfies the first three requirements of State law listed above pertaining to the potential conversion of assisted housing units into market-rate housing between through October 15, 2031. Program 3 in the Housing Action Plan describes a program for preserving these at-risk units.

According to data provided by the California Housing Partnership, SCAG (using the HCD preapproved data), and the City of Alhambra, there are six properties in Alhambra providing 366 affordable housing units. Over the next ten years, three properties that provide 215 affordable units have expiring affordability restrictions: 11 units at (non-elderly) 17. S. Olive Ave., 110 units (elderly) at Plaza on Main, and 94 units (elderly) at Wysong Plaza. An example of this is the Alhambra Regency project at 500 West Main Street, which has 16 owner-occupied affordable units. No additional covenants are expected to expire within the next ten years.

Figure 54. Assisted Rental Housing in Alhambra

Source: 2013-2021 Alhambra Housing Element; California Housing Partnership, 2021 Information from City of Alhambra

Project Name	Tenant Type	Low Income Units/Cons. Type	LIHTC	Funding Source	Affordability End Date	Risk Level
Wysong Village Apartments 111 N Chapel Ave	Elderly	94 (rehab)	4%	HUD 202	2029	At risk
				Section 8		
Telacu Las Palmas 89 S Chapel Ave	Elderly	67 (unknown)	No	HUD 202	2049	Not at risk
				Section 8	2021	
Burke Manor 15 N 3rd St.	Elderly	74 (unknown)	No	HUD 202	2034	Not at risk
				Section 8	2025	
17 S. Olive Ave.	Low Income	11 (unknown)	No	HOME and Set-Aside	2027	At risk
	Elderly	11 (unknown)	No	HOME and Set-Aside	2063	Not at risk
	Elderly	110 (new)	4%	HOME and Set-Aside	2027	At risk
Total		366				
At Risk of Conversion		215				

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According to the California Housing Partnership, Both Wysong Village and 333 W Main were funded with 4% LIHTC. Wysong is also funded with PCAC/202 funds, 333 W Main also has funding from HOME. While these projects are technically eligible to convert to market rate housing over the next ten years, these projects are owned by non-profits and are not likely to convert to market rate, as these organizations' mission is to provide affordable housing.

Cost Analysis

Preservation. Project-based rental assistance programs can achieve preservation of at-risk units. Most of the units at risk in Alhambra are senior units. Senior households tend to have smaller household sizes and lower incomes. Subsidies for these households can be very high. In LA County a two-person VLI household has an affordable rent of around \$960. The average market rate rent for a one-bedroom unit in Alhambra is \$2,580 per month¹¹. The difference between market rents and affordable rents for these units is \$1,620 per month. This would result in an annual rent subsidy of \$19,440 per unit and a total preservation subsidy of \$4.1 million per year.

New Construction/Replacement. New construction of a new property or properties with the same number of units and similar quality and amenities would vary greatly depending on the location within the city, density, construction type, unit sizes, and a number of other factors. The cost to construct a new unit in the region ranges from \$470,000 to \$580,000. Initial estimates for Related's proposal for the Chapel affordable housing project is over \$600,000 per unit. Replacing 215 at-risk units with new construction would cost anywhere from \$101 to \$129 million dollars. Due to the high cost of land and construction in Alhambra, preservation of units through rent subsidies and other mechanisms is far lower than through construction.

Resources

The financial resources section in Chapter 4 documents a range of partners and funding sources that could be leveraged to support affordable housing preservation in the unlikely event that existing owners seek to allow covenants to expire. The city is actively engaged with both Related California and American Family Housing/Core on affordable housing projects. The city has previously worked with National Preservation Partners, and Habitat for Humanity. TELACU is another non-profit community development corporation that is active in developing and rehabbing affordable housing in the San Gabriel Valley.

Federal, State, and local financial resources could include (see Chapter 4 for details in these programs):

- Alhambra's Housing Asset Fund (RDA carryover)
- HOME
- LACDA administered Housing Choice Voucher Program
- CoC
- Inclusionary Housing Trust Fund (from In-lieu fees)

In addition to these resources, Program 13 and Program 14 implements actions to strengthen Alhambra's affordable housing funding and administrative capacity.

¹¹ CoStar. Properties in Alhambra with 25 or more units, built since 1980 (2Q21)

Chapter 3: Constraints Analysis

This section outlines the Opportunities and Constraints Analysis, which is a required component of the housing element update. HCD requires the following:

“The housing element must identify and analyze potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities. The analysis should identify the specific standards and processes of these constraints and evaluate their impact on the supply and affordability of housing. The analysis should determine whether local, regulatory standards pose an actual constraint and must also demonstrate local efforts to remove constraints that hinder a jurisdiction from meeting its housing needs.”

This section builds on the Opportunities and Constraints Analysis in the 2013-2021 Housing Element, as well as prior work conducted by the City of Alhambra. Importantly, it provides an update to address progress to leverage opportunities and remove constraints over the prior planning cycle.

Nongovernmental Constraints DRAFT

Housing development relies on inputs set by numerous interrelated markets and players, from the cost and availability of land to the cost of labor and materials to the price of rents. Each input to development is its own market with supply and demand factors constantly in flux. These nongovernmental factors impact housing market dynamics in Alhambra and the region and may pose barriers to housing production and affordability. To a large degree, the city has limited-to-no control over these constraints. However, through its housing programs, the city can take steps to mitigate the effects of these constraints.

Land Availability

Natural limits on land—like slopes, wetlands or floodplains, or forested areas—constrain the areas that are available for housing development. Artificial limits on land—like zoning, protected areas, and public policies—are subject to governmental input and oversight and are discussed in the subsection on Governmental Constraints beginning on page 67.

On a given parcel of land, landowners and property developers evaluate a site for the economically highest and best use allowed, be that office, residential, commercial, or vacant land, depending on the parcel’s unique characteristics.

The City of Alhambra is a built-out, landlocked community. The City of Alhambra currently has less than 5.5 acres of vacant land zoned for residential uses in the community. This will limit the city’s ability to accommodate future housing need for redevelopment and reuse. This condition is not uncommon, with many communities in the San Gabriel Valley experiencing a similar situation. Land scarcity is a direct cause of high land costs and contributes to lack of housing production.

Constraints Summary:

Alhambra is a built-out community with only five acres vacant residentially-zoned land in the city. Nearly all of residential development in the future will have to come through infill, redevelopment, and residential recycle.

What can the City of Alhambra do?

There are only a few tools that the city can use to increase the amount of land available for development, and these types of changes may come at the expense of other public goals (such as economic development, open space, or fiscal benefits) or invite public pushback:

- Change the zoning on non-residential parcels that are ripe for development or redevelopment.
- Sell or donate publicly-owned buildable land for development.
- Convert open space to residential uses. These conversions should be limited only to open space areas suited for development that are not planned for park, conservation, or recreational uses.

Among these options, changes to non-residential zoning is the most likely path to increasing Alhambra's residential land supply.

Relevant Housing Action Plan Programs: Program 8, Program 18, Program 19, Program 22, Program 23, Program 24, Program 25.

Market Feasibility

When land is available for development, the type of development that is ultimately built is dependent on zoning and regulations (discussed in the Governmental Constraints on Development section) and the feasibility/profitability from different development options.

Market feasibility is a robust process that assesses the demand for development—comparing the expected revenues against the investment costs for the desired and allowed types of development. Each development project has the potential to generate revenue from rents, leases, sales, parking, retail, and numerous other end uses. However, development projects are also costly and risky to build—most often requiring debt or equity (with return on investment requirements), raw materials, labor, fees and taxes, and other costs.

Development feasibility is assessed during a project's due diligence process, where the developer compares sources of capital (and their required returns) against the uses of capital (development costs) and the developer's own required return threshold for taking on the risk. If a development project is not feasible, it will not be built. A number of factors influence development feasibility, including (but not limited to):

- Development costs (land, labor, raw materials);
- Government costs (including taxes, permits, fees, and the time it takes to process);
- Interest rates (including return thresholds);
- Zoning and regulations governing what is allowed to be built; and
- Local market rents or sales prices, as well as prices of retail or commercial spaces, parking spaces, storage spaces, etc. that are influenced by the demand in an area.

Development will only happen when a developer anticipates meeting or exceeding their costs. Just like capital, development is mobile and not compulsory; developers can look to other locations, other segments of the market, or other financial opportunities for investment.

Development risk is important because it can affect the type of development that gets built, the design and look of the project, and the developers' willingness to pursue. Changes to any of the largest factors influencing development—market rents, sales prices, interest rates, zoning, taxes, fees, and overall demand for the development project—are all beyond the developer's control but can quickly make a project infeasible or unprofitable.

Development Costs

Development costs are a function of demand. The demand for parking is one of the most notable factors of development costs because parking spaces take up a significant portion of the parcel. Stacking parking stalls in private or shared garage structures would save space on the parcel for other uses, but it costs much more than parking directly on land. Demand for additional amenities, common spaces (e.g., lobbies, private parks), and aesthetic features of a property also add to the total costs.

Development costs are also a function of government policy, such as building codes, requirements for construction material, design standards (e.g., setbacks, maximum lot coverage, minimum lot size, maximum residential density), and affordable housing requirements adopted by communities. These are discussed in the section on Governmental Constraints beginning on page 67.

Real estate feasibility is a complex function that reconciles achievable pricing or income from a finished product, rates of return necessary to attract capital investments, and the costs of development. Governments have little-to-no control over most factors that influence market feasibility. This section summarizes market factors that influence housing feasibility and production.

Land Costs

The price of land is typically among the largest components of housing development costs. Costs are determined by both demand for space and the supply of developable land, which is influenced by topography, environmental issues (floodplains, seismic hazards, etc.), zoning, existing developments, and the presence of infrastructure, among other factors. A parcel of vacant land can be less costly than a parcel with an existing use, since the existing may have intrinsic value, and will need to be demolished and assessed for hazardous materials, among other steps.

Different uses of land—building office, industrial, retail/commercial, or residential—are able to pay different amounts for land, so competition for land is influenced by the demand for all of these different uses. What ultimately gets built is dependent on zoning and regulations (discussed in the Governmental Constraints on Development section), and the feasibility/profitability from different development potentials (discussed above).

Many cities in Southern California suffer from the dual forces of high land demand and limited land supply, a recipe for high prices. According to data from CoStar¹², in the first quarter of 2021

¹² CoStar is a private, third-party, proprietary real estate data provider, commonly used for market analysis in the real estate industry. Of its residential data, CoStar focuses on multifamily properties with four or more units, and industry trends. While CoStar is one of the best available sources of multifamily rent and vacancy data overall, the data has gaps and limitations that make it less reliable in areas with few existing buildings. Newer buildings and

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when this draft was written, Alhambra did not have a single active listing for any vacant residentially zoned parcel or a nonvacant residentially zoned parcel marketed as a redevelopment site. Over the last five years, CoStar reported 12 properties sold for land. Most of these properties were redevelopment sites. Most of these sites were between 0.25 and 0.75 acres in size. The average sale price was \$3.8 million per acre. Example recent sales in Alhambra include the Midwick Collection site (8.8 acres; \$3.1 million per acre), 1428 S Marengo Avenue (8.0 acres; \$4.06 million per acre), 747 Stoneman Avenue (0.44 acres; \$5.89 million per acre), and 107 S Chapel (0.23 acres, \$2.78 million per acre).

The added costs of redevelopment are particularly burdensome for affordable housing development, which cannot achieve market rents necessary to offset increased development costs. The land costs remain the same whether the housing is rent-restricted to be more affordable for low- to moderate-income households or whether the housing is market-rate.

Cost of Labor and Materials

Labor costs are another large factor in determining the overall cost of development and are set by the supply of workers and the demand for labor. Examples of labor costs include the wages of construction workers, architects, engineers, designers, developers, financiers, and investors.

Materials costs for housing development include the price of raw materials (like wood, concrete, steel, etc.) as well as lease rates of construction equipment (cranes, cement mixers, hauling). These factors influence the overall cost of development and thus the price or rents that need to be charged. Fluctuations in material costs can add cost and uncertainty to development projects.

According to Engineering News Record's Construction Cost Index, overall construction costs in the Los Angeles area increased 20% from November 2010 to November 2020. This index includes both a labor component (200 hours of common labor) and a materials component (25 cwt of fabricated standard structural steel).¹³

While construction costs for material and labor are large portion of development costs, these input costs are often determined at a regional level. We do not find any evidence of these inputs being higher in Alhambra compared to other cities in the region.

Labor Cost Impacts of Subsidized Housing

When more than \$1,000 of public funds are included in a project, California law requires prevailing wages to be paid.¹⁴ If federal funds are included in a project, Davis-Bacon wage requirements may apply. The development of regulated affordable housing is an interesting example where public funds are used to advance public goals, but one policy goal—paying prevailing wages—has the potential effect of limiting the output of the other policy goal—affordable housing—since development costs are increased from higher wages, and fewer housing units can be built with the same total amount of funding. In effect, a portion of the public subsidy goes toward subsidizing prevailing wages. Prevailing wage policies have their own trade-offs and benefits, but the economics are clear that they can place an additional cost burden on affordable housing development.

those that are professionally managed are more likely to have reliable rent and vacancy information, while smaller, older buildings may have incomplete data or be missing from the system entirely.

¹³ <https://www.enr.com/economics>

¹⁴ https://www.dir.ca.gov/OPRL/FAQ_PrevailingWage.html#q15

Other Costs

In addition to land, labor, and material costs, the costs of development include the time and moneys required to interact with the government (taxes and permitting processes and fees). These are discussed in the Governmental Constraints on Development section.

Constraints Summary:

Marginally higher costs require marginally higher prices for housing to remain feasible. Where income growth does not keep pace with price increases, communities are increasingly cost burdened. High land costs are clearly impacting the cost of housing in Alhambra. The lack of vacant land also means that development in Alhambra is increasingly redevelopment, which is inherently more costly. While construction and land costs are high in Alhambra, there is nothing to indicate that local costs are disconnected from regional trends.

What can the City of Alhambra do?

Communities on the urban periphery have the ability to add land through annexation when land supply becomes a constraint. Alhambra is surrounded by built-out urban communities and does not have this option. Alhambra has the ability to influence the cost function in a number of ways. It can purchase land and sell or lease it at a discount price, donate publicly-owned land, reduce parking requirements, streamline processes, or adjust its fee structure to offset overall costs. It can also take measures to influence the income function by allowing more housing to be built on a given site (height and density bonus). While these actions are clearly “governmental” factors, they represent actions that offset nongovernmental factors the city has limited control over.

Relevant Housing Action Plan Programs: Program 13, Program 15, Program 16, Program 17, Program 20, Program 26, Program 27, Program 28.

Timing and Density

A variety of factors can constrain the timing between project approvals and requests for building permits. This can be a product of a developers ability to get financing, shifts in market conditions, the sophistication of the developer in its ability to respond to corrections. In Alhambra a project has one year from planning approval to obtain a building permit or the planning approval expires. A one-year extension may be requested. After the Planning Commission approves a project, the decision is not final until a 10-day appeal period lapses and no appeals are filed. After the 10-days lapse and no appeal are filed, staff is ready to accept the plan check application. The actual time interval between approval and submittal of a plan check application is usually not as swift as 10 days and can be highly variable from applicant to applicant. The time interval is to a large extent based upon factors beyond the City’s control such as how long it takes the applicant’s design team to have drawings ready. However, the data from 2013-2021 suggests that the time interval tended to be 4-6 months for smaller projects and 1 year for larger jobs. Over the last planning cycle only 4% of projects expired without a plan check application being submitted within one year.

Among projects receiving planning approval since 2013, most projects are requesting densities at or near maximum allowed density. Because the cost of land is high in Alhambra, developments rarely go below 75 percent of max density. Where it does, it has most commonly been a small

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project that allows three or four units but built at two or three. Since 2018 only two projects have requested densities below 75 percent or max density. The sites inventory methodology assumes a maximum achievable density of 70 percent of maximum allowed density to reflect this trend.

Figure 55. Approved projects by Percent of Max Density Requested

Source: City of Alhambra

	Above 100%	At 100%	75% to 99%	Below 75%	Total
2013-2017	0	12	7	4	23
2018-2021	3	16	7	2	28

Zoning Code requirements is one of the man reasons projects are submitted below maximum density. AMC Section 23.20050(C) states that in the case of multiple dwelling on property, the number of units shall be determined by counting the number of kitchens, or the number of bedrooms divided by two. The number of bedrooms divided by two is key because a project built to maximum density must limit the number of bedrooms to an average of 2 bedrooms/unit, and a developer wanting more than an average of 2 bedrooms/unit (such as 3-bedroom units) would need to reduce the number of units. The Zoning Code update will remove this bedroom tie-in to density to remove this barrier.

Availability of Financing

The availability of financing for housing is influenced by greater economic forces, like interest rates, credit markets, and other macroeconomic effects that are dictated by national polices and federal programs.

New Housing Development

The vast majority of new housing development is financed through borrowed money. This capital is necessary to pay for the costs of development and the lenders' expected return on investment influences development feasibility, including defining the type of property that is built, the needed revenues (which affects the rents or prices that need to be charged), and the design and amenities that are offered. When real estate development cannot meet the return requirements, return-seeking capital will flow to other sectors such as stocks and bonds.

The availability of financing for new housing development is largely dependent on macroeconomic factors like interest rates and the availability of credit (how easy it is to get a loan). Better profitability or investment return opportunities in other types of development (such as office, commercial, industrial) can also influence the availability of financing for new housing development.

Homeownership

The majority of homeowners also borrow funds to purchase or renovate a home via a mortgage. Low interest rates on mortgages increase the amount that a potential buyer can borrow. When low interest rates and strong demand for buying a new home are met with a low supply of homes, for-sale prices will rise.

Under the federal Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The availability of financing for a home greatly affects a person's ability to purchase a home or invest in repairs and improvements.

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Figure 56. Home Purchase and Improvement Loan Applications in Alhambra in 2017.

Source: ECONorthwest analysis of Home Mortgage Disclosure Act Data, 2017

Loan Type	Total Applications	Percent Approved	Percent Denied	Percent Other
Conventional Purchase	565	82.1%	4.8%	13.1%
Government-Backed Purchase	28	75.0%	7.1%	17.9%
Refinance	1,084	67.3%	14.0%	18.6%
Home Improvement	151	67.5%	19.9%	12.6%
TOTAL	1,828	72.0%	11.5%	16.4%

Notes: Percent approved includes loans originated, loans purchased by the institution, and loans approved but not accepted by the applicant. Percent other includes loans withdrawn or closed for incompleteness.

In 2017, a total of 1,828 applicants sought a home loan, either conventional or government-backed, to purchase homes, refinance, or do home improvements in Alhambra. The majority (59%) of all loan applications were for refinancing existing mortgages while about a third were for new purchases (either conventional or government-backed) and about 8% were for home improvement loans. Would-be buyers in Alhambra have high loan approval rates, with 82% of the conventional purchase applications and 75% of government-backed applications approved.

The data in Figure 56 suggest that loan denial rates in Alhambra are low and in line with typical benchmarks. This would indicate that home loans are accessible to local residents and should not be considered a constraint to access housing.

Loans for refinancing and home improvements have lower approval ratings, at roughly two-thirds of loans approved. Comprehensive data is not available on the reason for denials, but factors could include insufficient income or lack of home equity. These rates also remain in line with regional averages and should not be considered a constraint.

Foreclosures

Foreclosure occurs when households fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current. If payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. The homeowner would lose their home and would also owe the home lender an additional amount.

High rates of foreclosures can have an adverse impact on housing markets because they have a depressing effect on home values. According to RealtyTrac, the regional foreclosure rate in Los Angeles County was 0.01 percent in 2020. In the City of Alhambra only one out of every 15,479 homes are in foreclosure.

Constraints Summary:

Rates of financing approvals in Alhambra are in line with typical benchmarks across all loan types. Rapid price escalation over the last 10 years has driven foreclosure rates to historic lows, having no impact on the local housing market. The availability of financing and functionality of financial markets are not a constraint of housing.

What can the City of Alhambra do?

While local governments like Alhambra have little control over the financing industry or macroeconomic forces that affect the availability of credit, they can institute local programs and policies to help reduce the cost of developing or purchasing a home. Typically, these types

of financing benefits are offered to achieve some public goal, like increasing the homeownership rate (particularly for low-income homebuyers) or by developing regulated affordable housing. Examples include:

- Programs offering loans with generous or flexible terms can help to reduce the borrowing costs associated with buying or developing a home. These include: below-market interest rates, deferred interest payments, soft loans (for developments, loan payments and/or interest payments are cash-flow dependent), or government-insured loans (which transfer the borrowing risk from the bank to the government, in the event of non-payment), among others.
- Grants, or funds that are not expected to be repaid. These programs include down payment assistance for homeowners or grants to finance a development project the government wants to see built.
- Purchasing foreclosed or auctioned properties to sell at below-market rates.

Relevant Housing Action Plan Programs: Program 1, Program 14, Program 31.

Community Influence on New Housing Development

It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.

Economically speaking, homeowners who have seen equity grow with their home values have a financial motive to prevent any new development from occurring that might reduce their home values.¹⁵ However, many homeowners have wide-ranging perspectives on what might actually influence their home values. In addition, financial motives are not the only factor that influences community opposition to new housing development; a few examples of the wide array of concerns about development include the following:

- Concerns about market-rate development's effects on **housing affordability** may lead to opposition of new market-rate housing development, or to new office development.
- Concerns about the built form's effects on **the environment**—such as traffic, air quality, open spaces, sunlight permeability, noise, etc.—may lead to opposition of all types of development.
- Concerns about development form (size, density, height, etc.) and its effects **on quality of life** (congestion, sunlight permeability, noise, population density) may lead to opposition of higher density development in favor of single-family homes.

¹⁵ Paavo Monkkonen & Michael Manville (2019): Opposition to development or opposition to developers? Experimental evidence on attitudes toward new housing, Journal of Urban Affairs, DOI: 10.1080/07352166.2019.1623684

Constraints Summary:

Some segments of the community are active opponents to development. Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This serves as an extra delay for even small development projects that meet all codes and standards. Combined, these factors have resulted in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production.

What can the City of Alhambra do?

The best approach to mitigate community opposition to housing production is through outreach efforts. The city should consider new programs that educate the public on the tradeoffs of production and affordability, provide information on state law impacting housing approvals, and build community support for housing development at all income levels in the City.

Moreover, California State law promotes a variety of permitting/environmental review streamlining measures to help accelerate affordable housing development. AB1485 (2019) clarifies and expands SB 35 (adopted in 2017) by requiring local jurisdictions to approve more housing projects (up to 120% AMI) through a ministerial approval process within certain timeframes, and removed the Conditional Use Authorization requirement (or similar discretionary entitlements) which are granted by local Planning Commissions. Essentially this updated law builds on existing environmental streamlining laws by reducing barriers for developing low- to moderate-income housing.

The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval.

Relevant Housing Action Plan Programs: Program 21, Program 28, Program 29.

Governmental Constraints

This section describes the constraints on housing development that come from the government, with a particular focus on the City of Alhambra. Numerous other governmental influences on development come from state and federal policies, but the City of Alhambra can do little to affect these policies or how they impact development. Where local programs or policies can influence the effects imposed by state or federal policies, they are listed.

At the same time that the Housing Element is being updated, a parallel effort is underway to update the city's Comprehensive Zoning Code, which will be one tool to help to implement the Land Use decisions suggested in the Housing Element. The zoning code update began with an initial zoning code audit which identified inconsistencies, complexities, and overall aspects of the zoning code that could act as a constraint on development. These findings were summarized in the *Code Analysis Memo* (2020) by Miller Planning Associates. Where relevant, these findings help

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inform the constraints analysis of the Housing Element with respect to land use controls and development standards. Key findings of the City's zoning code audit include:

- General complexity in the code that could be simplified
- Unclear presentation of allowed uses, definitions, and rules of measurement
- Insufficient form and design-related standards
- Potentially onerous parking requirements that may limit development to maximum densities
- An outdated approach to land use regulation
- Overreliance on discretionary review
- Unclear and inconsistent review and approval procedures

Land Use Controls

Land use controls dictate what can be built and where, as well as other considerations like allowed use, height, density, open space, and design, among others. This section lists four categories of land use control plans: the city's General Plan Land Use Element, Specific Plans in effect in the city, overlay districts, and the city's general development standards. These plans have direct impacts on the availability and affordability of housing in the city.

General Plan Land Use Element

The City of Alhambra's General Plan (including the Land Use Element) was updated in August 2019. Recalibrating the plan periodically helps ensure that it continues to be comprehensive, internally consistent, and takes a long-term perspective. The Alhambra General Plan is referred to as Vision 2040—A Community Mosaic, and this vision articulates Alhambra's values and priorities, resources, and future needs of residents. A range of policies and implementation actions outline how to achieve this vision. The vision focuses on promoting stable residential neighborhoods; improved commercial corridors including a mixture of retail, office, entertainment, and lodging meeting the needs of residents while also attracting visitors; industrial and commercial districts meeting local demand, creating good jobs, and taking advantage of the close proximity to downtown Los Angeles; and the establishment of a beautiful community with enhanced streetscapes, parks, and gateways. This plan provides guidance on how to direct local development and accommodate housing growth and provides a "constitution" for local land use decisions to address community issues and support the city's vision.

The Land Use and Community Design Chapter encompasses the Land Use Element and includes eight goals and an overall purpose to manage the use of land to enable growth and re/development to occur in an orderly fashion, sensitive to opportunities, and adhering to constraints imposed by the city's infrastructure and environmental and social resources. The General Plan's Land Use section discusses the preservation of residential neighborhoods, while emphasizing mixed-use and commercial opportunities along commercial corridors and nodes. This chapter supports efforts to enhance the community identity and appearance and retain traditional character in the downtown area.

The city's zoning regulations offer more detail on how to carry out the General Plan policies by providing direction on the types of land uses allowed in different zones across the city, as well as detail regarding development density, scale, and form. Two-thirds of the acreage in Alhambra is designed for residential uses of varying densities (Low Density Residential or R-1, Medium Density Residential or R-2, and High Density Residential or R-3 Zones), but among these zones, the

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largest amount of land is dedicated to the R-1 zone and the least amount is designated as the R-2 zone. Although Alhambra is the second-largest city in terms of land in the San Gabriel Valley, the area is largely already built out. Overall, the southern part of the city consists of lower-intensity development with low- to medium-density residential uses. The northern part has more high-density residential uses, especially in the areas nearby commercial uses.

Key development opportunities identified in the General Plan are summarized below.

- Adoption of design guidelines for the preservation of historic neighborhoods/districts.
- A vision for a mixed-use entertainment district on the eastern end of Valley Boulevard. The Valley Boulevard corridor has the potential to support activity nodes where economic or social resources/activities will be concentrated for the benefit of the community.
- A transition of the Garfield Corridor into a medical office corridor with high-quality job opportunities for the community. The Garfield Corridor currently has a mix of older multifamily housing and newer office developments. The new vision could phase out the older stock of multifamily residential units in this area of the city.
- The Industrial Corridor, located in the western part of the city, has a large concentration of industrial and commercial uses. The General Plan envisions media and high-tech industries moving into the area. The plan encourages regional commercial development along Fremont Avenue and more mixed-use developments in this section of the city.

Alhambra's land uses with allowed residential use are summarized in Figure 57 below.

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Figure 57. Description of the City of Alhambra Residential Land Use Designations and their Associated Development Standards and Allowed Uses

Source: Alhambra General Plan, 2019

Land Use Designation	Zone	Allowed Uses	Maximum Height Allowed
Low-Density Residential	R-1	<ul style="list-style-type: none"> Single-family housing units (1-5 units per acre) 	<ul style="list-style-type: none"> 2 stories, 25 feet; 15 feet for accessory structures
Medium-Density Residential	R-2	<ul style="list-style-type: none"> Single-family detached units, duplexes, triplexes, and fourplexes (6-12 units per acre) 	<ul style="list-style-type: none"> 2 stories, 25 feet; 15 feet for accessory structures
High-Density Residential	R-3	<ul style="list-style-type: none"> Multifamily housing types, including garden style units and town houses (13-24 units per acre); densities up to 30 units per acre are allowed on larger sites; densities up to 43 units an acre allowed on large sites in the Central Business District. 	<ul style="list-style-type: none"> 3 stories, 35 feet; 15 feet for accessory structures.
General Commercial	CPD	<ul style="list-style-type: none"> Mostly commercial and office uses allowed or conditionally allowed. Conditional: Residential uses, when proposed in conjunction with commercial uses. 	<ul style="list-style-type: none"> 5 stories, 55 feet; 3 stories, 40 feet if adjacent to a residential zone or use.
Central Business District	CBD	<ul style="list-style-type: none"> All commercial uses except for fortunetelling businesses, computer game and internet access centers, and office uses on the first floor of buildings with frontage on Main Street; higher residential density on larger lots. This area provides a multi-purpose residential and commercial district that meets the service needs of surrounding neighborhoods. 	<ul style="list-style-type: none"> 5 stories
Office Professional	PO	<ul style="list-style-type: none"> Professional, financial, administrative, medical, and general business office use; urban residential (15-75 units per acre) with minimum lot size 	<ul style="list-style-type: none"> 5 stories, 55 feet; 3 stories, 40 feet if adjacent to a residential zone or use

Maximum densities permitted in the high-density R-3 zone vary according to location or parcel size. For example, property with frontage only on Curtis or Electric Lanes have a maximum of 12 units per acre, while properties larger than 20,000 square feet can be developed at up to 30 units per acre. Maximum density is extended to 43 units per acre on sites greater than 20,000 square feet that are located in the Central Business District.¹⁶

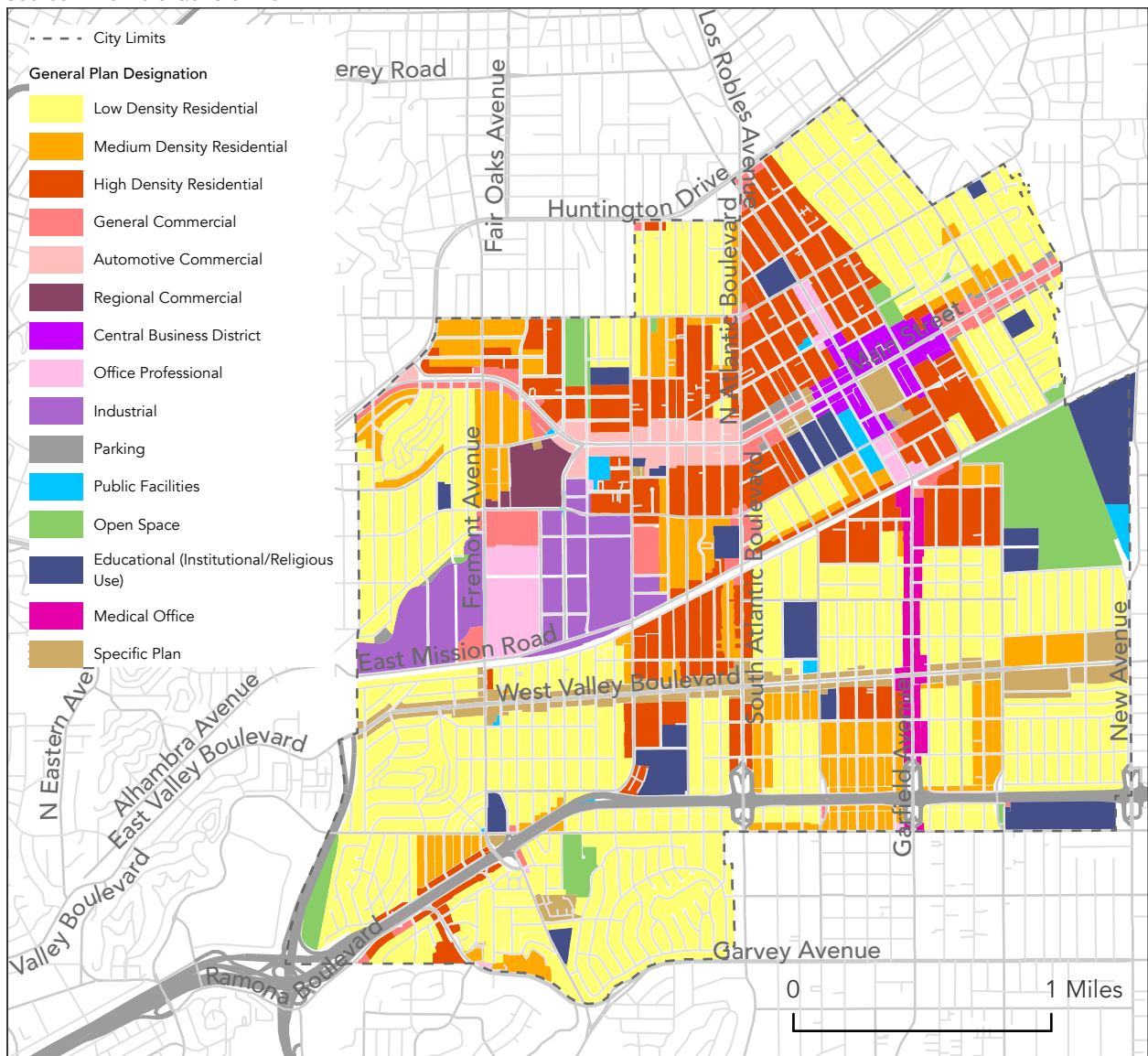
¹⁶ Defined as the area bounded by Atlantic Boulevard, Commonwealth Avenue, Chapel Avenue, and Woodward Avenue.

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Residential uses (multi- and single-family) are also conditionally permitted in the Commercial Planned Development (CPD) and Central Business District (CBD) zones. In the CPD zone, residential uses must be proposed in conjunction with commercial uses. Such residential uses are subject to the development regulations associated with the R-3 zone. The Valley Boulevard Specific Plan provides for up to 43 units per acre, allowing both single-family and multifamily developments.

The Community Identity and Urban Fabric section of the plan describes the Residential Neighborhoods and the importance of retaining the unique housing architecture in Alhambra, a town referred to as the “City of Homes” with a rich array of historical development reflective of different time periods. For example, early 1900s development included Craftsman, Foursquare, Mediterranean, Spanish Colonial Revival, and Victorian architectural styles, while 1920-30s development sprinkled throughout Alhambra consisted mostly of Craftsman, Tudor Revival, and Spanish Colonial Revival architectural styles.

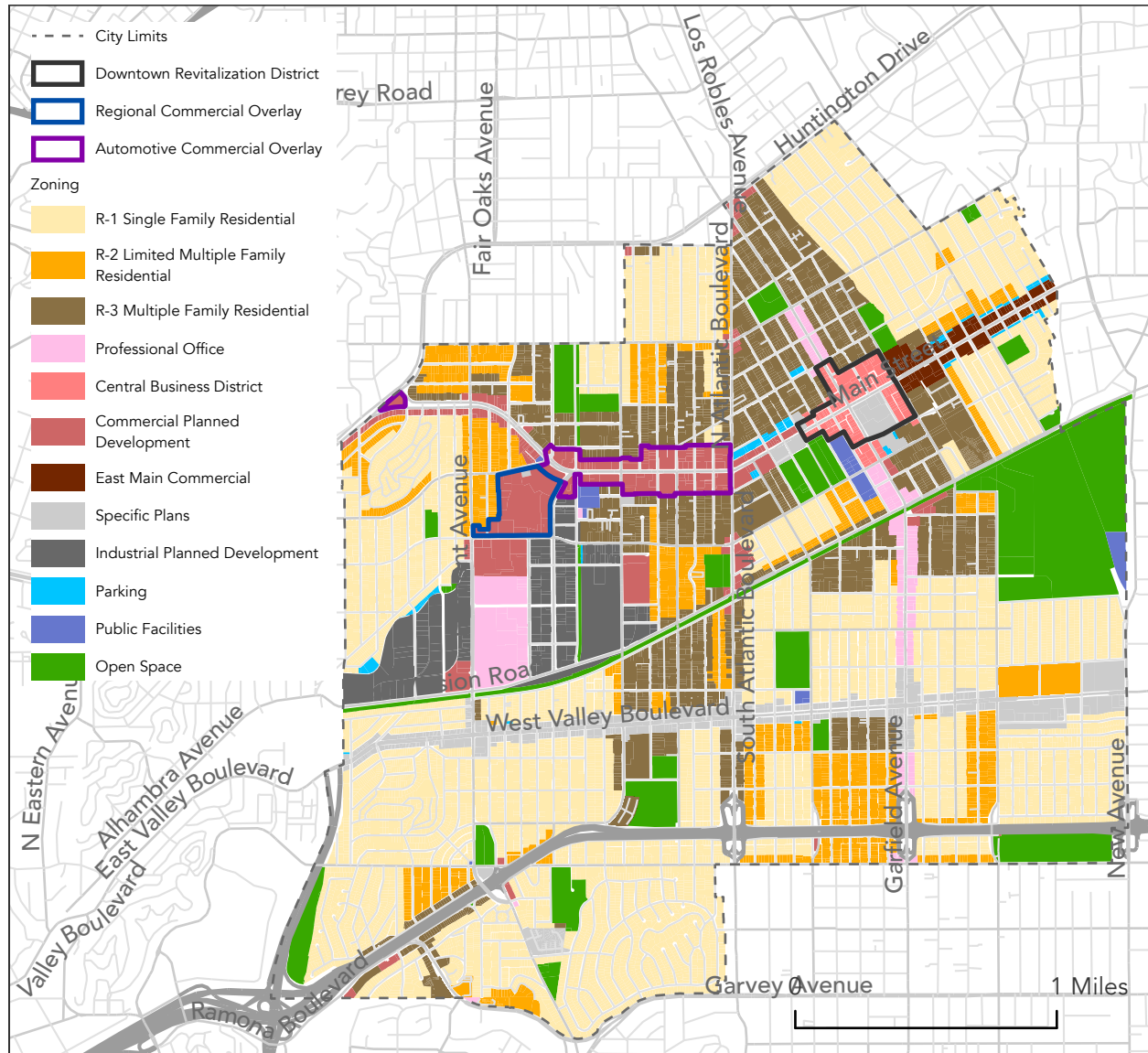
Figure 58. Map of General Plan Land Uses in Alhambra
 Source: Alhambra General Plan



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Figure 59. Map of Alhambra Zoning, Overlay Districts, and Specific Plans

Source: Alhambra General Plan



New guidelines for siting lower income RHNA require that sites have an allowable density of at least 30 units per acre and be between .5 and 10 acres in size. This is because affordable housing typically requires higher densities and larger sites to be financially viable. Based on the city's zoning ordinance, only sites within the R-3, CPD, CBD, and RSP¹⁷ that are greater than 0.5 acre¹⁸ and not within 50 feet of a lower density zone can accommodate this type of density. Under existing zoning, all parcels not meeting these criteria would not be considered suitable to accommodate lower-income housing need without significant parcel aggregation.

Specific Plans

The City of Alhambra has adopted a master plan and several specific plans that provide for further variety in residential types and locations. Specific Plans are a land use planning tool that set

¹⁷ In the Valley Boulevard Specific Plan.

¹⁸ Minimum lot size for residential uses in RSP is 40,000 square feet

planning policies for a specific area within a community. It creates a nexus of place-specific policies to the General Plan. The City of Alhambra has adopted 10 Specific Plans dating back to 1990.

Alhambra's Specific Plans as described in the General Plan include (in alphabetical order):

2300 Poplar Specific Plan (SP-5) was approved in 2011. SP-5 allows a 0.66-acre, vacant site to be transformed into a commercial, mixed-use development consisting of 104,000 square feet of self-storage and 4,300 square feet of leasable commercial space. The self-storage component consists of interior-accessible, climate-controlled self-storage units. In addition, when constructed the complex will contain open and covered parking spaces on the ground floor of the building.

2400 Fremont (SP-9) (Midwick Collection) was approved in 2015. It allows a project of up to 70 residential units, including 28 town homes and 37 new, single-family homes. It retains five existing homes that have been rehabilitated.

2500 West Hellman Avenue (SP-7) was approved in 2012, covering approximately 1.25 acres of land. It transformed three older, functionally obsolete retail/commercial structures and a former gasoline service station site into a 135,000 square-foot self-storage development with a customer leasing-office and an option to provide an on-site residence for the management.

Acacia and Marengo (SP-8) was approved in 2012. It transformed an underutilized site into a planned residential community with 18 attached, three-story town homes.

Alhambra 5th and Main Specific Plan (SP-3) (Main Street Collection) was adopted in 2006. SP-3 transformed the site from an institutional use (previously the Alhambra Public Library) into a planned, mixed-use development with 86 for-sale condominium units, 8,200 square feet of leasable commercial/office space, and a parking garage.

Alhambra Gateway Walk (SP-10) was approved in 2003. It transformed 2.69 acres of blighted, vacant land into a planned residential community with 129 high-end condominiums.

Alhambra Pacific Plaza (SP-6) was approved in 2011. This project replaced an existing low-density, full-service grocery store located at 300 West Main Street, between 3rd and 4th streets. It revitalized the property with a higher-density development that includes 120 condominium units with ground floor retail/grocery and restaurant uses.

Alhambra Place (SP-2) was originally approved in 2006 and amended in 2014. It covers the 11-acre block located at the juncture of Garfield Avenue and Main Street. SP-2 consists of a planned, mixed-use development with 260 luxury apartments and 140,000 square feet of commercial, restaurant, and retail space. It also has a parking structure with subterranean and ground-level parking for visitors and upper-level, secured parking for residents.

Casita de Zen (SP-4) was approved in 2010. It transformed this area along the north side of Main Street into a planned mixed-use development with 94 for-sale condominium units and 5,000 square feet of leasable commercial space. The complex also contains at-grade and subterranean parking.

Downtown Specific Plan Overlay was adopted in 2005, pursuant to the West Main Street Corridor Master Plan. This plan is aimed at providing a pedestrian-friendly downtown that offers residents dining, shopping, entertainment, employment, and other amenities within short walking distance. The West Main Street Corridor Master Plan identified for principal opportunity sites. As of 2020 three of these sites have been fully redeveloped.

Valley Boulevard Corridor Specific Plan (SP-1) was adopted in 1990. The Valley Boulevard corridor consists of 130 acres along 3.1 miles of Valley Boulevard. SP-1 was designed to guide reuse and new development along the corridor, and provides guidelines to ease traffic congestion, enhance the corridor’s physical appearance, and ensure that new development is sensitive to adjacent land use.

Figure 60. Map of Alhambra Specific Plans
 Source: Alhambra General Plan



The two large-scale plan areas with remaining residential capacity are the Valley Boulevard Corridor Specific Plan and sites within the Downtown Specific Plan Overlay.

Housing capacity within Specific Plan areas are considered opportunities to meet the city’s RHNA allocation. Most of Alhambra’s Specific Plans are for site or project-specific areas that have already been developed. Specific Plans appear to have been an effective tool in facilitating development. Capacity remains in the Valley Boulevard Specific Plan and the Downtown Specific Plan Overlay will have the greatest impact on the Housing Element. The Specific Plans can also help guide redevelopment of existing areas, and redevelopment, done in a way to minimize or mitigate

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displacement, can offer opportunities for providing more residential housing needed by the community. However, the VBSP was adopted in 1990, and many of the standards in the plan are antiquated. Large site requirements and height limits may be preclusive to development. Moreover, among the 130 acres in the VBSP, only 12.5 acres have an RSP designation that allows for housing.

Overlay Districts

The current zoning code has three overlay districts: The Downtown Revitalization Overlay District, the Automobile Commercial Overlay District, and the Regional Commercial Overlay District. Mixed-use developments, including housing, are conditionally permitted consistent with R3 in the Downtown Revitalization Overlay District and the Automobile Commercial Overlay District areas, so these overlays are not prohibitive to housing development. However, the Regional Commercial Overlay District—which is comprised mostly of the Costco and Target Sites—has a minimum size requirement of five acres which would be prohibitive to most housing development. This condition could potentially prohibit infill development on the site. However, this property is a productive commercial use with surface parking consistent with standard parking ratios for similar development. Land within the Regional Commercial Overlay should not be considered a market-supported candidate for redevelopment over the planning period.

Development Standards

The city regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance (Title 23 of the Municipal Code).

In addition to the Valley Boulevard Specific Plan, residential uses are allowed and encouraged to locate in the R-1, R-2, and R-3 Zones, and are allowed conditionally in the CBD, CPD, and to a lesser extent the PO¹⁹ Zones.

¹⁹ Residential development in the PO zone requires a 30-acre minimum lot size.

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Figure 61. Development Standards in Residential Zones

Source: Alhambra, California Code of Ordinances, last updated in 12-9-19

R-1 Zone	
Maximum density	1-5 units per acre
Maximum building height	2 stories, 25 feet; 15 feet for accessory structures
Maximum floor area ratio	0.35 - Lot area less than 10,000 square feet 0.325 - Lot area between 10,000 and 19,999 square feet 0.30 - Lot area 20,000 square feet and over
Minimum front yard	25 feet for structures up to 20 feet in height. If street has right-of-way of less than 60 feet, 55 feet from centerline of street for structure up to 20 feet in height. For structures over 20 feet in height, an additional 5 feet of front yard or a 40° angle from the front property line, whichever is greater, shall be provided for that portion of the structure above 20 feet.
Minimum rear yard	Main Buildings: 20% of lot depth, up to 15 feet Accessory Structures: 3 feet
Minimum side yard	Main Buildings: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor 10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet
Maximum lot coverage	50% if all buildings on the property are one story, 40% if any buildings or portion thereof contain more than one story; accessory buildings may not occupy more than 40% of the required rear yard area
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three
Minimum habitable space for each dwelling occupant	150 square feet
Minimum distance between buildings	6 feet

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R-2 Zone	
Maximum density	6-12 units per acre
Maximum building height	2 stories, 25 feet; 15 feet for accessory structures
Maximum floor area ratio	0.35
Minimum front yard	Average of the front setbacks of the two adjacent properties, with a minimum of 20 feet. Minimum of 50 feet from centerline of street if street has right-of-way less than 60 feet.
Minimum rear yard	Main buildings: 10 feet Accessory structures: 3 feet
Minimum side yard	Main Building: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor 10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet
Maximum lot coverage	45%; accessory buildings may not occupy more than 40% of the required rear yard area
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three
Minimum habitable space for each dwelling occupant	150 square feet
Minimum distance between buildings	6 feet if only one or neither building is used for residential purposes. 10 feet if both buildings are used for residential purposes.

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R-3 Zone	
Maximum density	13-24 units per acre (higher densities, up to 43 units per acre, are allowed on larger lots)
Maximum building height	<p>3 stories, 35 feet for high density residential in General Plan, except that 6 stories, 75 feet shall be permitted in the area bounded by the centerline of the following streets: Woodward Avenue on the north, Chapel Avenue on the east, Commonwealth Avenue on the south and Atlantic Boulevard on the west. 6 stories shall also be permitted on properties designated as high density residential, located on a major arterial street and within 1300 feet of an existing or proposed freeway interchange as depicted on the General Plan land use map.</p> <p>For that portion of a property which is within a 50 foot radius (less street or alley right-of-way) of properties zoned R-1 or R-2 the height limit shall not exceed the maximum height of the applicable adjacent zone.</p> <p>The prior building height restriction notwithstanding, for those properties which are across a street from R-1 or R-2 zones, the building height shall be not higher than the height allowed by a 50 degree angle measured from the front property line.</p>
Maximum floor area ratio	<p>0.60 for all living area (excluding non-living areas and garages), for lots up to 19,999 square feet</p> <p>0.70 for all living area (excluding non-living areas and garages), for lots 20,000 square feet and larger</p>
Maximum building length	95 feet
Minimum front yard	Average of the front setbacks of the two adjacent properties, up to a maximum of 30 feet, with a minimum of 20 feet. Minimum of 50 feet from centerline of street if it has right-of-way less than 60 feet. For properties which have their front yards on Curtis or Electric Lanes, 15 feet.
Minimum rear yard	<p>Main Buildings: 10 feet. For properties which have rear yards on Curtis or Electric Lanes, 15 feet.</p> <p>Accessory Structures: 3 feet. For properties which have rear yards on Curtis or Electric Lanes, 15 feet.</p>
Minimum side yard	<p>Main Buildings: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor</p> <p>10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet. For properties on Curtis and Electric Lanes, 10 feet.</p> <p>For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear.</p> <p>Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet</p> <p>For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot</p> <p>A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet</p>

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Minimum distance between buildings	6 feet if only one or neither building is used for residential purposes. 10 feet if both buildings are used for residential purposes.	
Maximum lot coverage	55% for all structures	
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three	
Minimum habitable space for each dwelling occupant	150 square feet	
For land use conversions from low or medium density residential development (less than 18 units per acre) or any other use other than high density residential to high density residential development (18 units or more per acre) along streets classified as Major Arterials in the General Plan, the following additional development standards shall also apply:	Minimum Lot Area: 12,000 Sq. ft. Minimum Street Frontage: 75 ft.	

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Central Business District Zone, Commercial Planned Development Zone (if different for CPD)²⁰

Maximum density	Consistent with the regulations of the R-3 zone	
Maximum building height	10 stories, 115 feet ^{1, 2}	
Maximum floor area ratio	Lot area less than 10,000 sf: 1.0 (0.75) Lot area between 10,000 and 19,999 sf: 1.5 (1.0) Lot area between 20,000 sf and one acre: 2.0 (1.25) Lot area larger than one acre: 3.0 (2.0)	
Maximum building length	Not listed	
Front yard	Not listed	
Rear yard	Not listed ^{3,4}	
Side yard	Not listed ³	
Minimum distance between buildings	6 feet	
Maximum lot coverage	Not listed	
Minimum dwelling unit size	Not listed, consistent with R-3	
Minimum habitable space for each dwelling occupant	Not listed, consistent with R-3	

²⁰ Residential uses in these zones are required to be built in conjunction with commercial uses (mixed-use).

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Office Professional (PO Zone)	
Maximum density	Not listed, N/A
Maximum building height	5 stories, 55 feet (if adjacent to a residential zone or use, 3 stories, 40 feet) 1, 2
Maximum floor area ratio	Lot area less than 19,999 sf: 0.45 Lot area between 20,000 and 39,999 sf: 0.6 Lot area between 40,000 and 59,999 sf: 1.0 Lot area 60,000 sf and over: 1.5 Urban residential uses if included on a site with a minimum size of 30 acres: 3.28
Maximum building length	Not listed
Front yard	20 feet for buildings up to two stories or 26 feet in height. 25 feet for buildings higher than 26 feet. Projections to within 10 feet of the front property line may be permitted for up to 25% of the front building length. The front yard shall be maintained in landscaping. Urban residential uses if included on a site with a minimum size of 30 acres: 10 feet from back of curb.
Rear yard	10 feet for the first story up to 14 feet in height, 30 feet for the second story up to 26 feet in height and 40 feet thereafter. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Side yard	5 feet for the first 30 feet from the front property line. 10 feet if adjacent to a residential zone or public right-of-way. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Minimum distance between buildings	6 feet or 3 feet for urban residential uses if included on a site with a minimum size of 30 acres
Maximum lot coverage	75% (for urban residential uses included on a site with a minimum size of 30 acres)
Minimum dwelling unit size for urban residential uses included on a site with a minimum size of 30 acres	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 860 square feet Three-bedroom unit: 920 square feet
Minimum habitable space for each dwelling occupant	Not listed

¹ Where a rear lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (MC 23.42.040(D))

² Where an interior side lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (AMC 23.42.040(E))

³ Wherever a rear lot line or an interior side lot line of a parcel which does not generally require a rear or side yard abuts any portion of a residential zone, there shall be provided on the lot, along that portion of the lot line, a yard with a minimum width equal to the side yard which would be required on the lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(A))

⁴ Wherever the rear lot line of a parcel which does not generally require a rear yard abuts the rear lot line of a residential zone, there shall be provided on the former lot, along the abutting portion of its rear lot line, a rear yard with a minimum depth equal to that which would be required on the former lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(B))

Open Space

To improve the living environment of residential neighborhoods, communities typically require housing to have a certain amount of open space, such as yards, common space, and landscaping. In Alhambra, open space is reflected in setbacks and lot coverage requirements for single-family developments, and minimum required open space areas for multi-family developments. For single-family homes, buildings must be in compliance with the lot coverage standard for the

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respective zone (for example, the R-1 zone maximum lot coverage is 50 percent of the lot if all the buildings on the property are one story and 40 percent if any buildings (or part of a building) include more than one story while the R-3 zone maximum lot coverage is 55% for all structures). Most of this open space is located within the required front and back yards.

The R-2 and R-3 zones require developments to provide common open space for residents. Units with two or more bedrooms must provide 400 square feet of common open space; those with fewer than two bedrooms are required to provide 300 square feet of common open space. All areas designed for use as common open space must have a minimum dimension of 15 feet. In addition, recreational amenities are required on all projects of four or more units. The amenities include one or more of the following: swimming pool, spa, recreation room with ping-pong table and lounge furniture or billiard table, children's play equipment, barbecue and picnic table, tennis court, shuffleboard, weight room or sauna. Only one of the listed amenities is required. These amenities serve to provide a high-quality of life for residents, providing a space for children to play, and rapport to develop among neighbors. Developers may opt to include a less expensive recreational amenity in the project, such as a gazebo or barbeque area. The cost impact to an affordable housing development would be minimal. Developments that are directly accessible to a public park may be granted up to a 50-percent reduction in the common open space requirement.

Private open space (indoor or outdoor) is devoted to the recreation and leisure use. The Zoning Ordinance does not require the provision of private open space and will reduce the common open space requirements proportionally when private open space is provided, up to a maximum reduction of 50 percent. Alhambra's open space standards mirror those of similar nearby communities and are not considered a constraint to development. Alhambra's open space standards are, in general, slightly less than those of nearby Monterey Park and Baldwin Park.

Second Units (ADUs)

California Assembly Bill 68 (AB 68) builds upon recently-adopted state laws to provide more flexibility as to where and how ADUs can be created. AB 68 also places additional restrictions on local governments from adopting ordinances that would hinder the creation of ADUs. A summary of recent changes to the city's ADU ordinances is below.

Expansion of Ministerial Approval. AB 68 requires ministerial approval, rather than a discretionary approval process, for most ADU types. Under new state law, local agencies are required to ministerially approve at least one ADU and one Junior ADU (JADU) per lot.

Removal of Owner-Occupancy Requirement. New State law eliminates the requirement for owner occupancy of either the primary dwelling or the ADU. The bill requires that ADUs be used for rental terms of at least 30 days by requiring the local government mandate 30-day minimum rentals for ADUs.

Prohibition on Local ADU Laws. To further remove barriers in the creation of ADUs, AB 68 prohibits local governments from enacting ADU ordinances that would do one the following:

- Impose requirements on lot coverage or minimum lot size.
- Allow more than 60 days to ministerially approve an ADU or JADU permit if there is an existing dwelling on the lot.
- Require replacement parking when a garage, carport or covered parking structure is demolished to create an ADU or is converted to an ADU.

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- Require a setback for ADUs within existing structures, and new ADUs located in the same location and footprint as existing structures, and no more than a four-foot side and rear yard setback.
- Set a minimum ADU size that does not allow an ADU of at least 800 square feet and 16 feet in height.

The City of Alhambra allows all ADUs and JADUs in all of its residential zones including single-family and multifamily zones and mixed-use zones. All residential lots can have one ADU and one JADU. Multiple ADUs may be allowed within the portions of multifamily structures that are not used as livable space. Local agencies must allow at least one of these types of ADUs and up to 25 percent of the existing multifamily structures. Also, up to two detached ADUs are allowed on a lot with existing multifamily dwellings that are subject to height limits of 16 feet and 4-foot rear and side yard setbacks. All ADUs are required to have a living/sleeping area, a kitchen or kitchenette, and a bathroom including a shower or bathtub. ADUs are no longer subject to lot coverage or floor area ratio regulations.

An ADU is an attached or detached residential dwelling unit which provides complete independent living facilities for one or more persons, and includes permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel where an existing single-family or multifamily is located.

Figure 62. ADU Development Standards

	Detached	Attached	Multifamily
Maximum Height	25 ft (or 2 stories)	25 ft (or 2 stories)	16 ft.
Size	Not to exceed 1,200 sq. ft.	Cannot exceed 50% of the main dwelling unit	Up to 25% of the existing multifamily dwelling unit if it's a conversion ADU
Design	ADU shall match the architectural design of the existing or proposed main dwelling	ADU shall match the architectural design of the existing or proposed main dwelling	N/A
Setbacks*	4 ft. from side and rear yard; 6 ft. from the existing main dwelling	4 ft. from side and rear yard; 6 ft. from the existing main dwelling	4 ft. from side and rear yard
Parking**	1 parking space if not within a one-half mile of public transit station or bus stop.	1 parking space if not within a one-half mile of public transit station or bus stop.	1 parking space if not within a one-half mile of public transit station or bus stop.

City of Alhambra ADU development Standards

Note: * Existing accessory structures and single-family homes that are converted into ADUs are exempt from meeting the required setbacks; however, any expansion shall meet the 4 ft. side and rear yard setbacks.

** In multifamily zones, for accessory structures or a portion of the existing residence that is converted into an ADU, no additional parking is required. An ADU cannot have direct access to a garage if the proposed or existing garage has less than three spaces.

A JADU is a small living unit created within an existing main dwelling. The JADU must have the same living provisions required in an ADU; however, a bathroom is not required. If a bathroom is not provided, the JADU shall have direct access into the main dwelling unit. If a JADU requires expansion, the expansion shall not exceed 150 square feet.

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Figure 63. Junior ADU Development Standards

	JADU
Size	Not to exceed 500 sq. ft
Setbacks	4 ft. from side and rear yard
Parking*	Parking is not required

City of Alhambra ADU development Standards

Note: * An ADU cannot have direct access to a garage if the proposed or existing garage has less than three spaces.

Parking Requirements

Parking is one of the most influential factors relating to the cost and density of new housing development. It has a large impact on development feasibility because it competes for site area with residential uses, thereby limiting the value that can be generated from more rental units. More rental units not only generate more rent revenue but also reduce per-unit fixed costs, such as land. Moreover, parking tends to add costs without generating its own source of revenue.

City parking standards for residential developments are tailored to the vehicle ownership patterns associated with different residential uses. The Zoning Ordinance requires parking based on the number of units on the property. Parking requirements for residential uses are listed in Figure 64.

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Figure 64. City of Alhambra Zoning Code Parking Standards

Source: Alhambra, California Code of Ordinances, last updated in 12-9-19

Zone	Dwelling Type	Off Street Parking Standards ^A
R-1	Single-family dwellings	2 covered parking spaces per unit; plus 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit
R-2	Single-family dwellings and apartment units	2 covered parking spaces per unit; plus 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit; a two-car garage shall be required for front units and at least one garage space shall be required for rear units.
R-3	Single-family dwellings, apartment units, and residential condominiums	2 covered spaces within an enclosed garage for each unit; plus 1 additional uncovered space for each 500 sf in excess of 1,000 sf per unit;
	Senior citizen unit	1 covered space for each unit
	Guest parking	A minimum of one guest parking space is required for three units. Additional units will require additional guest spaces based on the following ratios: 1 space (covered or uncovered) for each 5 units on local residential streets; 1 space for each 4 units on collector streets; 1 space for each 3 units on arterial streets.
	Residential hotels, boarding houses, and similar uses	1 covered space for each sleeping room or 1 for each 100 sf. of sleeping area, where sleeping rooms do not exist.
	Sanitariums, Rest Homes	1 space for each 3 beds. Minimum of 3 spaces per establishment.
R-1, R-2, R-3 Zones	Accessory Dwelling Units	1 open or enclosed parking space per bedroom. For purposes of this section, a studio unit shall count as having one bedroom. No parking is required for an ADU in any of the following instances: (1) The ADU is located within one-half mile of a public transit stop or station. (2) The ADU is located on a parcel that has been designated on a local, state, or national register of historic places or districts. (3) The ADU is an integrated ADU. (4) When on-street parking permits are required, but not offered to the occupant of the ADU. (5) When there is a car share vehicle operation parking hub or station located within one block of the ADU.

^A California's Parking Statute enacted in 2015 (AB 744), limits parking requirements for development containing affordable housing and located near transit. No more than 0.5 parking spaces per bedroom can be required if the development includes 11% very low-income units or 20% low income units and is within one-half mile of a transit stop. TOD rental housing affordable to lower income households or senior housing development with sufficient transit access cannot be required to provide more than 0.5 parking spaces per unit. Special needs affordable rentals within one-half mile of transit cannot be required to provide more than 0.3 parking spaces per unit.

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The city's parking standards are generally comparable, but slightly more restrictive than peer communities including San Gabriel, Monterey Park, Baldwin Park, and South Pasadena.

Figure 65. Comparative Parking Standards for Peer Communities

Source: ECONorthwest review of local codes (2021)

Jurisdiction	Single Family	Multi Family	Guest	Senior
San Gabriel	2 spaces (covered)	2 garage spaces per unit.	1 space per 3 dwelling units	0.75 spaces per unit.
South Pasadena	2 spaces (covered)	1-bed unit: 1 space per unit. 2+bed unit: 2 garage spaces.	1 space per 2 dwelling units	0.5 spaces per unit. 1 additional space per 4 units.
Monterey Park	2 spaces (covered)	4 or fewer bedrooms: 2 garage spaces per unit. 5 or more bedrooms: 3 garage spaces per unit. ^c	3 or fewer bedrooms: 1 space per 2 dwelling units. 4 or more bedrooms: 1 space per 1 dwelling unit.	Unknown
Baldwin Park	2 spaces (covered) ^A	1 carport space per dwelling unit plus one other space per dwelling unit.	1 space per 3 dwelling units	1 space per dwelling unit.
Alhambra	2 spaces (covered) ^B	2 covered parking spaces per unit plus additional spaces for larger units. ^D	1 space per 3 dwelling units. Additional units will require additional guest spaces based on the following ratios: 1 space (covered or uncovered) for each 5 units on local residential streets; 1 space for each 4 units on collector streets; 1 space for each 3 units on arterial streets.	1 space per dwelling unit.

A 1 additional space required for 5 bedrooms or more

B 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit

C 1 additional open parking space required for each bedroom above 5.

D 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit in R-2, Plus 1 additional uncovered space per for each 500 sf in excess of 1,000 sf per unit in R-3.

The city offers applicants the ability to request reductions in the parking requirement if different uses can prove they have different time-of-day demands for parking facilities. However, the city does not have a track record of applying this adjustment to residential uses.

The Planning Commission can reduce parking requirements for projects utilizing the flexible development standards allowed in Section 23.20.080 of the Alhambra Municipal Code in areas zoned CBD or R-3 and where the permitted height is 75 feet, including any of the following:

- Spaces may not be required to be enclosed,
- One-third of the spaces may be compact size,
- The number required for one-bedroom units may be reduced by up to 25 percent, and
- The number required for efficiency units may be reduced by up to 33 percent.

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The Planning Commission may reduce the number of parking spaces required for senior citizen housing by up to 50%, or 75% for low- and moderate-income senior citizen housing based upon findings that the proposed development is located in proximity to commercial activities and services and is adequately served by public transportation systems.

The Planning Commission may permit up to one-half of the required parking spaces to be uncovered for dwelling units provided exclusively for low- and moderate-income and senior citizen households.

The Planning Commission may count city-owned public parking facilities within 400 feet of a use (excluding residential parking), measured from the use's nearest public access to such parking, in waiving all or part of the parking requirements if the sum of the required parking for such facilities is less than the existing parking provided.

Flexibility in Development Standards

Section 23.20.080 of the Alhambra Municipal Code states that the special objectives of the flexible development standards in the R-3 zone are to:

- (1) Promote higher-quality multifamily residential development by providing a more flexible approach to development standards;
- (2) Encourage innovative design and efficient use of land which might otherwise be stifled by standard, rigid development standards;
- (3) Encourage the consolidation of parcels;
- (4) Permit developments to be judged on individual merits and overall impacts on the site and the neighborhood.

Flexibility is offered for standards set out in the R-3 Zone (Chapter 23-20), standards set out in the General Development Standards (Chapter 23-42), General Design Standards (Chapter 23-44), and General Parking Standards (Chapter 23-52-060). Developments must have a minimum net parcel area of 40,000 square feet to utilize the flexible development standards.

Flexible development standards are implemented through the planned residential development permit process and approved by the planning commission. The city's 2013-2021 Housing Element included policies and a program to continue to promote the use of flexible development standards in the R-3 zone.

SB330 State Override on Local Laws

Passed in 2019, SB330 makes numerous changes to the Permit Streamlining Act and the Housing Accountability Act. These rules limit the ordinances and policies that can be applied to housing developments. The law defines "housing development" as residential and mixed-use projects where two-thirds of the square footage is dedicated to residential units and transitional or supportive housing projects.

The legislation also establishes a new preliminary application process where a housing development is considered to have completed the preliminary application process by providing information with respect to site characteristics, project description, environmental concerns, and other factors. Housing developments will only be subject to standards in effect when it completes its preliminary application. Developers will have 180 days to submit a development application. It also makes additional streamlining amendments including reduced timeframes of housing development approval and creating a limit on the number of hearings allowed.

Consistency with Other Plans

The city's development standards are mostly consistent with the General Plan. We identified one exception where there is inconsistency in stated height limits in the CBD zone.

Constraints Summary:

General Code Usability:

The *Code Analysis Memo* (2020) by Miller Planning Associates found many issues in Alhambra's existing zoning code that contribute to a constraint on development. Factors identified include inconsistent organization, general complexity, inconsistencies in allowed uses, and lack of clear definitions and rules of measurement. **Taken together these issues add time, cost, and uncertainty for code users which can be a constraint on housing development.** Program 21 will adopt the Comprehensive Zoning Code Update to remove this constraint.

Density:

The City of Alhambra only allows residential densities greater than 30 units per acre on sites that are high-density residential (R-3, CBD, CPD, PO, and RSP), are greater than 20,000 square feet, and are not in proximity to a lower-density designation. Excluding recently developed Specific Plan areas (which are not likely to be redevelopable), these conditions apply to only 253 individual parcels totaling 295 acres of land. Most of this land is located on high-value commercial properties (i.e., Costco, Home Depot, Auto Commercial) or on sites that already have residential development, making redevelopment more challenging. High-density land is also concentrated in downtown. Because most land in Alhambra does not allow for densities greater than 30 units/acre, density is a likely constraint on affordable housing development. The recent pattern has been for projects to be able to develop near maximum densities. However, Program 19 will implement the City's rezoning program that will increase allowed densities across most of the city. This will create a disconnect between existing development standards and density, resulting in a constraint on housing production and diversity of housing types.

Specific Plans:

The city has developed various Specific Plans which has helped to clarify the complexities of the city's code. The city wants to try to eliminate this use of Specific Plans in the future by addressing the constraints and complexities of its zoning code. The only Specific Plan with meaningful land suitable for redevelopment is the VBSP. This plan was adopted in 1990 and many of its standards are antiquated. For example, the plan has a 40,000 sq. ft. minimum lot size requirement for residential uses. Only three blocks with the RSP designation have contiguous parcels capable of meeting this threshold. The Valley Boulevard Specific Plan has certainly constrained residential development by limiting the amount of land available for residential uses along an underutilized corridor with high transit access. Program 19 directs the city to replace the Valley Boulevard Specific Plan.

Overlay Districts:

Housing is permitted in overlay districts consistent with the base zone. There is nothing inherent in the overlay districts that is prohibitive to housing development and they should not be considered a constraint on development.

Development Standards:

The city's development standards include minimum setbacks, height limits, maximum floor area ratios (FARs) and lot coverage and minimum size for dwelling units, open space, and minimum parking requirements. We found that collectively, the city's development standards will make it difficult to reach maximum allowed densities and place additional financial burden on development. Height limits, open space and parking requirements are the greatest constraint.

Height Limits. The city uses a graduated height limit where height defaults to a lower zone within 50 feet of a lower zone. For example, a high-density parcel adjacent to a low-density zone would have the area within 50 feet of the low-density zone limited to only two stories or 25 feet. This condition impacts a large share of high-density land in Alhambra. Combined with minimum unit sizes and FAR, height limits will prohibit development from reaching maximum densities in zones that will have increased density under the city's rezoning program.

Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones.

Parking Requirements. Parking requirements are one of the primary factors influencing site utilization and financial feasibility. Parking is costly to build and consumes land that could otherwise be used for housing. When minimum parking requirements are too high, they can be a constraint on development by reducing redevelopment potential and limiting the redevelopment of irregular sites. The city's parking requirements are slightly higher than similar jurisdictions and covered parking (garages) are required for multifamily development. This space requirement and costs associated with structured (garage) parking could reduce the number of units feasible on a site, discourage smaller units, limiting housing choice, and result in higher priced units only being feasible, perpetuating lack of affordability. The zoning code provides options to reduce parking requirements for projects that meet certain criteria (addressed in section above), but these incentives are limited to the R-3 zone and require discretionary approval from the Planning Commission, therefore, existing standards should be considered a constraint for multifamily development. Programs 27 and 21 require the analysis and amendment of parking standards to remove as a constraint.

Inconsistency with the General Plan:

The maximum height limit in the Central Business District is listed at five stories in the Land Use Element of the General Plan, but the current code lists a limit of 10 stories and 115 feet. This is expected to be addressed in the next Zoning Code update.

Collective Assessment of Constraints:

Under proposed rezoning to densities ranging from 30 to 64 units per acre in high density residential areas and commercial zones, the combination of allowed uses, height limits, FAR, minimum unit size, and parking and open space requirements under existing land use controls will make developing near maximum densities both physically and financially infeasible. These factors will make only projects with the highest income potential (rent or sales price) feasible, impacting affordability and a diversity of housing choice.

What Can the City of Alhambra do?

The city has already recognized challenges and constraints in its land use controls and is in the process of completing a comprehensive zoning code update. Many of the issues identified in this section will be addressed through this process. The city is also in the process of evaluating

whether there is a need for a new set of design guidelines providing direction on architectural themes and elements associated with new development and redevelopment of the East Main Corridor. Whether through these efforts or other programs (to be determined in the housing plan), potential constraints on development could be mitigated through:

- Improve the organization and usability of the zoning code
- Update ordinances to be consistent with state law
- Update the Valley Boulevard Specific Plan or replace with an appropriate zoning classification
- Amend development standards to allow for development to maximum densities
- Study the appropriateness minimum parking requirements and make reductions where possible.
- Expand the use of parking reductions and/or waivers
- Address inconsistencies with the General Plan.

Relevant Housing Action Plan Programs: Program 5, Program 6, Program 12, Program 15, Program 16, Program 18, Program 19, Program 21, Program 24, Program 26, Program 29, Program 39, Program 40.

Residential Planned Development **DRAFT**

The Residential Planned Development (RPD) Permit is the name of the entitlement application involving residential development projects (this should not be conflated with Planned Unit Developments). The RPD permitting process is required for nearly all residential projects and this process largely requires review and approval by the city's Planning Commission. Design review is embedded in the RPD permitting process and this can add extra time and additional costs for applicants.

The only exceptions for full RPD permitting are residential development projects within the 1) R-2 and R-3 zones including one-story additions of less than 50% of existing floor area (these development requests would be processed by Zoning Clearance); or 2) R-1 zone including new single-family residential development with second-story additions of any size, and one-story additions of more than 50% of the total residential building (requires a RPD Permit but the RPD Permit is processed administratively); and 3) R-1 zone with one-story additions of less than 50% of the total residential building area (processed by Zoning Clearance).

Constraints Summary:

Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development.

Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.

What can the City of Alhambra do?

To mitigate this constraint, the City should reconsider which developments are subject to Planning Commission approval. The city has started down this path. In early 2020, the city began implementing RPD requirements of the Code to allow administrative review of permit applications in the R-1 zone rather than a RPD permit process, subject to Design Review Board and Planning Commission discretionary review. This update is a step towards right-sizing the discretionary review with the scale of change in the built environment. Additional efforts to ameliorate development uncertainty and risk especially for projects small in scale should be considered as a way to better meet the community's housing needs. As a part of the city's comprehensive zoning code update, it will be exploring how the number of projects that require discretionary review can be reduced through new design standards and requirements in the Code.

Relevant Housing Action Plan Programs: Program 16, Program 29.

Density Bonus

The City of Alhambra offers housing density bonuses (Code Section 23.20.060) consistent with the state law outlined in California Government Code § 65915. This Code essentially helps expedite local residential development and promotes affordable housing. Eligible applicants are allocated a density bonus for projects providing at least ten percent of the total units as lower income households (defined as 80% AMI), or five percent of the total as very low-income households, or for a senior citizen housing development (defined by California Civ. Code § 51.3). The City of Alhambra Code Section 23.20.060 E provides detail on the calculation of the density bonus units and outlines the range of percentages allocated for different eligible projects. Generally, the greater the share of lower-income housing units, the greater the percentage of density bonuses. For example, a project with ten percent low-income units would gain a 20 percent density bonus allocation while a project with 20 percent low-income units would gain a 35 percent density bonus allocation.

Additional updates are expected for California Government Code § 65915 in response to AB 1763 approved by the Governor on October 9, 2019. The expected update generally allows housing development located within one-half mile of a major transit stop and meeting all housing affordability requirements to have a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. Essentially, housing projects with a minimum of 80 percent low-income units and up to 20-percent moderate-income units are eligible for a density bonus of up to 80 percent of the maximum allowed density or a density bonus with no limit if located within one-half mile of a major transit stop. Also, eligible applicants qualify for reduced parking requirements and a height increase of up to three stories or 33 feet when located within one-half mile of a major transit stop.

State law also now requires the replacement of affordable units in redevelopment projects and additional incentives for projects that are 100 percent affordable. While the City of Alhambra enforces the State Density Bonus requirements, its ordinance will require an update to be in compliance with State law.

There has only been one project applicant (application filed on 2/12/2021) submitting a request to use density bonuses. This application is requesting bonus units for a project referred to as the Mariposa Affordable Housing site that will include 50 units, 100% affordable, and will utilize

density bonuses provided under AB 1763. Since the site is within one-half mile of a major transit stop (Atlantic/Main) there is no maximum density applicable.

Constraints Summary:

The city’s density bonus ordinance is not currently in compliance with State law. However, the city enforces the minimum requirements of current State law. Density bonuses are an opportunity to support affordable housing development, but the city has not seen any utilization of the density bonus in recent years. The density bonus itself is not a constraint on development, but there may be other factors in the city’s development standards that are limiting the ability of developers to utilize density bonuses.

What can the City of Alhambra do?

There are two paths forward for the city to improve its density bonus program. The first will be to update the current ordinance to be compliant with state law and institute a process to identify and adopt conforming amendments in the future within a reasonable time frame. The second path is to explore how other market or regulatory factors interact with the density bonus to understand why it is not being utilized in the community.

Relevant Housing Action Plan Programs: Program 12, Program 15.

Inclusionary Housing Ordinance **DRAFT**

The City of Alhambra adopted an Inclusionary Housing Ordinance in September 2020 that is applicable to five (5) or more units. City Council held the first reading of the proposed ordinance on September 14, 2020. The ordinance includes a maximum 15-percent affordability requirement at low- and moderate-income levels for all projects with seven or more units. Credit is given for including a larger number of units at progressively lower income levels. An in-lieu fee is also allowed with limitations.

1. Applicability and Exemptions: The Ordinance will apply to all new residential construction projects consisting of seven (7) or more units in a single-family or multifamily setting, unless exempt by state law. This threshold will apply to for-sale or rental units equally.

The units developed as Inclusionary must be dispersed throughout the Residential Development, and of a similar size, bedroom count, location, and generally comparable to the market rate units in terms of design, appearance, materials and finished quality. Units developed on site must be constructed concurrently with the market rate units.

2. Inclusionary unit requirement: For all applicable projects, the Ordinance will require a total of fifteen percent (15%) of all newly constructed dwelling units be offered for sale or for rent to low- and moderate-income households comprising of:

- 1) Nine percent (9%) of all required inclusionary units to be sold or rented to low-income households (80% of LA County area median income or AMI); and,
- 2) Six percent (6%) of all required inclusionary units to be sold or rented to moderate-income households (120% of LA County AMI).

Rental units must remain affordable in perpetuity; for-sale units must remain affordable for 45 years.

In calculating the required number of Inclusionary Units, fractional units of .75 or above will be rounded up to a whole unit if the Residential Development consists of ten (10) to twenty (20) units; fractional units of .50 or above will be rounded up to a whole unit if the Residential Development consists of twenty-one (21) or more units.

3. Incentives for greater affordability: The Ordinance will provide incentive credits when a required inclusionary unit is offered to a lesser income bracket than required.

- 1) If Very-Low-Income units are provided in lieu of required Low-Income units, a credit of 1.5 units to every 1 unit shall be provided.
- 2) If Very-Low-Income units are provided in lieu of required Moderate-Income units, a credit of 2 units to every 1 unit shall be provided.
- 3) If Low-Income units are provided in lieu of required Moderate-Income units, a credit of 1.5 units to every 1 unit shall be provided.

4. Alternative to providing Inclusionary Housing Units: The Ordinance will provide a series of three alternatives to requiring the inclusionary housing units being built. They are in-lieu fee, off-site units, and land donation.

In-lieu fee. Applies to developments of 5-20 units and is payable for all or some of the required units. The fee is based on a fee schedule established by resolution of the City Council.

Off-site units. A developer may satisfy the inclusionary requirement by providing affordable units, in whole or in part, by constructing or substantially rehabilitating the required number of units at a site different than the site of the Residential Development.

Land Donation. The Developer may satisfy the requirement of providing Inclusionary Units as part of the Residential Development, in whole or in part, by a conveyance of land to the city for the construction of the required Inclusionary Units.

5. Inclusionary Housing Trust Fund: The IHO will create an Inclusionary Housing Trust Fund to receive the in-lieu fees paid by developers, instead of creating affordable units and/or units sold to an above moderate-income purchaser, provided that the sale shall result in a recapture by the city or its designee of a financial interest in the unit equal to (1) the difference between the initial affordable sales price and the appraised value at the time of the initial sale, and (2) a twenty percent share of any appreciation.

This fund can be used for a Revolving Loan Program, housing vouchers, or similar programs, or for quarterly reporting on revenues and expenditures available.

Figure 66 presents a comparison of Inclusionary Housing Ordinances in the Region. Across most categories, Alhambra's structure is less restrictive. Alhambra has a higher exempt threshold (7 units), lower fees, offers credits, and has generally lower affordability thresholds.

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Figure 66. Comparison of Inclusionary Housing Ordinances in the Region

Source: ECONorthwest

	Alhambra	South Pasadena ^A	Pasadena	West Hollywood	Santa Monica
Standard Set Aside	15%	15%	20%	20%	25% - 40%
Applicable Project Size	7+ units	4+ units	All	2+ units	4+ units
Set-aside Structure (Rent)	<i>Same for rent and sale</i> 9% @ LI or below 6% at MI or below Credits for higher percentages at lower income levels.	10% @ LI or below 6% @ MI or below Credits for higher percentages at lower income levels.	5% @ VLI or below 5% @ LI or below 10% @ MI or below	<i>Same for rent and sale</i> 2-10 units: 1 unit @ MI or below 11-20 units: 20% @ MI or below 21-40 units: 20% @ MI or below, 30% if units are small. 41+ units: 20% @ MI or below,	4-15 units: 20% @ LI or below 10% @ VLI or below, or 5% @ ELI. 16+ units: 25% @ LI or below 15% @ VLI or below, or 10% @ ELI or below.
Set-aside Structure (Sale)	at lower income levels.	15% @ MI or below.	20% @MI or below	20% of total floor area if units are small.	4-15 units: 20% @ MI or below 16+ units: 25% @ MI or below
In-Lieu Fee	Rent: \$0.89-\$14.30 Own: \$1.88-\$30.00	Rent: \$20.00-\$30.00 Own: \$30.00-\$40.00	Rent: \$1.19-\$33.76 Own: \$16.86-\$63.89	\$13.63-\$29.23	Rent: \$35.70 Own: \$41.70
Incentives and Bonuses	None	Density Bonus Reduced Fees Reduced Parking	Density Bonus Reduced Fees	Density Bonus Reduced Parking	Density Bonus Reduced Fees

ELI = Extremely Low Income

VLI = Very Low Income

LI= Low Income

MI = Moderate Income

A South Pasadena IHO adopted May 2021

Constraints Summary:

Because the City of Alhambra's IHO is relatively new, there is not information on the potential impacts on actual development feasibility. However, IHO policies have been effective in delivering affordable housing in the region. While Alhambra's IHO does not offer associated incentives, its structure is less restrictive than existing or proposed IHOs in the region.

What can the City of Alhambra do?

The city should be actively monitoring its IHO through development applications and conversations with developers. It should be prepared to make amendments that respond to changes in market conditions or evidence that the current structure is misaligned with the market.

Relevant Housing Action Plan Programs: Program 5.

Growth Controls and Local Ordinances

The City of Alhambra has the following housing-related Local Ordinances that can affect housing development. These local ordinances have been discussed in their respective places in this document.

- **Short-Term Rentals:** The City of Alhambra is in the process of considering a short-term rental ordinance. Short-term rentals are units that are rented by visitors to the community and are typically defined as properties that are rented for a period of less than 30 days. Online platforms that have made it easier to promote and book peer-to-peer rentals have resulted in a proliferation of short-term rental units in Southern California. Short-term rentals have yet to have meaningful impacts on Alhambra's housing market. For example, in 2021 we found only 300 units listed publicly in the city²¹, representing less than one percent of the local housing stock. The City of Alhambra is committed to limiting the impacts of short-term rentals on the supply of housing for community residents, and the adoption of a short-term rental ordinance will limit future market disruption.
- **Transitional Housing:** See page 101.
- **Supportive Housing:** See page 102.
- **Mobile Homes and Manufactured Housing:** See page 97.
- **Single-Room Occupancy Housing (SRO):** See page 102.
- **Accessory Dwelling Units:** The city's Accessory Dwelling Unit ordinance, Chapter 23.57, was nullified by the changes to State ADU laws on January 1, 2020. The city is presently applying the State ADU laws in processing ADU applications. The city has a draft ADU ordinance already approved by the Planning Commission that needs to be adopted by the City Council that brings its ADU policies in line with state requirements. This adoption process was delayed by the COVID-19 crisis. See page 97.
- **Emergency Shelters:** See page 98.
- **Reasonable Accommodations:** See page 103.
- **Inclusionary Housing:** See page 91.

²¹ Airbnb search, February 1, 2021.

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- **Historic Preservation:** Since 2017, the city has been working to establish a historic preservation program for the purpose of preserving the cultural identity of Alhambra as a diverse residential and commercial city with distinct single-family neighborhoods. This program is still in process, including determinations for eligibility criteria, resource inventory, and review process. Historic preservation programs are good at protecting cultural identity and the architectural consistency and integrity of the community and can be value-enhancing programs. However, preservation programs may also limit redevelopment potential. If too comprehensive, a historic preservation program in Alhambra may emerge as a constraint on housing production.

Constraints Summary:

Potential constraints for each ordinance summarized above are discussed in their respective referenced sections. Several ordinances (emergency shelters, ADUs) require updates to be consistent with State Law, but the city currently defaults to enforce State requirements. Generally, the city's adopted ordinances serve to facilitate housing development, and are not a constraint.

What can the City of Alhambra do?

The city should continue to monitor how its policies and ordinances impact development feasibility and production. It should maintain relationships with local developers, organizations, and non-profits to continually inform its processes.

Relevant Housing Action Plan Programs: Program 5, Program 8, Program 26.

Providing for a Variety of Housing

State law requires jurisdictions to provide the opportunity for development of a variety of housing types including single-family housing, multifamily housing, mobile and manufactured homes, and accessory dwelling units. These housing types are either permitted or conditionally permitted in Alhambra by zone, as defined in the Alhambra Zoning Ordinance. The law further defines a variety of housing to meet the needs for specific demographic groups including senior housing, residential care facilities, emergency shelters, transitional housing, supportive housing, farmworker housing, and single-room occupancies. These housing types are also either permitted or conditionally permitted by zone in the Alhambra Zoning Ordinance, though some types, such as transitional or supportive housing, depend on the form of the development as they can vary.

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Figure 67. Permitted Residential Uses by Zone

Source: City of Alhambra Planning Department

Residential Use	R-1	R-2	R-3	PO	CPD	CBD	RC	Valley SP	IPD
Single-Family Dwelling	P	P	P	*	C(1)	C(1)	C(1)	P	*
Multifamily	*	P (no condos)	P	C(2)	C(3)	C(3)	C(3)	P	*
Mobile Homes and Manufactured Housing	P	P	P	*	C(3)	C(3)	C(3)	P	*
ADUs	P	P	P	*	P	P	P	P	*
Senior Housing	Could be permitted as a group home or residential care facility 6 or less	Could be permitted as a group home or residential care facility 6 or less	P, C	*	C(3)	C(3)	C(3)	C	*
Residential Care Facilities	P	P	P	*	C(3)	C(3)	C(3)	C(3)	*
Emergency Shelters	*	*	*	*	*	*	*	P	P
Transitional Housing	P	P	P	*	C(3)	C(3)	C(3)	P	*
Supportive Housing	P	P	P		C(3)	C(3)	C(3)	P	
Farmworker Housing	*	*	*	*	*	*	*	*	*
Single-Room Occupancy	*	*	P	*	*	*	*	*	*

P = Permitted Use
 C = Conditional Use
 A = Accessory Use
 * = Not permitted

(1) N conjunction with, and accessory to, a permitted or conditionally permitted use.

(2) Urban Residential uses permitted on a site with a minimum of 30 acres and with a density ranging from 15 to 75 units per acre.

(3) When proposed in conjunction with commercial uses.

Multifamily Housing

According to the California Department of Finance’s (DOF) Population and Housing Unit Estimates, approximately 12% of Alhambra’s total housing units in 2020 were structures with two to four units and 33% were larger multifamily housing with five or more units. Multifamily housing is permitted outright in Alhambra in the R-2 and R-3 zones and in the Valley Boulevard Corridor Specific Plan, and permitted with a conditional use in PO, CBD, CPD, and RC zones.

Maximum allowed densities for multifamily housing range from 12 units per acre in the R-2 zone to 43 units per acre in areas of R-3 and other zones including CPD, CBD PO, and Valley Boulevard Corridor Specific Plan.

Mobile Homes and Manufactured Housing

In 2020, less than one percent (0.1%) of Alhambra's total housing units were mobile homes or manufactured housing. The city's Zoning Ordinance includes mobile homes in the definition of single-family dwelling as: *"a building containing one dwelling unit constructed entirely on-site, or a unit constructed and/or assembled off-site, including mobile homes manufactured and certified under the National Mobile Home Construction and Safety Standards Act of 1974 and located on a permanent foundation system approved by the Building Department."*

Thus, mobile or manufactured homes are permitted where single-family dwellings are also permitted. In Alhambra, these housing types are allowed outright in R-1, R-2, and R-3 zones and in the Valley Boulevard Corridor Specific Plan, and are conditionally allowed in CPD, CBD, and RC zones. The Alhambra Zoning Ordinance meets all legal requirements for mobile and manufactured housing types.

In addition, the city has a Mobile Homes and Manufactured Housing Ordinance, which describes this housing allowance as follows:

Individual mobile homes installed on a permanent foundation are treated as single-family dwellings. They are permitted by right in the R-1, R-2, R-3 and residential areas of the Valley Boulevard Corridor Specific Plan).

Second Units (ADUs)

Chapter 23.57 of the Alhambra Zoning Ordinance includes development standards for accessory dwelling units (ADUs). Initially adopted in 2005, the code was amended and replaced in December 2017 to meet new state requirements. ADUs, or second units, are permitted outright on lots 6,500 square feet or greater with an existing or proposed single-family dwelling in the R-1, R-2, and R-3 zones.

ADUs must also meet the design and development standards of the underlying zone. In R-1, the lot with the ADU must abut property with a zone other than R-1 and no shared boundary with the Open Space zone. ADUs are permitted through a ministerial review process under a zoning clearance permit. Recent legislation since 2017 make amendments to ADU standards. For example, applicants for an ADU in Alhambra must be owner-occupants of the existing unit on the lot. New legislation will require the city to remove this requirement. The city currently enforces the minimum state requirement but will need to update its ADU ordinance to be in compliance with State law.

Senior Housing

The Alhambra Zoning Ordinance allows development of multifamily senior housing in zones that allow multifamily development. Senior housing developments are also subject to additional density bonuses and additional use allowances based on the zoning district. For example, senior housing developments that include housing for lower-income households have a density bonus of 20%. Additionally, in the R-3 zone, additional uses may be allowed as part senior housing planned developments including specific commercial or retail services.

Reductions in parking spaces for senior citizen units also apply in certain zones. For example, in the R-3 zone, 2 covered spaces per unit are required for non-senior housing, and 1 covered space per unit for a senior citizen unit. In other zones with a proposed senior housing development, Planning Commission may reduce the number of required spaces by 50% or up to 75% for income-restricted housing (low- and moderate-income).

Residential Care Facilities

The Alhambra Zoning Ordinance defines residential care facilities as “any family home or group care facility for 24-hour non-medical care of persons in need of personal services, supervision or assistance essential for sustaining the activities of daily living or for the protection of the individuals, excluding jails and other detention facilities.” Residential care facilities serving six or fewer people are allowed outright in all residential zones in Alhambra, consistent with State regulations. Larger residential care facilities are conditionally allowed in R-3, PO, CPD, and CBD zones and the Valley Boulevard Corridor Specific Plan. The process to obtain a conditional use permit for a residential care facility follows the same standards as other similar uses, and the average processing time is approximately three months.

Figure 68. Summary of Approvals for Group Homes

Source: City of Alhambra

Small residential care facilities of 6 or less:	
Permitted by right	R-1, R-2, R-3 zones.
Conditionally permitted	PO, CPD, CBD, VSP zones.
Larger residential care facilities of 7 or more:	
Permitted by right	Not permitted by right in any zones.
Conditionally permitted	R-3, PO, CPD, CBD, VSP
Rest homes:	
Permitted by right	Not permitted by right in any zones.
Conditionally permitted	R-3, PO, CPD, CBD, VSP

The Zoning Code should be amended to allow large family care homes by right where multi-family is allowed by right instead of requiring a Conditional Use Permit or not being allowed.

Emergency Shelters

The Alhambra Zoning Ordinance defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.” Chapter 23.86 of the Zoning Code defines the regulations for permitting and development of emergency shelters in the city.

As noted in the previous housing element, Alhambra updated the Emergency Shelter code to comply with SB 2 in 2008, which required changes to the permitting process and allowing emergency shelters outright in at least one zoning district. Alhambra allows emergency shelters outright in the Valley Boulevard Corridor Specific Plan (VSP) and the Industrial Planned Development (IPD) zoning districts.

“AMC Section 23.86.040(B): Emergency shelters are allowed by right in the VSP (Valley Boulevard Corridor Specific Plan) zone and the IPD (Industrial Planned Development) zone, provided they meet the minimum property development standards of the zone in which then are located.”

These parcels are located along transportation corridors and therefore have access to services. Emergency shelters are not permitted in all parts of the VSP or IPD zone. The following location requirements apply and have the effect of limiting shelters to only one remote area for each of the zones.

“AMC Section 23.86.040(C)(1): Shall be permitted in the VSP zone only when located in the area bounded by Vega Street to the west and New Avenue to the east.

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"AMC Section 23.86.040(C)(2): Shall be permitted in the IPD zone only when located in the area bounded by Orange Street to the north, Mission Road to the south, Raymond Avenue to the east, and Palm Avenue to the west."

"AMC Section 23.86.040(C)(3): There shall be no other emergency shelters within 300 feet of the subject property, nor shall the proposed emergency shelter be located within 1,000 feet from any residential care facility, public park or public school (not including trade or technology schools), as measured from property line to property line."

"AMC Section 23.86.040(C)(4): Shall be located within one-quarter mile of a designated public transportation stop."

Other development standards for emergency shelters in Alhambra include:

- Maximum stay. No person(s) shall stay within an emergency shelter for more than six months from the date of their acceptance into the emergency shelter. In addition, no person(s) shall be re-admitted to the same emergency shelter within five calendar days of being discharged.
- Maximum number of beds. No more than 12 beds shall be provided on the entire property where the emergency shelter is to be located. Beds shall be provided for men and women in separate and secured areas. No such separation shall be required when beds are located in a bedroom intended for a single family.
- Maximum density. The maximum resident density shall be one resident per 150 square feet, up to a maximum of 12 residents.
- Waiting area. If the intake of clients occurs on site, there shall be provided an on-site client intake and waiting area in a location not adjacent to the public right-of-way, that is fully screened from public view, and provides consideration for weather events including shade and rain cover. The intake and waiting area shall be suitably sized to prevent queuing in the public right-of-way or within any parking lot but shall occupy a maximum area of 400 square feet.
- Operating hours. Each emergency shelter shall establish and maintain set hours of operation for client intake and discharge. These hours shall be clearly displayed at the entrance to the emergency shelter at all times. In the event an emergency shelter client is socially disruptive, a threat to the safety of others, or in violation of the emergency shelter facility rules during non-business hours of operation, the emergency shelter management may proceed with discharging that client immediately.
- On-site personnel. On-site personnel shall be provided during all hours of operation when clients are present. A designated area for on-site personnel shall be located near the main entry to the facility for the purpose of controlling admittance into the facility and providing security.
- Client restrictions. The emergency shelter operator shall not intake any person as a client of the emergency shelter that the operator knows is wanted by the police or knows has been convicted of committing any violent offense.
- Personal storage. A private storage area or closet shall be provided with each on-site bed. At no time shall any client of an emergency shelter be allowed to keep on-site any alcoholic beverages or store any type of illegal substances, illegal drugs, and/or weapons of any kind.

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- Personal space. A minimum of 30 square feet of personal space shall be allocated for each client bed.
- Restroom and shower facilities. A communal restroom facility with at least two toilets, one shower, and one sink shall be provided for every 12 clients residing at an emergency shelter.
- Common space. Interior and/or exterior common space for the on-site clients to congregate shall be provided on the property at a ratio of not less than 15 square feet per occupant or a minimum overall area of four hundred square feet, whichever is greater.
- Telephones. Each emergency shelter shall provide telephone(s) for the use of the on-site clients.
- Food service areas. The emergency shelter operator shall be responsible for ensuring that any food service or on-site meal preparation areas comply with all applicable requirements of the city and the Los Angeles County Health Department.
- Laundry facilities. The emergency shelter shall provide laundry facilities adequate for the number of clients.
- Outdoor storage. Any provision of on-site outdoor storage shall be fully screened from all public rights-of-way and on-site parking lots.
- Parking. Off-street parking shall be provided at the ratio of one on-site parking space for every five beds, one space for each bedroom intended for families, plus one additional space per staff member. No client shall sleep or live within a motor vehicle on the property of an emergency shelter at any time.
- Refuse. There shall be provided a refuse storage area that is completely enclosed with masonry walls not less than five feet high with a solid-gated opening and that is large enough to accommodate a standard sized trash bin adequate for the parcel. The refuse enclosure shall be accessible to refuse collection vehicles.

In addition, the city has a standalone Emergency Shelter Ordinance that was passed in 2011, and emergency shelters are allowed by right in the VSP and IPD zone, pursuant to geographical limitations within the zone. However, it was identified in the city's 2020 Analysis of Impediments, that the current ordinance includes requirements that are not permissible under state law²², including:

- "Emergency shelters must not be located within 1,000 feet of any residential care facility, public park or public school.
- Emergency shelters must be located within one-quarter mile of a designated public transit stop.
- AB 139 (Emergency and Transitional Housing)—parking for shelter staff only; definition of sufficient capacity
- AB 101 (Low Barrier Navigation Center)—housing for homeless or at-risk homeless while waiting to transition to permanent housing"

The city will need to revise its Emergency Shelter Ordinance to be in compliance with State law.

²² City of Alhambra. 2020 Draft Analysis of Impediments, Page 68. April 2020.

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In the VSP and IPD zoning districts where emergency shelters are allowed, there are 27 total parcels that cover about 28 acres. Of these parcels, those zoned VSP are occupied by old, small shopping centers with retail and restaurant uses, as well as parking lots. The parcels zoned IPD have existing industrial uses and parking lots. In these areas, three of the structures are vacant, with a total of 10,080 vacant square feet. These vacant and underutilized properties would accommodate emergency shelter need.

Transitional and Supportive Housing

Transitional Housing

Transitional housing is defined as buildings configured as rental housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (California Health and Safety Code Section 50675.2[h]). State law requires local jurisdictions to address the provisions for transitional housing.

Pursuant to State law, transitional housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). Transitional housing provides additional housing options for people with disabilities, a protected class of the population.

The city has a Transitional Housing Ordinance in place, which describes transitional housing allowances as follows:

Small transitional housing serving six (6) or fewer people is considered a standard residential use and is permitted in all zones where residential uses are permitted (R-1, R-2, R-3 and residential areas within the Valley Boulevard Corridor Specific Plan). Transitional housing for seven (7) or more people that is operated as a residential care facility is conditionally permitted in the R-3 zone. If operated as a boardinghouse, it is permitted by right in the R-3 zone.

The city's Zoning Ordinance permits, conditionally permits, or prohibits transitional housing in the same manner as other residential dwellings of the same type in the same zone, consistent with State law.

Supportive Housing

Supportive housing is defined as housing with no limit on length of stay that is occupied by a target population and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code 50675.14 [b]). Target population means persons, including persons with disabilities, and families who are "homeless," as that term is defined by Section 11302 of Title 42 of the United States Code, or who are "homeless youth," as that term is defined by paragraph (2) of subdivision (e) of Section 11139.3 of the Government Code.

The city's Zoning Ordinance permits, conditionally permits, or prohibits supportive housing in the same manner as other residential dwellings of the same type in the same zone. The city also has a Supportive Housing Ordinance in place, which describes transitional housing allowances as follows:

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A supportive housing development in the form of a residential care facility serving six (6) or fewer persons is treated as a residential use. Facilities serving more than 6 persons are conditionally permitted in the R-3 zone.

However, recent changes to State law under AB139 would require supportive housing to be permitted by right in all zones where multifamily and mixed uses are permitted. Program 8 will direct the city to amend the zoning code to allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units in all zoning districts where multifamily and mixed-use development is permitted consistent with AB2162 changes to California Government Code Section 65583.

Farmworker Housing

The Housing Needs Assessment shows that about 93 workers in Alhambra were employed in farming, fishing, and forestry occupations in the 2014–2018 period. This is about 0.2% of workers in Alhambra. Alhambra is an urban community in a metropolitan area, and those persons identified as having agriculture jobs are most likely employed at plant nurseries and similar enterprises and thus are not anticipated to have the seasonal housing needs associated with crop-related farm worker jobs.

Further, as Alhambra is an urban community, the city does not have any land designated for agricultural use. However, the city must still meet California Employee Housing Act requirements for housing with six or fewer employees to be allowed as a residential use. Alhambra updated the definition for employee housing in the Zoning Ordinance in 2014 to comply with this state law.

Single-Room Occupancy Housing

Single-room occupancy (SRO) housing is considered part of the definition of boardinghouses in the Alhambra Zoning Ordinance, “a building having space for not more than ten boarders and one kitchen facility for common usage, other than a hotel, motel or dormitory.” Boardinghouses are permitted outright in the R-3 zoning district.

Housing for People with Disabilities

State law 65583(a)(4) and 65583(c)(3) require local governments to assess and address constraints for housing needs for people with disabilities. This includes removing barriers where possible to “provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.” Part of the analysis of governmental constraints includes evaluating the jurisdiction’s definition of a family as well as zoning and building code controls.

Definition of a Family

The City of Alhambra’s definition of a family is “one or more individuals occupying a dwelling unit and living as a single household unit.” This definition meets the requirements for a broadened definition required by state law and meets fair housing law, as it does not discriminate against people with disabilities.

Zoning and Land Use Controls

Alhambra’s Zoning Ordinance allows residential care facilities serving six or fewer people in all zoning districts that allow residential uses. This is compliant with State law and meets zoning requirements for accommodations for people with disabilities. Other housing types, such as residential care facilities serving more than six people, are subject to conditional use permits in the R-3 zone, and boardinghouses are allowed outright in R-3.

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Review of Building Code

The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, sanitation, adequate light and ventilation, energy conservation, and safety to life and property from fire and other hazards attributed to the built environment and to provide safety to firefighters and emergency responders during emergency operations. Consistent with this purpose, the provisions of this Code are intended and always have been intended to confer a benefit on the community as a whole and are not intended to establish a duty of care toward any particular person.

The city Building Services Division is responsible for enforcing the California Building Code and provisions of the Americans with Disabilities Act that regulate building accommodations for persons with disabilities. Section 20.21.010 of Alhambra's Code states that in the event any differences in requirements exist between the accessibility requirements of Alhambra's code and the accessibility requirements of the California Code of Regulations, then the California Code of Regulations shall govern.

Review of Permit and Review Procedures

Most residential projects in Alhambra require design review and approval by the Planning Commission. This process and its potential constraints are addressed in detail on in the section on "Development Review and Permitting Process" below. The hearing process is the same for housing structures that accommodate people with disabilities as other residential projects.

Review of Reasonable Accommodations

The City of Alhambra has a reasonable accommodations ordinance that was passed in 2013. Its role is to provide individuals with disabilities reasonable accommodation in the application of the city's rules, policies, practices, and procedures, as necessary to ensure equal access to housing. Section 25.59.020 of the Alhambra Municipal Code describes the process for reasonable accommodations application and approval:

- In order to make specific housing available to an individual with a disability, a disabled person or representative may request reasonable accommodation relating to the application of various land use, zoning, or building laws, rules, policies, practices, and/or procedures of the city.
- A request for reasonable accommodations must describe how the property will be used by the disabled individual and a specific reason the reasonable accommodation is necessary to make particular housing available to the disabled individual(s).
- A reasonable accommodation application requires a ten-day written notice to all adjacent property owners within a 100-foot radius of the subject property so that their input may be received
- The Community Development Director has the authority to act on any application for a reasonable accommodation.
- There is no original application or filing fee charged. However, for appeals, an administrative appeal filing fee is charged.

Over the planning period the city has approved three reasonable accommodations requests.

Constraints Summary:

The city's code allows for a range of housing types as required by State law and does not unduly constrain or prohibit a variety of housing types. The city enforces minimum State regulations where its current ordinances require updates. The city has adopted the 2020 Los Angeles County Building Code as amended, which is based on the California Uniform Building, Plumbing, Mechanical, and Electrical Codes. Enforcement of building code standards does not constrain the production or improvement of housing in Alhambra but instead serves to maintain the condition of the city's neighborhoods. Further, the California Building Code is adopted by many cities throughout Southern California and does not, in general, pose a constraint to residential development. The city adopted an administrative procedure for processing requests for reasonable accommodation in 2013, pursuant to State and Federal fair housing laws.

What can the City of Alhambra do?

The city adequately meets its obligation to provide for a variety of housing types and opportunities for housing for persons with disabilities. It will update its ADU, emergency shelter, and transitional housing ordinances to be compliance with State law.

The city may also explore strengthening its design standards to be more accommodative for persons with disabilities. Universal design standards are features in a home that encourage equitable use and visitability for individuals, particularly people living with disabilities and older adults. Features include, but are not limited to: step-less entrances, one-story living, wide doorways, wide hallways, extra floor space, lever door handles, rocker light switches, etc.

In Assembly Bill 2787, the California Department of Housing and Community Development created a Universal Design Model Ordinance for local governments to voluntarily adopt. The model ordinance offers definitions for key terms, options for building code standards, and options for exemptions and enforcement. The city could review this ordinance, meet with those knowledgeable about the building code and building living spaces for those with disabilities, and may amend the Building Code accordingly during the triannual code adoption process.

Relevant Housing Action Plan Programs: Program 2, Program 8, Program 26.

Fees and Exactions²³

The City of Alhambra charges a range of fees for planning and development services, including permit fees for residential construction. These fees are allowed under State law and are necessary to maintain public services and facilities in the community. However, fees place an additional cost on development and can be a constraint if abnormally high.

Development fees in the city vary by development type and location throughout the city. A summary of the city's fee structure is included here. **The city posts its fee schedule online on its website consistent with government code 65940.1.**

²³ Fees reported in this Housing Element update reflect fees current of 2021. Current fees should be verified through the city's fee schedule available online or through the finance department.

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Figure 69. Planning and Development Fees, Alhambra

Source: City of Alhambra, 2020

Permit Fee Type	Cost	Note	Neighboring Jurisdictions ²⁴
Planned Development			
Single-family residential	\$1,051.50		\$790 - \$1,340
Multifamily residential	\$1,633.75	Plus \$108.25 for each additional unit	\$1,580 - \$2,840
Design review			\$300 - \$8,280
Single-family	\$480.00		
Multifamily	\$ 960.00		
Window changeouts, Front	\$195.00		
Public Works/Engineering	\$446*		\$400 - 800
Conditional Use Permit			
Base Fee	\$1,500.00		\$1,070 - \$4,560
Planning Variance			
First variance	\$1,023.50		\$1,070 - \$6,800
Each additional variance	\$218		
First modification	\$212.50		
Each additional modification	\$26.75		
General Plan Amendment	\$1,138.50		\$2,940 - \$17,390
Specific Plan Amendment	\$1,600.00		NA - \$6,540
Zone Change	\$1,099.75		\$6,220 - \$18,230
Subdivisions			
Tentative tract/Parcel map	\$485.00	1st 4 units + \$108.25 for each add. unit	\$2,540–\$5,200
Lot line adjustment	\$1,012.75		\$500 - \$4,800
Second Unit Review (ADUs)	\$400		No fee - \$307
Zoning Clearance	\$400		NA - \$370

The only impact fees for residential development collected by the City of Alhambra are a New Construction Tax, a Water Connection Fee, and a Public Arts Fee. All other fees are paid as ongoing services fees. The Alhambra School District also collects an impact fee.

Figure 70. Impact Fees, Alhambra

Source: City of Alhambra, 2020

Impact Fee Type	Cost per Unit
New Construction	\$2,000
Public Arts	0.5% of total building valuation excluding land value, off-site improvements, interior improvements, parking facilities and public facilities

²⁴ Neighboring jurisdictions surveyed include EL Monte, Pasadena, Glendale, Monterey Park, and San Gabriel.

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Water System Access Fee	\$2,282
LA County Sanitation	Single-Family: \$1,630 - \$1,687 Condo: \$1,222.50 - \$1,265.25 Multifamily: \$978 - \$1,012.20
Alhambra USD School	Residential: \$4.39 per sq. ft. Commercial \$0.61 per sq. ft.
Sewer Connection	None

Note: The Public Works/Engineering fee is collected by the Planning Division on behalf of the Public Works Dept. at time of entitlement submittal. The \$446 fee is deposited in PW's account.

The typical impact fees for single-family, duplex, and multifamily, residential projects in Alhambra are listed in Figure 71. The per unit fees for multifamily development is lower than for single-family.

Figure 71. Example Development Fee Schedule

Housing Type	Example Size	New Construction Tax	Public Art Fee	Water System Access Fee	School Impact Fee	Per-unit Fee
Single-family	2,000	\$2,000	\$0	\$2,282	\$7,580	\$11,862
Duplex	2,500	\$4,000	\$0	\$2,282	\$9,475	\$7,879
Multifamily (10 units)	10,000	\$20,000	\$9,000	\$2,282	\$37,900	\$6,918

Constraints Summary:

The City of Alhambra’s Planning and Development fees are within regional ranges among peer communities such as Monterey Park, Pasadena, San Gabriel, and El Monte. Impact Fees are lower than typical in Alhambra because the City’s shas a higher reliance on service charges than impact fees. Further, fees on a per-unit basis are not disproportionately high as a percentage of cost. The city has a consolidated list of its fees clearly posted online. While fees can be a constraint on development when disproportionately high, Alhambra’s fees are lower than typical and not a constraint on development.

What can the City of Alhambra do?

The City of Alhambra is in the process of updating and recalibrating its fee structure. Fees are being recalibrated based on cost recovery. When estimates are completed, the city should conduct a peer analysis to ensure that its fees remain within regional ranges.

The city currently does not utilize its fee program as an opportunity to incentivize development. Jurisdictions in California are increasingly using fee deferrals or waivers for projects that meet targeted affordability thresholds to help offset the costs of affordable housing. The city can explore the marginal impact a fee incentive program would have on development.

Relevant Housing Action Plan Programs: Program 14, Program 17, Program 27, Program 29.

Development Review and Permitting Processes

Applicable Permits for Residential

The Residential Planned Development (RPD) Permit is the name of the main City of Alhambra entitlement application for residential construction projects. This permitting process is required for nearly all residential projects.

Prior to submittal of a residential development application to the Planning Division, the developer may request a review conducted by staff to ensure that proposed project will meet all development standards with the City of Alhambra's Zoning Ordinance. The city offers pre-application meetings which can be booked online.²⁵ Pre-application meetings providing preliminary review are optional and require a fee priced at approximately \$162.75 individually for the first and second review and at approximately \$48.50 for subsequent reviews.²⁶ A few of the major items required for the RPD Permit application are a site plan (full set of architectural plans), photos of elevations, radius map, and land use findings. The radius map listing property owners within 300 feet of a proposed land use application (Planned Development, Conditional Use Permit, etc.) is required due to California state law.²⁷

The city is working to advance a "One-Stop" Streamline Permit Processes and has launched a new customer service portal. City staff worked with developers, contractors, and property owners to help streamline the process and develop guides to help applicants navigate the process. The city also provides a citizen's access portal that allows applicants to track permits, inspections, planning applications, etc.

If understandable, predictable, and accessible, the process of permitting residential development can help provide housing needed for a community. Many cities, including Alhambra, are working to help make their permitting process more straightforward to help the city attract desirable growth and this is typically an ongoing process.

By-Right Development

A land use permitted "by right" is a type of development that is allowed to be built without a conditional use permitting process. The constraints analysis previously denoted the specific residential uses by zone which are permitted ("P") in the table. These uses tend to be the targeted uses that the city is encouraging to be built in the respective zone and they tend to already exist in the area and complement the existing land use pattern.

Conditional Use

A Conditional Use Permit (CUP) is required for proposed land uses which are conditionally allowed in the city. The constraints analysis previously denoted the specific residential uses which are currently categorized as "conditional" in the table.

Conditional uses are those uses which have a special impact or uniqueness requiring specific consideration as to their potential impacts on surrounding properties. At the time of application, a review of the location, design, configuration and impact of the proposed use is conducted by staff to compare the proposed use to established standards. This review determines whether the proposed use should be permitted by weighing the public need for and the benefit to be derived

²⁵ City of Alhambra, retrieved February 2021, <https://www.cityofalhambra.org/resources/planning-zoning>

²⁶ City of Alhambra, retrieved February 2021, <https://www.cityofalhambra.org/resources/planning-zoning-permits>

²⁷ City of Alhambra, Planning Application Requirements Handout, retrieved February 2021: <https://drive.google.com/file/d/1WwaxL82oMZrPOu6xa-cWmK93V81p-0RV/view>

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from the use against the impact that it may cause. A CUP is an entitlement application that requires a public hearing and the adoption of specific findings. Similar to a RPD permit, the Planning Commission must make a set of findings that generally determines that the proposed land use is compatible with the area's existing character, is in compliance with existing and future uses, compatible with surrounding land uses and the physical conditions, and has sufficient services for the community. In addition, they must find that the proposed use would not be detrimental to the public interest, health, safety, convenience or welfare.

The requirements are the same for all uses requiring a CUP. Residential uses requiring a CUP include large (more than six persons) community care facilities, fraternities and sororities, and rest homes, as well as mixed-use developments in the CPD and CBD zones. A CUP is subject to public hearing before the Planning Commission. The city's CUP review process is in place to provide city decision makers with more information on uses that have a special impact or uniqueness and that require specific consideration as to their potential impacts on surrounding properties.

A few of the major items required for the CUP Permit application are a site plan (full set of architectural plans), photos of elevations, radius map, and land use findings. The radius map listing property owners and occupants within 300 feet of a proposed land use application (Planned Development, Conditional Use Permit, Design Review if the project is new construction, or an addition to an existing structure, or if there are exterior alterations, etc.) is required due to California state law.²⁸ The total processing time for a CUP is approximately three and one-half months. While both a Conditional Use Permit and a Planned Development Permit are required for developments in the CBD, concurrent processing is available to facilitate the review process.

The CUP process is a common requirement for cities and has been necessary to help facilitate the development of uses that may have unique development requirements. However, CUPs should be reserved for uses that pose potential or significant land use compatibility issues and warrant Planning Commission review and approval and land uses conditionally allowed should be reviewed periodically, to ensure development patterns are achieving the intended outcomes.

Residential Development Permit

The Residential Planned Development (RPD) Permit is the name of the City of Alhambra entitlement application involving residential construction projects. This RPD permitting process is required for nearly all residential projects; however, the level of review with the city's Planning Commission varies by the scale of development. Developers of residential uses and structures within R-1, R-2, and R-3 zones, including all two-story, second story, or multi-story additions, must obtain a planned development permit and in some cases, this will require public noticing. A planned development permit is also required for any new buildings in the CPD, CBD, and PO zones.

The planned development permit procedure is intended to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use. The Planning Commission must make a set of findings to approve the project which help ensure the project is in compliance with Zoning Code and General Plan, compatible with surrounding land uses and the physical conditions, and has sufficient services for the community. This process does not change the permitted uses or densities on the property. A typical Planned Development Permit must be approved by the Planning Commission. Three months is the typical

²⁸ City of Alhambra, Planning Application Requirements Handout, retrieved February 2021: <https://drive.google.com/file/d/1WwaxL82oMZrPOu6xa-cWmK93V81p-0RV/view>

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time between an application being deemed complete and the Planning Commission hearing. The Planned Development Permit can be processed concurrently with other applications. In addition to the requirements of the planned development permit, all improvements within the downtown revitalization district must undergo design review if the project involves new construction, or an addition to an existing structure, or if there are exterior alterations.

Findings Examples

To demonstrate the RPD process and the potential challenges the procedure presents, we highlight two recent project examples.

PROJECT 1: 234 Marguerita Ave & 234 S Curtis Ave
<p><u>Project Description:</u> Proposed 11-unit condo project in an R-3 zone. Project replacing six existing units to be demolished. Project is in the R-3 zone with a maximum allowed density of 30 units/ac.</p>
<p>Filing Date: 8/23/2019 Approval Date: 8/3/2020</p>
<p><u>Project Summary:</u> This Residential Planned Development Permit met all objective zoning code requirements and was even proposed under max density. The project was placed on the Planning Commission agenda four times, although, no discussions were held on the first two meetings due to rare circumstances relating to public noticing and technical issues. The third meeting of July 16, 2020 was a special meeting. Because of two other items needing to be discussed first, the PC did not get to this item until 11:14 PM. At 1:00 AM, the Commissioners still had not begun Commissioner deliberations, so the item was continued to a fourth meeting of August 3, 2020.</p> <p>In preparation of the August 3rd meeting, staff requested the the Commissioners to each give prepare a list of their concerns to have consensus items discussed/addressed at the Aug 3 meeting. Consensus items included concerns around:</p> <ul style="list-style-type: none"> ▪ Occupancy. Questions about the number of occupants being displaced by the development and the tenure status of the existing units. ▪ Ownership. Questions over the identify of the owner/LLC developing the property. ▪ Property Conditions. Concerns regarding the current conditions of the existing structures and ongoing code enforcement of the new development. ▪ Relocation Assistance. Concerns over the existing landlord/owners plans for relocation assistance for tenants at the existing units being demolished. ▪ Other factors. General questions including if the existing units would qualify under historic preservation, inclusionary housing requirements, and statements about the actual number of meetings for the permit given the unusual circumstances of the first two meetings.
<p><u>Outcome:</u> The application was approved with the following vote: 6-Ayes; 1-Noes; 1-Abstain; 2-Recused. The approval came roughly two months after the first meeting.</p>

PROJECT 2 510 N. 3rd Street
<p><u>Project Description:</u> Proposed four unit apartment project in a three-story structure. The project is located in the R-3 zone with a maximum allowed density of 24 units/ac.</p>
<p>Filing Date: 8/16/2018 Planning Commission Denial Date: 1/7/2019 Ultimate Approval Date: 5/16/2020</p>
<p><u>Project Summary:</u></p>

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The project had two planning commission meetings, the first on December 3, 2018, roughly four months after application filing. The second meeting was held 1/7/2019 where the application was denied by the planning commission. Concerns and findings from the Planning Commission included:

- **Height.** Findings that the proposed three-story height was incompatible with the neighboring one-story residence to the north. Both properties are zoned R-3 with a three-story maximum height.
- **Shade and shadow.** Recommendation that a shade and shadow study would be needed to evaluate the impact on the residence to the north. The city does not have shade and shadow standards.
- **Architectural Style.** Findings that the proposed architectural style was incompatible with the existing development on the street.

Three members of the public also spoke against the project, highlighting similar concerns over height, shadow, architectural character, and parking impacts.

The project was denied by the Planning Commission and appealed to the City Council. A summary of City Council Meetings include:

- **March 25, 2019.** Council expressed concerns similar to the Planning Commission. The item was continued to April 22, 2022.
- **April 22, 2019:** Appellant requested continuance to May 13, 2019
- **May 13, 2019:** Council again expressed concerns similar to the Planning Commission. The item was again continued to May 28, 2019.
- **May 28, 2019:** After public comment and discussion, the City Council continued the item to July 8, 2019, and asked the appellant to conduct three meetings with neighbors to address issues of height, design, and privacy.
- **July 8, 2019:** The appellant requested continuance to September 9, 2019, as he needed more time to complete the neighbor meetings.
- **July 31, 2019:** After several meetings with neighbors the appellant decided to withdraw the appeal after unsuccessful negotiations on height limit.

Project Outcome:

The initial RPD was denied on 1/7/2019 by the Planning Commission by a vote of 2-Ayes; 5-Noes; 2 absences. A revised resubmitted 5-unit project was ultimately approved on 5/16/2020 administratively under SB35.

Prevalence of One-year Extensions

Approved Planned Development Permits are valid for one year and the applicant must obtain the building permit within that one year or the approval expires. This creates a short time period to obtain permits, a condition that is challenging for complex projects. The city does offer a one-year extension for \$400 that requires Planning Commission approval. Over the 2014-2020 period 30 projects had to rely on an extension. This condition certainly places additional time, cost, and uncertainty on applications.

RPD Summary:

Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. The project examples and findings summarized above demonstrate that through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development.

Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.

Design Review

The Design Review Board reviews the design of each new or altered improvement in the downtown revitalization district for which a building permit, license, certificate, or other approval is required. The Board also reviews the design of all new residential development, and commercial and industrial buildings and uniform sign plans for multi-tenant buildings throughout the city.

Within 30 days after the architectural plan is filed with the Community Development Department, the Design Review Board must consider the architectural plan and approve, disapprove, or conditionally approve the plan. When the architectural plan is approved or conditionally approved, the Design Review Board issues a certificate of design approval with attached conditions.

Residential design standards are clearly outlined in Section 23.44 of the city's Zoning Code. Design review approval is based on adherence to the general design standards listed in Chapter 23.44.030 of the Zoning Ordinance. In addition, Sections 23.44.040 and 23.44.050 address specific design standards for residential and commercial developments. General design standards are tailored to encourage quality development that is compatible with surrounding uses. For example, the design guidelines require that storage is screened and that lighting is deflected away from adjacent properties. In addition, the guidelines require that the proposed design is compatible with existing development in the area in terms of scale, height, bulk, materials, cohesiveness, colors, roof pitch, roof eaves and the preservation of privacy. Residential design standards are tailored to encourage compatibility of finishes and styles, continued maintenance of the property, appropriate massing so as to provide harmony with surrounding land uses, and to minimize such things as razor wire, metal roofs, outdoor storage. These standards are objective and not overly restrictive and are unlikely to have a significant impact on the affordability of a housing development.

The city provides pamphlets at the Community Development Counter that outline the process, submittal requirements, and a fee schedule. Overall, the Design Review process takes approximately two weeks.

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Figure 72. Processing Procedures and Approximate Timelines by Residential Development Type

Source: City of Alhambra

Residential Type	Approving Body/Entity	Public Hearing Required?	Estimated Processing Times	Appealing Body (if applicable)
Single-Family	Staff only for R-1 zones, RPD Permit required for R-2 and R-3 zones	Some cases require Design Review Board approval	Approximately 1 month from time of complete application	Planning Commission
Multifamily	Planning Commission	Planning Commission and Design Review Board approval required	Approximately 3 months from time of complete application	City Council
Mixed-Use	Planning Commission	Planning Commission, Design Review Board approval required, City Council may be required on some applications	Approximately 6 months from time of complete application	City Council
ADU	Staff	None	Approximately 1 month from time of complete application	Planning Commission

Processing Timelines

Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. Communities with strong opposition to development can often use these processes to further prohibit development.

The city strives to employ a “One-Stop” streamlined permit process. Step-by-step guides were developed to help contractors and homeowners through the process. For large-scale projects, city staff conducts pre-development coordination meetings with project proponents and all city departments that play a role in the construction process to help ensure a smooth-running project.

Figure 73 summarizes development review requirements for various types of applications. The city provided a list of project applications from 2016-2019. This list included 94 projects with a calculated time period from application to approval. The average time of approval across all projects was 6 months²⁹.

²⁹ Data was not provided on the number of units, complexity, or ultimate development outcome.

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Figure 73. Development Review Requirements

Source: City of Alhambra (2020)

Application	Typical Timeline (months)	Staff	Planning Commission	City Council
General Plan Amendment	5 mos.	R	R	D
Rezone (adjustment to zoning map)	varies	R	R	D
Zoning Ordinance Amendment	varies	R	R	D
Parcel Map (subdivision with less than 5 parcels)	3 mos.	R	D	A
Tentative Tract Map	3 mos.	R	D	A
Condominium Conversion	varies	R	D	A
Conditional Use Permit	3 mos.	R	D	A
Variance	3 mos.	R	D	A
Site Plan Review	1 mo.	D	A	A
Planned Development Permit	2-3 mos.	R	D	A
Recommendation (R)		Reviews the proposed project and submits a recommendation		
Decision (D)		A decision to approve, approve with conditions, or deny is made and will stand unless appealed within 10 calendar days.		
Appeal (A)		A decision made by the Planning Commission may be appealed, a public hearing will be set with the City Council.		

Constraints Summary:

A recent study from the Turner Center found that shortening permitting and approval timelines can mitigate costs associated with uncertainties and delays³⁰. Another study in the Seattle region found that just cutting permitting times in half can lower development costs and/or supportable rent/sales levels, improving affordability³¹. These themes have been present in local developer comments as well.

The city works to process permits concurrently and typical timelines for approval reported by the city are not considered overly constraining on development. The city's review processes are generally typical, with a few exceptions. First, requiring full Planning Commission approval for all variances can add to approval times. An initial variance can often be approved administratively. Second, as previously evaluated, the city's Residential Planned Development (RPD) permit adds uncertainty, time, and discretionary approval that is a constraint on development.

The city's zoning code audit found Alhambra's development review processes to be burdensome and over reliant on discretionary review. Subjective findings could lead to a protracted review process or denial of a project based on interpretation. Additional costs and uncertainty can negatively impact developer interest in the community, limiting affordable and market-rate housing production and perpetuate under-supply and lack of affordability.

What can the City of Alhambra do?

³⁰ Turner Center from Housing Innovation. "The Hard Costs of Construction" Recent Trends in Labor and Materials Costs for Apartment Buildings in California". March 2020

³¹ 2019 Seattle Affordable Middle Income Housing Advisory Council Final Report (pg. 59), see <https://durkan.seattle.gov/wp-content/uploads/sites/9/2020/01/AMIHAC-Final-Report-2020-01-22-.pdf>

Many cities, including Alhambra, are working to help make their permitting process more straightforward to help the city attract desirable growth. The City of Alhambra can take steps to increase development certainty and reduce risk to encourage development. This is largely done by limiting changes to the development process (e.g., reducing overly subjective design review requirements, clear messaging from elected or review bodies, outlining permitting steps), or by limiting changes to the costs of development (e.g., permit costs, taxes, fees).

Periodic reviews of the permitting process requirements, particularly for targeted development crucial to meeting the community's needs, can be a useful exercise for identifying possible areas of improvement. These process reviews could incorporate input from local housing and affordable housing developers and nonprofits. Lastly, many jurisdictions are working to move as much of the permitting process to online as possible, to promote "paperless" submittals, where it reasonably is effective. At the end of 2020, the city launched a new customer service portal called the Tyler Systems/Energov permitting system to implement permitting process efficiencies and to deliver better and faster assistance to the public. Citizens can pay bills, track permits, get zoning information, submit planning applications, and do more, in one centralized online location.

Portal link: <https://alhambraca-energovpub.tylerhost.net/Apps/SelfService#/home>).

Relevant Housing Action Plan Programs: Program 13, Program 16, Program 17, Program 20, Program 27, Program 29.

Building Codes and Enforcement

Alhambra adopted the amended Chapters 2 through 35, 66, 67, 96, 98, 99 and Appendices I) and J) of the Los Angeles County, Title 26, Building Code in December 2019. This is now referred to as the Alhambra Building Code as Chapter 20.03 of the city's Building and Construction Ordinance. Modifications to the building code included changes to language in grading fees, compliance with Zoning Code processes, and completion of work requirements.

Alhambra also updated its fire code (Chapter 19.02 of the city's Fire Ordinance) in 2019, adopting the 2019 California Fire Code. Updates included refinements to requirements for additional address information, fire sprinklers, access to fire equipment in buildings, and minimum fire flows for R-3 and R-4 buildings and townhouses.

As noted in the previous housing element, the city adopted the Uniform Housing Code (1988) in 2010 and it has not been updated or amended.

Constraints Summary:

Enforcement of building code standards does not constrain the production or improvement of housing in Alhambra but instead serves to maintain the condition of the city's neighborhoods. Further, the California Building Code is adopted by many cities throughout Southern California and does not, in general, pose a constraint to residential development.

What can the City of Alhambra do?

The city continues to link code enforcement to its Housing Rehabilitation Program. During the 2019-2020 fiscal year code enforcement staff made 533 referrals to the Housing Rehabilitation Program for assistance.

Relevant Housing Action Plan Programs: Program 2.

On and Off-Site Improvements

Site improvements are a necessary component of the development process. Improvements can include the laying of sewer, water, and streets for use by a community when that infrastructure is lacking, and these improvements make the development feasible. Due to the built-out nature of the city, the residential areas in Alhambra are already well-served with infrastructure. Site improvement requirements for infill or redevelopment will vary depending on the existing condition of each project. Typically, requirements include the undergrounding of utilities, provision of a fire sprinkler system, ensuring the existence of one fire hydrant within 250 feet from the property line, dedication of streets and alleys, and smoke detectors. The street and alley dedications can be a significant constraint especially if it reduces the available density for a development project since density and FAR are all calculated using “net” lot area minus any dedications. Developers are required to purchase and have the city install water service pipe and meter and may be responsible for upgrading sewer laterals or installing backflow prevention devices. Portions of curbs, gutters, sidewalks, and driveways may be required to be replaced, depending on their condition.

Constraints Summary:

The City of Alhambra is a largely built-out community. The majority of future housing development will come through redevelopment of underutilized parcels. Required infrastructure improvements have not been reported as excessive by the development community and are not considered a burden or constraint on development.

What can the City of Alhambra do?

The city can continue to monitor the impact of its requirements on development projects to ensure that requirements are scaled to the impact of the project. It can also ensure that fees are calibrated to cost of service. The city should consider adding Code updates associated with the street and alley dedication requirements to remove unintended barriers to needed housing development.

Relevant Housing Action Plan Programs: Program 20, Program 29.

Environmental and Infrastructure Constraints

Environmental and infrastructure constraints can hamper development of sufficient housing for all economic segments. The following section discusses potential environmental and infrastructure constraints to residential development in Alhambra.

Environmental

Alhambra is an urbanized city in a large metropolitan area. No rare or endangered plant and animal species are known or suspected to exist.³² The city’s topography is generally level, with no significant hillside areas, and soil erosion is not an issue. No active seismic faults are known or suspected to traverse the city, and Alhambra is not included in any special seismic study zones identified by the State. In the event of significant seismic activity in Southern California, ground shaking has the potential for substantial damage. The city maintains an up-to-date Emergency

³² City of Alhambra General Plan, 1986.

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Service Plan. City officials and staff responsible for implementing the plan have attended training classes and emergency simulation exercises.

To assist jurisdictions in addressing potential environmental constraints, SCAG developed the Housing Element Parcel Tool (HELPR). This tool includes a comprehensive list of environmental constraints including:

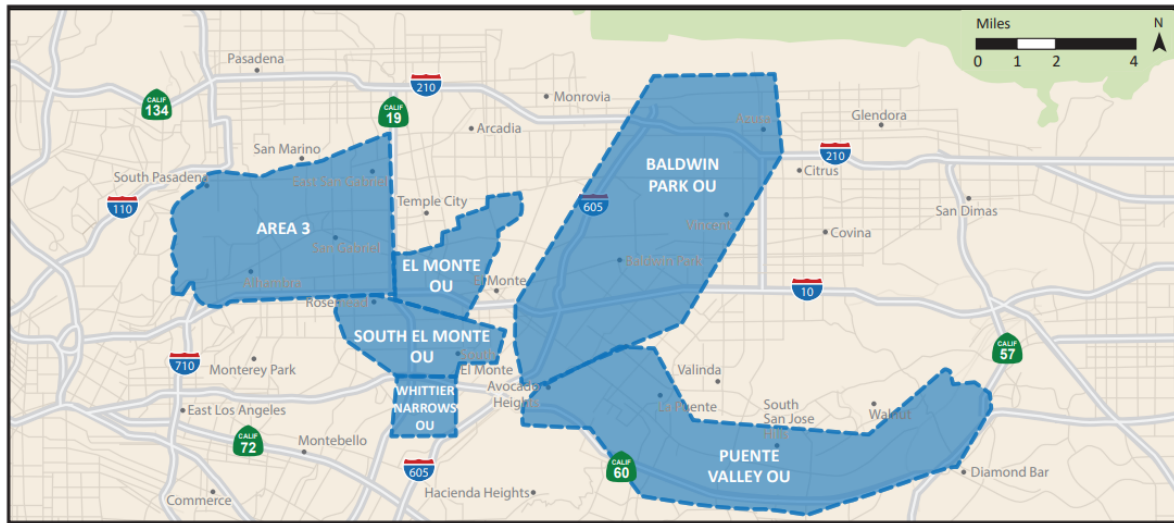
- Fire hazard areas
- 3ft. sea-level rise inundation area
- FEMA 100-year flood plain area
- Alquist-Priolo earthquake fault zone
- Liquefaction susceptibility zones
- Landslide hazard zones
- California protected areas
- River or wetland areas
- Wildlife habitat zones
- 6ft. sea-level rise inundation areas
- Locations with rare plants and animals
- NCPP/HCP reserve areas

Alhambra is generally void of constraints in nearly all these areas. There are a few pockets considered in landslide hazard zones. There is also a section straddling the San Pascual Wash from Huntington Drive to the Alhambra Golf Course that is considered inside an active river/wetland area. However, this is a controlled waterway and impacts on actual parcels are likely limited. This constraint impacts only a handful of sites in the sites inventory. Sites with potential environmental constraints are noted in the detailed inventory appendix and electronic inventory database.

Soils and Groundwater Contamination. Most of Alhambra that lies north of Interstate 10 is located within a portion of the San Gabriel Valley Superfund Fund Site – Area 3. Area 3 covers 19 square miles of contaminated ground water and is one of 8 Operable Units identified by U.S. EPA for the San Gabriel Valley Superfund Sites and is known as the San Gabriel Valley Area 3 Superfund Site.

Figure 74. San Gabriel Valley Superfund Sites

Source: City of Alhambra



San Gabriel Valley Superfund sites (boundaries are approximate)

Discovery of contamination in water purveyor production wells led the U.S. EPA to designate Area 3 as a National Priorities List (NPL) site in 1984. Volatile organic compounds (VOCs) have been detected in production wells and safeguards are in place to ensure acceptable drinking water quality. Area 3 groundwater is contaminated with VOCs (most commonly tetrachloroethene [PCE] and trichloroethene [TCE]), perchlorate, and nitrate at concentrations exceeding state and federal water quality standards. The EPA is expected to finish groundwater investigation by 2021 and will then develop next steps for potential action.

Several areas of the city are experiencing groundwater contamination. Similar to contamination the underlying soils in the Villages east of Fremont Avenue area were also found to be contaminated. The combination of the groundwater and soils contaminations and the magnitude of groundwater required for the Villages development caused the Villages to propose significant and costly soils and vapor mitigation measures. As this was a large project that was heavily capitalized, it was able to absorb the fiscal impact of those mitigations, however, other projects within the city, if faced with similar currently unidentifiable issues, may not be able to overcome these constraints.

Infrastructure

The infrastructure of critical importance to the maintenance and development of new housing includes water facilities, sewerage facilities, streets, and sidewalks. The water supply for the city comes from two sources: groundwater from wells in the Main Basin, and through direct delivery of treated imported water from the Metropolitan Water District of Southern California (MWD).

The Sewer and Storm Drain Section of the Utilities Department maintains and operates the sanitary sewer collection system, which consists of 1,000 storm drains/catch basins, 2,800 manholes, seven lift stations with main sewer lines ranging in size from four inches to 36 inches. Approximately 99 percent of the system is composed of vitrified clay pipe, with less than one percent being cast iron pipe and reinforced concrete pipe. The sewer system is maintained consistently with the use of high-pressure jetting to clean sewer lines.

The city has completed a number of infrastructure improvements on local roads and streets, including the widening, reconstruction, and repaving of a number of main streets. The provision and maintenance of infrastructure in a community enhances not only the character of the

neighborhoods, but also serves as an incentive to homeowners to routinely maintain the condition of their homes. In the alternative, when public improvements are left to deteriorate or are overextended in use, the neighborhoods in which they are located become neglected and show signs of deterioration.

Very little undeveloped residential land remains in the city. Future housing growth will occur on existing infill sites or will be integrated with commercial uses. All necessary infrastructure to meet housing development pursuant to the RHNA is already in place.

Water System Capacity. The city has nine active wells located within the Main Basin including Wells No. 7, No. 8, No. 9, No. 11, No. 12, No. 14, No. 15, Longden 1, and Longden 2. The city of Alhambra's distribution system includes six reservoir locations, five booster pump stations, one interconnection with MWD (designated USG-5), and an interconnection with San Gabriel County Water District. The city's total water demands (including potable and recycled water) over the past 10 years have ranged from 8,840 AFY to 11,199 AFY, with an average of 9,998 AFY. The city currently measures its water use through meter data and billing records. The city updated its 2020 Urban Water Management Plan in June 2021. It analyzes the projected water demand in five-year increments over the next 25 years. Projected water demands for lower income households are included in these projected water demands. The analysis found that the city will be able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive drought period. Therefore, the city should have adequate systemwide capacity to meet its regional housing need.

Sewer System Capacity. Wastewater generated in the city is treated by the Sanitation District of Los Angeles County (LACSD). Wastewater generated in the city is treated at one or more of the following: Most wastewater is treated at the Whittier Narrows Reclamation Plant (WRP) located near the City of South El Monte, which has a capacity of 15 million gallons per day (mgd) and currently produces an average recycled water flow of 9.9 mgd; the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 23.1 mgd. These plants are capable of treating the potential increase in wastewater associated with Alhambra's regional housing needs.

The city updated its Sewer System Management Plan in 2019 which identified projects and funding required to maintain safe operations of the system. In 2018 the city approved a sewer rate increase to assist in funding the Capital Improvement Plan.

Statutory Requirements. Government Code §65589.7 requires each public agency or private entity providing water or sewer services to grant a priority for the provision of these services to proposed developments that include lower income housing units. The City has not denied, applied conditions, or reduced the amount of sewer service for a development that includes housing affordable to lower-income households consistent with state law. The City will adopt written policies and procedures that grant a priority for sewer hook-ups and service to developments that include affordable housing for lower-income households.

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

Transparency Requirements

The city is complaint with transparency requirements for posting all zoning, development standards and fees on the City's website.

Code Availability. The entire Alhambra Municipal Code, including Title 23 ("Zoning") is accessible from the City's website³³.

Development Standards. Development Standards contained Title 23 of the Alhambra Municipal Code are accessible on the City's website. The City also has specific pages on the City's website devoted to the following:

- Accessory Dwelling Units
- Residential Development Standards
- SB35 Affordable Housing Streamlining Act Information
- Master Fees and Services Charges Schedule

In addition, the Planning Division's page on the City's website contains information on "Zoning Permits, Licenses, and Applications" that provides a direct link to an itemized list of all Planning entitlement fees.

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³³ <https://codelibrary.amlegal.com/codes/alhambra/latest/overview>

Chapter 4: Housing Resources

The magnitude of housing need in most communities, especially affordable housing need, is often large relative to the resources available. Providing for an adequate supply of housing across all income levels is challenging and requires a balance of resources across the physical, social, and financial realm. To inform the city's Housing Plan, this section of the Housing Element provides an overview of the resources available to the city.

Land and Market Support

The City of Alhambra has 5.5 acres of vacant residential land available for development with the capacity to accommodate up to 59 units. Market conditions in Alhambra are characterized by escalating rent and home prices and low vacancies and inventory—characteristics that are generally supportive of redevelopment. The site's inventory in Chapter 7 details redevelopment potential in Alhambra. Through this process the city identified realistic market-supportive redevelopment capacity of 5,571 units.

Administrative Resources

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Providing solutions that meet the housing needs of the city's residents requires an ecosystem of governmental, non-profit, and private partners that offer resources and expertise.

The City of Alhambra Community Development Department

The Community Development Department is responsible for assisting business owners, citizens, and developers through the city's review and approval process; developing a comprehensive, long-range plan for development and improvement of land use; and promoting quality development and rehabilitation of existing structures. The department includes five divisions: Planning, Economic Development, Housing, Building, and Code Enforcement. The overarching role of the Department is to administer the city's land use and zoning regulations and ensure the city is in compliance with State and Local regulations, administer the building and land use permitting services, support the rehabilitation and creation of affordable housing, and support the business community.

Alhambra HCDA Citizen Advisory Committee

The City has established the HCDA Citizen Advisory Committee to make recommendations to City Council regarding the use of HUD funds and the administration of the CDBG and HOME programs. The HCDA is a 10-person council of community members.

Non-profit Developers and Community Development Organizations

Alhambra works with a variety of non-profit developers and community development organization partners collaboratively to facilitate the production of affordable housing in the city.

- TELACU is a non-profit community development corporation that provides affordable home-ownership opportunities for families, and apartment rentals for low-income senior citizens and the disabled. Since its establishment in 1968, TELACU has developed thousands of such units in communities throughout Southern California. In Alhambra,

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TELACU developed a 66-unit very low-income housing unit for seniors (the head of the household must be 62 years-old and the household income must not exceed 50% of the HUD annual income limits).

- Habitat for Humanity is a non-profit Christian organization dedicated to building affordable housing and rehabilitating damaged homes for lower-income families. Habitat builds and repairs homes for families with the help of volunteer and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable no-interest loans. Volunteers, churches, businesses, and other groups provide most of the labor to build the homes. Land for new homes is usually donated by government agencies or individuals.
- The city has also worked with the National Preservation Partners to develop an affordable housing project on the city-owned Howard Street property – a property purchased with CDBG funds and developed by National Preservation Partners with HOME and Redevelopment Housing Set-Aside funds from the city.
- The city contracts with the Housing Rights Center to provide fair housing services in the community.
- The city is also undertaking a Disposition and Development Agreement to build 50 one-to two-bedroom permanent supportive and low-income rental housing on a currently city-owned parking lot at 2nd and Main Street with American Family Housing/National Core.
- The city also negotiating a second agreement with Related California to develop 44 units on a 0.32-acre city-owned parking lot on N Chapel Avenue.

Homeless Services

Alhambra has a very small homeless population. The city recognizes that many agencies in the County provide services to homeless persons in the San Gabriel Valley. The city's strategy is to focus resources on the at-risk homeless, specifically the elderly and frail elderly with limited resources.

The city has cooperative relationships with non-profit organizations, such as the Union Station Homeless Services (USHS), Housing Rights Center (HRC), the Los Angeles Homeless Services Authority (LAHSA), and the Greater Pasadena Housing and Homeless Network to provide services and housing for homeless persons.

Since 2017, the city has been funding a Homeless Outreach Services program. The program connects homeless agencies that provide emergency shelter, provide supportive services, and/or help transition them to permanent housing. The USHS in Pasadena administers the program and provides outreach, shelter, rapid-rehousing, case management, and supportive services for homeless persons from Alhambra. The city's efforts include an emergency hotel/motel voucher program, which is facilitated by USHS. The city is currently requesting proposals for a new contract to provide homeless support services and case management, including shelter assistance.

Financial Resources and Incentives

Financial Resources

California Redevelopment Agencies (RDAs) were created with the state's passing of the Community Redevelopment Act in 1945. In February 2012, the approximately 400 RDAs were officially dissolved as part of the 2011 Budget Act. Although the documented shortcomings of

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these agencies were plenty—particularly in the last few years leading up to their dissolution—, they played a key role in aiding affordable housing development across the state, in addition to renovating rundown urban areas, cleaning up and rehabilitating contaminated land, and redeveloping areas for commercial retail, which resulted in the creation of new jobs and increases in private investments.

According to a white paper from the U.S. Department of Housing and Urban Development (HUD), during the fiscal year period of 2001 to 2008, RDAs created approximately 63,000 affordable housing units, 44 percent of which were affordable to those earning 50% of MFI or lower. Statewide, the removal of these agencies expected to result “in a statewide average annual loss of 4,500 to 6,500 new affordable units through the foreseeable future after all enforceable obligations have been met.”

A key benefit RDAs provided to local communities, beyond the creation of new affordable housing units, was assisting developers in filling fund gaps in Low-Income Housing Tax Credit (LIHTC) developments. In California’s 2011 funding round, it was estimated that “62 percent of all 9% LIHTC awards also had RDA financing.” Hence, the dissolution of RDAs has and will continue to impact developers insofar that access to this bridge in funding is gone.

In place of the RDAs’ absence, local governments have alternatives to encourage redevelopment and affordable housing; however, these options are narrower in scope and often require a 2/3 majority vote to become reality. Some of these options include: Infrastructure Financing Districts, Community Facilities Districts, Assessment Districts and Business Improvement Districts, Statutory Development Agreements, Federal New Market Tax Credit Programs, or Community Controlled Nonprofit Economic Development Corporations.

Additionally, California’s cap-and-trade program, which is set-up to reduce carbon emissions and generate revenue for the state via auctions of pollution permits, is being used to fund affordable, or “sustainable”, housing projects for residents. In particular, these projects are required to be constructed near transit lines so as to provide residents ease of access to public commuting. As of 2015, about \$122 million was allocated to 28 sustainable housing projects in the state. Some cities that received funding include Los Angeles, San Diego, Riverside (a veteran’s village), and Long Beach, among many others across the state.

The following programs exist to continue to fund housing and affordable housing developments, but they do not backfill the gap left by the dissolution of RDA programs in 2012.

[Alhambra Housing Asset Fund](#)

The City of Alhambra maintains a Housing Asset Fund that includes funds remaining from the former RDA. The city uses these monies to fund affordable housing development. The city plans to use Asset Fund monies for both the Mariposa project and the Chapel Lot project.

[Community Development Block Grant \(CDBG\)](#)

Through the federal CDBG program, the HUD provides funds to local governments to fund a wide range of community development activities for low-income persons. The CDBG program provides formula funding to larger cities and counties, while smaller cities (fewer than 50,000 population) receive its allocation from the county or competes for funding that is administered by the state. Given Alhambra’s population, it is entitled to receive CDBG funds directly from HUD. The city anticipates receiving a CDBG allocation of approximately \$1,014,111 for the 2020-21 Proposed Budget. CDBG allocations fluctuate annually; however, the city conservatively estimates an average of \$1,000,000 annually.

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The CDBG program is flexible in that the funds can be used for a range of activities. In the past, the city has used CDBG funds for eligible housing activities including acquisition and/or disposition of real estate, housing rehabilitation, and code enforcement efforts.

HOME Investment Partnerships (HOME)

The city receives an annual entitlement of funds from HUD under the HOME program. HOME funds can be used for activities that promote affordable rental housing and homeownership for construction, reconstruction, moderate or substantial rehabilitation, and first-time homebuyer assistance. In recent years, Alhambra has contributed HOME funds to help lower-income homeowners with rehabilitation and to provide first-time homebuyers with down payment assistance. The city anticipates receiving a HOME allocation of approximately \$631,003 for the 2020-21 proposed budget. Similar to the CDBG funding, the HOME allocations fluctuate annually. The city conservatively assumes an average of \$700,000 per year.

Housing Choice Voucher Program

The Los Angeles County Development Authority (LACDA) administers the local Section 8 Housing Choice Voucher Rental Assistance Program for Alhambra residents, providing rental assistance payments to owners of private market-rate units on behalf of low-income tenants. Typically, the voucher pays for the difference between the Fair Market Rent for the unit and 30 percent of the voucher recipient's household income.

Continuum of Care (CoC)

Grants for development of a continuum of housing options and support services to assist homeless persons in the transition from homelessness are available from HUD. These grants are awarded to the Los Angeles Continuum of Care to be distributed to nonprofit homeless agencies (such as the Greater Pasadena Housing and Homeless Network and LAHSA), in order to implement a broad range of activities that benefit homeless persons.

Housing Opportunity for Persons with AIDS (HOPWA)

The HOPWA program provides funding for the housing and related support-service needs of low-income persons living with human immunodeficiency virus (HIV) and acquired immunodeficiency syndrome (AIDS). The City of Los Angeles receives HOPWA funding on behalf of Los Angeles County, as the largest jurisdiction in the County.

Low Income Housing Tax Credits

Tax credits are available to individuals and corporations that invest in low-income rental housing. Usually, the tax credits are sold to corporations with a high tax liability and the proceeds from the sale are used to create the housing.

California Permanent Local Housing Allocation (PLHA)

SB2 created a permanent funding source through a \$75 real estate recording fee. Over the initial PLHA five-year period, Alhambra is estimated to receive nearly \$2.8 million in PLHA funds. The city's planned disposition of these funds is to fund the Homeless Supportive Services/Case Management Program.

San Gabriel Valley Regional Housing Trust (SGVRHT)

Alhambra is a member city of the SGVRHT. Alhambra initially contributed \$116,400 of its PLHA funds to the trust. The trust was established in February 2020 as a JPA to fund the planning and construction of affordable and homeless housing. In 2020 the trust successfully received a \$1,000,000 match from the California Local Housing Trust Fund (LHTF) program. The SGVRHT maintains a pipeline of projects seeking funding. Both the Mariposa and Chapel projects are in the regional pipeline. The Mariposa project has received a loan from the trust.

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Inclusionary Housing Trust Fund

In 2020 the city approved an Inclusionary Housing Ordinance that includes an option for developers to pay an in-lieu fee as an alternative to providing mixed-income development. A fee calibration study was completed in Winter 2020. In-lieu fees collected will be eligible to support affordable development in the future.

Other State and Federal Programs Available to the City of Alhambra

The State of California has many other programs and funding sources the city and its residents can draw from to fund housing programs and access in Alhambra. A sampling of these programs include:

- Multifamily Housing Program (MHP)
- Affordable Housing and Sustainable Communities Program (AHSC)
- Calhome
- California Emergency Solutions and Housing (CESH)
- Infill Infrastructure Grant Program (IIG)
- Local Early Action Planning (LEAP) Grants
- Affordable Housing Partnership Program (AHPP)
- California Homebuyer's Down Payment Assistance Program (CHDAP)
- California Tax Credit Allocation Committee (CTCAC): Low-Income Housing Tax Credits (LIHTCs)
- California Tax Credit Allocation Committee (CTCAC): Historic Rehabilitation Tax Credits (HRTCs)
- California Debt Limit Allocation Committee (CDLAC): Various Programs

Development Incentive Programs

For both market-rate and affordable housing developments, government actors can offer a variety of non-market financial resources in the form of development incentives to encourage more housing development. Often these programs are aimed at encouraging the types of housing the market is not delivering, or housing that helps meet public goals.

Financial incentives often lower the cost of development (such as fee waivers or expedited permitting processes) or lower the cost of operations (tax exemptions). Regulatory incentives adjust site allowances and requirements (such as building higher or providing less parking) to increase developable space or reduce costs, thereby creating value. These incentives help increase development feasibility to shape market responses.

Flexible Development Standards

Section § 23.20.080 of Alhambra's zoning code allows for flexible development standards in the R-3 zone to promote high quality multiple-family residential developments, to encourage innovative design and efficient use of land which might otherwise be constricted by rigid development standards, to encourage consolidation of parcels, and permit developments to be evaluated on individual merits. The flexible development standards provide for variation from three of the provisions required by the R-3 zone (Section 23.20), three provisions required by the property development standards (Section 23.42), and three provisions required by the design standards (Section 23.42). Flexible development standards are available to lots of 40,000 square

feet and larger. This is due to economies of scale. The city has used this tool threshold size to encourage consolidation of small lots to achieve large-size projects that can offer amenities, efficient site planning, and cost reductions in senior and affordable housing projects in conjunction with density bonuses.

Density Bonus Program

The City of Alhambra offers housing density bonuses (Code Section 23.20.060) consistent with the state law outlined in California Government Code § 65915. Eligible applicants are allocated a density bonus for projects providing at least ten percent of the total units as lower-income households (defined as 80% AMI), or five percent of the total as very low-income households, or for a senior citizen housing development (defined by California Civ. Code § 51.3).

AB1763 Density Bonus

AB 1763 generally allows housing development located within one-half mile of a major transit stop and meeting all housing affordability requirements to receive a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. The city's Mariposa project is using this bonus. As a part of the Housing Element Update, the city is planning to adopt an ordinance that extends the AB1763 bonus throughout the entire Downtown Revitalization District.

Inclusionary Housing Ordinance

In July 2020, the City Council of Alhambra approved the resolution to amend its zoning code to include a new inclusionary housing ordinance that outlines inclusionary unit requirements, incentives for greater affordability of units, and in-lieu fee for alternatives to the inclusionary unit requirement. The ordinance was adopted in September 2020. A detailed overview of the city's IHO is included in Chapter 3 of the Housing Element. At the most fundamental level, inclusionary policies reduce the economic value of a development site by driving part of its use to a below-market purpose. Therefore, inclusionary policies only work when the market can deliver market-rate housing and/or the loss in net-operating-income (NOI) is offset by value-enhancing incentives.³⁴ If poorly designed and executed, inclusionary policies may be a constraint to housing production. When structured appropriately and in supportable market conditions, an IHO can have meaningful impacts on the delivery of affordable housing units. The city's policy is too new to have observable direct impacts. However, the Constraints Analysis of the Housing Element did not find the city's IHO to be overly restrictive compared to peer cities that have has positive affordable housing development outcomes from their IHOs. Further, the Housing Element includes a program to monitor the IHOs impact on development in the community and make a mid-cycle adjustment in the event that it is found to be inhibiting development.

Opportunities for Energy Conservation

The City of Alhambra has taken action on energy conservation through policies in its building code, general plan, and utility partnerships. The city integrates the most current California Energy Code (California Code of Regulations Title 24, Part 6) and California Green Building Standards Code (California Code of Regulations Title 24, Part 11).

Alhambra's municipal code has a guideline for solar energy design with the intent of maximizing passive heating and cooling opportunities for residential developments. It is also intended to protect possible solar energy systems from shading. The code requires subdivisions to "maximize the number of future buildings which will receive sun-light sufficient for using solar energy

³⁴ In rare instances rents are sufficiently high to cross-subsidize affordable housing without offsets.

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systems.”³⁵ Additionally, the code requires a balance between sunlight and shade to “receive cooling benefits from both prevailing summer breezes and existing shading vegetation.”

Alhambra’s General Plan has a policy that encourages and language that requires green building construction. Policy R-5C from the plan “encourage the use of green building technology for building retrofit and pursue LEED-certification for new development.” This policy comes after this statement on new developments, “New development projects are required to incorporate green building standards, which promote environmentally responsible and resource-efficient design through siting, construction, operation, maintenance, renovation, and de-construction.”

This plan is using contradictory language while supporting the construction of green buildings because it both “encourages” and “requires” it. If the plan cleans this up, then the proper direction can clear up confusion for developers.

The City of Alhambra has a partnership with utility programs, like Southern California Gas Company (SoCal Gas) and Southern California Edison (SCE), to promote efficient energy use and assist lower-income customers. These partnerships are in direct alignment with the examples provided by the California Department of Housing and Community Development (HCD). Broadly these programs are looking to provide rebate programs for installing energy-efficient appliances, and public education about ideas to conserve energy. SoCal Gas offers installation of energy-saving home improvements at no cost to low-income households. SCE also offers free energy-saving appliances to low-income households.

Opportunities for the City of Alhambra to build on what they already have to include combining general plan policies with permitting and updating its energy plan.

The General Plans policy and recommendation on green building construction could be combined with three of California HCD’s recommendations.³⁶ By combining these three recommendations, Alhambra can achieve a win for green building construction, while reducing cost of construction by speeding up their permitting process:

1. “Streamline and expedite the approval process for housing built using green building standards and specific energy standards.”
2. “Adopt policies and incentives to promote energy-efficient retrofits prior to resale of homes.”
3. “Target local funds, and Community Development Block Grants, to assist affordable housing developers incorporate energy-efficient designs and features.”

Also, Alhambra could include “cool roofs” in its development code or encourage it through a rebate program as recommended by the U.S. Department of Energy. Cool roofs are designed to reflect more sunlight by choosing more reflective paint colors or materials. These roofs would reduce need for air conditioning, thereby lowering peak electricity demand.

Alhambra has facilitated mixed-use, compact development for decades in the Central Business District and throughout the city. Mixed-used development encourage walking due to more compact development patterns and housing development that is in close proximity to services

³⁵ https://codelibrary.amlegal.com/codes/alhambra/latest/alhambra_ca/0-0-0-109642

³⁶ <https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/opportunities-for-energy-conservation.shtml>

and retail businesses. To the extent that the city is able, mixed-use zoning should be expanded so that all residents have the option to walk to fulfill weekly errands, rather than drive.

In 2012, the city published its Energy Action Plan (EAP) along with the 27 other cities that are part of the San Gabriel Valley Council of Governments. The purpose of this plan is to establish a long-term vision and commitment to achieve energy efficiency in the city, for both the community and the government operations. This plan was created with a 2020 target goal of reducing greenhouse gas emissions. The State of California now has a 2030 target and a carbon neutral goal for 2045.

Affirmatively Furthering Fair Housing Analysis

AB686 requires that all Housing Elements due after January 1, 2021, must contain an Assessment of Fair Housing. California defines affirmatively furthering fair housing as:

"Meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development"³⁷

The City of Alhambra updated and adopted a local Analysis of Impediments (AI) to fair housing choice in 2020. This document identifies fair housing needs and issues in the city and recommends solutions to mitigate or remove impediments. As an entitlement city for CDBG funding, the city also completed an update to its FY 2020-2024 Consolidated Plan in August 2020. Collectively, these analyses include considerable baseline information, outreach, and recommendations to serve and a foundation for additional research.

Summary of Housing Element Outreach

Chapter 1 includes a comprehensive reporting of community outreach and engagement that was conducted as a part of the Housing Element. Outreach was designed to both disseminate and gather information from the community. A summary of this outreach, specific to AFFH includes:

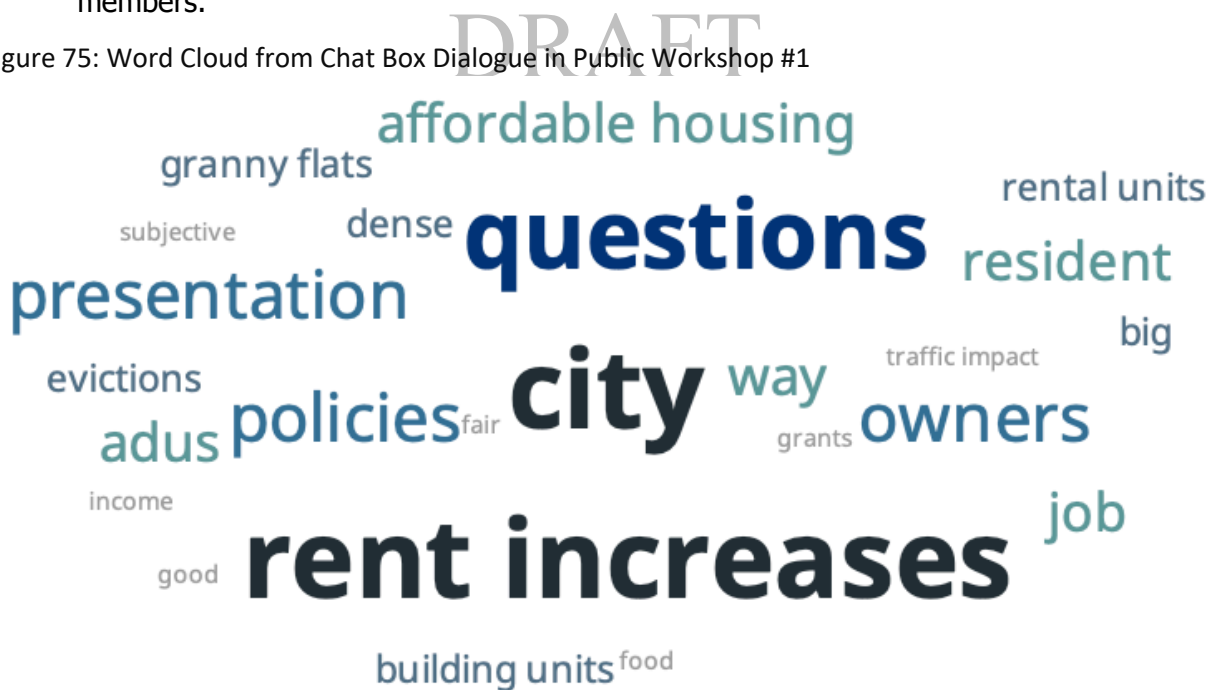
1. Initial scoping with the City of Alhambra to develop a comprehensive list of groups to directly send project information and invite to participate in the project. This initial effort identified 82 organizations including community organizations (i.e., Housing Rights Center, East LA Women's Center, Grassroots Alhambra), Culturally specific groups (i.e., Alhambra Latino Association, Asian American Association of Alhambra), faith-based groups, real estate and business groups (i.e., AbundantLA, Alhambra Downtown Association), and special housing needs groups.
2. Project updates and announcements across a broad spectrum of resources to maximize exposure. This included the city's social media platform, articles in the city's newsletter, the city's Parks and Recreation Leisure Guide that reaches 31,000 households in print,

³⁷ Gov. Code, § 8899.50, subd. (a)(1).

announcements on the library and school district social media accounts, and articles in the Around Alhambra Newsletter.

3. A public workshop was held at the beginning of the project that included a live interactive survey. The survey included questions and requests for insights specific to AFFH issues. Announcements for the workshop were translated into Spanish and Traditional Chinese. The Survey was also translated and posted to the project webpage for community members who could not attend the workshop to participate. This initial workshop was conducted virtually due to the COVID-19 pandemic. The project team offered “office hours” to discuss with community members who could not participate by computer, though none were requested.
4. To ensure comprehensive outreach throughout the entire community, each City Councilmember held a virtual town hall with the project team to discuss housing issues in each district.
5. In addition to the Housing Element outreach, the city updated its Analysis of Impediments in April 2020 and its Consolidated Plan in August 2020. Both efforts included significant outreach that included public study sessions, public meetings with the Housing and Development Advisory Committee, and a joint educational workshop with community members.

Figure 75: Word Cloud from Chat Box Dialogue in Public Workshop #1



In addition to the outreach efforts listed above, the organized an effort to reach input for specific groups and organizations. The city developed a contact list representing a range of business associations, non-profit organizations, community organizations, faith-based institutions, housing advocacy groups, and other neighborhood and social groups. This list included:

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Exhibit 76: List of Organizations Receiving Direct Contact

Category	Organization Name
Business associations	Alhambra Downtown Association
Business associations	Chamber of Commerce
Business associations	San Gabriel Valley Economic Partnership
Community Organizations	Knights of Columbus #2431
Community Organizations	Maravilla Foundation
Community Organizations	People for People WSGVCC
Community Organizations	Door of Hope
Community Organizations	Women’s Center for Creative Works
Community Organizations	Elizabeth House
Community Organizations	Alhambra Women’s club
Community Organizations	LA Works
Community Organizations	Green Menu
Community Organizations	Housing Rights Center
Community Organizations	Grassroots Alhambra
Community Organizations	San Gabriel Valley Oversight Group
Culturally Specific Organizations	Alhambra Latino Association
Culturally Specific Organizations	Mexican American Opportunity Foundation
Culturally Specific Organizations	Asian American Economic Development Enterprise
Culturally Specific Organizations	Asian Business Association
Culturally Specific Organizations	Chinatown Service Center
Culturally Specific Organizations	Taiwanese American Professionals LA
Culturally Specific Organizations	Hai-Ninh Community Association
Culturally Specific Organizations	Eng Family Benevolent Association
Faith based institutions/Churches	Alhambra SDA Church The Grace Place
Faith based institutions/Churches	Bethany Church of Alhambra
Faith based institutions/Churches	Chinese Bible Missions Church
Faith based institutions/Churches	Emmaus Lutheran Church & School
Faith based institutions/Churches	First Baptist Church
Faith based institutions/Churches	First United Methodist Church
Faith based institutions/Churches	Mandarin Baptist Church of Los Angeles
Faith based institutions/Churches	Sage Granada Park United Methodist Church
Faith based institutions/Churches	Saint Therese Church
Faith based institutions/Churches	San Gabriel Mission
Faith based institutions/Churches	Gateway Community Church
Faith based institutions/Churches	Pasadena Hindu Temple
Faith based institutions/Churches	Temple Beth David
Faith based institutions/Churches	Jewish Federation of the Greater San Gabriel and Pomona Valleys
Historical/Preservation	Alhambra Historical Society
Historical/Preservation	Alhambra Preservation Group
Homeowners/Apartment/Tenant/RE associations	Foothill Apartment Association
Homeowners/Apartment/Tenant/RE associations	West San Gabriel Valley Realtors
Homeowners/Apartment/Tenant/RE associations	Housing Rights Center
Homeowners/Apartment/Tenant/RE associations	City Ventures
Homeowners/Apartment/Tenant/RE associations	YIMBY Law
Homeowners/Apartment/Tenant/RE associations	Abundant Housing LA
Homeowners/Apartment/Tenant/RE associations	Making Housing Happen

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Homeowners/Apartment/Tenant/RE associations	HCDA Citizen Advisory Committee
Housing Developers/Owners	National Builders Control
Housing Developers/Owners	Intracopr Homes
Housing Developers/Owners	Pacific Plaza Premier Development Group
Housing Developers/Owners	Hillcrest Development / Charles Dunn
Housing Developers/Owners	Shea Properties
Housing Developers/Owners	southern California Multihousing Group
Housing Developers/Owners	Dynasty Builders Inc
Housing Developers/Owners	City Ventures Llc
Housing Developers/Owners	Foundation For Affordable Housing/Embrace Foundation
Housing Developers/Owners	National Church Residences of Southern California
Housing Developers/Owners	Telacu Housing-Alhambra, Inc.
Housing Developers/Owners	Wysong Village Apartments Limited Partnership
Housing Developers/Owners	The Villages at Alhambra
Housing Developers/Owners	Alhambra Community Association Management
Housing Developers/Owners	Habitat for Humanity SGV
Housing Developers/Owners	AOF /Golden State Community Development Corp
Housing Developers/Owners	East LA Community Corporation (ELACC)
Large employers	Cal State University Los Angeles
Publications	WaChow Media
Publications	Pasadena Star News
Special Needs Housing	Esperanza Services
Special Needs Housing	Home of Angels
Special Needs Housing	Choices Community Housing Options

These organizations represent constituents that could be impacted by fair housing issues, including Hispanic and Asian American populations, women’s organizations, and organizations supporting special needs populations. These groups received direct notification via email of project announcements, public meeting notifications, and notifications of workshops and surveys. Public meeting announcements and survey materials were translated into Spanish and Traditional Chinese.

Elemento de Vivienda de Alhambra
FORO DE LA COMUNIDAD

Miércoles 17 de febrero de 2021 de 6:00 p.m. a 7:30 p.m.

Únase a este foro virtual de la comunidad para aprender más sobre este proyecto y conocer las formas de participar.

Los temas del foro incluyen:

- El Proyecto de Actualización del Elemento de Vivienda incluyendo el proceso, fechas clave y los requisitos estatales importantes.
- El número de la Asignación Regional de Necesidades de Vivienda (RHNA) de Alhambra.
- Cómo el RHNA afecta a las viviendas en la ciudad y sus alrededores.
- El actual parque inmobiliario y las tendencias del mercado inmobiliario.
- Formas de participar y dar su opinión.

Servicios de traducción disponibles:

Las solicitudes de los servicios de traducción se pueden hacer en el momento de registrarse para el evento o por correo electrónico a HousingElement@CityofAlhambra.org. Las solicitudes deben realizarse antes de las 8:00 a.m. del jueves 11 de febrero de 2021. Los materiales traducidos de la encuesta también estarán disponibles en la página web del proyecto después de la reunión en www.alhambrahousingelement.com



City of Alhambra
Es necesario registrarse para asistir a este evento.
Para registrarse visite:
www.alhambrahousingelement.com/get-involved.

阿罕布拉市住房比例分配 (Housing Element)
社區論壇

2021年2月17日 (星期三) 下午6:00-7:30

請參加本次虛擬社區論壇，瞭解更多有關本專案的詳情，並瞭解參與的方法。

論壇主題將包括:

- 住房比例分配更新專案 (Housing Element Update Project), 包括程序、重要日期及重要州政府要求。
- 阿罕布拉市地區租房需求分配 (RHNA) 數字。
- RHNA 如何影響本市及周圍地區的住房。
- 阿罕布拉市目前的住房存量和住房市場發展趨勢。
- 參與和提出意見的方法。

可提供翻譯服務:

在登記參加活動時可提出翻譯服務請求，或請發電子郵件至 HousingElement@CityofAlhambra.org。翻譯服務請求必須在2021年2月11日 (星期四) 上午8時之前提出。會議結束後，將在以下專案網站刊載翻譯的調查問卷資料: www.alhambrahousingelement.com。



City of Alhambra
參加本次活動需要登記。請在以下網站登記:
www.alhambrahousingelement.com/get-involved.

Information from these outreach efforts assisted the team in better understanding fair housing issues. Qualitative data from outreach efforts is important because reveals the lived experiences of residents beyond what is available in common datasets. However, outreach may not include a proportional cross-section of the population and findings are rarely statistically significant representations. Nonetheless, input from residents can be as important or more in revealing unique local challenges.

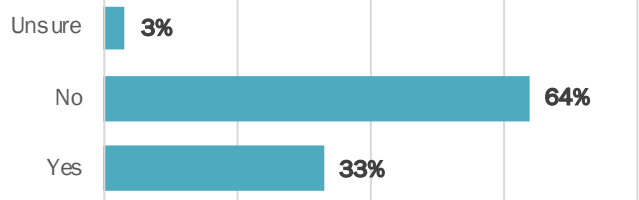
The most relevant information from the efforts outlined above is summarized under “local context” subsections and **are also summarized and consolidated below**. Combined with the data analysis, this information assisted in refining the city’s fair housing objectives. For example, outreach revealed that housing discrimination remains a concern in Alhambra, and more importantly residents who experience it do not know where to get resources. This led the city to expand its information and outreach plan in its AFFH program. The city also learned that residents feel they have good access to public services, food, and health care, but feel that access to jobs and transit are more lacking. This led the city to prioritize lower income sites in proximity to transit corridors.

Summary of Fair Housing Outreach Input

A survey was held in both a live community workshop and online posted to the project website. This survey asked residents a series of targeted questions relating to fair housing and the accessibility of resources in their neighborhoods.

Have you ever experienced or witnessed housing discrimination in the City of Alhambra?

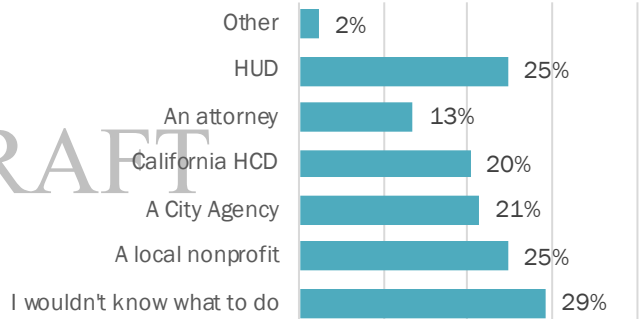
One-third of respondents have experienced or witnessed discrimination in Alhambra.



If you or someone you know experienced housing discrimination, where would you refer them to for assistance?

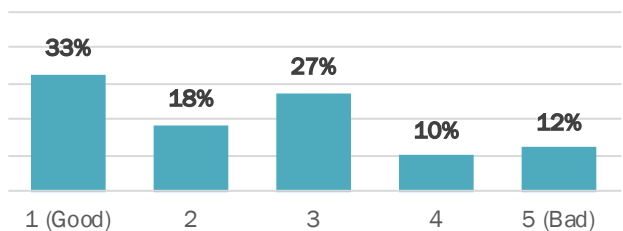
Nearly three in ten would not know what to do if faced with a housing discrimination issue.

Note: Respondents could select multiple answers



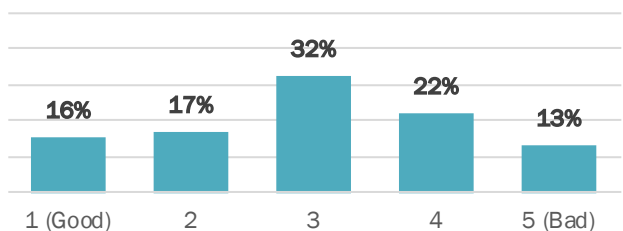
Is your home close to good schools?

Over half of respondents considered their home had access to above average quality schools.



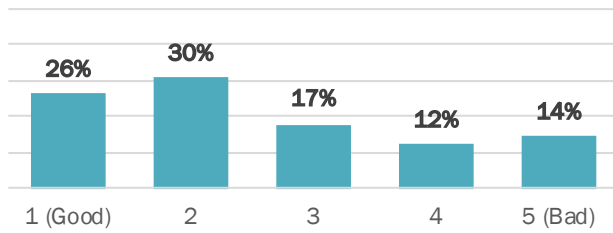
Is your home close to good jobs?

A full two-thirds of respondents noted their access to jobs was average or worse.



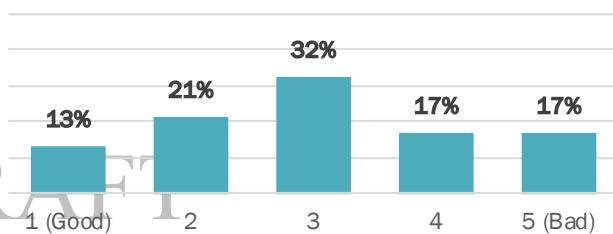
Is your home close to good parks and greenspace?

Fifty-six percent of respondents considered their home to have good or ok access to parks and greenspace



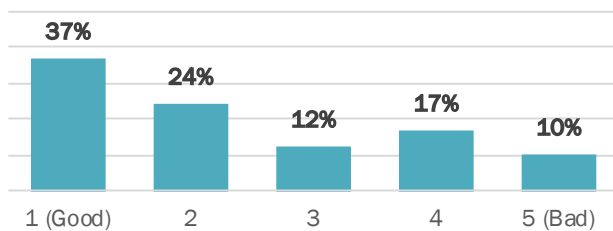
Is your home close to reliable and safe transit?

Only thirteen percent of respondents thought their home had good access to reliable and safe transit.



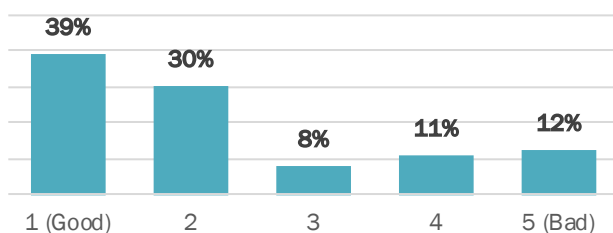
Is your home close to medical services (pharmacy, drugstore, health clinic, hospital)?

Roughly 73 percent of respondents thought their home had average or better access to medical services.



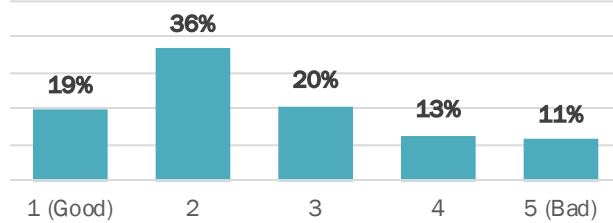
Is your home close to public services (library, post office, police/fire, City Hall, City services)?

Nearly 70 percent of respondents considered their home to have above average access to public services.



Are the streets and sidewalks in your neighborhood safe and well-kept?

Nearly one in four respondents considered the quality and safety of streets in their neighborhood to be below average.



Other Comments Received

In addition to survey responses, a summary of comments throughout the Housing Element Update process relating to fair housing issues include:

- What policies and measures can be implemented to protect tenants from rent increases and evictions in the housing element?
- How can we preserve existing low-income "naturally occurring" affordable housing in addition to production?
- Where does the community want to put the required housing capacity?
- Affordability [is most important]. I will have to move soon because rents keep getting higher and even 2-bedroom condo/townhomes are too expensive.
- Housing not as a commodity but a right
- [We need] easy access to public transportation for elderly who don't drive
- [We need] equitable, diverse, dynamic, growing but still independent and small-town feel
- [Alhambra needs to be] Inclusive, affordable, strong protection for tenants.
- [We need to] expedite ADU permits, allow ADU size that complements size of land not size of existing house. I would like to to increase pedestrian safety in Main Street, invigorate retail and family activities along East Main Street. General beautification of the area.
- [We have] a lack of housing for senior households
- [We need] Rent control, lack of permanent just cause eviction protections, informal evictions from lack of enforcement.
- [We have] Substandard, deteriorated, unsafe dwellings that need to be replaced.
- Loans not available for middle income persons/households
- [We have] Inadequate Park/green space located near higher density housing
- Gentrification caused by so much new market rate development.
- [We need] support for unhoused populations, landlord harassment and eviction protections.

- We need a designated area for affordable housing just like other cities. We want to preserve East Main Corridor. Besides housing that’s affordable cannot be placed there since the area is privately owned.
- How will Alhambra affirmatively further fair housing?
- We need to ensure that long-time residents aren't forced from the city by rising housing costs.
- Alhambra needs rent control.
- Education/outreach is key to making these successful (at least in Los Angeles Community Plans). 70% of attendees at the last Housing Element update were homeowners, but Alhambra is over 60% renters.

Assessment of Fair Housing

The City of Alhambra’s Analysis of Impediments (2020) identifies many housing issues in the city and provides a foundation of information for inclusion in this section of the Housing Element. However, this section provides additional information derived from the unique resources in the region and local context from community outreach. Many fair housing factors and data are included in the Housing Needs Assessment (Chapter 2 of the Housing Element).

Fair Housing Data in the Housing Needs Assessment

The Housing Needs Assessment includes the following data related to fair housing factors in Alhambra:

- | | |
|---|---|
| ▪ Regional comparison of population by race and ethnicity | ▪ Regional Comparison of People Experiencing Homelessness |
| ▪ Areas of minority concentration | ▪ Homeless Facilities and Service Providers |
| ▪ Regional Comparison of HHs by Income | ▪ People living in poverty |
| ▪ Share of renter-occupied housing (tenure split) | ▪ Housing stock lacking telephone, plumbing, and kitchen facilities |
| ▪ Overcrowding | ▪ Assisted housing at risk of conversion |
| ▪ Cost Burden | |
| ▪ Special Housing Needs | |

Identification of Fair Housing Issues

Section VII of the AI, which includes Alhambra’s Fair Housing Action Plan for the 2020 to 2024 planning period, provides a summary of fair housing issues that the city plans to address. These include:

Discrepancies in lending patterns by race and ethnicity. Between 2012 and 2017, the number of home loan applications decreased in Alhambra by about 3,300, with 2,061 applications in 2017. About 28% of applicants were White, while about 9% of Alhambra’s population is White. Additionally, 1% of applicants were Black (2% of total city population), 16% of applicants were Hispanic (38% of total city population), and 41% of applicants were Asian (50% of total city population).

Wide range of approval rates by top lenders. Of the loan applications in Alhambra in 2017, approval rates ranged among top lenders. For example, Nationstar had an approval rating of 21%, while Shore Mortgage had an approval rating of 73%.

Subprime lending discrepancies by race and ethnicity. The frequency of spreads reported on loans in Alhambra in 2017 was 2.8%. Non-white households in Alhambra have a higher incidence of rate spread on average, ranging from 3.3% (Asian applicants) to 5.3% (Hispanic applicants), compared to White applicants (2.2%).

Discriminatory practices in the housing market. The Housing Rights Center (HRC) received 177 fair housing complaints over the 2014 to 2018 period, 40 of which were fair housing cases and 26 of the cases had substantial evidence. Additionally, the HRC reported inconsistencies in the types of clients they serve compared to the distribution of racial and ethnic groups in Alhambra. For example, Asian residents in Alhambra make up about 50% of the city's population, but the HRC reported that Asian residents accounted for 20% of their clients served to address fair housing issues.

Discriminatory language in real estate ads. The AI found "potentially discriminatory language, mostly encouraging family living" in a review of ads for units both for rent and for sale.

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Figure 77. Lending Patterns by Race/Ethnicity Summary of Opportunity Indicators, Alhambra
 Source: Table 26, City of Alhambra Analysis of Impediments (www.lendingpatterns.com, 2018)

	Approved		Denied		Withdrawn/ Incomplete	
	2012	2017	2012	2017	2012	2017
White						
Low (0-49% AMI)	55%	40%	32%	26%	9%	23%
Moderate (50-79% AMI)	56%	33%	18%	30%	14%	33%
Middle (80-119% AMI)	53%	55%	17%	10%	22%	28%
Upper (≥120% AMI)	63%	63%	12%	13%	13%	18%
Black						
Low (0-49% AMI)	67%	0%	0%	0%	33%	0%
Moderate (50-79% AMI)	0%	0%	100%	0%	0%	0%
Middle (80-119% AMI)	50%	100%	25%	0%	0%	0%
Upper (≥120% AMI)	47%	44%	6%	22%	24%	33%
Hispanic						
Low (0-49% AMI)	59%	43%	31%	29%	6%	24%
Moderate (50-79% AMI)	58%	32%	20%	36%	8%	28%
Middle (80-119% AMI)	51%	56%	21%	12%	20%	23%
Upper (≥120% AMI)	59%	62%	16%	14%	13%	20%
Asian						
Low (0-49% AMI)	65%	40%	16%	27%	15%	27%
Moderate (50-79% AMI)	57%	57%	16%	12%	8%	24%
Middle (80-119% AMI)	56%	63%	12%	11%	9%	16%
Upper (≥120% AMI)	63%	66%	9%	9%	9%	14%

Fair Housing Enforcement and Capacity

The city does not have any local fair housing laws. However, in March 2020 the Alhambra City Council adopted an emergency ordinance prohibiting COVID-19 related evictions. When this moratorium expired the city committed to enforcing LA County’s eviction moratorium. As outlined in Alhambra’s 2020 Analysis of Impediments to Fair Housing Choice (2020 AI), the city has committed to complying with applicable federal and State fair housing laws including the Fair Housing Act of 1968, the Fair Housing Amendments Act of 1988, and the Fair Housing Employment and Housing Act (FEHA). The city does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.

The city contracts with the Housing Rights Center (HRC) to provide fair housing services in the community. The HRC is a non-profit, approved by HUD, that works with local government offices to ensure that Fair Housing Laws are upheld. In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

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Between FY 2014 and FY 2018, HRC provided fair housing services to an average of 29 clients per year (143 clients total). a majority (53 percent) of HRC clients from Alhambra were of “Other” races, followed by Whites (23 percent), Asians (20 percent), and Black/African Americans (four percent). The “Other” category most likely includes those who are of Hispanic origin.

In March, 2020, the COVID-19 pandemic was declared; subsequently, many of the HRC’s services shifted virtually. While the HRD statistics herein do not include 2019-2020 numbers, the need for housing services and support during the pandemic has been critical, given the uncertainty of economic resources and/or the ability for persons to maintain stable housing due to unemployment. Many eviction moratoriums, for example, were enacted, resulting in greater need for housing outreach and education by both the city and the HRC.

During the FY 2019-2020, HRC received 281 calls for general housing inquiries and 38 calls related to discrimination and fair housing inquiries. Among the fair housing inquiries 71 percent were related to disabilities or protected classifications.

During the FY 2019-2020, eight housing discrimination cases were opened, the majority were reconciled through counseling or withdrawn. A total of two cases were referred to litigation and went to small claims court.

Between 2013 and 2018, 12 cases were filed with the Department of Fair Employment and Housing (DFEH). Among these, one case was settled by enforcement and another by mediation. All other cases were dismissed, withdrawn, or were found to not have probable cause.

Local Context

Early in the development of this Housing Element, ECONorthwest and the City of Alhambra sought public input through a workshop and online survey. The workshop and online survey asked questions related to fair housing issues, including: “Have you ever experienced or witnessed housing discrimination?” and “If you or someone you know experienced housing discrimination, where would you refer them for assistance?”. Of the 94 survey respondents, 31 (33%) stated they had experienced or witnessed housing discrimination, 60 (64%) stated they did not experience or witness housing discrimination, and 3 (3%) stated they were unsure.

Of those who experienced or witnessed housing discrimination, 26 respondents stated they would not know where to seek assistance. Twenty-two respondents stated they would refer to a local nonprofit, while other respondents (at a lower response rate) stated they would refer to a city agency, HCD, an attorney, HUD, or other agencies. To better communicate available resources available for those facing housing discrimination, the City of Alhambra may consider reinforcing education about fair housing resources, and access to the HRC, to the public.

Relevant Factors and Data Available Related to Fair Housing Issues

In addition to findings stated in the AI and the Housing Needs Assessment, the city can draw from supplemental data and analysis to identify potential fair housing issues. These analyses include evaluations of segregation and integration, identifying racially or ethnically concentrated areas of poverty (or affluence), disparities in access to opportunity, and displacement risk. This section provides a summary of relevant analyses in Alhambra that further describe fair housing issues in the city.

Segregation and Integration Patterns and Trends

Trends in segregation and integration within a city can be closely linked to access to opportunities across racial and ethnic groups. Two analyses that help to identify patterns in segregation and integration are a dissimilarity index and an isolation index. The dissimilarity index requires a comparison group to determine another group's population distribution across Census tracts in Alhambra. The dissimilarity index for Alhambra is reported for racial and ethnic groups in comparison to the White alone population in the city. The isolation index also relies on distributions of groups of populations over a geographic area (Census tracts) but analyzes a population group's distribution across the city in relation to the group's total population in the city.

The results of the dissimilarity index and isolation index are shown in Figure 78. For the racial and ethnic groups (other than White alone) that have high shares of population in Alhambra, the dissimilarity indices for Black or African American alone, Asian alone, Some other race alone, and Hispanic or Latino (of any race) are in the moderate (30 to 60) or low range (0 to 30). For example, to achieve an even distribution of population for White alone and Black or African American alone groups, 40% of one group would need to move to a given Census Tract in Alhambra.

The isolation index scores across racial and ethnic groups in Alhambra are relatively low, as the total range is 0 to 100, and Alhambra ranges from 0.8 to 6.6. This shows that among each racial or ethnic group in Alhambra individually, the populations are relatively integrated in a given geographic area (i.e., Census tract).

Figure 78. Dissimilarity Index and Isolation Index Scores by Race/Ethnicity, Alhambra

Source: American Community Survey, 2015-2019 5-year Estimates

Racial/Ethnic Group	Dissimilarity Index Score	Isolation Index Score
White alone	n/a	1.9
Black or African American alone	40	1.1
American Indian and Alaska Native alone	50	0.6
Asian alone	23	6.6
Native Hawaiian and Other Pacific Islander alone	81	2.7
Some other race alone	17	1.6
Two or more races	24	0.8
Hispanic or Latino (of any race)	11	2.0

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Figure 79. Dissimilarity Index and Isolation Index Scores by Race/Ethnicity, Alhambra
 Source: American Community Survey, 2015-2019 5-year Estimates

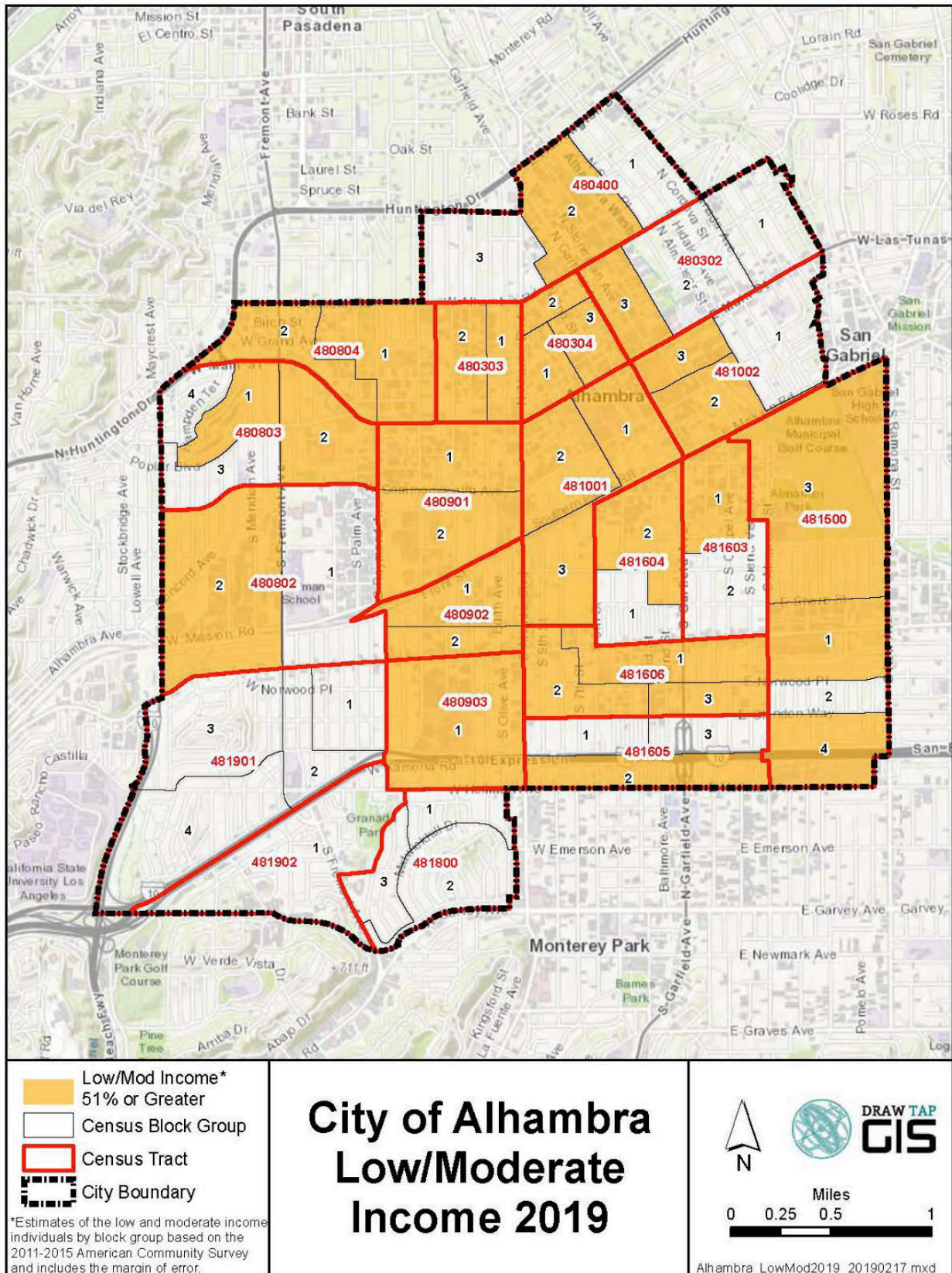
(Alhambra, CA CDBG) Jurisdiction				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	16.88	24.23	22.14	24.37
Black/White	16.47	31.00	24.60	30.81
Hispanic/White	18.13	22.92	20.94	23.71
Asian or Pacific Islander/White	17.22	27.69	27.29	30.48
(Los Angeles County, CA) Jurisdiction				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	53.33	53.62	53.85	55.87
Black/White	68.29	63.51	60.24	64.21
Hispanic/White	62.81	64.99	64.38	65.12
Asian or Pacific Islander/White	41.58	48.57	49.62	52.79
(Los Angeles-Long Beach-Anaheim, CA) Region				
Racial/Ethnic Dissimilarity Index	1990 Trend	2000 Trend	2010 Trend	Current
Non-White/White	55.32	55.50	54.64	56.94
Black/White	72.75	68.12	65.22	68.85
Hispanic/White	60.12	62.44	62.15	63.49
Asian or Pacific Islander/White	43.46	46.02	45.77	49.78

The general trend for racial and ethnic dissimilarity in the Los Angeles region has been growing at a slow pace since 1990. The city of Alhambra has seen a 44% increase in dissimilarity between its white and non-white population, being mostly driven by the Black and Asian/Pacific Islander communities. This trend demonstrates that racial and ethnic populations in the city have been moving to communities which represents their identity, whether by choice or institutional/de factor barriers to entry within other communities. However, dissimilarity in Alhambra remains well below regional levels.

The Alhambra AI provides a map showing the distribution of low and moderate-income (LMI) population in the city by block group, as of 2019. LMI areas are defined as Census tracts or block groups where 51 percent or more of the population is defined as LMI by HUD. The AI found that: "low- and moderate-income residents are generally dispersed across the middle of Alhambra with above-moderate income residents concentrated in block groups located in the southwest and northeast corners of the city".

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Figure 80. Low- and Moderate-income Areas, Alhambra
 Source: Figure 3, City of Alhambra Analysis of Impediments (2020).



Racially or Ethnically Concentrated Areas of Poverty

To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as R/ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. The City of Alhambra does not have any Racially or Ethnically Concentrated Areas of Poverty (R/ECAP), as defined by HUD. According to HUD data, this has been a consistent condition since at least 1990. Regionally, there are few areas in the San Gabriel Valley designated as R/ECAP areas. R/ECAP areas most proximate to Alhambra are located in East Los Angeles and more broadly Downtown Los Angeles.

The TCAC/HCD opportunity maps use a location quotient to proximate racial segregation and poverty. This calculation is reported in the High Segregation and Poverty Category. The 2021 methodology and associated map does not show any areas of High Segregation and Poverty in Alhambra. However, in the 2020 methodology, Census Tract 4803.04 was listed as a High Segregation and Poverty Tract. This area encompasses most of west downtown and is bounded by North Atlantic Boulevard, West Alhambra Road, North Garfield Ave, and West Main Street. Its improvement in 2021 to a High Resource Area is indicative of improving conditions in Alhambra.

Persons with Disabilities

The City has been following the general regional trends of in and out-migrations of persons with different disabilities. There are a few subtle differences such as the city's increase of populations with a self-care disability and Los Angeles County's decrease of that population. Generally, rates of young people with disabilities remain low and in line with regional trends. However, Alhambra is exhibiting and increasing need relative to the region for households aged 65 and older across most disability categories.

Figure 81: Population Distribution for Persons with Disabilities, Alhambra and LA County

Source: ACS 5-Year Tables 2010-2014, 2014-2018; Table S1810 – Characteristics of Disabilities

	Los Angeles County				Alhambra City			
	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total
2010-2014								
With a Hearing Difficulty	8,549	79,263	148,563	14.9%	0	520	1,591	13.8%
With a Vision Difficulty	11,725	88,565	81,447	9.4%	37	577	754	7.4%
With a Cognitive Difficulty	44,345	188,713	132,619	17.3%	132	1,204	1,187	12.9%
With an Ambulatory Difficulty	10,898	228,883	287,559	29.8%	30	1,315	2,559	23.4%
With a Self-Care Disability	15,917	102,737	143,061	15.3%	51	593	1,209	11.4%
With an Independent Living Difficulty	N/A	175,035	233,900	23.6%	51	593	1,209	21.1%

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	Los Angeles County				Alhambra City			
2014-2018	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total
With a Hearing Difficulty	7,909	80,656	160,486	14.3%	47	484	1,565	12.7%
With a Vision Difficulty	11,253	95,338	87,968	9.1%	78	608	687	6.8%
With a Cognitive Difficulty	N/A	224,488	306,248	27.5%	N/A	959	1,379	11.6%
With an Ambulatory Difficulty	N/A	224,488	306,248	27.5%	N/A	1,136	2,859	22.6%
With a Self-Care Disability	N/A	100,542	150,046	13.3%	N/A	605	1,459	11.6%
With an Independent Living Difficulty	N/A	178,883	243,856	21.9%	N/A	1,095	2,639	21%

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	Los Angeles County – Change over Time				Alhambra City – Change over Time			
Changes between 2014-2018	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total
With a Hearing Difficulty	-7.5%	1.8%	8%	-4%	4700%	-6.9%	1.6%	-8%
With a Vision Difficulty	-4%	7.6%	8%	3.2%	110.8%	5.4%	-8.9%	-8.1%
With a Cognitive Difficulty	N/A	4.7%	4.2%	-19.7%	N/A	-20.3%	16.2%	-10.1%
With an Ambulatory Difficulty	N/A	-1.9%	6.5%	-7.7%	N/A	13.6%	11.7%	-3.4%
With a Self-Care Disability	N/A	-2.1%	4.9%	-13.1%	N/A	2%	20.7%	1.8%
With an Independent Living Difficulty	N/A	2.2%	4.3%	-7.2%	N/A	-13.2%	14.1%	-0.5%

Trends by Familial Status

Between the 2014 and 2018 census years, Alhambra has seen measurable decreases in households across many family types. The decrease in all households with children under the age of 18 has been consistent with regional levels. However, Alhambra has seen a decline in single-parent households and female headed households with children at twice the rate of the regional average. This is indicative of housing affordability and lack of diversity in housing options contributing to these household’s inability to remain in the community.

Figure 82: Household Distribution by Familial Status

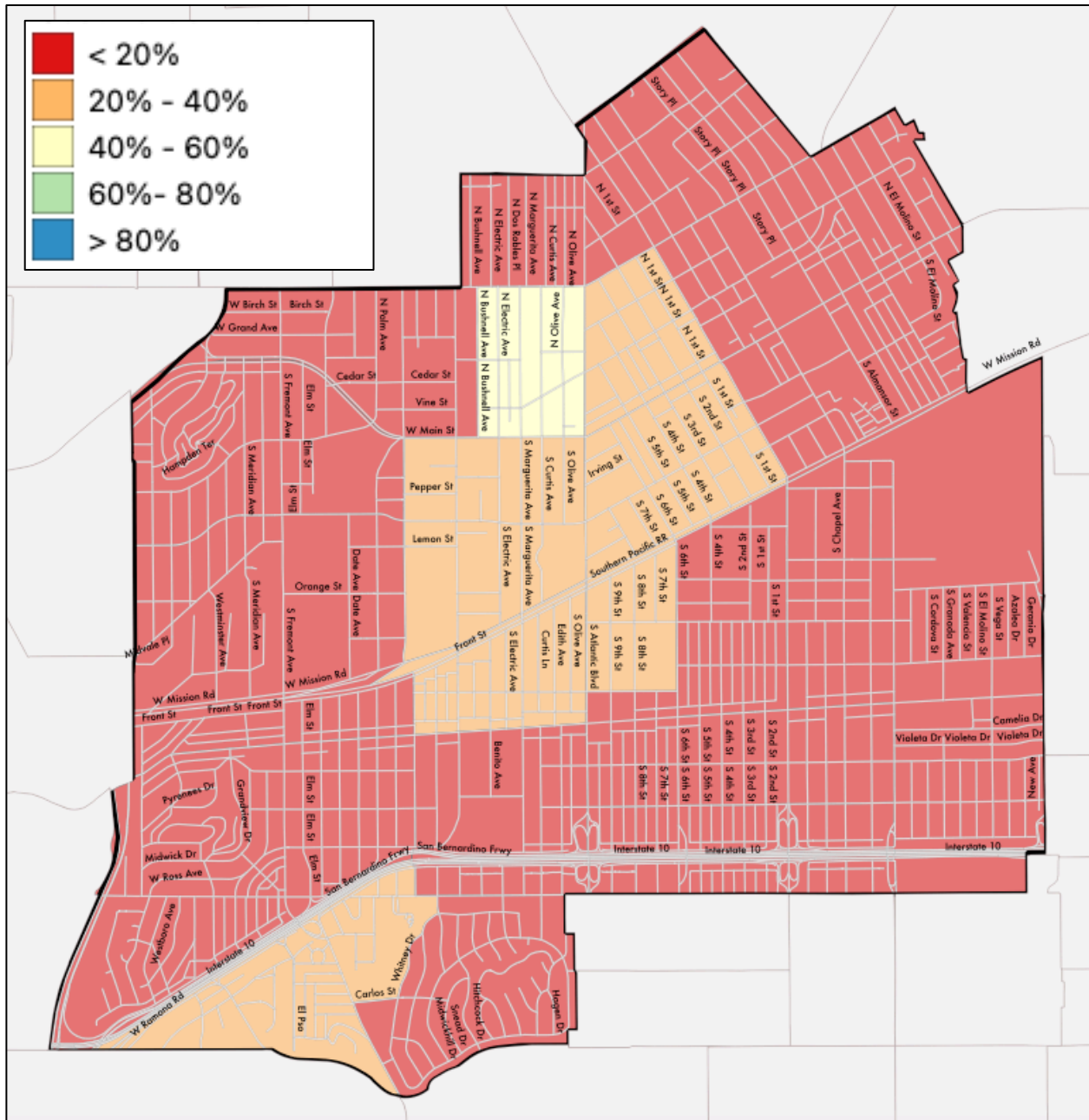
Source: ACS 5-Year Tables 2010-2014, 2014-2018; Table S1101 – Characteristics of Disabilities

Household Type	Jurisdiction	2014		2018		Percentage Change
		Households	Percentage	Households	Percentage	
Households w/ Children under 18	LA County	<u>1,087,704</u>	<u>34%</u>	<u>937,890</u>	<u>28%</u>	<u>-14%</u>
	Alhambra	<u>8,414</u>	<u>29%</u>	<u>7,165</u>	<u>24%</u>	<u>-15%</u>
Single-Parent Households	LA County	<u>351,852</u>	<u>11%</u>	<u>297,954</u>	<u>9%</u>	<u>-15%</u>
	Alhambra	<u>2,562</u>	<u>9%</u>	<u>1,795</u>	<u>6%</u>	<u>-30%</u>
Female Headed Households with Children	LA County	<u>261,586</u>	<u>8%</u>	<u>211,592</u>	<u>6%</u>	<u>-19%</u>
	Alhambra	<u>2,053</u>	<u>7%</u>	<u>1,254</u>	<u>4%</u>	<u>-39%</u>
All Households	LA County	<u>3,217,889</u>		<u>3,316,795</u>		<u>3%</u>
	Alhambra	<u>28,804</u>		<u>29,771</u>		<u>3%</u>

The concentration of female-headed households with children is generally centered in Central Alhambra near the downtown core. Areas in the northeast and southwest portion of the city that have a higher incidence of single-family homes have the lowest concentration of female-headed households.

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Figure 83: Distribution of Female-Headed Households with Children
 Source: HCD AFFH Data Viewer



Disparities to Access to Opportunity

Section II of the Alhambra AI provides information related to disparities to access to opportunity in the city. The assessment is based on HUD indices available for the city to report. Page 49 of the AI describes each index and explains the range of scores and how they related to measuring opportunity. In Alhambra, the AI found that after evaluating these indices, the Asian or Pacific Islander group has a higher exposure to poverty, compared to other racial or ethnic groups in the city. Hispanic or Latino populations in Alhambra had limited access to higher-performing

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schools and used public transit more than other groups. The Black, Non-Hispanic population in Alhambra had fewer opportunities to access employment in their neighborhoods.

Figure 84. Summary of Opportunity Indicators, Alhambra

Source: Table 23, City of Alhambra Analysis of Impediments

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	56.72	62.07	68.13	82.60	86.68	44.32	7.25
Black, Non-Hispanic	51.64	61.52	64.17	85.13	89.24	41.04	6.84
Hispanic	55.11	60.55	62.89	82.43	86.98	45.37	6.41
Asian or Pacific Islander, Non-Hispanic	50.00	64.47	61.73	83.33	87.64	45.63	6.40
Native American, Non-Hispanic	50.81	61.94	60.35	81.96	87.08	47.23	5.72
Population below federal poverty line							
White, Non-Hispanic	54.21	55.92	65.88	82.94	87.55	54.80	7.28
Black, Non-Hispanic	49.53	52.68	52.06	80.47	86.76	55.09	5.85
Hispanic	51.20	61.37	61.51	82.86	87.17	43.82	6.52
Asian or Pacific Islander, Non-Hispanic	46.05	63.26	61.69	85.51	89.98	45.45	6.35
Native American, Non-Hispanic	30.00	48.11	59.00	92.00	96.00	46.48	6.00

To further assist in the assessment of access to opportunity HCD compiled a series of datasets for jurisdictions to access for their area. This included a dataset developed with the California Tax Credit Allocation Committee (TCAC) that evaluates economic, educational, and health outcomes for low-income households. The dataset provides scores for each outcome metric, as well as a composite score. Figure 85 through Figure 88 show the TCAC opportunity areas for Alhambra.

The maps show that Alhambra generally has positive economic and educational outcomes throughout the city, and less positive environmental outcomes across the city. The composite score shows that areas in south and west areas of Alhambra have higher access to resources, and areas in the eastside of the city have moderate access to resources.

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Figure 85. TCAC Opportunity Areas, Environmental Score, 2021, Alhambra
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021

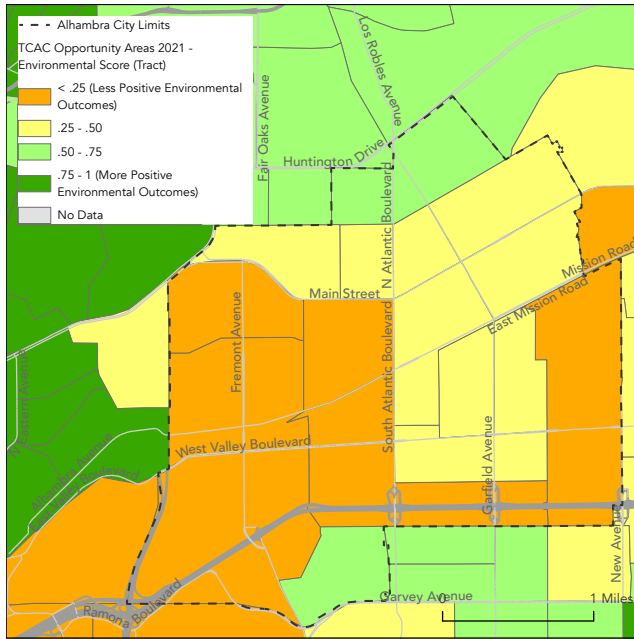


Figure 86. TCAC Opportunity Areas, Economic Score, 2021, Alhambra
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021

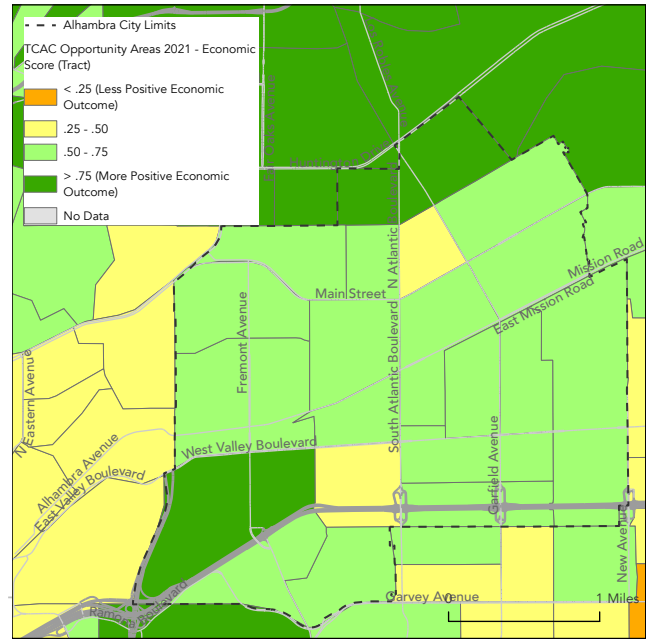


Figure 87. TCAC Opportunity Areas, Education Score, 2021, Alhambra
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021

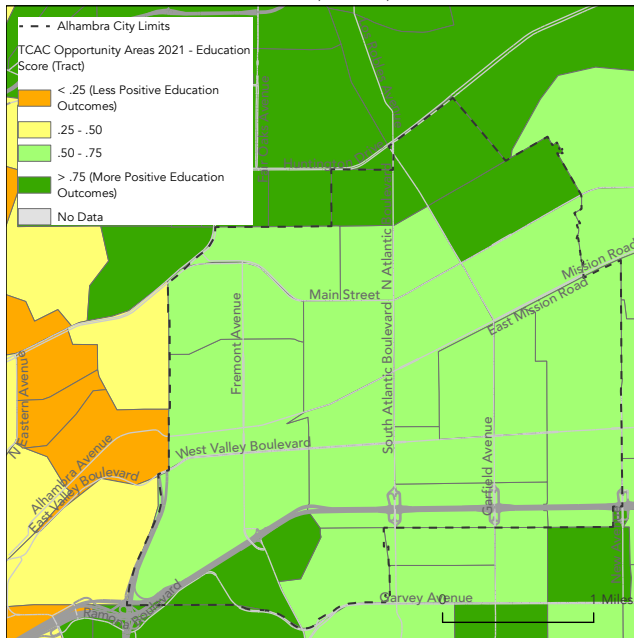
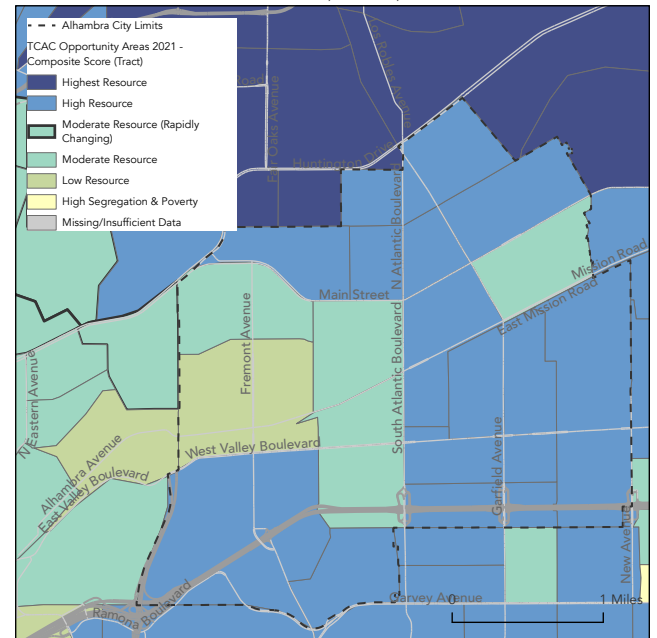


Figure 88. TCAC Opportunity Areas, Composite Score, 2021, Alhambra
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021



Local Context

In addition to this analysis, community outreach conducted in the Housing Element workshop and online survey asked Alhambra residents questions about their access to resources and opportunities. While not a statistically significant survey, these findings supplement the Census data with a local context. These findings are included in Figure 87 and show that Alhambra residents who responded to the survey have the most access to public services, grocery stores,

and medical services. Fewer residents who responded to the survey stated they have access to good schools, good jobs, and reliable and safe transit in their neighborhoods.

Discussion of Disproportionate Housing Needs

The Housing Element provides an assessment of both existing and future affordable housing needs in Alhambra. The existing housing need for very-low and low-income households in Alhambra is described in Chapter 5, stating that 564 Alhambra residents were receiving Section 8 Housing Choice Vouchers as of November 2019.

The Regional Housing Need Allocation (RHNA) for Alhambra over the 2021 to 2019 planning period states a future growth need of 6,825 units. Of these 6,825 units, the RHNA states that 1,774 units (26%) must accommodate very low-income households and 1,036 units (15%) must accommodate low-income households. Chapter 7 and Appendix A show the results of the Site Inventory for the Housing Element that meets the requirements of the RHNA by each income level.

Housing Needs and Problems

Chapter 2 of the Housing Element includes the Housing Needs Assessment, which describes key demographic and economic trends as they relate to the Alhambra housing market and affordability of housing. Many of the data points presented in Chapter 2 provide insight into fair housing issues in the city, including cost burden, overcrowding, substandard housing, and homelessness. Key findings in Chapter 2 related housing problems were:

- Renter households experience a higher rate of housing problems, 60% compared to 37% of owner households that experienced housing problems.
- Of all households who earned less than 80% of AMI renters more likely to experience at least one housing problem (53%) as compared to owner households (24%)
- Overall, 51% of all households in Alhambra reported at least one housing problem.

Figure 89 shows the incidence of housing problems by tenure and race/ethnicity in Alhambra and Los Angeles County. In Alhambra, 36.6% of owner households and 61.1% of renter households experience at least one housing problem. These rates are both lower than the regional average. White owner households are least likely to have any housing problems. The differential is less severe for renter households where black households have the lowest rate of housing problems by a slight margin.

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Figure 89: Presence of Housing Problems by Tenure and Race/Ethnicity

Source: HUD CHAS DATA (2014-2018 ACS)

Race/Ethnicity	City of Alhambra		Los Angeles County	
	Owner	Renter	Owner	Renter
White alone, non-Hispanic	29.5%	57.3%	31.9%	52.4%
Black or African-American alone, non-Hispanic	63.3%	56.7%	41.2%	62.8%
Asian alone, non-Hispanic	37.4%	64.0%	37.7%	56.0%
American Indian or Alaska Native alone, non-Hispanic	0%	75.0%	37.6%	59.1%
Pacific Islander alone, non-Hispanic	No Data	100%	42.3%	53.9%
Hispanic, any race	37.6%	58.4%	46.9%	70.2%
other (including multiple races, non-Hispanic)	63.0%	60.2%	36.5%	54.7%
Total/All	36.6%	61.1%	38.4%	61.7%

Cost Burden Households

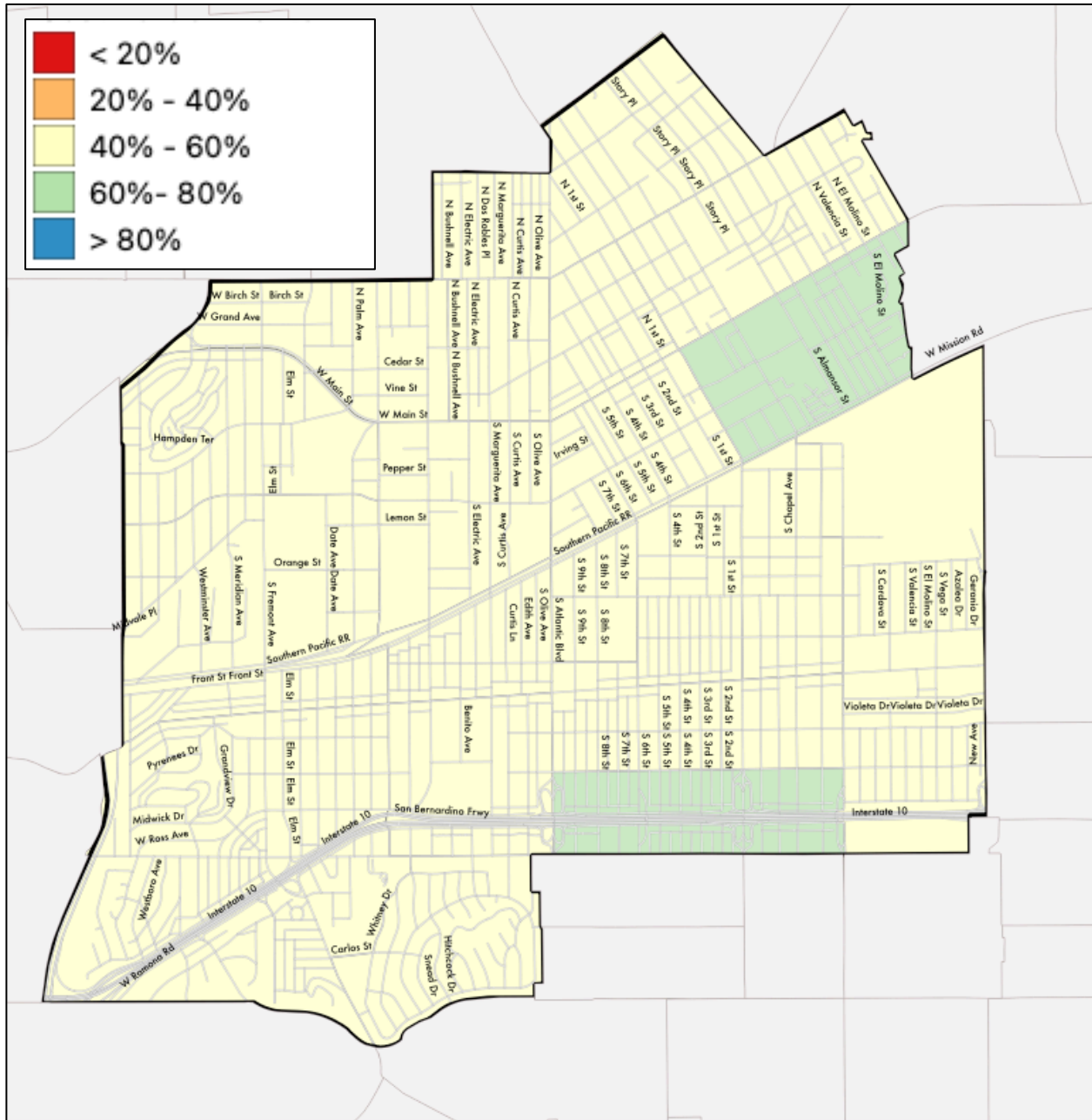
The share of cost burden households in Alhambra mirrors general trends in Los Angeles County, Overall, housing cost burden in Alhambra and in the region is most prevalent among extremely low-income households (85%), while very low-income households also experienced a high rate of cost burden (79%). The distribution of renter households that are cost burdened are generally distributed throughout the city, with two nodes of elevated cost burdening east of downtown and near the I-10 freeway between Atlantic Boulevard and Almansor Street

Cost burdening among owner-occupied households is generally lower on average, with the northeast and southwest corners of the city experiencing the lowest levels. Two nodes, one east north of Valley Boulevard between S Garfield Avenue and S Almansor Street, and another north of W Main Street between N Atlantic Boulevard and N Bushnell Avenue have elevated concentrations of owner-occupied cost burden.

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Figure 90: Distribution of Overpayment Renter Households

Source: HCD AFFH Data Viewer Data Set



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Figure 91. Distribution of Overpayment Owner Households

Source: HCD AFFH Data Viewer

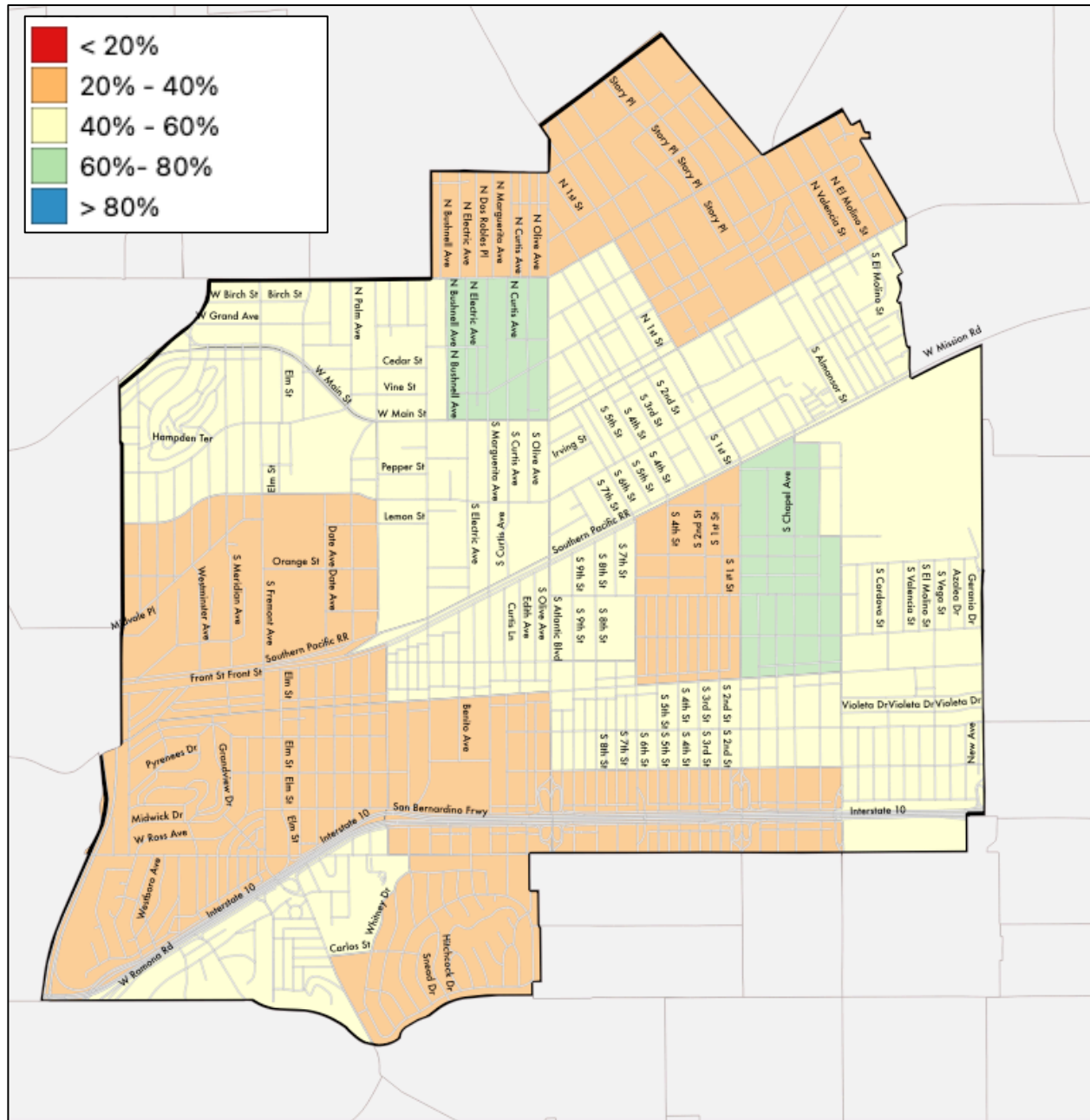


Figure 92 shows cost burdened data by race and tenure in Los Angeles County. Generally, renter households are more cost burdened than owner-occupied households. Among renter households, Hispanic and Black, non-Hispanic households have the most severely cost burdened. This trend holds true for owner-occupied households as well.

Figure 93 shows the same data set for the city of Alhambra. Among owner-occupied households, the rate of cost burden is relatively close among White non-Hispanic (28.9%), Asian non-Hispanic (32%), and Hispanic households (34%). Cost burden among black households is over twice the rate of white households, although the sample size is small (110 households). Local renter households are also more commonly cost burdened across all racial categories. The variance

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among renters is much more narrow, with Hispanic renter households having a lower cost burden rate (45.7%) than their White (52.3%) or Asian (55.6%) counterparts.

Figure 92. Cost Burden by Tenure and Race/Ethnicity, Los Angeles County

Source: HUD CHAS Data (2014-2018 ACS)

Race/Ethnicity	Cost Burden (>30%)	Cost Burden (>50%)	Total Households
Owner-Occupied			
White alone, non-Hispanic	30.8%	14.6%	642,205
Black or African-American alone, non-Hispanic	39.8%	20.2%	104,535
Asian alone, non-Hispanic	33.9%	15.8%	259,930
American Indian or Alaska Native alone, non-Hispanic	36.0%	12.8%	3,310
Pacific Islander alone, non-Hispanic	33.8%	16.9%	2,275
Hispanic, any race	38.0%	16.7%	474,795
other (including multiple races, non-Hispanic)	34.4%	17.6%	27,575
Renter-Occupied			
White alone, non-Hispanic	49.2%	27.1%	543,280
Black or African-American alone, non-Hispanic	59.0%	34.4%	209,040
Asian alone, non-Hispanic	47.5%	25.5%	227,400
American Indian or Alaska Native alone, non-Hispanic	51.7%	30.7%	4,475
Pacific Islander alone, non-Hispanic	45.3%	20.4%	4,245
Hispanic, any race	57.2%	29.5%	759,185
other (including multiple races, non-Hispanic)	49.8%	27.0%	43,855

Figure 93. Cost Burden by Tenure and Race/Ethnicity, City of Alhambra

Source: HUD CHAS Data (2014-2018 ACS)

Race/Ethnicity	Cost Burden (>30%)	Cost Burden (>50%)	Total Households
Owner-Occupied			
White alone, non-Hispanic	28.9%	16.9%	1,750
Black or African-American alone, non-Hispanic	63.6%	63.6%	110
Asian alone, non-Hispanic	32.0%	16.0%	6,455
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.0%	25
Pacific Islander alone, non-Hispanic			-
Hispanic, any race	34.0%	20.0%	3,100
other (including multiple races, non-Hispanic)	64.3%	50.0%	70
Renter-Occupied			
White alone, non-Hispanic	52.3%	26.0%	1,885
Black or African-American alone, non-Hispanic	56.3%	36.5%	480
Asian alone, non-Hispanic	55.6%	30.9%	8,575

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American Indian or Alaska Native alone, non-Hispanic	23.5%	23.5%	85
Pacific Islander alone, non-Hispanic	96.0%	16.0%	25
Hispanic, any race	45.7%	23.6%	6,640
other (including multiple races, non-Hispanic)	34.8%	21.7%	230

Overcrowded Households Across the Region

Severe overcrowding is defined as units with more than 1.5 persons per room. The dangers of overcrowding are exacerbated as public health risks, which have become more apparent during the pandemic. The County of Los Angeles has approximately 4.88% of its households facing this predicament, while the city of Alhambra has approximately 3.12% of households with severe overcrowding. The cities surrounding Alhambra, such as South Pasadena (1.25%), El Monte (2.03%), Pasadena (2.56%), San Gabriel (2.54%), and Los Angeles (5.86%)³⁸ share generally lower shares of households that are overcrowded, though the reasons behind this trend could be explained for many different reasons. For example, some cities may have older populations who may not need roommates aside from a partner, or the most likely determinant would be incomes among the renting populations. Once again, this indicator describes the importance of needing to provide affordable housing to renting populations to ensure that these groups can cohabitate safely to reduce public health dangers.

³⁸ CA HCD Data Viewer Data Tables, “Overcrowded Households Severe Tract”, ACS 2014-2019

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Figure 94. Distribution of Overcrowded Households
Source: HCD AFFH Data Viewer

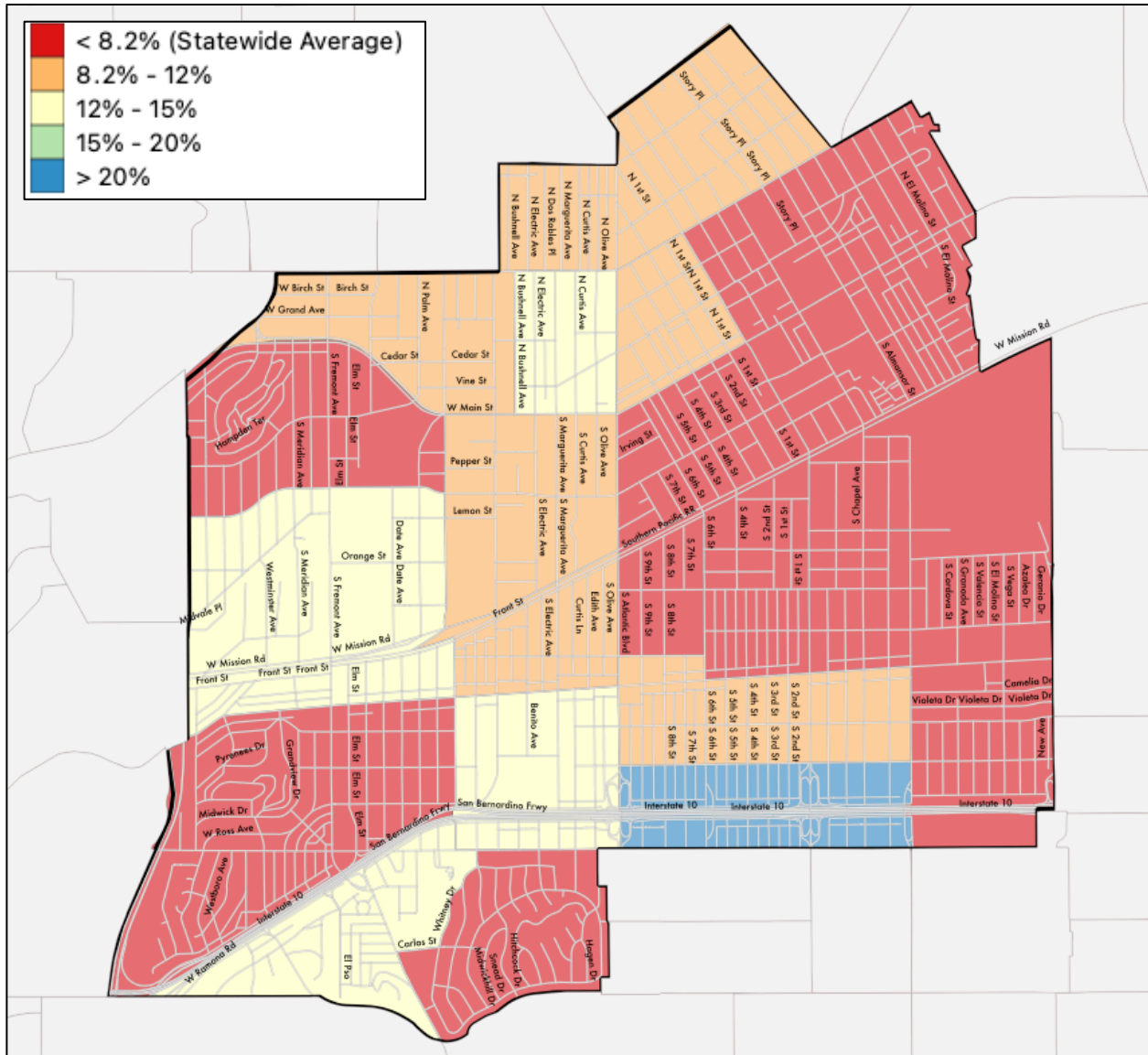


Figure 95 shows the concentration of overcrowded and severely overcrowded households in Alhambra and Los Angeles County by Tenure. It shows that the rate of overcrowding in Alhambra is slightly lower than the regional average for renter-occupied households but slightly higher for owner-occupied households. This is likely the result of a higher incidence of multi-generational households among homeowners.

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Figure 95. Overcrowding by Tenure, Los Angeles County and City of Alhambra

Source: HUD CHAS Data (2014-2018 ACS)

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
City of Alhambra					
Owner-Occupied	690	6.0%	225	2.0%	11,505
Renter-Occupied	2,710	15.1%	1,010	5.6%	17,920
Los Angeles County					
Owner-Occupied	83,580	5.5%	22,195	1.5%	1,514,630
Renter-Occupied	285,920	16.0%	128,010	7.1%	1,791,480

Displacement Risk

One empirical measure of displacement risk is identifying the number of affordable units at risk of converting to market-rate housing. Chapter 2 of the Housing Element provides an estimate of the number of these units at risk of conversion. In Alhambra, of the 366 affordable housing units for lower-income households, about 215 low-income units are at risk of conversion. These units are located in three properties with affordability term end dates between 2021 and 2029. Additionally, city staff reports that there are other affordable ownership units in the community built in the last 20-years with unknown covenant expirations that could be at risk over the planning period.

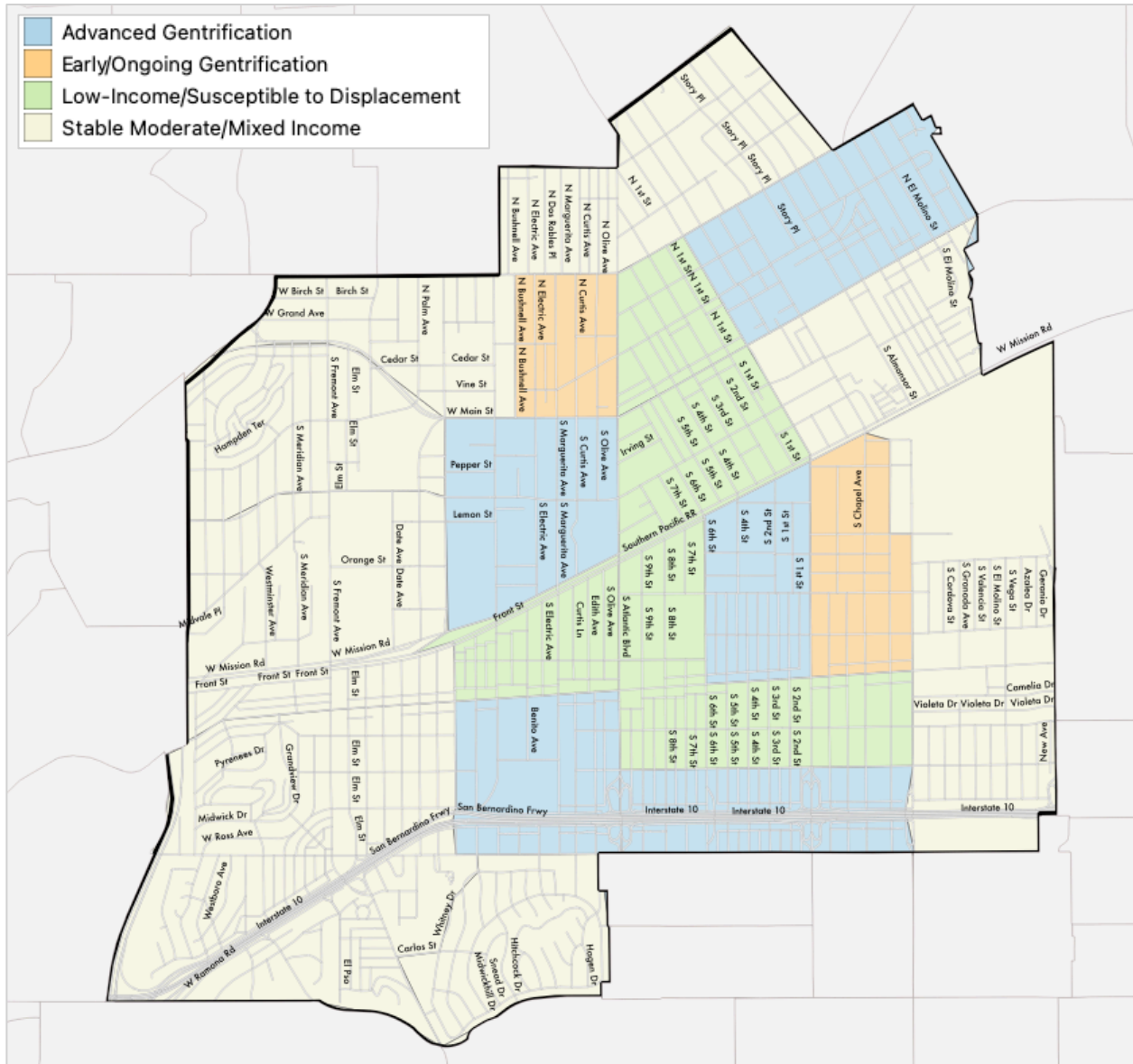
Other analyses of displacement risk can provide a more comprehensive evaluation of displacement risk using a range of criteria and aggregating various data sources. The Urban Displacement Project provides useful metrics for evaluating displacement risk in the Los Angeles region, including Census tracts in Alhambra.

Figure 96 shows the results of the [Displacement Typology](#) for Census tracts in Alhambra. Many tracts in the city are stable/mixed incomes areas with moderate displacement risk. Other areas, in central and southern Alhambra are low-income areas that are susceptible to displacement, or are areas in at-risk, early/ongoing, or advanced stages of gentrification.

Figure 97 shows the results of the renter vulnerability index in Alhambra, which accounts for measures affecting renter vulnerability to displacement, with considerations for accelerated vulnerability due to Covid-19. These factors include measures for cost burden, employment characteristics (e.g., service-sector jobs), and immigrant status. Most areas in Alhambra have an index value between 3 and 8, which indicates moderate to high vulnerability.

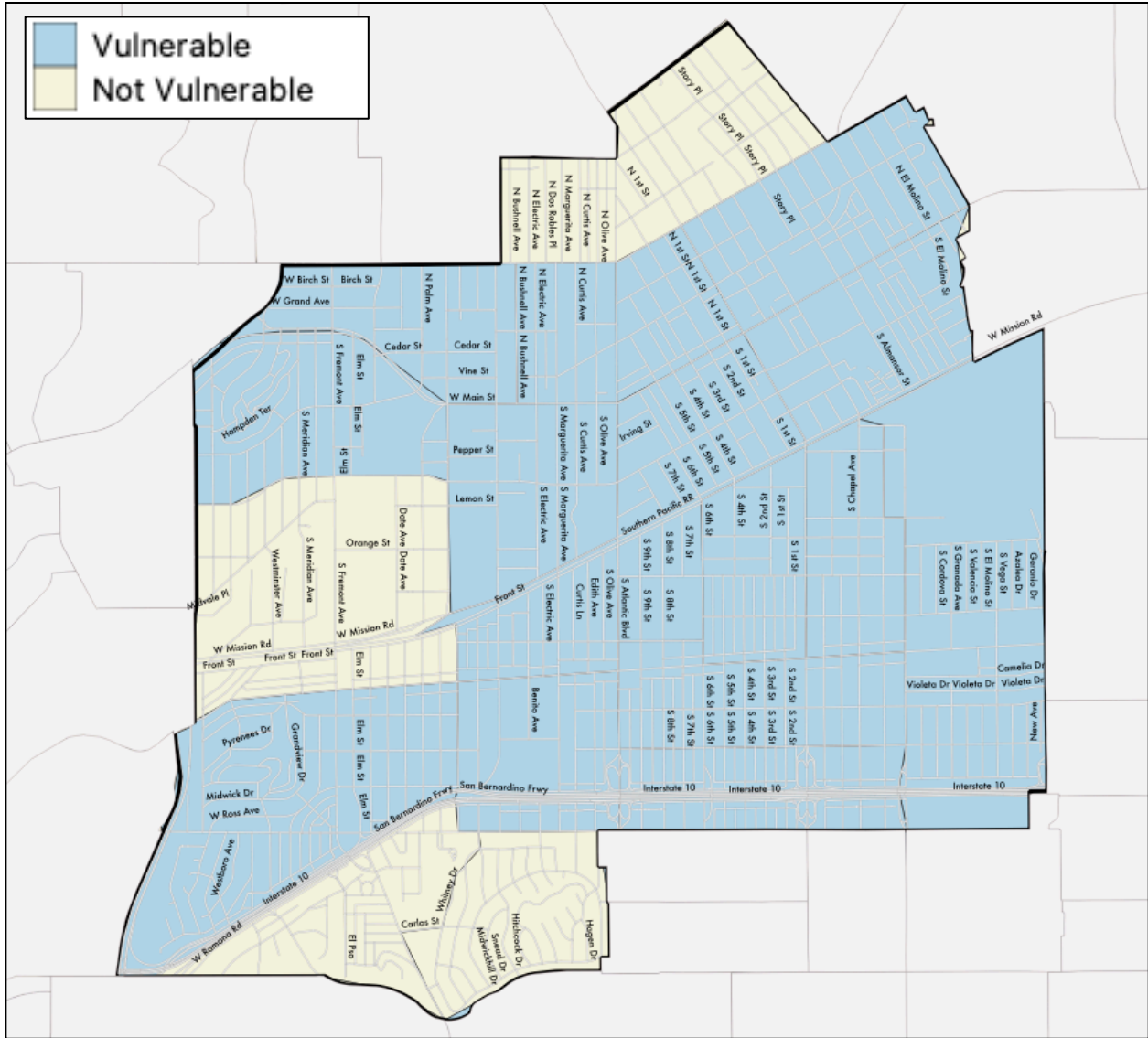
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Figure 96. Displacement Typology by Census Tract, Alhambra
 Source: Urban Displacement Project, 2021.



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Figure 97. Renter Vulnerability Index by Census Tract, Alhambra
 Source: Urban Displacement Project, 2021.



Homelessness

Regional Trend

The Los Angeles Homeless Services Authority (LAHSA) conducts an annual Point-in-Time Count (PIT) of the homeless population. In 2020, LAHSA estimated that there were 66,436 people experiencing homelessness. The majority of the homeless population was unsheltered (72 percent). Both the homeless population and the share of the homeless population that is unsheltered has been trending higher over the last five years. Since 2015 the homeless population has increased by nearly 50 percent.

Figure 98: Sheltered and Unsheltered Homeless Population in Los Angeles County (2015-2020)

Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.

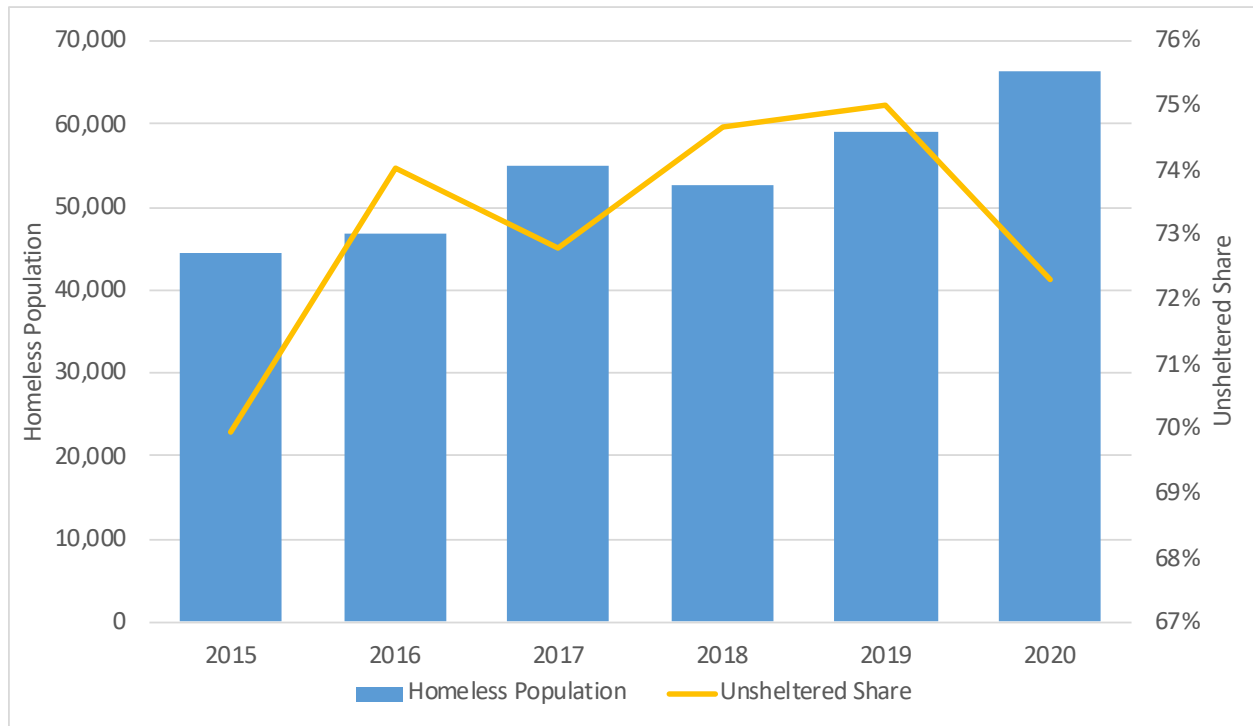
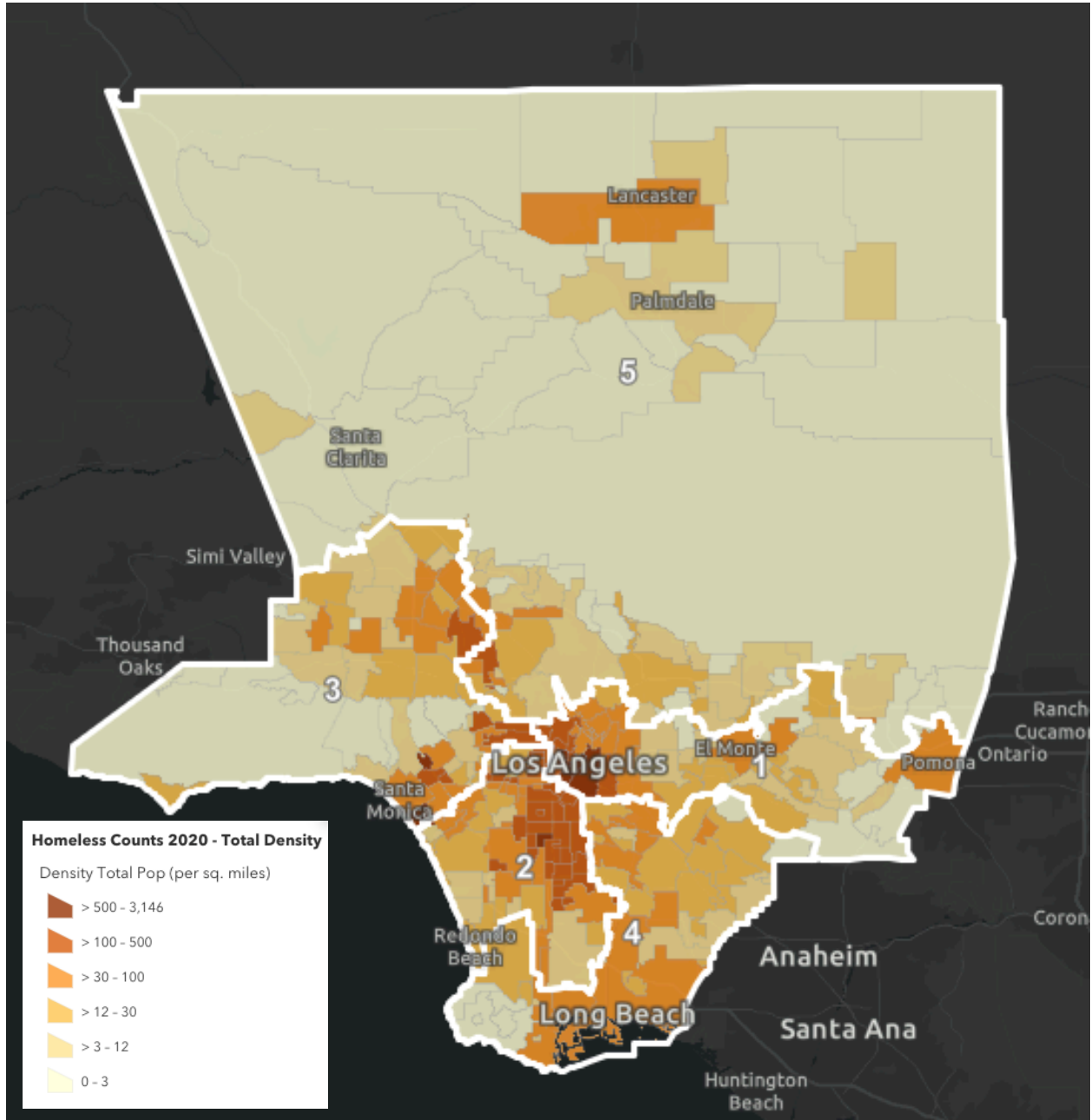


Figure 99 below displays the density of the homeless population across Los Angeles County. Los Angeles County jurisdictions located near the central city have the highest density of persons experiencing homelessness. This would be expected given the concentration of resources in this portion of the region.

Figure 99: Los Angeles County Homeless Count Density (2020)

Source: Los Angeles County Homelessness & Housing Map



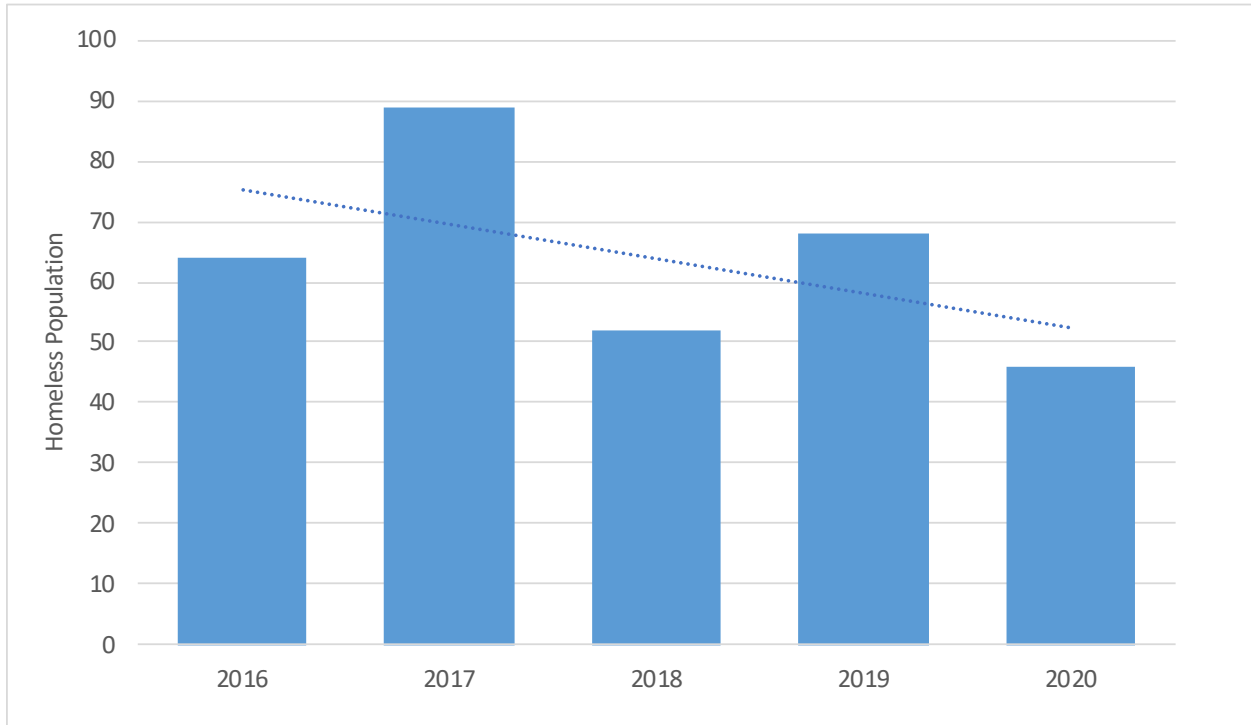
Local Trend

The City of Alhambra is part of the Los Angeles Continuum of Care (CoC), which is a regional planning body funded by HUD that coordinates housing and services funding across its partner jurisdictions.

LAHSA can provide homeless services to all individuals requiring support within Alhambra. According to the PIT count there were an estimated 46 persons experiencing homelessness in Alhambra in 2020. The number of people experiencing homelessness in Alhambra has been on a downward trend in recent years, with the 2020 count down 49 percent from a 2017 peak.

Figure 100: Alhambra Homeless County (2020)

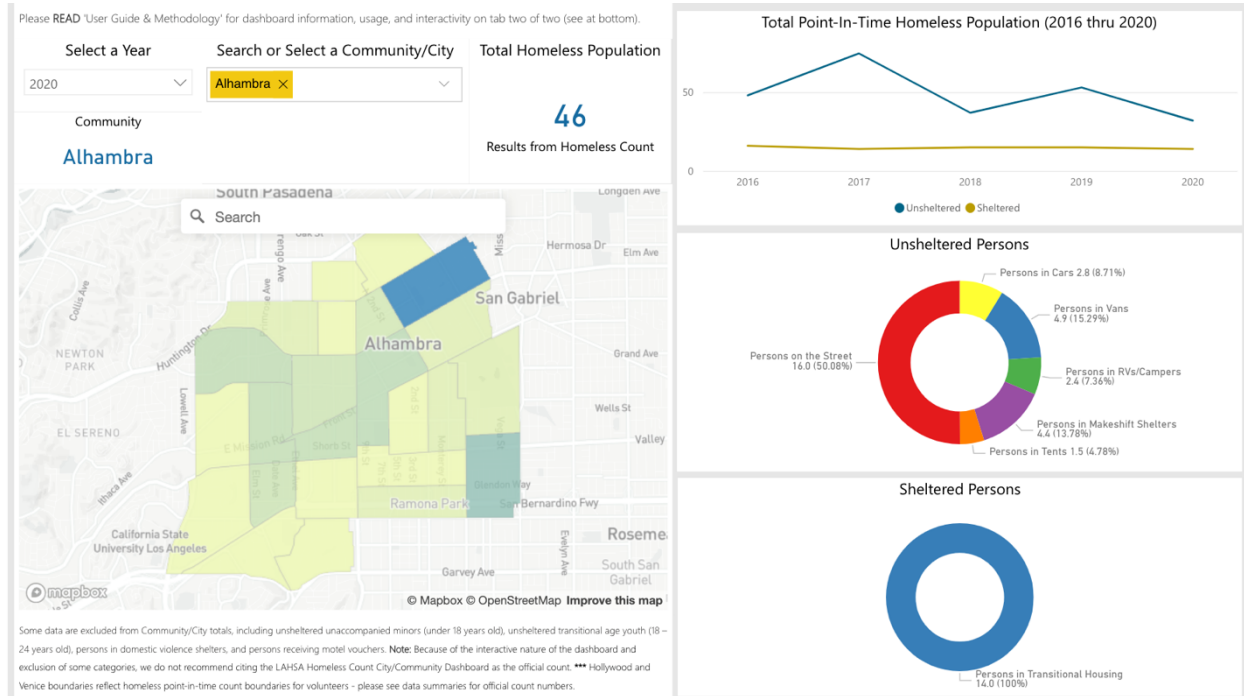
Source: LAHSA



A summary of the homeless population in Alhambra is summarized below. This data is derived from LAHSA’s homeless population dashboard by city. The data shows that 30 percent (14 individuals) of Alhambra homeless population was unsheltered in 2020. The homeless population is generally dispersed throughout the community, with slight concentrations on the north side of East Main Street near downtown and in the southeast corner of the city near the Crawford’s Corner Shopping Center. Over half of unsheltered persons were living on the streets with the remaining persons living in miscellaneous vehicles, makeshift shelters, or tents.

Figure 101: Characteristics of Alhambra’s Homeless Population (2020)

Source: LAHSA



Historic Trends and other Relevant Factors

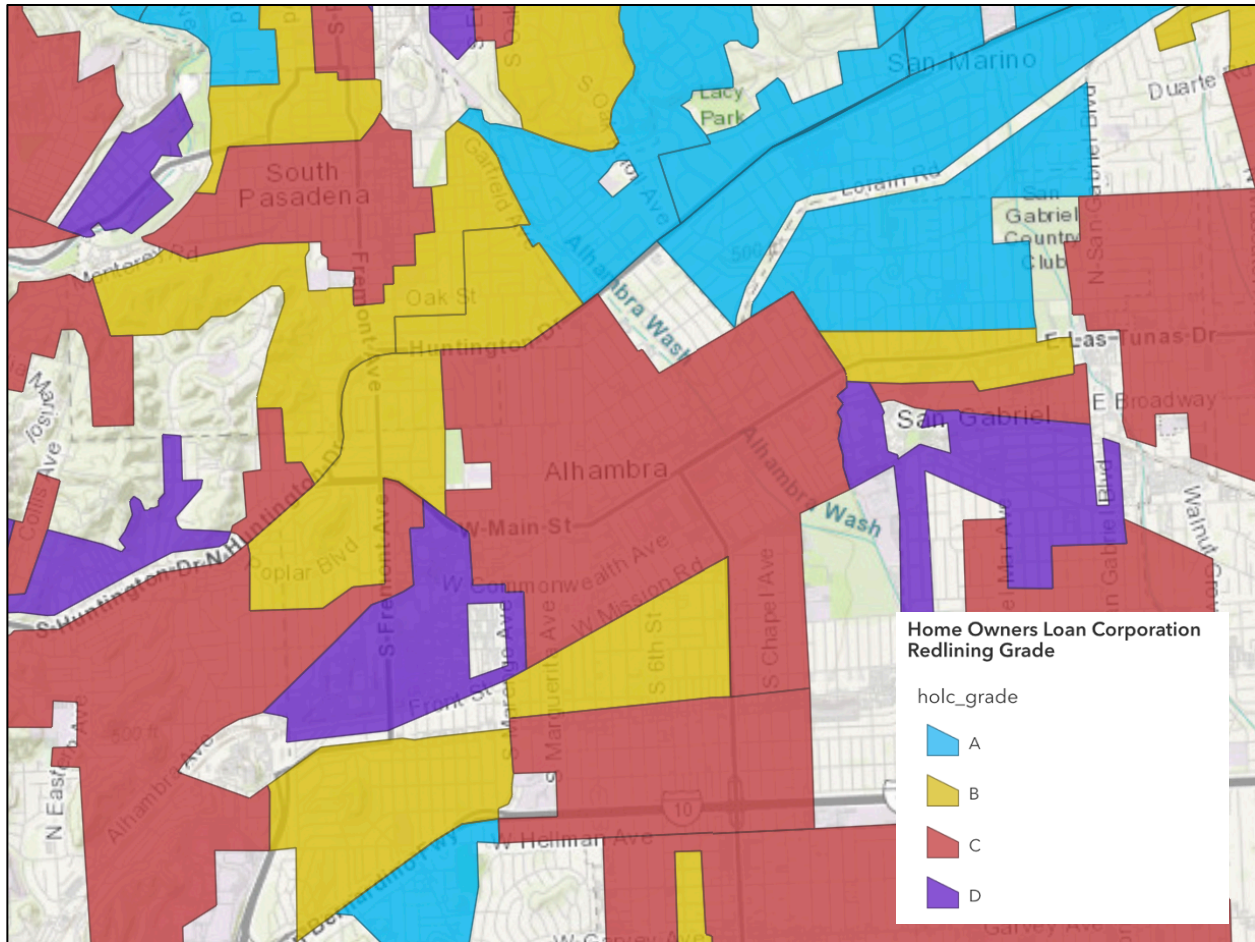
History of Redlining

The Home Owners’ Loan Corporation (HOLC), formed in 1933 under the New Deal Program, established the County’s first red-lining maps. Redlining maps established under the National Housing Act of 1934 ranked neighborhoods from A-rated (green), indicating the community “represented the best investment for homeowners” to D-rated (red), indicating the least desirable neighborhoods, where minority communities typically lived³⁹. A key factor that influenced HOLC grades was race. A racially homogenous population was considered desirable, but only so long as that race was white and non-immigrant. Communities with African American, Asian, Native American and Latino residents typically received, at best, a C grade and, more commonly, a D grade. Figure 102 presents historic redlining areas in Alhambra and the surrounding area. It shows that the majority of Alhambra was a C-rated community and considered “in decline”. At the time over 70 percent of the population was considered “foreign”.

³⁹ KCET. (2017). Segregation in the City of Angels: A 1939 Map of Housing Inequality in L.A.

Figure 102. Historic Redlining Map

Source: HCD AFFH Data Viewer



Structural Factors Zoning and Land Use

The Federal Advisory Committee on Zoning was established in 1921. This committee was responsible for establishing the first model zoning ordinance. The characteristics of this model ordinance encouraged exclusionary zoning^{40 41}. In the 1970s, local no-growth movements permeated throughout the San Gabriel Valley. These themes led to a high proportion of land dedicated to larger lots allowing only single-family zones. Today Alhambra's R-1 zone accounts for over 65 percent of residential land area. Housing units in R-1 zones are predominately single-family, which by extension are also primarily ownership units. This has created a barrier to access in areas where R-1 zoning exists.

The areas of single-family zoning is aligned with higher median incomes, home values, and other factors that are similarly associated with the highest-resource designation in the TCAC/HCD opportunity map.

Under existing conditions, housing is allowed outright in the R-1, R-2, and R-3 zones. Housing is allowed conditionally in some commercial zones. However, development standards and

⁴⁰ Knack, Ruth. (1996). *The Real Story Behind the Standard Planning and Zoning Acts of the 1920s*.

⁴¹ Rothstein, Richard. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation.

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commercial requirements have limited the feasibility of more affordable housing types in commercial zones. Additionally, housing is not currently allowed in:

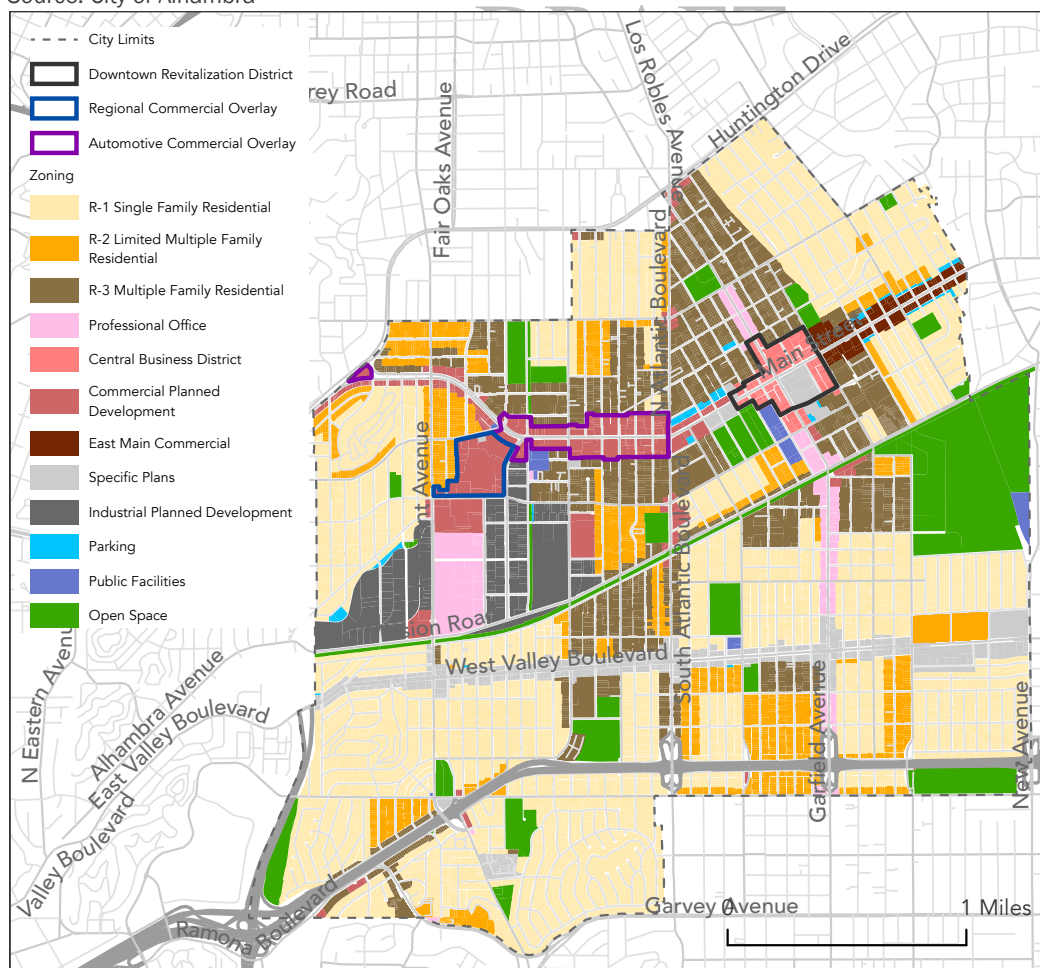
- EMC Zone (along the East Main Corridor)
- PO Zone (along the Garfield Corridor)
- Valley Boulevard Specific Plan (along the Valley Boulevard Corridor)⁴²

Existing zoning has prevented residential development and access to housing along three of Alhambra's highest resource corridors. Valley Boulevard specifically is among Alhambra's highest quality transit corridors. The barrier created to housing by the Valley Boulevard specific plan has limited accessibility to transit resources.

Alhambra also serves a role as a regional auto commercial hub that is concentrated along West Main Street. The stretch of the West Main Corridor from North Palm Avenue to North Atlantic Boulevard includes the Auto Commercial Overlay Zone, which was adopted in the 1980s. This land use pattern led to many of Alhambra's largest tracts to be held by car dealerships.

Figure 103. Existing Zoning Map

Source: City of Alhambra

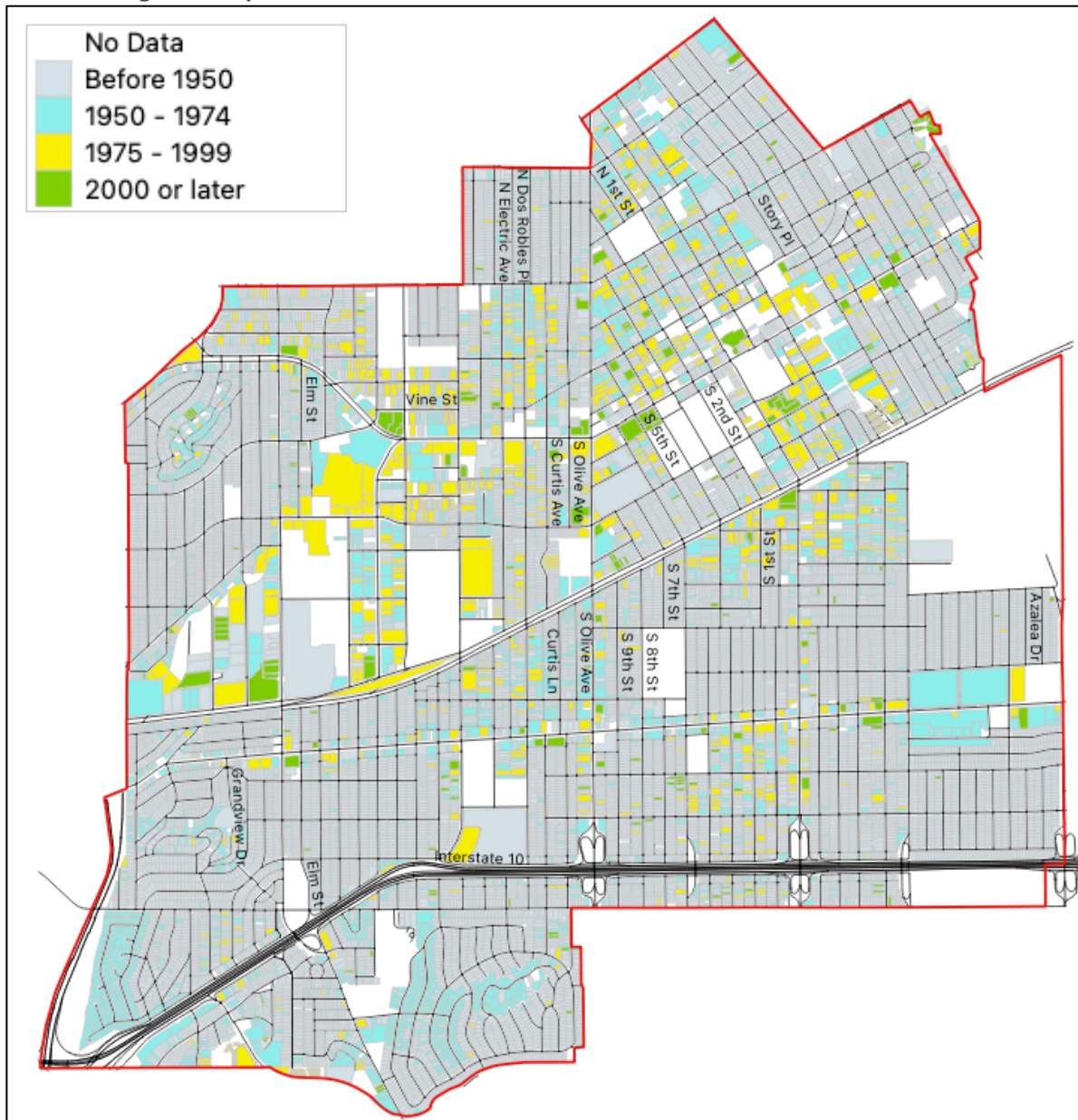


⁴² Housing is technically allowed on some parcels that meet certain criteria, but standards applied to these parcels make redevelopment along Valley Boulevard effectively infeasible. This is discussed in detail in the constraints section of the Housing Element

Impacts of Historic Development Pattern

Alhambra was largely built out in the early 20th Century. According to LA County Assessor’s data, over 62 percent of all existing structures were built before 1950 and 77 percent were built before 1975. The historic development pattern driven by a WWII era boom that preceded modern zoning designations resulted in a small lot parcelization pattern, even in today’s higher density zones. For example, the median lot size in today’s R-3 zone is only 7,600 square feet and only six percent of R-3 lots are greater than a half-acre. This historical development pattern has resulted in an environment where even in today’s commercial areas and high-density residential areas, development of housing in high opportunity areas is fundamentally challenged.

Figure 104. Historic Development Pattern, Year-Structure Built
 Source: Los Angeles County Assessor



Homeownership and Lending Patterns

The homeownership rate in Alhambra is 40 percent compared to 46 percent in Los Angeles County. However, in Alhambra access to homeownership is not equal across racial and ethnic groups. The white racial group has a higher homeownership rate than all other racial and ethnic groups. The city’s two largest racial groups, Asians and Hispanic/Latino have homeownership rates of 43 percent and 33 percent, respectively. The City’s Black and African American population has the lost rate at 15 percent.

Figure 105. Housing Tenure by Race/Ethnicity, Alhambra

Source: ACS 2019 5-year Estimates, Table S2502

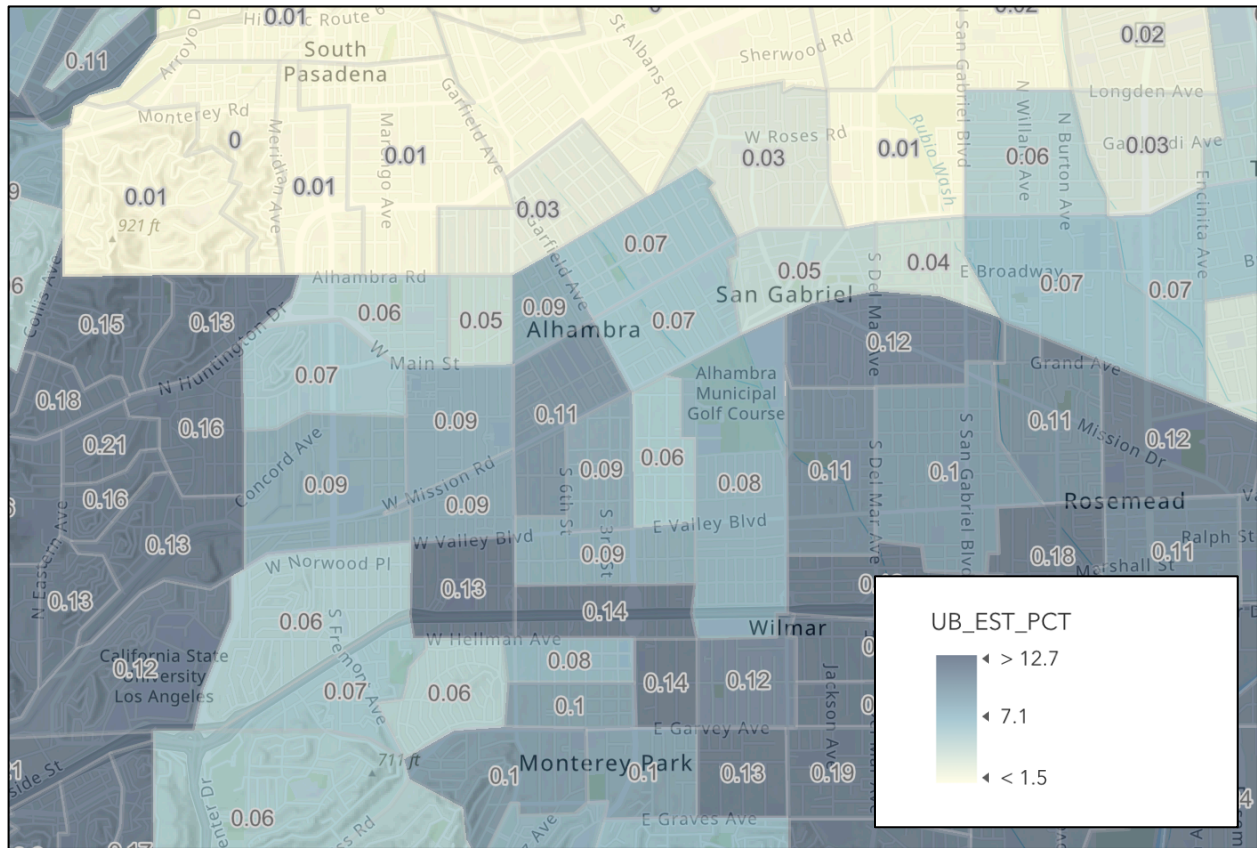
Race	Total Occupied Units	Owner Occupied	Renter Occupied	Home Ownership Rate
White alone, not Hispanic or Latino	3,574	1,708	1,866	47.8%
Black or African American	558	85	473	15.2%
American Indian and Alaska Native	204	93	111	45.6%
Asian	15,247	6,641	8,606	43.6%
Native Hawaiian and Other Pacific Islander	37	8	29	21.6%
Some other race	5,387	1,384	4,003	25.7%
Two or more races	668	260	408	38.9%
Hispanic or Latino origin	9,872	3,264	6,608	33.1%
Total	29,771	11,898	17,873	40.0%

Access to credit remains a barrier to homeownership in Alhambra. An analysis of lending patterns in Figure 105 above found that denial rates for moderate- and middle-income Black and Hispanic/Latino applicants were higher than those for whites. Denial rates for Asians were lower than whites across all income categories. Also, the Federal Financial Institutions Examination Council (FFIEC) provides Community Reinvestment Act data on access to banking. The CRAMap 2021 data and “Unbanked Index” created by RPM consulting estimates the number of households by census tract lacking access to the primary banking system.

Figure 106 presents estimates of the share of households in Alhambra and the surrounding region that lack access to banking. Generally, three to fourteen percent of households in Alhambra lack access to banking. This is an above average rate that aligns with racial composition in the community. The census tracts with the highest rates of Hispanic/Latino and Asian composition also have the highest unbanked rate.

Figure 106. Percent of Households Without Access to Banking or Credit, 2021

Source: FFIEC CRAMap 2021 Spatial Data



Historical Investment Patterns

The pattern of investment in a community can influence access to housing and opportunity. Communities that habitually invest in existing high-resource areas risk perpetuating the divide between neighborhoods that foster mobility and those that do not. Data on Alhambra’s historically pattern of investment is sparse, ranging from oral record to recent and planned investments. We evaluated available information including recent Capital Improvement Plans, interviews with long-time city staff, and new and media records detailing announced investments. Key findings include:

Alhambra has historically invested in its park infrastructure. Alhambra has a low rate of parks and open space per capita relative to the region. The built-out nature of the land use pattern makes new park development very costly, so Alhambra invests in improving and enhancing its existing parks. With the exception of Emery Park, Alhambra’s existing parks are in high resource areas but are also generally located adjacent to areas zoned for higher density housing. Also, the City conducts analysis using data from Placer.ai to understand who is benefiting from and using existing parks. A recent analysis from 2022 found that 81.1 percent of visitors at Alhambra Park and 85.3 percent of users at Emery Park and non-white. Frequent visitors also trend toward lower income residents, with the median income of visitors to

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Alhambra Park coming in at \$57,000 and Emery Park at \$52,000 annually⁴³. This is indicative that Alhambra’s existing parks are accessible to lower income families in the community.

Figure 107 shows recent and planned park investment. Figure 108 displays Alhambra’s parks alongside TCAC opportunity areas. Between 2014 and 2018, Alhambra spent \$1.8 million on capital parks projects. Over the next five years the city will invest over \$5 million.

Figure 107. Recent Capital Investments in Parks Infrastructure

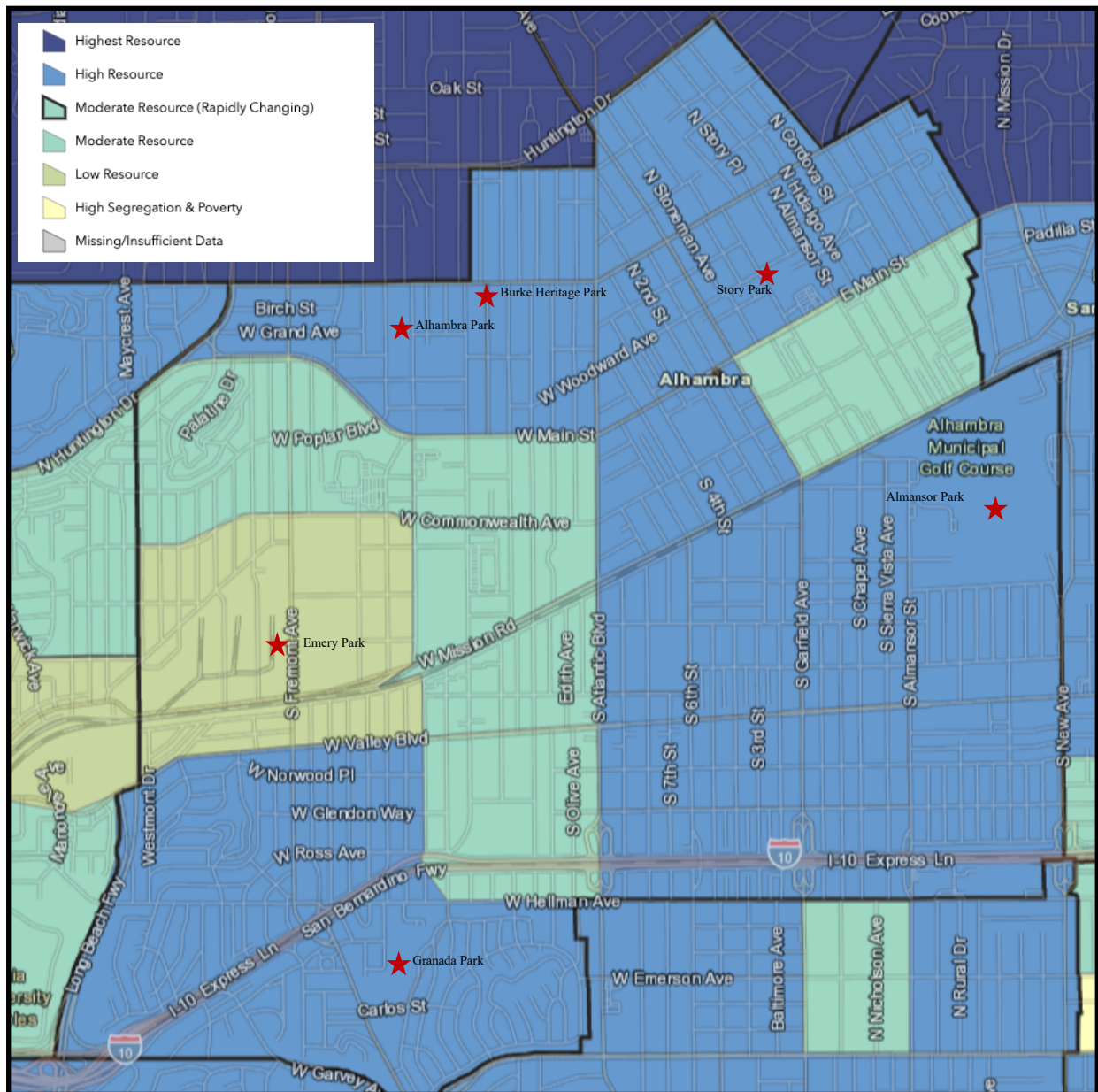
Source: City of Alhambra

YEAR	AMOUNT	PROJECT	LOCATION
2014	\$203,880	Alhambra Picnic Shelter Replacement	Alhambra Park
2015	\$71,650	Granada Gym Flooring	Granada Park
2015	\$156,620	Almanson Gym HVAC	Almanson Park
2015	\$90,939	Almanson Park Picnic Shelter Replacement	Almanson Park
2015	\$76,900	Granada Gym Equipment	Granada Park
2016	\$52,850	Granada Restroom	Granada Park
2017	\$59,000	Almanson Jogging Trail	Almanson Park
2017	\$67,960	Almanson Jogging Trail Light	Almanson Park
2017	\$85,000	Almanson Playground Rubberized Surface	Almanson Park
2017	\$199,400	Alhambra Pool Re-Plaster	Alhambra Park
2017	\$179,039	Almanson Restroom	Almanson Park
2017	\$268,907	Emery Park Playground Replacement	Emery Park
2018	\$276,108	Almanson Field Light	Almanson Park
2018	\$90,155	Alhambra Park Fitness Project	Alhambra Park
2022-2027	\$250,000	Burke Heritage Park Improvements	Burke Heritage Park
2022-2027	\$850,000	Story Park Improvements	Story Park
2022-2027	\$700,000	Alhambra Park Restroom	Alhambra Park
2022-2027	\$960,000	Alhambra Park Pool	Alhambra Park
2022-2027	\$275,000	Alhambra Park Playground	Alhambra Park
2022-2027	\$230,000	ALMANSOR Gym Window Replacement	Almanson Park
2022-2027	\$410,000	GRANADA Park Playground	Granada Park
2022-2027	\$500,000	Dog Park	Almanson Park
2022-2027	\$500,000	Granada Pool Mechanical	Granada Park
2022-2027	\$500,000	Alhambra Pool Mechanical	Alhambra Park

⁴³ Data derived from Placer.ai, retrieved for the 2022 calendar year.

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Figure 108. Location of City Parks in Relation to TCAC Resource Areas
 Source: City of Alhambra and TCAC



History of Redevelopment Agency Investment. Prior to the dissolution of redevelopment agencies in California, Alhambra utilized redevelopment funds to invest in its downtown and in affordable housing, including all existing deed restricted affordable units in the city. For example, in the late 1990s, Alhambra embarked on an aggressive downtown revitalization plan that included purchase and renovation of existing properties, street and storefront improvements, and investments to catalyze redevelopment⁴⁴. At the time, Downtown was an underinvested part of town, and has historically been classified as an area of high segregation

⁴⁴ <https://www.latimes.com/archives/la-xpm-1998-nov-09-me-40890-story.html>

and poverty. A review of “completed projects” from the 2005-2009 implementation plan include⁴⁵:

- Storefront, tenant improvements support for several businesses along Main Street
- Completion of the 45,000 square foot Alhambra Civic Center Library
- Creation of a “one-stop” Streamlined Permit Process.

Alhambra has also prioritized downtown investment through adoption of several specific plans and the West Main Corridor Master Plan, which has resulted in mixed-use redevelopment in downtown.

Street Quality and Improvements. Figure 109 shows the 2020-2025 street improvement plan alongside street quality scores across the city. We observe a correlation between lower opportunity areas, areas where multifamily rental is allowed/feasible, and lower quality streets. This is indicative of a historical pattern of underinvestment in these areas. However, we also find that Alhambra’s investment priorities also correlate to areas that are most underinvested. For example, in Figure 110, Alhambra’s 2020-21 project map shows investment in the Alley Rehabilitation Project and other street rehabilitation along Valley Boulevard, which includes moderate resource areas, concentrations of persons with protected characteristics, and is historically Alhambra’s Asian business district.

⁴⁵ <https://www.cityofalhambra.org/DocumentCenter/View/520/Alhambra-Redevelopment-Agency-Five-Year-Implementation-Plan-2010-2014-PDF>

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Figure 109. 2020-2025 Street Improvement Plan and Current Street Quality Scores
 Source: City of Alhambra

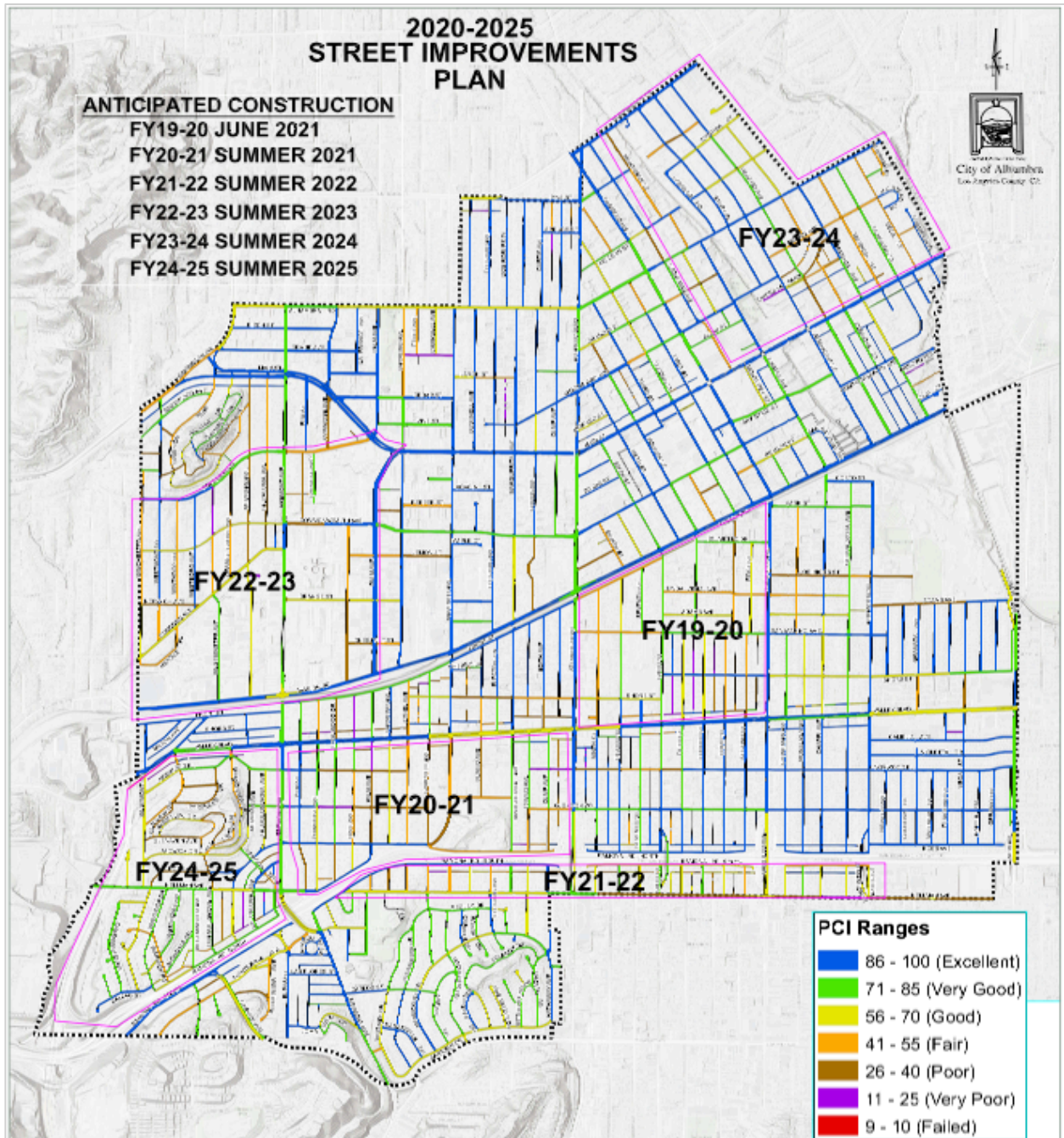


Figure 110: 2020-2021 Public Works Projects, City of Alhambra
 Source: City of Alhambra



Findings

Alhambra has historically invested heavily in downtown where fair housing challenges have historically been most common. Downtown has slowly transitioned from an area of high segregation and poverty to a high resource area. However, evidence suggests some areas correlated to concentrations of households with protected characteristics have exhibited disinvestment (Valley Boulevard, south of downtown). The current Capital Improvement Plan is prioritizing investments in these underserved areas. However, it is important that the City is proactive in ensuring that its investment mitigate historically inequitable investment patterns. Program 30 include guidance to for the Community Development Department to cooperate with Public Works in developing a process to include an assessment of fair housing characteristics in developing future capital improvement plans.

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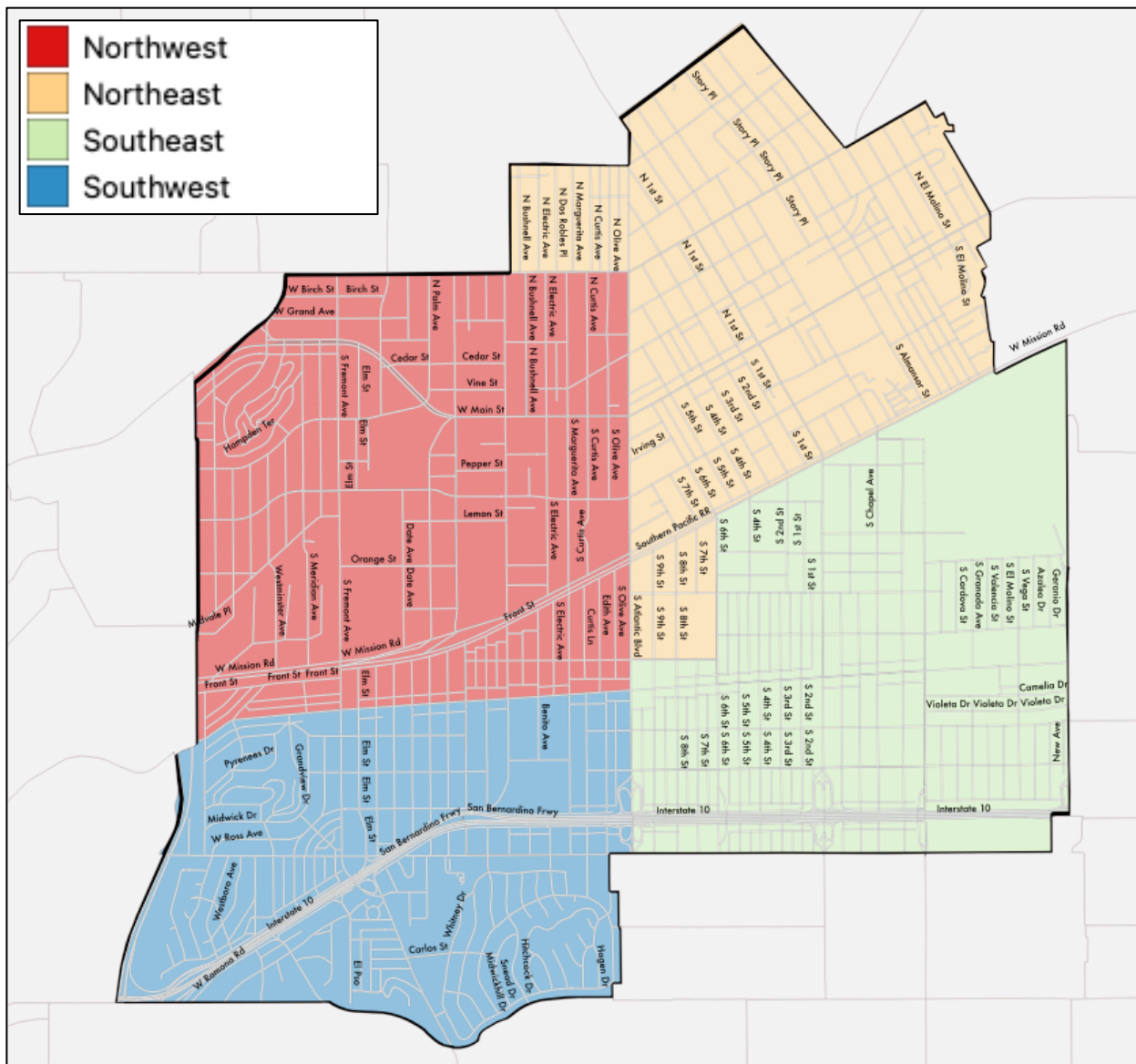
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Analysis of Sites

In this analysis we evaluate RHNA allocation by census tract and general region throughout the city. We define regions as quadrants generally aligning with major north-south (Atlantic Boulevard) and east-west (Mission Road) arterials. This delineation also aligns with census tract boundaries.

Figure 111: Map of Alhambra Quadrants for AFFH Sites Analysis

Source: ECONorthwest



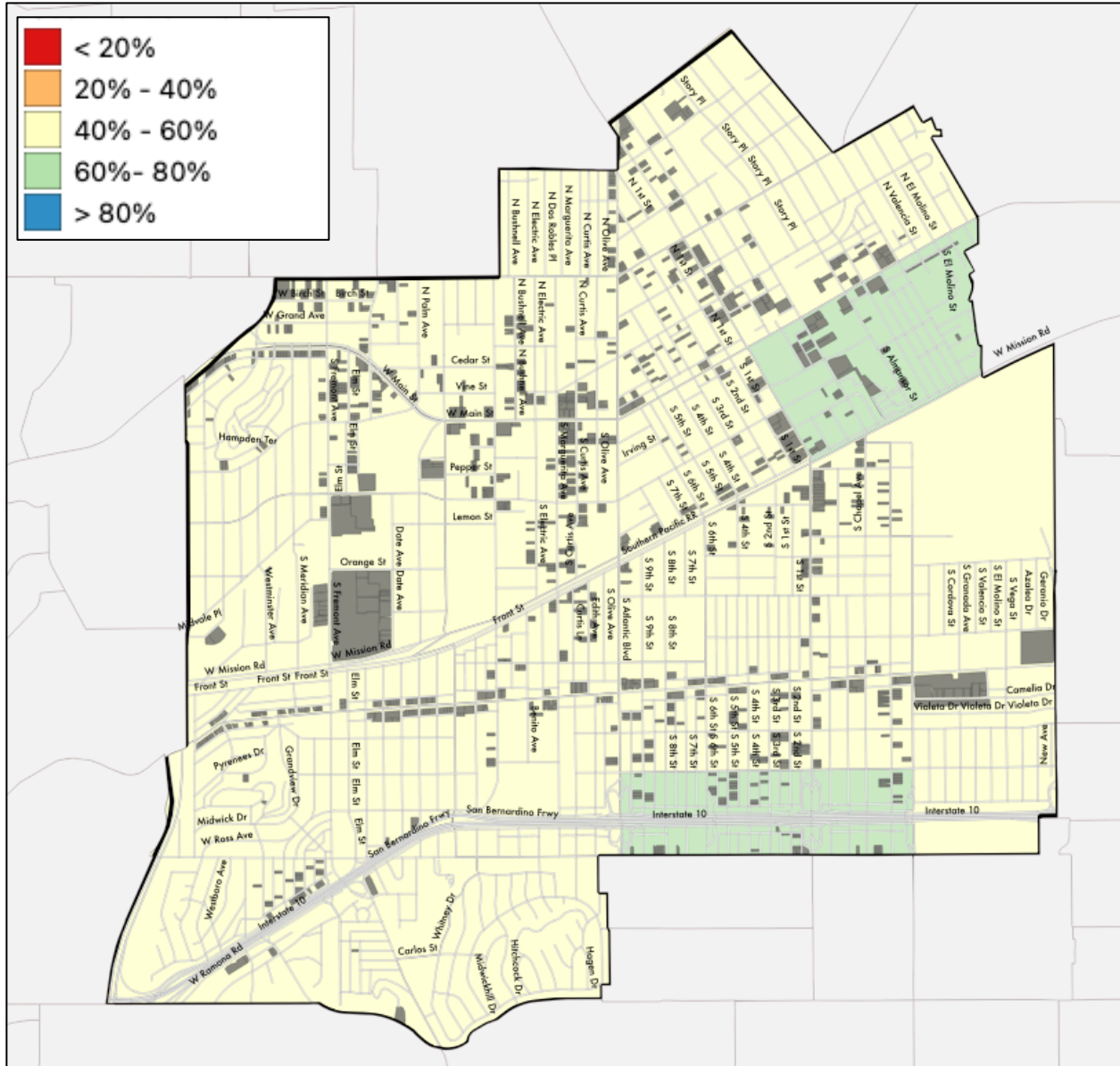
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Renter Cost Burden

Most census tracts have a renter cost burden between 40 and 60 percent. Two census tracts with an elevated cost burden rate include 8 percent of total RHNA capacity and 6 percent of lower income RHNA capacity.

Figure 112: Renter Cost Burden with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer; 2021



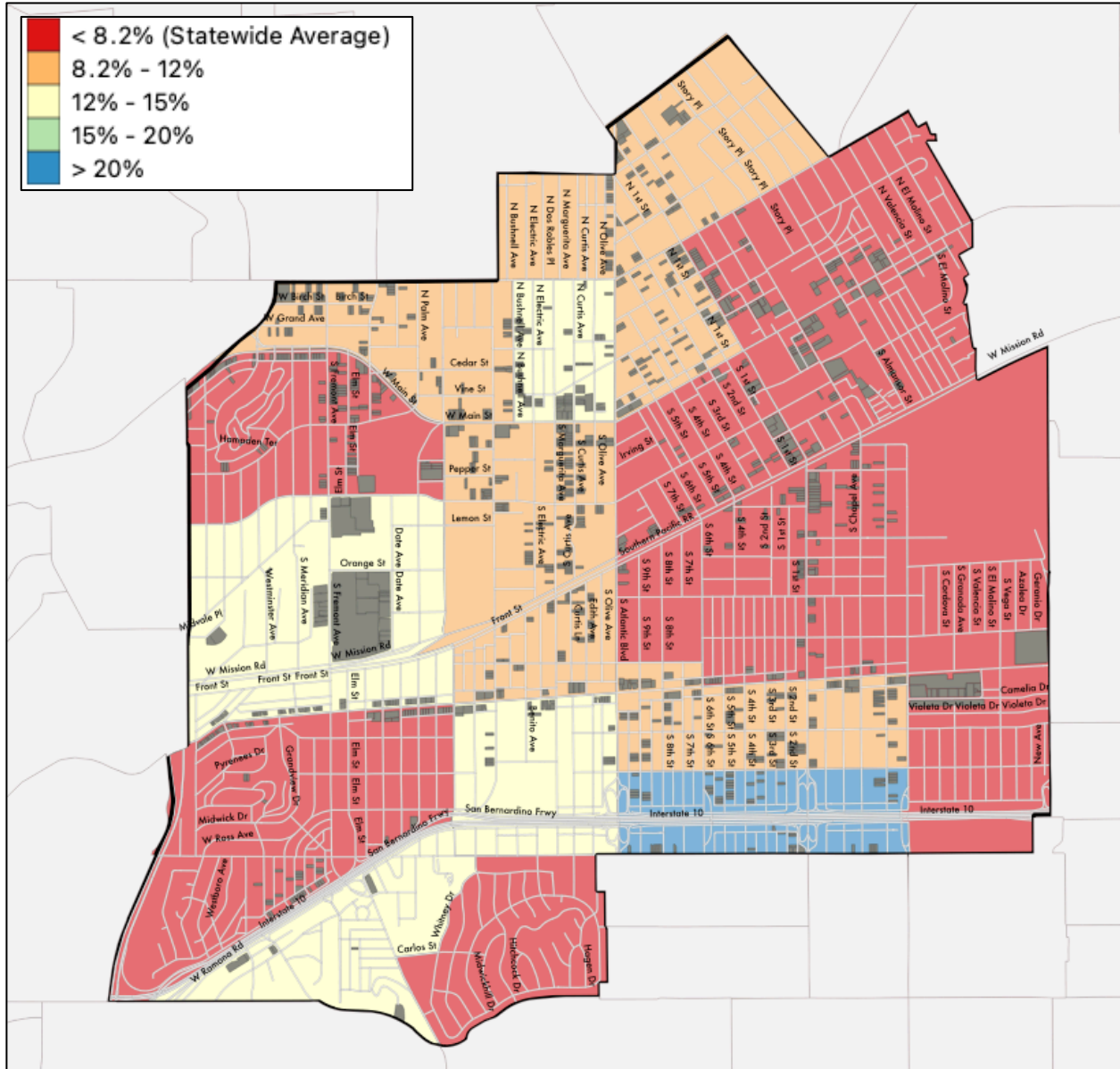
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Overcrowding

Most of northeast and southeast Alhambra have overcrowding rates that are lower than the statewide average. Taken together these areas include 45 percent of total capacity and 51 percent of all lower income capacity. One census tract with an elevated level of overcrowding only includes 69 units of total capacity (one percent) and nine units of lower income capacity.

Figure 113: Overcrowding Rate with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer; 2021



Access to Opportunity

Alhambra's low and moderate resource census tracts are located in the western portion of the city. Alhambra's strategy of a combination of upzoning and rezoning to meet its RHNA obligation was in part designed to provide access to new and existing neighborhoods. Alhambra's constrained land supply and parcelized nature contribute to limited sites that meet the criteria necessary to support lower-income housing development. In the site inventory, **nearly all sites that met minimum criteria** (between .5 and 10 acres and density at a minimum of 30units/ac) were required to be used to meet lower income obligations. This constraint limits the city's ability to be strategic about the location of lower-income site allocation. However, Alhambra only has one Census Tract that is classified as a low resource area according to the TCAC/HCD opportunity analysis. The major contributor to this classification is the tract's environmental score because it includes large portions of the city's industrial area. This tract scores high on both economic and education factors. Figure 114 below shows **that 60 percent of lower income capacity is in high resource areas and 85 percent is in high or moderate resource areas**. This should serve to improve access to higher opportunity areas, mitigate displacement, and unwind concentrations of poverty.

Identified site capacity across all income levels is well-distributed along corridors and in medium and high-density zones throughout the community. Site inventory capacity was further prioritized by transit access. Alhambra is generally a high transit access city. Nearly all capacity located west of Chapel is located in a SCAG designated 2016 High Quality Transit Area (HQTA) and **86 percent of all capacity is located within 1/4 mile of a transit stop**.

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Figure 114: Lower Income RHNA Allocation and Composite TCAC Opportunity Score: Alhambra, CA
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021 and ECONorthwest

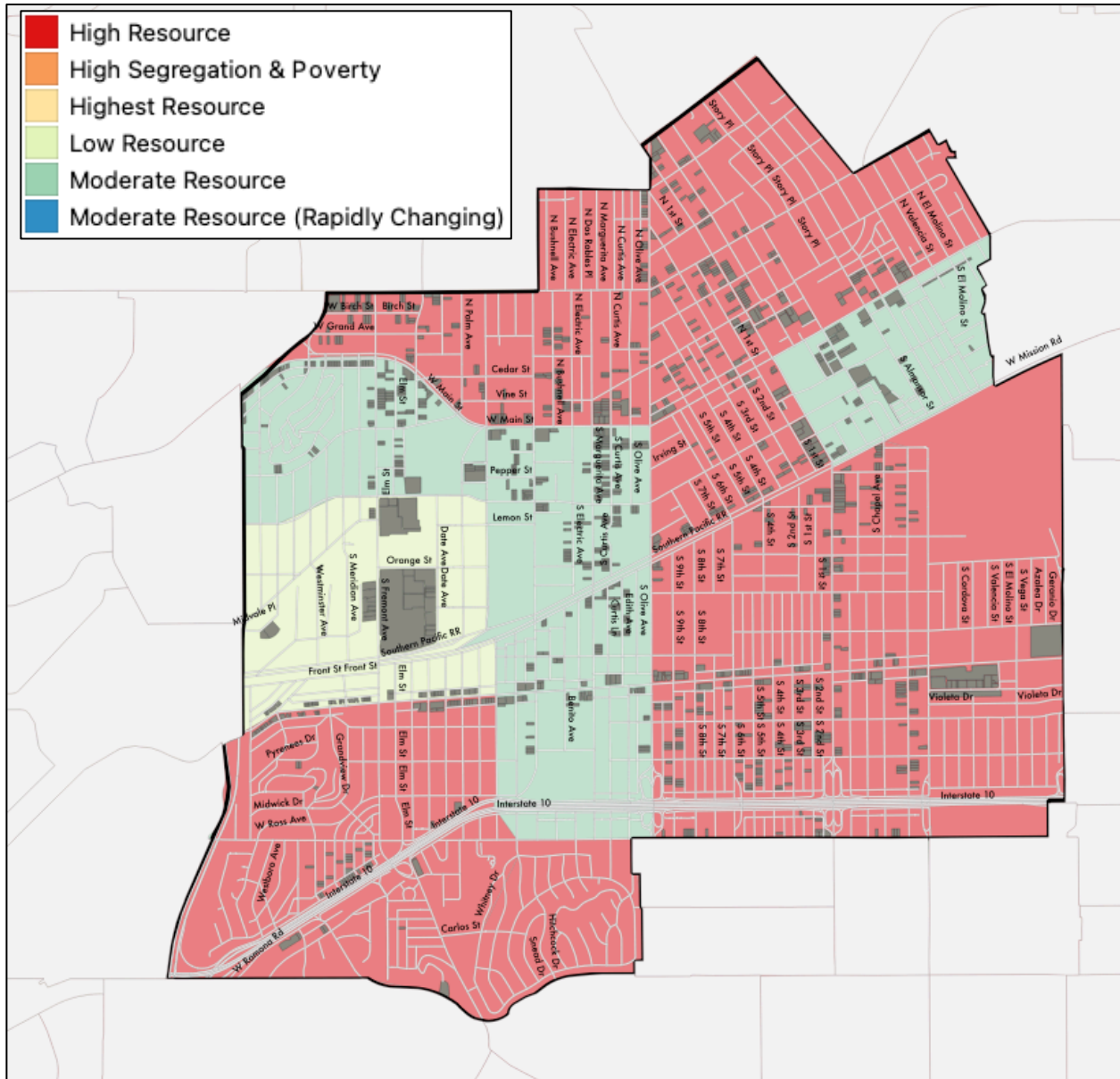


Figure 115: Unit Capacity by Composite TCAC Opportunity Score and Income Level: Alhambra, CA⁴⁶
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021 and ECONorthwest

Income Level	High Resource	Moderate Resource	Low Resource
Lower Income	1,681	716	409
Moderate Income	678	295	139
Above Moderate Income	1,655	934	664
Total	4,013	1,946	1,212

⁴⁶ Sites only, excludes capacity in proposed projects

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Displacement Typology According to the Urban Displacement Project, the City of Alhambra's twenty census tracts has five tracts that are experiencing advanced gentrification, two that are in the early stages of gentrification, and four that are vulnerable to displacement due to gentrification, with the other nine being stable moderate/mixed income. Gentrification pressures are most pronounced in the central and southern portion of the City. The majority of RHNA capacity (57 percent) is located in areas of displacement stability. Roughly 17 percent (497 units) of lower income capacity is located in areas of early or advanced gentrification. **Areas of advanced gentrification also correlated to areas of elevated cost burden.**

Figure 116: Site Capacity by Income Level and UDP Displacement Typology, City of Alhambra

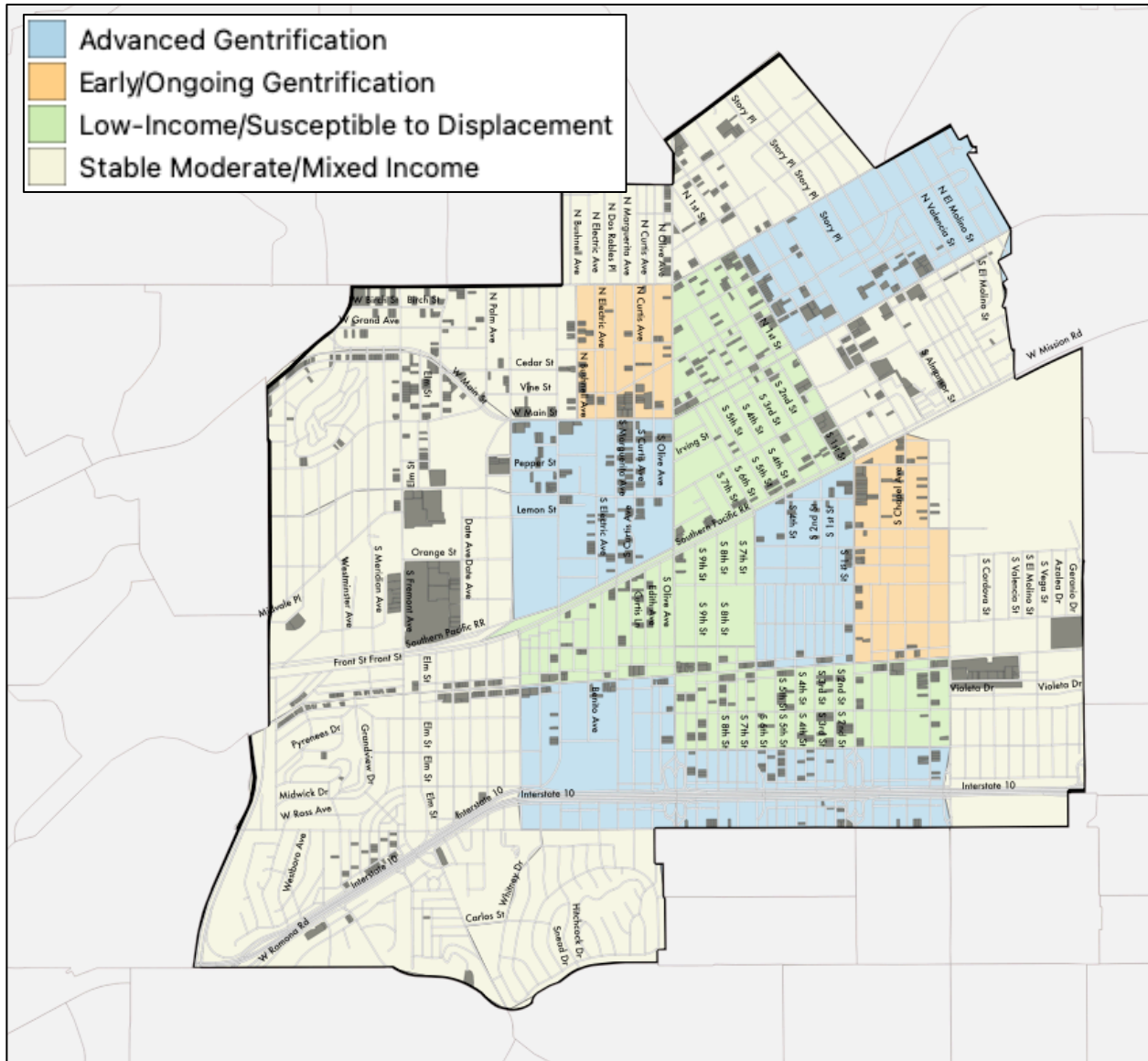
Source: UDP Displacement Typology, Los Angeles 2018, ECONorthwest

Typology	Lower	Moderate	Above Moderate
Advanced Gentrification	266	166	459
Early/Ongoing Gentrification	231	116	286
Low-Income / Susceptible to Displacement	696	261	618
Stable Moderate /Mixed Income	1,613	569	1,890

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Figure 117: UDP Displacement Typology with Sites Inventory: Alhambra, CA
 Source: HCD AFFH Data Viewer; 2021, UDP 2021, and ECONorthwest



Effects of Patterns of Segregation

A comparison of the site inventory against areas of concentrated low to moderate income households and Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) areas are indicative of the direction of patterns of segregation in the community.

Low to moderate Income Concentration

Census tracts in Alhambra range from 38.2 percent to 72.1 percent concentration of low to moderate income households. Over 55 percent of the sites in the inventory are located in census tracts at the median LMI concentration or lower. Sites designated to accommodate lower income are more broadly dispersed because a higher percentage of sites with higher maximum densities are appropriately located within the downtown revitalization district.

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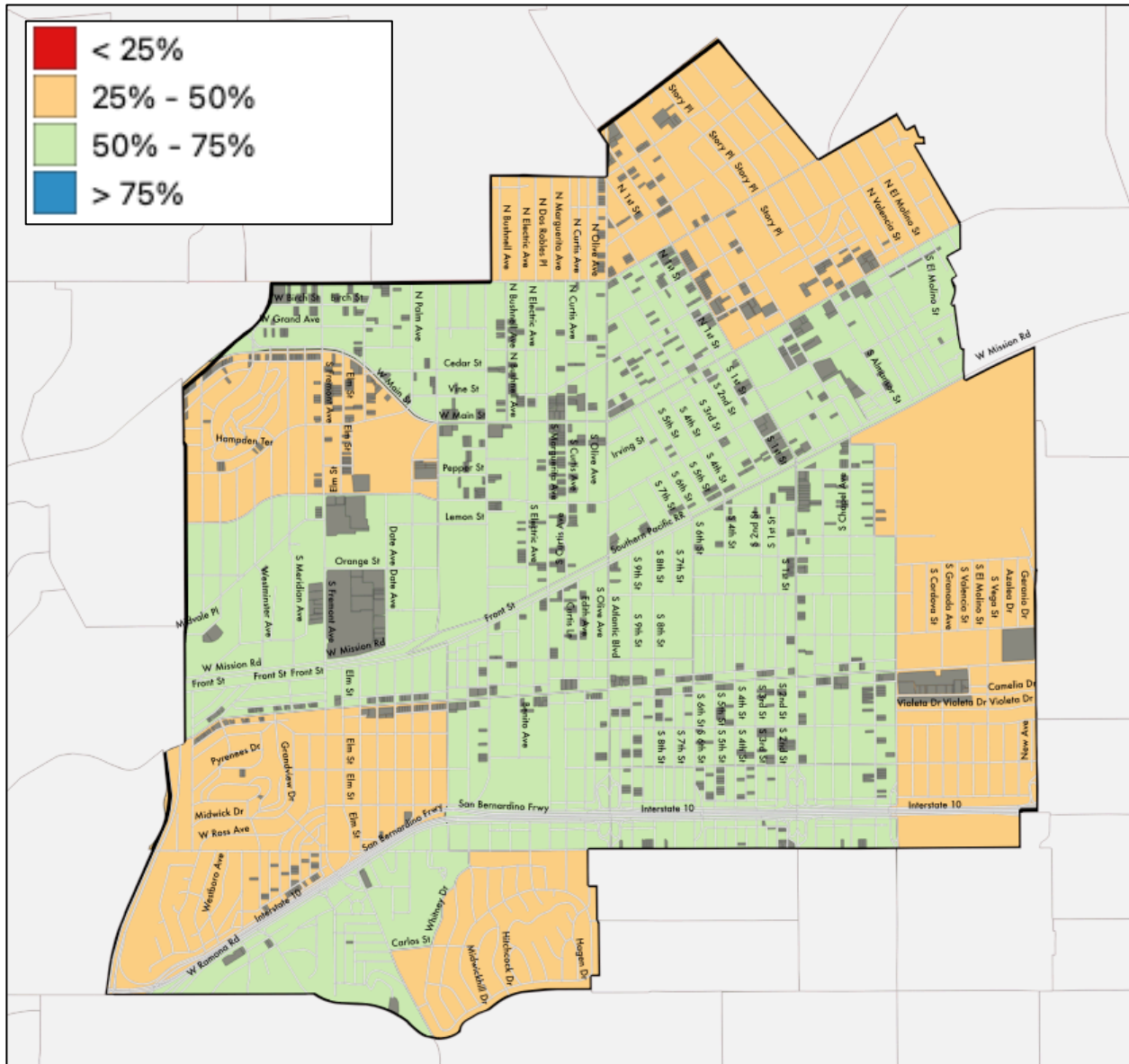
Figure 118: Number of Sites by LMI Share, City of Alhambra

Source: HCD Data Viewer Data, Low-Moderate Income Population Tracts, HUD; US Census Bureau Tracts , ECONorthwest

Percentage LMI (Quintile)	Lower	Moderate	Above Moderate	Total
25% to 50%	881	316	760	1,957
50% to 75%	1,925	796	2,493	5,214

Figure 119: Low-to-Moderate Income Population with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer 2021, and ECONorthwest

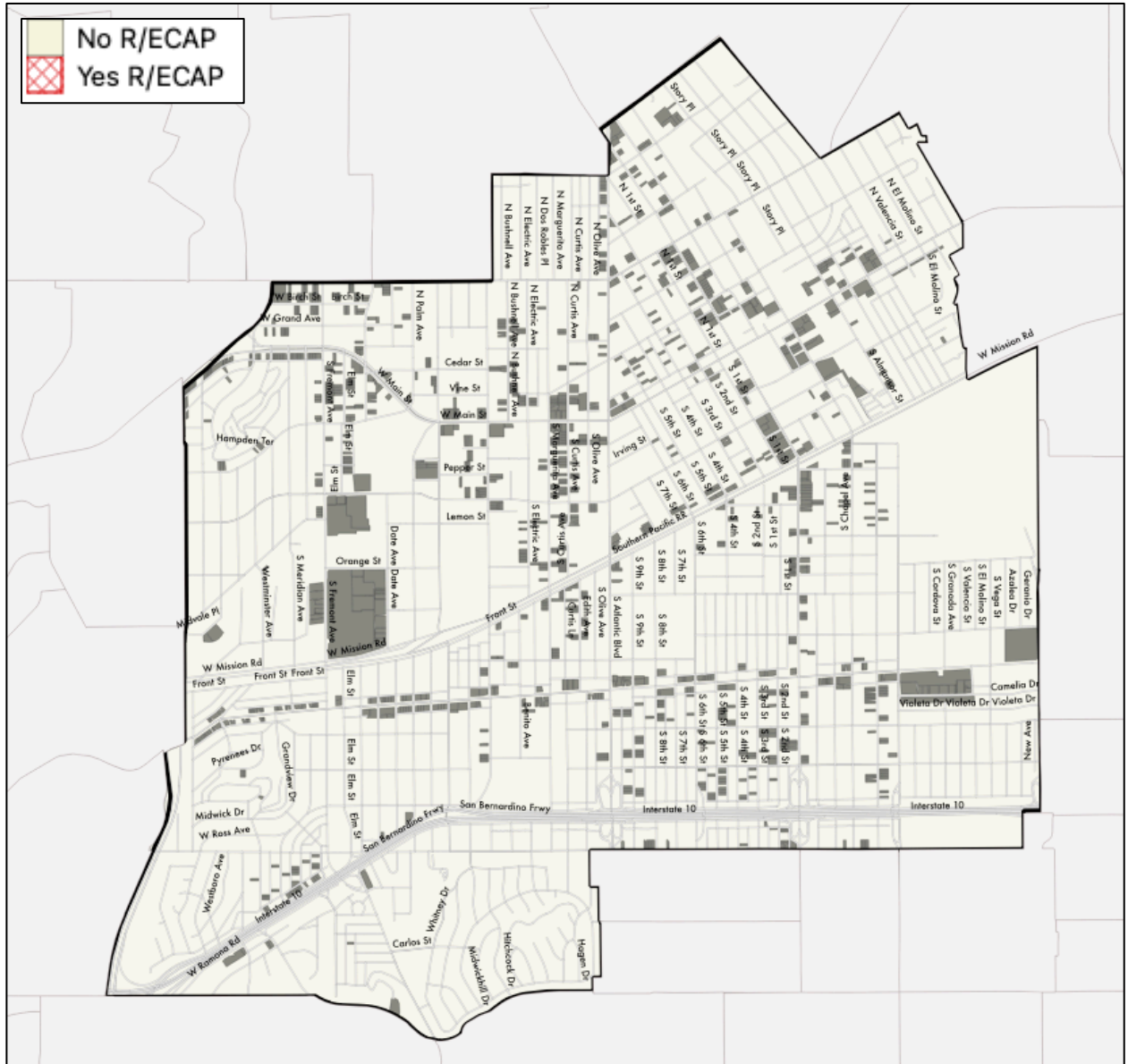


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R/ECAP Areas

Alhambra does not have any R/ECAPs within its boundaries. All sites in the inventory are not within a R/ECAP area.

Figure 120: R/ECAP Areas with Sites Inventory: Alhambra, CA
Source: HCD AFFH Data Viewer 2021, and ECONorthwest



Sites Analysis Summary

Figure 121 and 122 below summarizes data covering RHNA capacity alongside nine key AFFH indicators by census tract and quadrant area defined in Figure 111 above. Key findings in this analysis include:

Northwest

The Northwest Area has the highest share of capacity at 44 percent. This largely impacted by two large opportunity sites in the Northwest quadrant, including the proposed Villages project. The Northwest has below average rates of cost burden and is mostly moderate and high resource. However, it does include the only low resource tract in the city.

Northeast

The Northeast area includes 32 percent of lower income capacity and 30 percent of all capacity. It has the lowest rate of minority population (still high at 87.8 percent) and the lowest rate of owner cost burden and overcrowding. It is mostly a high resource areas with a few pockets of potential susceptibility to displacement.

Southeast

The Southeast is the highest resource area in the city. All tracts in this area are high resource. This area include 22 percent of lower income capacity and 21 percent of total capacity. It also has lowest rate of female headed households with children and the lowest poverty rate. Four out of five tracts in this area have displacement vulnerability.

Southwest

The Southwest Area is a completely built-out and include the greatest share of single-family homes. The majority of its capacity to accommodate future growth (six percent of capacity) is concentrated in opportunity sites along Valley Boulevard. The area has mostly stable displacement typologies with the exception of one moderate resource tract showing advanced gentrification.

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Figure 121: RHNA Capacity and AFFH Indicators by Tract and Area (part 1), City of Alhambra

Census Tract	Total HHs	Capacity			AFFH Indicators				
		Lower	Moderate	Above Mod.	Minority %	LMI Share	Renter Cost Burden	Owner Cost Burden	Overcrowding
NORTHWEST AREA									
6037480802	1,132	409	139	664	94.9%	57.8%	41.8%	28.1%	12.1%
6037480803	1,244	274	93	241	88.8%	40.0%	55.1%	59.2%	4.5%
6037480804	1,811	117	50	144	93.0%	57.0%	46.5%	40.7%	10.2%
6037480303	1,552	123	56	131	92.7%	58.5%	58.2%	67.9%	13.9%
6037480901	1,680	163	87	242	94.0%	62.2%	45.6%	55.7%	11.8%
6037480902	1,382	64	37	86	95.1%	63.9%	59.0%	59.9%	8.4%
Total	8,801	1,151	462	1,508	93.1%	57%	51%	52%	10.3%
NORTHEAST AREA									
6037480400	2,146	43	50	128	82.8%	39.9%	45.6%	25.6%	9.0%
6037480304	1,875	193	90	208	93.9%	72.1%	54.1%	50.5%	8.4%
6037480302	1,770	244	70	164	81.4%	49.8%	45.2%	35.3%	6.4%
6037481002	2,062	177	55	303	93.4%	66.5%	62.7%	50.7%	6.2%
6037481001	1,761	249	62	133	87.4%	56.6%	57.3%	43.5%	8.0%
Total	9,614	906	327	936	87.8%	56.7%	53.0%	40.9%	7.6%
SOUTHEAST AREA									
6037481604	1,406	56	44	105	90.2%	69.6%	53.2%	36.3%	8.0%
6037481603	1,147	108	61	155	95.9%	62.9%	54.3%	63.8%	6.8%
6037481500	1,596	264	62	108	94.6%	47.7%	48.4%	42.3%	5.1%
6037481606	1,627	190	73	192	95.1%	68.4%	58.1%	57.0%	11.8%
6037481605	1,046	9	10	49	94.7%	63.5%	60.4%	27.8%	21.0%
Total	6,822	627	250	608	94.0%	62.1%	54.5%	46.0%	10.0%
SOUTHWEST AREA									
6037480903	1,106	37	24	63	95.2%	53.6%	51.9%	39.4%	12.7%
6037481901	2,036	55	41	120	84.3%	45.5%	44.9%	38.9%	2.6%
6037481902	1,035	29	9	18	92.3%	52.1%	56.9%	59.7%	13.7%
6037481800	883	0	0	0	83.9%	38.2%	43.5%	32.3%	1.7%
Total	5,060	122	74	201	88.2%	47.4%	48.6%	42.1%	6.9%

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Figure 122: RHNA Capacity and AFFH Indicators by Tract and Area (part 2), City of Alhambra

Census Tract	Total HHs	Capacity				AFFH Indicators			
		Lower	Moderate	Above Mod.	Total RHNA	Female Headed HHs w/Children	Poverty Status	TCAC Resource (2021)	Displacement Type
NORTHWEST AREA									
6037480802	1,132	409	139	664	1,212	7.2%	4.3%	Low Resource	Stable
6037480803	1,244	274	93	241	608	13.5%	6.0%	Moderate Resource	Stable
6037480804	1,811	117	50	144	312	18.0%	5.4%	High Resource	Stable
6037480303	1,552	123	56	131	310	44.9%	5.1%	High Resource	Early Gentrification
6037480901	1,680	163	87	242	493	23.6%	7.1%	Moderate Resource	Advanced
6037480902	1,382	64	37	86	187	25.1%	7.5%	Moderate Resource	Low Income/Susecptible
Total	8,801	1,151	462	1,508	3,120	22.9%	6.0%	Mod and High	Mixed
NORTHEAST AREA									
6037480400	2,146	43	50	128	221	4.9%	4.1%	High Resource	Stable
6037480304	1,875	193	90	208	490	38.2%	6.2%	High Resource	Low Income/Susecptible
6037480302	1,770	244	70	164	478	7.7%	4.0%	High Resource	Stable
6037481002	2,062	177	55	303	535	9.3%	9.6%	Moderate Resource	Stable
6037481001	1,761	249	62	133	444	20.7%	4.5%	High Resource	Low Income/Susecptible
Total	9,614	906	327	936	2,169	15.7%	5.7%	Mixed	Mixed
SOUTHEAST AREA									
6037481604	1,406	56	44	105	205	13.4%	3.0%	High Resource	Advanced
6037481603	1,147	108	61	155	323	18.4%	6.3%	High Resource	Early Gentrification
6037481500	1,596	264	62	108	434	14.3%	3.2%	High Resource	Stable
6037481606	1,627	190	73	192	455	4.9%	5.5%	High Resource	Low Income/Susecptible
6037481605	1,046	9	10	49	69	17.1%	5.6%	High Resource	Advanced
Total	6,822	627	250	608	1,485	13.0%	4.6%	Mod and High	Mixed
SOUTHWEST AREA									
6037480903	1,106	37	24	63	124	18.5%	9.3%	Moderate Resource	Advanced
6037481901	2,036	55	41	120	217	2.6%	2.6%	High Resource	Stable
6037481902	1,035	29	9	18	56	25.9%	6.9%	High Resource	Stable
6037481800	883	0	0	0	0	14.8%	2.9%	High Resource	Stable
Total	5,060	122	74	201	396	13.0%	5.0%	Mod and High	Mixed

Priorities and Contributing Factors

The most meaningful and prevalent fair housing issues in Alhambra are based on the analysis above. These factors are prioritized cardinally through the findings of the AFFH assessment.

Priority 1: The most important fair housing issue is disproportionate housing needs, including housing need for persons with disabilities. This is based on its applicability to the broadest spectrum of residents. The primary factors contributing to disproportionate housing need include:

Factor 1.1. Displacement of residents due to economic pressures. Alhambra has a high incidence of census tracts with high risk of gentrification and displacement.

Factor 1.2. Availability of units in a range of sizes. Alhambra is exhibiting a trend of out-migration among female-headed households with children and a high prevalence of cost burden and overcrowding.

Priority 2: The second most prevalent housing issue is disparities in access to opportunity. While Alhambra has seen improvements in TCAC opportunity scores overtime, environmental scores in the western part of the city continue to present health hazards. The primary factors contributing to disparities in access to opportunity include:

Factor 2.1. Location of Environmental Health Hazards. Alhambra generally has good component opportunity scores for access to education and economic factors, but environmental scores are low in West Alhambra and along the I-10 freeway.

Factor 2.2. Location and Type of Affordable Housing. Alhambra has only a handful of subsidized affordable housing projects available to low-income households. A large share of even seasoned housing stock in the city rents at rates above lower income affordability levels.

Factor 2.3. Access to Financial Services. The analysis found that discrepancies in access to financial services by racial category could be contributing disproportionate access to home ownership and housing mobility.

Factor 2.4. Lack of Investments in Specific Neighborhoods. Alhambra has historically invested throughout the city. It's investments in downtown have resulted in a transition to higher resource scores. But it has also disproportionately invested in parks and other infrastructure that are concentrated in higher resource areas; and the city lacks a process for considering AFFH factors in Capital Improvement Planning.

Priority 3: A third fair housing issue that should be prioritized is fair housing enforcement and capacity. Alhambra has an above average percentage of the population that does not speak English at home or have access to a computer with internet service. Many residents are unaware of resources available in the community.

Factor 3.1. Lack of Fair Housing Outreach and Enforcement. During the outreach process with residents, the city found that while it has a broad range of fair housing services available through its contract with the Housing Rights Center, many residents, specifically people of color and low income residents, do not know how to access these services.

Factor 3.2. Lack of Language Access. Nearly one-in-six households in Alhambra speak a language other than English at home. Language barriers exist in accessing marketing and informational materials as well as participating in public processes.

Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.

Priority 4: Sites Inventory; Alhambra’s historic zoning and land use patterns alongside the historic pattern of private investment has led to a physical condition that makes housing challenging in some neighborhoods. Zoning has essentially excluded housing production on three of the city’s major corridors.

Factor 4.1. Zoning and Historic Land Use Pattern. The AFFH sites analysis found that exclusionary zoning along primary corridors aligns with a development pattern that has many single-family homes in existing high-density areas has prevented development in higher resource and higher income areas.

Goals

1. Expand Fair Housing Choice and Access
2. Expand Affordable Housing Opportunities
3. Maintain Safe and Green Neighborhoods
4. Mitigate Gentrification and Displacement

Fair Housing Program: Meaningful Actions and Outcomes

The city has an obligation to prevent and mitigate factors limiting fair housing access and barriers to equal opportunity in housing choice. The City adopted and updated a five-year Analysis of Impediments to Fair Housing Choice in April 2020. Affirmatively furthering fair housing requires that the city take meaningful actions to address the impediments identified in the AI and in this Housing Element Update.

Figure 123: Meaningful action the City will pursue to overcome identified patterns and trends from the AFFH assessment of contributing factors to fair housing issues

Fair Housing Issue	Contributing Factor	Geographic Target	Meaningful Action	Metric	Milestones and Targets
Fair Housing Enforcement and Outreach Capacity	<ul style="list-style-type: none"> ▪ Lack of language access ▪ Lack of Fair Housing Enforcement and Outreach ▪ Lack of awareness of fair housing laws and advocacy. ▪ Community opposition 	Citywide, tracts with highest non-English speaking population.	<ul style="list-style-type: none"> ▪ Continue to contract with the Housing Rights Center to provide fair housing services and education. ▪ By year-end 2023, develop a program to prioritize access to language access for housing and planning meetings. ▪ By year-end 2024, update citywide survey completed in 2021, offering in English, Spanish, and Traditional Chinese. Include survey questions assessing barriers to public participation. 	<ul style="list-style-type: none"> ▪ Number of cases served by the housing rights center. ▪ Community participation among non-English speaking residents. 	<ul style="list-style-type: none"> ▪ Target to serve 350 individuals annually through HRC programs. ▪ Include translated announcements in Spanish and Traditional Chinese for outreach on housing related issues. ▪ 100% of announcements will be translated in Spanish and Traditional Chinese for participation from non-English speaking residents on housing related issues.

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			<ul style="list-style-type: none"> When holding community meetings, proactively outreach to a wide range of community groups. 		<ul style="list-style-type: none"> 100% of participants will have access to translation services to encourage outreach and engagement by non-English speakers. City will track 100% of requests from non-English speakers seeking translation services for housing programs.
Disproportionate Need for Persons with Disabilities	<ul style="list-style-type: none"> Availability of units in a range of sizes. Displacement of residents due to economic pressures. Demographic factors driving needs for seniors with disabilities. 	Central City, Citywide	<ul style="list-style-type: none"> Begin educational programs that promote the positives of integrated income neighborhoods to change local attitudes about affordable housing (Program 28). Implement Program 5 (Inclusionary Housing). Establish siting requirements for SRO housing (Program 9) Implement an adaptive reuse program (Program 23) to encourage lower cost housing alternatives. Implement an aggressive Accessory Dwelling Unit Program (Program 26) to incent production in high resource single-family neighborhoods. Complete projects planned on City-owned land (Mariposa, Chapel) by year-end 2025 	<ul style="list-style-type: none"> Units built or dollars collected in in-lieu fees from inclusionary program. Affordable ADU production Success in adopting SRO requirements. Production of SRO units. Number of units built on city owned land. 	<ul style="list-style-type: none"> Target of one SRO housing project over the planning period. Construction of at least 92 lower income units on existing city-owned land. ADU units in R1 zones consistent with estimate of 60 units annually. Adoption of SRO ordinance by Summer 2023.
Disproportionate Housing Need	<ul style="list-style-type: none"> Displacement of residents due to economic pressures. Lack of Affordable Housing Units 	Citywide	<ul style="list-style-type: none"> Preserve the City's existing affordable housing stock for low- and moderate- income households (LMI) in the 0 to 80 percent of Area Median Income (AMI) category, with a focus on tracts with an above average concentration of LMI households. Continue to monitor and preserve affordable senior housing units for lower 	<ul style="list-style-type: none"> Number of units preserved. Completion of cost control report. 	<ul style="list-style-type: none"> Preservation of 215 units with expiring affordable housing covenants over the planning period. Present a report to City Council with alternatives for adoption of programs mitigating rent increases for lower income residents by 2025. As part of the study, evaluate and establish

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			<p>income elderly households throughout the community.</p> <ul style="list-style-type: none"> By year-end 2024, provide a report to City Council detailing alternatives for mitigating rent increases for lower income residents. 		<p>appropriate metrics toward meaningful and significant mitigation of displacement risk.</p>
Disparities in Access to Opportunity	<ul style="list-style-type: none"> Location of Environmental Factors Location and type of affordable housing and lack of affordable units Access to financial services Lack of investments in specific neighborhoods. Land Use and Zoning Laws 	Northeast Quadrant, Citywide	<ul style="list-style-type: none"> Implement density bonus program that expands on AB1763 into entire downtown revitalization district. Propose expanding program as an affordable housing overlay zone in high-resource areas (Program 12). Contract to provide housing mobility counseling services. By the next update to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in amenities in low and moderate resource areas. Programs to implement SB9 (Program 33) and target housing production in the R1 Zone. Place-based programs (Programs 35-38) to direct parks and public safety improvements in low and moderate resource areas. 	<ul style="list-style-type: none"> Trend in TCAC scores by census tract. Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary. Number of 100% affordable projects using density bonus under Program 12. Number of projects or dollars spent in low and moderate resource areas. 	<ul style="list-style-type: none"> Improvement of at least one census tract that is currently lower or moderate resource to a higher tier over the planning period. Target of at least four affordable housing projects utilizing the density bonus program. Spending on place-based programs consistent with actions outlined in Programs 35-38 Target of 20 middle housing units per year in high resource R1 areas.
Site Inventory	<ul style="list-style-type: none"> Historic development pattern impact on location of feasible sites. 	R-3 zones. Zones that do not allow housing	<ul style="list-style-type: none"> Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary. 	<ul style="list-style-type: none"> Housing production on sites that did not previously allow housing. Lower Income Housing Production in high-resource areas. 	<ul style="list-style-type: none"> Development of at least 50 units in the EMC zone that will have a portion rezoned to allow housing by-right. Target of 20 middle housing units per year in high-resource R1 areas.

Chapter 5: Evaluation of Accomplishments Under Adopted Housing Element

State law requires the Housing Element Update to evaluate the effectiveness and progress of the city's programs in meeting the community's housing goals and implementing the city's Housing Plan. Where possible, results should be quantified but may be qualitative where necessary. Programs are also assessed based on their appropriateness in further contributing to housing goals. A program-by-program review is included below. The city's programs are organized into six categories:

1. Maintain and preserve the existing affordable housing stock
2. Assist in the development of affordable housing
3. Identify adequate sites to achieve a variety and diversity of housing
4. Remove constraints to housing development
5. Promote equal housing opportunity
6. Housing element maintenance

The table below lists the 2013-2021 Housing Plan programs and policies, as well as a review of accomplishments and consideration for suitability going forward.

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Program	Objectives	Accomplishments
Goal #1: Maintain and improve the quality of existing housing and residential neighborhoods in Alhambra.		
<p>Program 1: Housing Rehabilitation Program</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Provide assistance to 5 households annually, to assist a total of 40 households during the 2013-2021 planning cycle. ▪ Continue to allocate CDBG and HOME funding for this program annually. ▪ Continue to permit funding from the single-family rehabilitation programs to be used towards room additions to alleviate overcrowded conditions. ▪ Promote energy efficiency improvements to households participating in rehabilitation programs. ▪ Continue to advertise the Housing Rehabilitation Programs through brochures available at the Development Services Department and information on the city's website. Include a yearly advertisement or notice in the Chamber's newsletter, Around Alhambra, providing information on the available Housing Rehabilitation Programs. 	<p>The Housing Rehabilitation Program is available to income-qualified Alhambra homeowners to assist them in completing minor and major repairs. Eligible improvements consist of building/property deficiencies that bring the property up to health and safety standards, to correct code violations, and work necessary to preserve or protect the dwelling unit and/or ADA accessibility requirements. In 2019 the program includes minor rehabilitation deferred loans utilizing CDGB funds for projects where total improvements and softs are costs below \$50,000. The major rehabilitation deferred loan program utilizes HOME funds and may fund projects where total costs exceed \$50,000. Over the planning period the city has assisted 54 households through this program. The City continues to allocate CDBG and Home funds for this program and permits funding to promote energy-efficient improvements. The city partners with CHDO, a non-profit organization to act as a developer or project sponsor. The program continues to be advertised through the city's website, the Around Alhambra newsletter, and social media platforms.</p>
<p>Assessment and Recommended Action:</p> <p>The program has been effective in preserving the deterioration of housing stock in Alhambra. It has been utilized by residents at a rate consistent with program objectives. The program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>		
	<ul style="list-style-type: none"> ▪ Continue to implement the Code Enforcement program to bring substandard housing units into 	<p>As a part of the city's code correction efforts, the Code Enforcement Staff connects eligible</p>

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Program	Objectives	Accomplishments
<p>Program 2: Code Enforcement</p> <p>Responsible Agency: Development Services Department—Code Enforcement Division</p>	<p>compliance with city building and property maintenance codes.</p> <ul style="list-style-type: none"> ▪ Mail property maintenance tips flyers out with all ten-day notices to abate. Refer 500 potentially eligible housing projects to the Housing Division for possible assistance using newly created flyers written in English, Spanish, and Chinese. 	<p>households to the city’s Housing Rehabilitation program for assistance. In the 2019-2020 fiscal year, the city investigated 913 code violations, 54 percent of these were located in low- and moderate-income areas. Code enforcement staff made 506 referrals to the Housing Rehabilitation Program for assistance. Over the entire planning period 54 households being assisted through the program. The city updated its Housing Rehabilitation Program Flyer in 2020 and it is translated into English, Spanish, and Chinese.</p>
Assessment and Recommended Action:		
<p>The program has been effective in addressing code violations for owner-occupied households and acting as a pipeline for the Housing Rehabilitation Program. However, the city has emerging concerns about substandard housing among rental properties. This program will be expanded in the 2021-2029 Housing Element to address rental housing concerns.</p>		
<p>Program 3: Preservation of At-Risk Rental Housing</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Annually monitor the status of the 234 affordable housing units that are at risk of converting to market-rate during the 2013-2021 Housing Element. ▪ Monitor Section 8 legislation and provide technical assistance to nonprofit property owners as necessary. ▪ Continue to pursue partnership opportunities with non-profits to preserve and expand affordable housing in the city. 	<p>The city continues to monitor the 234 units of affordable housing inventoried in the 2013-2021 Housing Element. These units are included in three projects. These projects are all owned by non-profits and all had covenants extended during the planning period. Among these projects, only one, Wysong Plaza (94 units) has covenants that could potentially expire during the 2021-2029 planning period. Long-term affordability is fairly secure for these projects as this is consistent with the non-profits’ mission to provide affordable housing for the low-income elderly. The California Housing Partnership now also identifies an additional affordable 110 units at Plaza on Main. Over the planning period the city has added the East LA Community Corporation</p>

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Program	Objectives	Accomplishments
		(ELACC) to its network of affordable housing non-profit organizations.
<p>Assessment and Recommended Action:</p> <p>The city has been successful in preserving its affordable housing stock and continues to work with property owners and pursue partnership opportunities with non-profits. The city will continue to maintain this program in the 2021-2029 Housing Element.</p>		
<p>Goal #2: Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter- and owner-households.</p>		
<p>Program 4: First-Time Homebuyer Program</p> <p>Responsible agency: development services department—housing division</p>	<ul style="list-style-type: none"> ▪ Provide homeownership opportunities to residents through down payment assistance. ▪ Provide homeownership assistance to one lower income household annually, for a total of eight households during the 2013-2021 planning period. ▪ Annually evaluate market conditions and determine the affordability gap for first-time homebuyers and adjust the maximum assistance accordingly. ▪ Continue to advertise the First-Time Homebuyer Program through brochures available at the Development Services Department and information on the city's website. Include a yearly advertisement or notice in the city's newsletter, Around Alhambra, providing information on the city's First-Time Homebuyer Program. 	<p>This program offers down payment assistance to Alhambra residents with an income of 80 percent or below the Los Angeles area median. Over the planning period the program provided assistance to 12 low-income households. The City has continued to promote the program through its Website and its community newsletter (Around Alhambra). The city contracts with a housing consultant to provide an annual analysis of market conditions. The most recent market analysis was completed in August January 2021.</p>
<p>Assessment and Recommended Action:</p> <p>The program was effective in surpassing its objective of serving eight households during the cycle by serving nine households. However, market conditions have driven prices in Alhambra considerably higher, and the program is no longer cost-effective in providing adequate down payment assistance. In 2020 the HCDA committee recommended discontinuing the First Time Homebuyer program. This program is no longer appropriate and will be removed from the 2021-2029 Housing Element.</p>		

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Program	Objectives	Accomplishments
<p>Program 5: Affordable Housing Development</p> <p>Responsible Agency: Development Services Department—Planning Division, Housing Division</p>	<ul style="list-style-type: none"> ▪ Continue to provide financial incentives through HOME funds, as well as regulatory incentives, including but not limited to density bonuses and flexible development standards, to developers to increase the supply of affordable housing. ▪ Continue to exempt new affordable housing developments from the public art and new construction impact fees. Focus a portion of financial assistance toward rental projects that meet the needs of extremely low, very low, and low-income renters, large families, and persons with disabilities (including persons with developmental disabilities). 	<p>The city continues to use Housing Assets funds for the purchase, CHDO funds for rehabilitation, and disposition of properties. Over the planning period the city purchased two properties that were renovated and sold through the first-time homebuyer program. The 50-unit Mariposa project currently proposed on a city-owned site will be 100 percent affordable at supportive and very low-income levels. American Family Housing and National CORE were selected to develop the project through a bid process. The city continues to investigate options including site purchase and disposition to utilize available housing funds remaining following the dissolution of the Redevelopment Authority. Financial and discretionary incentives continue to be offered on a discretionary basis. In 2020, the city adopted an inclusionary housing ordinance (IHO) to facilitate the development of affordable housing. The IHO includes scaled set-aside requirements by affordability level and flexible alternative means of meeting the requirement such as land donation, off-site units, and in-lieu fees.</p>
<p>Assessment and Recommended Action:</p> <p>Promotion of affordable housing remains a priority for the city’s Housing Plan and this program remains appropriate. In light of limited affordable housing development over the planning period and new ordinances, this program will be amended and expanded to include monitoring of inclusionary housing policies in the 2021-2029 Housing Element.</p>		
<p>Program 6: Section 8 Housing Choice Voucher Program</p>	<ul style="list-style-type: none"> ▪ Support the County's efforts to maintain, and possibly to increase, the current number of Housing Choice Vouchers, and direct eligible households to the program. 	<p>As of June 20021, 533 Alhambra residents were receiving Section 8 Housing Choice Vouchers, and as of November 2019 LACDA’s closed its Housing Choice Voucher waitlist. With limited funding and a long</p>

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Program	Objectives	Accomplishments
<p>Responsible Agency: Housing Authority of the County of Los Angeles, Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Coordinate with the Housing Authority of the County of Los Angeles to promote the use of vouchers to extremely low-income households. ▪ Annually provide information and referrals to landlords regarding participation in the Housing Choice Voucher Program. Provide information on the Housing Choice Voucher Program at the city’s annual fair housing training facilitated by the Housing Rights Center. 	<p>waitlist, LACDA is not able to estimate the length of wait, according to information posted on its website.</p> <p>Assessment and Recommended Action:</p> <p>This program has been effective in providing affordable housing in the city and will remain in the 2021-2029 Housing Element.</p>
<p>Goal #3: Identify adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the city’s share of regional housing needs.</p>		
<p>Program 7: Adequate Sites for Regional Housing Needs Allocation</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Continue to provide appropriate land use designations and a density incentive to consolidate lots in the R-3 zone. ▪ Facilitate the assembly and recycling of underutilized properties in the R-3 zone for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives and provision of the list of sites available for residential development to local real estate agents and developers. ▪ Provide processing assistance to projects initiating a lot of consolidation. Assistance will include, but is not limited to, counseling applicants on the lot consolidation process; presenting and explaining alternative lot consolidation processing methods and determining the appropriate 	<p>The city continues to provide a density incentive in the R-3 zone that incentivizes lot consolidation. Over the planning period the city has had 12 lot consolidations. The city continues to provide technical assistance consistent with the objectives of this program. The city maintains records of development activity on all sites through assessor and planning records. The Planning Department website prominently displays recently completed, approved, and proposed projects that are of significant scale. The city’s 2013-2021 Housing Element remains its only site inventory.</p> <p>Assessment and Recommended Action:</p> <p>The program will continue to be appropriate in the 2021-2029 planning period. This program will be amended and expanded to include policies and objectives that reflect new state regulations requiring that the city maintain its inventory at all income levels through the planning period and</p>

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Program	Objectives	Accomplishments
	<p>method to expedite lot consolidation and the review process.</p> <ul style="list-style-type: none"> ▪ Maintain an inventory of suitable sites for residential development. Update the vacant and underutilized residential sites inventory every two years to maintain accurate information. 	<p>that it presents the site inventory in a standardized format to HCD.</p>
<p>Program 8: Residential Development in Central Business District (CBD)</p> <p>Responsible Agency: Development Services Department—Planning Division</p>	<ul style="list-style-type: none"> ▪ Continue to facilitate the construction of residences in the CBD zone. ▪ Encourage lot consolidation for mixed-use developments. Facilitate the assembly and recycling of underutilized properties in the CBD for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives, and the provision of the list of sites available for residential development to local real estate agents and developers. ▪ Continue to waive the new construction and public art fees for affordable housing projects. ▪ Annually evaluate development activity in the CBD to gauge development interest, inquiries, and progress towards mixed-use development. 	<p>Five of the City’s Specific Plan areas with residential components are located adjacent to the CBD zone and/or within the Downtown Specific Plan overlay or the Downtown Revitalization District. Over the planning period three of these areas developed totaling 402 units (the other two areas developed prior to the 5th Cycle planning period). The CBD is largely built out and future development will be contingent on lot consolidations. The city continues to promote redevelopment and lot consolidations through a density bonus and technical assistance. The city continues to waive new construction tax and public art fees for affordable housing projects. However, due to the dissolution of redevelopment in California along with diminished housing funds from the State and Federal levels, Two 100% affordable projects are currently proposed on city lots. The city will continue to pursue affordable housing opportunities in the CBD but without redevelopment funds, the city is not likely to offer significant financial incentives for affordable housing. The city has identified through discussions with developers that density limits in the district may be a barrier to development.</p>

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Program	Objectives	Accomplishments
	<p>Assessment and Recommended Action:</p> <p>The CBD will remain an important district in accommodating the city’s share of regional housing need. Given limited development activity and identified barriers, this program will be amended and expanded in the 2021-2029 housing element.</p>	
<p>Program 9: Residential Development in Valley Boulevard Specific Plan Area</p> <p>Responsible Agency: Development Services Department – Planning Division; Housing Division</p>	<ul style="list-style-type: none"> ▪ Pursue residential development in conjunction with commercial development and continue to provide flexible development standards for residential development within the Valley Boulevard Corridor Specific Plan area. ▪ Facilitate the assembly and recycling of underutilized properties in the Valley Boulevard Corridor Specific Plan Area for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives, and the provision of the list of sites available for residential development to local real estate agents and developers. ▪ Continue to waive the new construction and public art fees for affordable housing projects. 	<p>The Valley Boulevard Corridor Specific Plan (VSP) was adopted in 1990. The plan includes a range of land uses including the Residential Specific Plan (RSP) designation that allows residential density up to 43 units per acre. While residential may be conditionally permitted in other land use designations, the RSP is not broadly distributed in the plan area. While the city continues to pursue mixed-use development and offer flexible development standards, The plan area has not seen any residential development during the planning period.</p> <p>Assessment and Recommended Action:</p> <p>This program was not effective at facilitating development over the previous planning period. This program will be removed and replaced with a more comprehensive set of policies and programs to promote redevelopment in the plan area.</p>
<p>Program 10: Second Units</p> <p>Responsible Agency: Development Services Department –</p>	<ul style="list-style-type: none"> ▪ Provide information on second units at Development Services counters and on the city's website. ▪ Monitor the trend of second unit construction and assess the appropriateness and effectiveness of second unit requirements. 	<p>The city’s ADU ordinance took effect in January 2018. Subsequent amendments have been made to clarify lot area and setback requirements. The city’s ordinance was nullified by changes in State ADU laws that took effect on January 1, 2020. The city is currently applying the default State ADU laws in processing ADU</p>

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Program	Objectives	Accomplishments
<p>Planning Division</p>		<p>applications. The city has a draft ADU ordinance approved by the Planning Commission that meets or exceeds the State’s minimum requirements. The draft is pending adoption by the City Council. The city has continually tracked ADU applications and development. The city’s 2020 ADU status report shows that since 2017 the city has received 108 ADU applications. A total of 16 units have been completed and an additional 37 have had building permits issued. An additional 44 ADUs are pending approval. The city continues to promote ADUs through flyers and on the city’s website.</p>
<p>Assessment and Recommended Action:</p> <p>ADUs will continue to play an increasing role in meeting the city’s share of regional housing needs. This program will be amended and expanded to reflect new state requirements and strengthen policies to promote ADU development to meet housing need.</p>		
<p>Goal #4: Mitigate potential governmental constraints to housing production and affordability.</p>		
<p>Program 11: Flexible Development Standards</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> Continue to use flexible development standards to facilitate the development of affordable housing through promotion of maximum development densities in the R-3 zone. 	<p>The City of Alhambra has three residential zones: R-1, R-2, and R-3. R-1 is designated a single-family while R-2 and R-3 are designated multifamily. The R-3 zone allows for high density residential development of a maximum of 43 units per acre. To encourage high density multifamily developments, the city offers several variations to projects in order to achieve better building design and contribute to better overall development. These variations that the city offers through the flexible development standards include three variations for each of the following: R-3 zone regulations, development standards, and design standards. The city continues to use flexible development standards along with</p>

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Program	Objectives	Accomplishments
		<p>density bonuses to promote the development of affordable housing.</p> <p>Assessment and Recommended Action:</p> <p>Flexible development standards will continue to play an important role in reducing governmental constraints to housing production, feasibility, and affordability. This program will be amended and expanded to reflect state density minimum requirements and strengthen policies to promote affordable housing development to meet housing need.</p>
<p>Program 12: Density Bonuses</p> <p>Responsible Agency: Development Services Department—Planning Division</p>	<ul style="list-style-type: none"> ▪ Make available information at the Development Services Department counter outlining affordable housing incentives, including density bonuses. Information will be provided at the city’s annual fair housing training facilitated by the Housing Rights Center. 	<p>The City of Alhambra continues to provide density bonuses to affordable housing projects consistent with the requirements of the California Government Code. During the planning period one (currently proposed) project utilized the density bonus program to deliver low-income affordable housing units. The city continues to contract with the Housing Rights Center to communicate this program to residential developers. Density bonuses coupled with flexible development standards help reduce constraints to housing production and aid to further increase the city’s affordable housing supply. Density bonuses, flexible development standards, and other incentives will play an increasing role in conjunction with the city’s recently adopted inclusionary housing ordinance.</p>
		<p>Assessment and Recommended Action:</p> <p>Density bonuses will continue to play an increasing role in meeting the city’s share of regional housing needs and increasing the number of affordable housing units. This program will be continued in the 2021-2029 Housing Element.</p>
<p>Program 13: Extremely Low Income and Special Needs Housing</p>	<ul style="list-style-type: none"> ▪ Amend the Zoning Ordinance to facilitate housing opportunities for extremely low-income persons and persons with special needs (including seniors and persons with disabilities) by establishing 	<p>The city continues to make progress in amending the zoning code to facilitate housing opportunities for extremely low-income persons and persons with special needs. In addition, prioritization of projects</p>

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Program	Objectives	Accomplishments
<p>Responsible Agency: Development Services Department – Planning Division</p>	<p>definition, performance standards, and siting regulations for single-room occupancy housing (SRO).</p> <ul style="list-style-type: none"> ▪ Prioritize project review/processing and funding for affordable housing projects that set aside units for extremely low-income households and persons with special needs. Support funding applications for affordable housing projects that set aside units for extremely low-income households and persons with special needs, provided the projects are consistent with the city’s General Plan. 	<p>with affordable housing projects continues to be an objective for the city toward increasing extremely low-income and special needs housing.</p> <p>Assessment and Recommended Action:</p> <p>Increasing housing opportunities for extremely low-income and special needs housing continues to be an objective for the city. This program will be updated and maintained in the 2021-2029 Housing Element.</p>
<p>Program 14: Zoning Ordinance Amendments</p> <p>Responsible Agency: Development Services Department – Planning Division</p>	<ul style="list-style-type: none"> ▪ Amend the Zoning Ordinance to accurately reflect the residential uses that are permitted and conditionally permitted in all zones. ▪ Amend the Zoning Ordinance to meet the provisions of the California Employee Housing Act. ▪ Amend the Zoning Ordinance to permit transitional and supportive housing in all zones where residential uses are permitted, subject to the same development standards and permitting processes as the same type of housing in the same zone. 	<p>The city has successfully amended the zoning code to allow transitional and supportive housing in all zones and for the zoning code to accurately reflect the residential uses permitted and conditionally permitted. The city is currently contracted with a consultant for a comprehensive zoning code update. The city continues to make progress in this program toward meeting the provisions of the California Employee Housing Act.</p>
<p>Assessment and Recommended Action:</p> <p>The city has made great progress in aligning its zoning code to reflect new state legislation requirements. This program will be removed from the 2021-2029 Housing Element and replaced with a new program that will maintain a focus in amending the Zoning Code to meet state requirements as well as new requirements for sites in the city’s Housing Element sites inventory.</p>		
<p>Goal #5: Goal: Promote equal housing opportunity for all residents.</p>		
<p>Program 15: Fair Housing Program</p> <p>Responsible Agency: Development</p>	<ul style="list-style-type: none"> ▪ Assist approximately 400 persons annually, for a total of 3,200 persons during the 2013- 2021 Housing Element planning period. ▪ Continue to contract with a qualified fair housing service 	<p>The city continues to contract with the Housing Rights Center. In 2020 this contract was awarded through 2027. In the 2019-2020 fiscal year, the city assisted 318 households through its Fair Housing Program,</p>

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Program	Objectives	Accomplishments
<p>Services Department – Housing Division; Housing Rights Center</p>	<p>provider to provide fair housing services and landlord-tenant counseling services to residents, landlords, management companies, and others involved in the provision of housing and housing services.</p> <ul style="list-style-type: none"> ▪ Implement actions identified in the 2013 Analysis of Impediments to Fair Housing Choice related to fair housing, including increasing education to residents and landlords regarding fair housing laws. 	<p>the city has made considerable progress alleviating impediments identified in the 2013 Analysis of Impediments and updated these implementation actions in 2020 to reflect new conditions and objectives.</p> <p>Assessment and Recommended Action:</p> <p>Promotion of fair housing remains an objective for the city and this program has been effective in meeting fair housing objectives. This program will be updated to reflect new objectives and maintained in the 2021-2029 Housing Element.</p>
<p>Goal #6: Goal: Ensure that City housing goals are met.</p>		
<p>Program 16: Housing Element Maintenance</p> <p>Responsible Agency: Development Services Department – Planning Division; City Manager’s Office</p>	<ul style="list-style-type: none"> ▪ Prepare an Annual Review Statement, per Section 65588 of the Government Code, to evaluate the progress made in implementing housing element policies and programs and in meeting the city's housing goals. ▪ Monitor progress of Community Development Block Grant (CDBG) and HOME-funded projects through the Consolidated Annual Performance Evaluation Report (CAPER). 	<p>The city has annually prepared and submitted its Annual Review Statement and Progress Report. The 2019 APR was adopted in March 2020. The city continually monitors CDBG and HOME-funded projects. The city’s fiscal year 2019-2020 CAPER was completed in September 2020.</p> <p>Assessment and Recommended Action:</p> <p>This program continues to be appropriate and will be included in the 2021-2029 Housing Element.</p>

Summary of Quantified Objectives

State Housing Element law requires the development of quantified objectives with respect to new construction, rehabilitation, and conservation/preservation activities in the city’s Housing Plan. Figure 124 summarizes the city’s quantified objectives from the 2013-2021 Housing Element and the progress identified through this review.

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Figure 124 2013-2021 Quantified Objectives and Progress

Source: City of Alhambra, ECONorthwest

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA)						
Objectives	190	190	224	246	642	1,492
Progress	0	0	2	3	297	302
Rehabilitation						
Objectives	5	10	25	0	0	40
Progress	N/A	N/A	N/A	N/A	N/A	54
Homebuyer Assistance						
Objectives	0	4	4	0	0	8
Progress	N/A	N/A	N/A	N/A	N/A	11
At-Risk Housing Units to be Conserved						
Objectives	167	167	0	0	0	234
Progress	167	167	0	0	0	234

New Construction

Through the city's 2020 Annual Progress Report, the city had issued permits for 302 units. The majority of these were for above moderate-income households. The city currently has six projects totaling 1,155 units pending approval in addition to 44 ADU units pending approval. These projects are expected to be approved during the 2013-2021 planning period. The majority of these planned units are also likely to be above moderate income. If approved, the city will come close to meeting its total construction target but would maintain shortfalls at lower income levels.

Rehabilitation

The city's Home Rehabilitation program includes minor rehabilitation deferred loans utilizing CDGB funds for projects where total improvements and softs are costs below \$50,000. The major rehabilitation deferred loan program utilizes HOME funds and may fund projects where total costs exceed \$50,000. So far in the planning period the city has assisted 54 households through this program. The city continues to allocate CDBG and Home funds for this program and permits funding to promote energy-efficient improvements.

Conservation

The city's quantified conservation objective included the preservation of 234 "at-risk" affordable units within three projects that were identified in the Housing Element. All of these units had covenants extended through the planning period and none were converted to market rate.

Other

Increasing homeownership has been an important city goal. The city's Homebuyer Assistance Program set out to assist eight lower-income households achieve homeownership. Through 2019 a total of 11 households were assisted through the program.

Effectiveness in Addressing Special Housing Needs

Like most communities, special housing need in Alhambra exceeds the financial capacity of the city to comprehensively address this need. This funding deficit was made all more prevalent

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with the elimination of redevelopment in California. Therefore, in the 5th Cycle, Alhambra's objectives to address special housing need emphasized removing barriers to housing production of units suitable for extremely low-income households. This was set to be achieved by amending the zoning code to facilitate housing opportunities for extremely low-income households and persons with disabilities. Other priorities were to prioritize project review/processing and funding for affordable housing projects with units set aside for households with special needs. Specific progress has included:

- Continued prioritization of processing requests for reasonable accommodations. Over the planning period the city received five applications for reasonable accommodations. All five were processed.
- The city is currently in the process of completing a comprehensive zoning code update. The establishment of siting regulations for single-room occupancy housing (SRO) is a priority in that project.
- Coordination with the Los Angeles County Development Authority to expand Section 8 Housing Choice Vouchers in Alhambra. As of 2019 57 percent of voucher holders were seniors, 46 percent were people with disabilities, and 74 percent were female-headed households.
- The city employed a full-time mental health clinician to assist with field officers assisting or responding to homeless population needs and assist in connecting with local service providers and in finding appropriate shelter.
- The city began a pilot Homeless Outreach Services Program in 2017. The city expanded funding in FY 2020 with \$250,000 in Housing Successor Agency Funds and \$200,000 from the San Gabriel Valley Council of Governments. Since its inception in 2017, the program has moved 99 individuals to crisis housing, referred 13 individuals to rapid re-housing, 43 individuals to permanent housing, and permanently housed 22 formally homeless individuals.
- The city identified a city-owned parcel suitable for affordable housing at 38 S 2nd Street. The "Mariposa" project has been approved through an expediated permit process aligned with funding and grant milestones. The project will deliver 50-units with 24 units at ELI or VLI, 25 units at LI, and one manager's unit. The contributed \$5,840,000 to the project through land dedication (\$1,840,000) and a housing asset loan (\$4,000,000).

Chapter 6: Housing Plan

This Chapter provides the Housing Action Plan which is a required component of the housing element update. HCD requires the following:

“Each jurisdiction must identify specific programs in its housing element that will allow it to implement the stated policies and achieve the stated goals and objectives. Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction’s specific role in implementation, and (whenever possible) identify specific, measurable outcomes.”

As this is an update of Alhambra’s prior Housing Element, the programs and policies listed herein build on those listed in the 2013-2021 Housing Element. Edits to past programs, as well as new programs come from the following documents and sources:

1. City of Alhambra staff edits and feedback on the “Chapter 5 Evaluation of Accomplishments under Adopted Housing Element”
2. Results and recommendations offered in the *Analysis of Impediments to Fair Housing Choice* (2020)
3. Findings from “Chapter 3 Constraints Analysis”
4. Changes needed to accommodate all the sites included in “Appendix A: Adequate Sites Inventory”
5. Changes needed to adhere with new state laws
6. Changes based on best practices from other cities and guidance from HCD

Alhambra Housing Goals and Policies

The City of Alhambra’s long-term housing goal is to facilitate and encourage housing that fulfills the diverse needs of the community. This Chapter identifies long-term housing goals and shorter-term policies to address the identified housing needs. The goals and policies are implemented through a series of housing programs. Programs identify specific actions the city will undertake toward putting each goal and policy into action. Quantified objectives identified in particular programs are estimates of assistance the city will be able to offer, subject to available financial and administrative resources.

The goals, policies, and programs build upon the identified housing needs in the community, constraints confronting the city, and resources available to address the housing needs. This Plan will guide city housing policy through the 2021-2029 planning period.

Goal 1: Preservation and improvement of the existing supply of housing and prevention of displacement among existing tenants.

Preserving the existing housing stock in Alhambra is a high city priority. Continued maintenance of the existing housing stock helps to ensure that housing is safe and habitable and helps to ensure Alhambra has high-quality neighborhoods. Housing activities that help achieve these goals include rehabilitation of single- and multifamily housing units, code enforcement, and the preservation of publicly supported housing units that may be at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the city maintains the condition of existing housing units.

Policy 1.1: Pursue state and federal funding to support local housing programs that provide housing assistance in the rehabilitation and preservation of the existing housing stock.

Policy 1.2: Provide rehabilitation and home improvement assistance to lower-income households, seniors, and the disabled.

Policy 1.3: Cooperate with interested individuals, nonprofit housing providers, and developers in the acquisition, rehabilitation, and maintenance of housing in need of rehabilitation to maintain long-term housing for lower-income households.

Policy 1.4: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term affordable housing. Ensure that property owners are aware of city programs to promote improvements to rental housing and encourage continued maintenance, repair, and rehabilitation.

Policy 1.5: Enforce the building, safety, and housing codes through active code enforcement efforts.

Policy 1.6: Encourage and support creative strategies for the rehabilitation and adaptation and reuse of residential, commercial, and industrial structures for housing.

Policy 1.7: Encourage the preservation of naturally occurring and restricted affordable rental housing.

Policy 1.8: Work to preserve existing affordable low-income housing in the city that is considered at risk of converting to market-level rents.

Policy 1.9: The city shall ensure the replacement of lower-income multi-unit housing that is demolished, consistent with State Law.

Policy 1.10: Within established neighborhoods, the city shall promote residential development that respects existing neighborhood character.

Goal 2: Assist in the maintenance and production of a wide range of housing types to meet existing and future housing needs in the community.

Alhambra encourages the development of housing units affordable for all segments of the population. The city facilitates the production of affordable for-sale and rental housing through the provision of both financial and regulatory incentives

Policy 2.1: Encourage the production of housing affordable to extremely low, very low, low, and moderate-income households through continued focus of available resources, such as

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city-owned land and financial resources to assist nonprofit housing providers and for-profit developers develop housing consistent with the city's housing needs.

Policy 2.2: Support partnerships with new and existing organizations and nonprofit groups to explore new funding sources to facilitate housing affordable to extremely low, very low, low, and moderate-income households and households with special needs.

Policy 2.3: Support the passing of federal, state, and local legislation to provide funding to assist in affordable housing production and pro-housing programs.

Policy 2.4: Use financial and/or regulatory incentives where feasible to encourage the development of affordable housing.

Policy 2.5: Streamline and speed up the permitting and review processes for affordable housing developments.

Policy 2.6: Encourage housing development throughout the city that meets a broad range of special housing needs, including single parents, large families, multigenerational households, large families, the elderly, veterans, and the unhoused.

Policy 2.7: Continue to support regional efforts to address homelessness.

Policy 2.8: Encourage the development of a variety of missing middle-density housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) housing types.

Policy 2.9: Explore innovative pro-housing programs to assist in the production of a variety of housing types.

Goal 3: Identify adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the city's share of regional housing needs.

Meeting the housing needs of all residents of the community requires the identification of adequate sites for all types of housing. Appendix A of the Housing Element identifies the inventory of sites identified to meet the 2021-2029 Regional Housing Needs Assessment. The city of Alhambra will update its Zoning Code to ensure that the sites identified in the RHNA have the appropriate zoning designations as suggested in the inventory. By capitalizing on the allowances of the current Zoning Ordinance and continuing to maintain an inventory of potential sites, the city will assure that adequate residentially-zoned and mixed-use sites are available.

Policy 3.1: Maintain an adequate supply of residential land in land use designations to accommodate the city's RHNA production targets by income category throughout the planning period, consistent with State Law.

Policy 3.2: Promote infill development, commercial redevelopment, and higher density residential development where feasible.

Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2(c).

Policy 3.4: Implement rezoning and changes in development standards identified in the city's Comprehensive Zoning Code Update.

Policy 3.5: Facilitate parcel assemblage in areas zoned for high-density residential development consistent with the Land Use Element of the General Plan.

Policy 3.6: Support the development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) by working with applicants to integrate ADUs into existing development patterns of the neighborhood, consistent with state law provisions related to lot size, parking, height, setbacks, and minimum/maximum ADU size requirements.

Policy 3.7: The city will respond to opportunities to acquire surplus government land and underutilized commercial, industrial, or properties owned by religious institutions for development of affordable housing.

Goal 4: Develop regulations and strategies that mitigate potential governmental and nongovernmental constraints to housing production and affordability.

Market and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower and moderate-income households due to their limited resources for absorbing the costs. The city is committed to removing governmental constraints that hinder the production of housing and offers a “one-stop” streamlined permitting process to facilitate efficient entitlement and building permit processing. In addition to the density bonuses and flexible development standards already in place, the city proposes revisions to the Zoning Ordinance to encourage housing opportunities for extremely low-income households and special needs persons.

Policy 4.1: Periodically review city regulations, ordinances, permitting processes, and residential fees to ensure that they do not constrain housing development and are consistent with State Law.

Policy 4.2: Coordinate with developers, lenders, consultants, and other entities to monitor trends in nongovernmental factors that could influence the feasibility of housing production.

Policy 4.3: Offer financial and/or regulatory incentives, where feasible, to offset or reduce the costs of developing affordable housing.

Policy 4.4: Continue to make efforts to streamline the review process for extremely low, very low, and low-income housing development and special needs housing.

Policy 4.5: Ensure the Zoning Code is user-friendly, streamlined, and flexible to accommodate new housing development.

Goal 5: A community that provides equitable housing access to all neighborhoods and provides housing opportunities for all persons regardless of race, sex, marital status, religion, color, national origin, disability color, or family status.

To fully meet the community’s housing needs, the city must ensure that housing is accessible to all residents.

Policy 5.1: Continue to support fair housing laws prohibiting discrimination in the building, financing, selling, or renting of housing.

Policy 5.2: Provide fair housing services to Alhambra residents and ensure that residents are aware of their rights and responsibilities regarding fair housing.

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Policy 5.3: Partner with local community organizations to engage in outreach strategies that raise awareness of fair housing laws.

Policy 5.4: Enforce the housing code to eliminate and prohibit unsafe, unsanitary, and illegal conditions.

Policy 5.5: Ensure that extremely low, and very low-income housing may be located in any zone that allows housing and should be dispersed throughout Alhambra and not concentrated in one geography or zone.

Policy 5.6: In its housing programs and activities, the city shall affirmatively further fair housing and promote equal opportunities for all social and economic segments of the community.

Policy 5.7: Continue to provide reasonable accommodations to support persons with disabilities in accessing housing units that have been designed to be accessible or adaptable to meet their needs.

Policy 5.8: Promote access to neighborhoods that offer proximity to jobs, transportation services, high-performing schools, and healthy environments—particularly in areas that have historically excluded segments of the population.

Policy 5.9: Provide support to local agencies that ensure the provisions of federal and state laws that prohibit housing discrimination are enforced.

Goal 6.0 A community that has a balance of employment and housing in proximity to one another and offers opportunities for access to affordable housing near employment concentrations.

Policy 6.1: Encourage higher density housing in proximity to commercial and civic services, public transportation, and employment centers.

Policy 6.2: Promote mixed-use development where housing is located adjacent to jobs, shopping, schools, transportation services, and amenities.

Policy 6.3: Promote economic development strategies to grow living wage jobs in Alhambra in proximity to housing opportunities.

Policy 6.4: Continue to work with the Alhambra Chamber of Commerce and other business organizations to recruit businesses to Alhambra and expand and diversify the economic base.

Goal 7.0 Ensure that the City's housing goals are met, and its housing policies are consistent with State law and the General Plan

Policy 7.1: Monitor state housing legislation and evaluate the potential impacts on the city's Housing Element policies and programs.

Policy 7.2: Conduct a mid-cycle review of progress toward meeting the city's regional housing needs allocation and the city's policies and programs.

Implementation Programs

The implementation programs outlined in this section reflect seven broad categories that align with the goals and policies outlined in the above. Each program may address the implementation of one or more policy objectives.

Housing Rehabilitation and Preservation

Program 1: Housing Rehabilitation Program

The older housing stock in Alhambra suggests that repairs and rehabilitation will be required to maintain quality structures and living spaces. The city addresses this need through housing rehabilitation assistance. A high priority is given to conserving and improving affordable housing stock, including addressing lead-based paint hazards. The Housing Rehabilitation Program is separated into two components:

- **Minor Rehabilitation Deferred Loan:** This program utilizes CDBG funds and is available for rehabilitation projects where the total costs of improvements and "soft costs" associated with the rehabilitation to the property are less than \$50,000.
- **Major Rehabilitation Deferred Loan:** This program utilizes HOME funds and is available for rehabilitation projects where the total development costs for the improvements to the property exceed \$50,000.

Other program elements include:

- Promote energy efficiency improvements to households participating in rehabilitation programs.
- Explore the feasibility of purchasing foreclosed or auctioned properties for the acquisition and rehabilitation program. This would allow the city to sell these properties to mission-oriented affordable housing providers at below-market rates to reduce the cost of supplying affordable housing.
- Continue to advertise the Housing Rehabilitation Programs through brochures available at the Community Development Department, information on the city's website, and through the City's social media accounts. For example, the city could include advertisements or notices in the Chamber's newsletter, *Around Alhambra*, to provide information on the available Housing Rehabilitation Programs.

Objective: Quantified objective of six households under Minor Housing Rehabilitation component and three households under the Major Housing Rehabilitation component.

Timeframe: Advertising efforts quarterly, Target of two minor and one major rehabilitation loans annually as homeowners apply.

Responsible Agency: Community Development Department – Housing Division

Funding Sources: HOME; CDBG

Program 2: Code Enforcement

Code enforcement is essential to ensuring housing conservation and rehabilitation. The Code Enforcement Division is responsible for providing uniform enforcement regarding a variety of

municipal, state, and county codes regulating property maintenance, zoning, land use, and other health and safety concerns. The primary goal of regulation is to provide reasonable controls for the maintenance, rehabilitation, preservation, and conservation of existing commercial and residential properties.

Objectives:

- Continue to implement the Code Enforcement program to bring substandard housing units into compliance with city building and property maintenance codes.
- Mail property maintenance tips flyers out with all ten-day notices to abate.
- Refer 500 potentially eligible housing projects to the Housing Division for possible assistance using newly created flyers written in multiple languages.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Code Enforcement Division

Funding Sources: Departmental Budget; CDBG

Program 3: Preservation of At-Risk Rental Housing

To meet the housing needs of persons of all economic groups, the city is committed to guarding against the loss of housing units reserved for lower-income households. According to data provided by the California Housing Partnership, SCAG (using the HCD pre-approved data), and the City of Alhambra, there were six properties in Alhambra in 2020 providing 366 affordable housing units to lower-income households. Over the next ten years, three properties that provide 215 affordable units have expiring affordability restrictions: 11 units at 17. S. Olive Ave., 110 units at Plaza on Main, and 94 units at Wysong Plaza. However, all three of these properties are owned by established mission-driven organizations and covenants are unlikely to convert. City staff reports that there are other affordable ownership units in the community built in the last 20-years with unknown covenant expirations that could be at risk over the planning period. An example of this is the Alhambra Regency project at 500 West Main Street that has 16 owner-occupied affordable units.

Program actions include:

- Monitor the status of the 215 affordable housing units that are at risk of converting to market-rate during the 2021-2029 Housing Element.
- Identify funding sources and/or other organization and partnership strategies to acquire units at risk if they become available.
- Contact property owners of units at risk of converting to market-rate housing within three year of covenant expiration to discuss extending covenants or other preservation alternatives.
- Continue to pursue partnership opportunities with nonprofits to preserve and expand affordable housing in the city.
- Work with tenants to provide education regarding tenant rights and conversion procedures and regulations.

- Explore financing opportunities to offer loans with generous or flexible terms (such as grants, forgivable loans, below-market interest rates, deferred interest payments, interest-only loans, cash flow dependent loans) to reduce the borrowing costs associated with buying or developing a home. This can also be by enhancing partnerships with mission-oriented funders and lenders already working in the area.

Objective: Annually monitor the city's supply of at-risk units and apply for funding for preservation activities where available.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Departmental Budget

Addressing Affordable and Special Housing Need

Program 4: Section 8 Housing Choice Voucher Program

The Los Angeles County Development Authority (LACDA, formerly known as the Housing Authority of the County of Los Angeles) administers the Housing Choice Voucher Program for most County residents, including Alhambra residents. The program extends rental subsidies to very-low-income households, as well as elderly and disabled persons. As of June 30, 2021, 553 households in Alhambra received Housing Choice Vouchers. The city shall continue to advocate for Section 8 funding and pursue funding to expand voucher programs.

Objectives:

- Maintain voucher programs to preserve the 553 households receiving vouchers in Alhambra to ensure housing choice across all income levels.
- Expand the number of households receiving vouchers through tenant and landlord engagement.

Timeframe: Ongoing

Responsible Agency: Los Angeles County Development Authority; Alhambra Community Development Department – Housing Division

Funding Sources: HUD

Program 5: Inclusionary Housing Requirement for Residential Development

To facilitate the construction of affordable housing across the entire community, the city established an Inclusionary Housing Ordinance in 2020. The ordinance includes a maximum 15-percent affordability requirement at low- and moderate-income levels for all projects with seven or more units. Credit is given for including a larger number of units at progressively lower income levels.

For all applicable projects, the ordinance will require a total of fifteen percent (15%) of all newly constructed dwelling units to be offered for sale or for rent to low- and moderate-income households comprising of:

- 3) Nine percent (9%) of all required inclusionary units to be sold or rented to low-income households (80% of LA County area median income or AMI); and,
- 4) Six percent (6%) of all required inclusionary units to be sold or rented to moderate-income households (120% of LA County AMI).

The Housing Element's review of the inclusionary ordinance found that the policy is in-line with peer cities and should not be a constraint on development. In accordance with state law, the city has also updated the ordinance to include alternatives including an in-lieu fee. The in-lieu fee was set at a graduated scale with a lower fee for smaller projects and rental projects to protect against adversely impacting feasibility. Projects with fewer than 5 units do not have an inclusionary requirement or fee. As a part of the approval process, the city will require developers to provide proof of good faith effort to make inclusionary units available to the public. The city will also encourage developers to work with affordable housing providers and advocates to place households in inclusionary units. The City will continue to evaluate the effectiveness of the inclusionary ordinance in facilitating affordable housing development through integrated mixed-income development or resources for affordable housing development through in-lieu fees. If the program is found to be a constraint on development the city will make appropriate amendments and modify the policy as needed. This will include consideration of added incentives such as a density bonus, fee reduction, or flexible parking and development standards.

Objectives:

- Continue to implement the inclusionary housing program to facilitate affordable housing production.
- Ensure the program does not constrain development.

Timeframe: Ongoing, biennial review of program effectiveness

Responsible Agency: Alhambra Community Development Department – Housing Division, Planning Commission, and City Council

Funding Sources: Department Budget

Program 6: Unit Replacement Program for Residential Demolitions

In accordance with California Government Code Section 65583.2(g), the city will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- Currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- Was 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

Objective: Maintain the city's inventory of affordable units and mitigate displacement risk

Timeframe: Ongoing, replacement requirement will be enforced immediately during project review and processing.

Responsible Agency: Alhambra Community Development Department – Planning Division,

Funding Sources: Department Budget

Program 7: Low Barrier Navigation Centers as a By-Right Use

Amend the city's zoning regulations to add low-barrier entry practices to the city's Navigation Housing use and permit them by right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses if the center meets certain statutory requirements consistent with SB48 changes to California Government Code Section 65583.

Objective: Ensure that the city's regulations and are in conformance with State Law

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division,

Funding Sources: Department Budget

Program 8: Supportive Housing Zoning Amendment

Amend the zoning code to allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units in all zoning districts where multifamily and mixed-use development is permitted consistent with AB2162 changes to California Government Code Section 65583.

Objective: Ensure that the city's regulations and are in conformance with State Law

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 9: Meeting Special Housing Needs

The City will continue to develop internal policies and coordinate with housing providers to address special housing needs for persons with disabilities, seniors, large families, single-parent households, and extremely low-income households. The city will utilize a combination of revisions to zoning standards, regulatory incentives, outreach and service programming to address these needs. Specific actions will include:

- Establish siting regulations and expand allowance of single-room occupancy housing.
- Adopt zoning code amendments to remove barriers to developing housing for households with special housing needs including emergency shelters, transitional and supportive housing, and low-barrier navigation centers.
- Continue the City's Homeless Outreach Services Program.

- As part of the Zoning Code Update, Chapter 23.59 PROCEDURES FOR REQUESTING REASONABLE ACCOMMODATIONS PURSUANT TO FAIR HOUSING LAW, will be modified to streamline the application process. Currently, Section 23.59.020(D)(3)(e) requires as part of the application, a 10-day written notice to all adjacent property owners within a 100-foot radius of the subject property so that their input may be received. The updated Zoning Code will remove this Section so that notice and adjacent owner input are no longer required.
- As a part of the city's comprehensive zoning code update (Program 27) and program to remove development constraints (Program 29), create a proposal to reduce parking requirements for projects serving seniors or persons with disabilities.
- As a part of the Zoning Code Update project, the code will be amended to group homes for seven or more persons by right in any residential zone.
- Alhambra has many religious institutions with the potential for excess property. To facilitate opportunities for development of housing for households with special needs, the city will conduct direct outreach with these institutions to inform property owners of AB 1851 and other incentives aligned affordable housing development.

Objective: Ensure equitable access to housing for persons with special housing needs.

Timeframe:

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- Establish siting recommendations for SRO housing, adopt zoning code amendments, propose parking reductions, revise reasonable accommodations ordinance revise code to allow large family care homes by-right within one-year.
- Homeless Outreach Program; ongoing/continuation
- Religious institution outreach; within one-year

Responsible Agency: Community Development Department – Housing Division, Housing Rights Center

Funding Sources: Departmental Budget, CDBG Funds

Program 10: Local Hire Program

The use of local skilled labor for housing development can have positive economic and environmental impacts. The city will assess the feasibility of, and develop a proposal for, a Local Hire Program for residential projects that meet specific criteria so long as it does not result in a constraint on development or housing production. This program will be designed to encourage the use of local workers for subsidized affordable housing projects. It will also offer flexibility, opt outs, and alternative options to ensure that the program is not a constraint on affordable housing production.

Objective: Balance housing with economic development and provide opportunities for local residents to generate wealth. Mitigate displacement risk of local residents.

Timeframe: Within two years of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 11: Workforce Housing Program

Alhambra's moderate-income households that earn between 60% and 120% of Area Median Income are facing increasing susceptibility to displacement risk due to economic and market pressures. These households commonly earn too much to qualify for subsidized housing and too little to afford market rate rents in the communities that they work in. Alhambra's inclusionary housing program is calibrated to deliver workforce housing and Program 24 will work to promote missing middle housing types. In addition to these efforts, the City will develop a proposal for a Workforce Housing Program that may include coordination with major employers to create Employer Assisted Housing, identification of financial resources specific to workforce housing, or other incentives and actions to preserve and produce workforce housing.

Objective: Provide housing opportunities and mitigate displacement risk for Alhambra's middle-income workforce, including teachers, public health and safety workers, and other essential middle-income occupations.

Timeframe: Within two years of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 12: Expanded Density Bonus in the Downtown Revitalization District

Provisions enacted under AB1763 allows housing development located within one-half mile of a major transit stop and meeting specific affordability requirements to receive a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. The city will apply the provisions of AB1763 across the entire Downtown Revitalization District. The city will conduct outreach with affordable housing developers and partners to raise awareness of density bonuses and other incentive programs. Based on the use and effectiveness of this program, the city will also consider expanding this incentive through an Affordable Housing Overlay Zone along other high resource areas.

Objective: Encourage and facilitate affordable housing development in the downtown revitalization area

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 13: Cooperation with Affordable Housing Developers and Providers

The city will conduct outreach and cooperate with affordable housing providers and developers in the region. The city will offer financial and regulatory incentives consistent with Programs 15 through 17 to assist in the acquisition of land, rehabilitation of housing stock, or the redevelopment of housing affordable to extremely low-, very-low-, low-, or moderate-income households.

Objective: Strengthen coordination with affordable housing developers and operators to meet the City's affordable housing RHNA targets.

Timeframe: Provide site inventory on city's website upon adoption of Housing Element and update when the zoning code update is complete; notify affordable housing developers of site inventory status annually.

Responsible Agency: Alhambra Community Development Department – Housing Division

Funding Sources: Department Budget

Program 14: Expand Affordable Housing Funding

The city will continue to monitor the federal, state, and local funding landscape to identify and expand on funding sources available. The city will support affordable housing by development (applying, facilitating, or directly placing financial resources for the construction, rehabilitation, and/or preservation) of extremely low, very low, low, and moderate-income households. Through this program the city will explore opportunities to:

- Utilize city-controlled funding sources such as the Inclusionary Trust Fund or the Alhambra Housing Asset Fund.
- Continue to support the San Gabriel Valley Housing Trust Fund
- Support developers' applications for State and Federal affordable housing funding.
- Direct application for available federal and state funding sources.
- Explore the feasibility of local funding sources including real estate transfer taxes, public service sales taxes, affordable housing linkage fees, and other mechanisms available to local governments.
- Work with, and encourage, local financial institutions to help meet the credit needs of residents in low- and moderate-income neighborhoods.

Objectives:

- Strengthen coordination with affordable housing developers and operators to meet the city's affordable housing RHNA targets.
- Increase local financial resources to support housing production

Timeframe: Study of funding alternatives within one-year of adoption. Annually evaluate notices of funding availability; submit at least one grant application every two years.

Responsible Agency: Alhambra Community Development Department – Housing Division,

Funding Sources: Potential funding sources include: The San Gabriel Valley Housing Trust Fund, the Alhambra Housing Asset Fund, HOME, CDBG, or other California HCD funding programs that become available.

Incentives for Housing Production

Program 15: Update Density Bonus Ordinance to be Consistent with State Law and Continue to Promote as a Housing Production Incentive

The city will update the density bonus ordinance to ensure consistency with changes to California Government Code 65915 and integration with the city's land use system and other incentives. The city commits to review and approve eligible requests so that projects that are eligible to

benefit from the bonus are allowed to develop and entitled densities. The city will also promote its own new density bonus developed under Program 12 that extends the provisions of the AB1763 density bonus throughout the Downtown Revitalization District. The city will also implement AB2097 in its density bonus ordinance to reflect parking requirements within a half-mile of Alhambra's two AB2097 eligible intersections at Atlantic and Main and Atlantic and Valley.

Objective: Ensure consistency with State Law and facilitate affordable housing production

Timeframe: Concurrent with Adoption of the city's Comprehensive Zoning Code Update

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 16: Flexible Development Standards

The city allows for flexible development standards in the R-3 zone to promote higher quality multifamily residential development; to encourage innovative design, efficient use of land, and consolidation of parcels; and to permit developments to be judged on individual merits. The flexible development standards provision allows for variation from up to three of the development/design standards required by the R-3 zone. In addition, flexible parking standards may be requested and are subject to approval by the Planning Commission. Flexible development standards are restricted to lots 40,000 square feet and larger. The city will continue to use this flexible development standards to facilitate the development of large-scale multifamily housing, including housing for special needs groups (large households, seniors, and persons with disabilities, including persons with developmental disabilities).

Objective: Encourage lot assemblage and assist in the facilitation of large-scale multifamily housing

Timeframe: Ongoing

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Program 17: Developer Fee Assistance Program

Through Program 5 in the city's 5th Cycle Housing Element, the city had previously committed to discretionary exemption of affordable housing from public art and some construction impact fees. This program will commission a study of the feasibility and effectiveness of a developer fee assistance program that provides deferrals or exemptions from select fees for targeted housing types, which could include lower-income development, ADUs, or missing middle housing types.

Objective: Evaluate the effectiveness of a fee incentive program to assist in supporting development of targeted housing types

Timeframe: Ongoing

Responsible Agency: Community Development Department – Planning and Housing Divisions

Funding Sources: LEAP Grant, General Fund

Adequate Site Strategies and Requirements

Program 18: Rezone Sites Used in Previous Housing Element Inventories

The City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower-income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City's two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.

Objective: Create an opportunity for housing production for units suitable for lower-income households

Timeframe: Concurrent with Adoption of the city's Comprehensive Zoning Code Update or within one year of Housing Element Adoption.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Department Budget

Program 19: Rezone and Upzone Strategies to Meet RHNA Targets and Buffers

The City of Alhambra has a Regional Housing Need Allocation of 6,825 units. Of these, 2,810 units are for sites suitable for lower-income households. At the same time, Alhambra only has 5.5 acres of vacant land capable of accommodating 58 units. Alhambra is also built out to a moderate level of existing density along corridors and in high-density zones. To meet its RHNA targets, Alhambra has identified nine rezoning and upzoning strategies that increase allowed densities in most existing residential and commercial areas that allow housing. Further, all or portions of all zones that currently do not allow housing will be rezoned to allow housing at a range of densities. Identified strategies include:

- Upzone by increasing the maximum allowed density in the R-2 zone from 12 to 18 units/ac. This change is complemented by Program 24 to encourage middle housing types.
- Upzone by increasing maximum density in the R-3 zone to 24 units/ac for sites under 10,000 feet and increasing maximum density up to 43 units/ac for sites larger than 10,000 square feet.
- Removing density "step down" reductions in the R-3 zone for "proximity"⁴⁷ to the R-2 zone.
- Upzone by increasing maximum density in the CPD zone outside of the Downtown Revitalization District from 30 units/ac to 48 units/ac.
- Upzone by increase maximum density in the geographic area bounded by Atlantic Blvd., W. Woodward Ave., W. Commonwealth Ave., and Chapel Ave. from 43 to 64 units/ac.

⁴⁷ See Municipal Code Section § 23.20.050 for methodology of calculating density adjustments for lower zone proximity.

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- Rezone to allow housing in the EMC zone on sites west of Granada Ave. at a maximum density of 30 units/ac.
- Rezone to allow housing in the PO zone along Garfield Blvd. consistent with the R-3 zone.
- Rezone to repeal the Valley Boulevard Specific Plan and replace with a new zone and development standards allowing housing along the corridor at a maximum density of 43 units/ac.
- Rezone to allow limited housing types in the IPD zone at a maximum density of 43 units/ac.

Collectively, these changes reflect an increase in “theoretical capacity” of 23,491 units. However, this capacity should reflect the realistic development potential of sites given information available. Table 100 of the Adequate Sites Inventory Analysis identifies the specific parcels and assemblages of parcels that exhibit the greatest redevelopment potential⁴⁸. This analysis takes into consideration existing uses, and discounts capacity based on physical characteristics of existing Novant sites. This process resulted in 5,556 units of realistic capacity, or less than 25 percent of potential zoned capacity.

The strategies in this program will work in connection with many of the other programs designed to further housing production. Specifically, Program 40 commits to a mid-cycle review and a commitment to further rezoning and upzoning if appropriate. Further, the City has committed through Program 20: to complete within two years of housing element adoption a detailed Development Feasibility Study of nonvacant site redevelopment potential for identified nonvacant sites. The City commits to further measures, including rezoning, within six month of completion of that study based on findings and the observed effectiveness of nonvacant site redevelopment over that two year period. Program 27 directs the city to monitor development standards and to adjust where appropriate to allow development to reach targeted densities. Finally, Program 21 directs the city to adopt the ongoing Comprehensive Zoning Code Update Project in 2022, which will implement the strategies of this program.

Lower Income RHNA Shortfall. To accommodate the lower-income RHNA shortfall of 2,339 units, as a subset to this rezoning program the city is required to identify and rezone sites with a minimum density of 20 units per acre and density of at least 30 units per acre by October 15, 2024. These rezoned sites will permit owner-occupied and rental multifamily units by right pursuant to Government Code §65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households. Rezoned sites shall allow 100 percent residential uses and require residential uses to occupy at least 50% of the floor area of a mixed-use project. Each rezone site must have capacity to accommodate a minimum of 16 units and have access to utilities within the planning period. To protect against inconsistent application of this requirement, the city will rezone all identified lower income sites (not just shortfall sites) to meet these criteria.

Objective: Provide adequate sites to meet the city’s RHNA targets across all income categories.

Timeframe: Concurrent with Adoption of the city’s Comprehensive Zoning Code Update or within the statutory obligation at the time of adoption, whichever is sooner.

Responsible Agency: Community Development Department – Planning Division

⁴⁸ See section 7 for methodological approach to this determination.

Funding Sources: Department Budget

Program 20: Development Feasibility Study

The city shall conduct a study exploring in detail the feasibility of residential redevelopment along corridors and in high-density residential areas. The study will use a pro forma based approach to explore site-specific redevelopment potential and impediments on identified nonvacant sites for lower-income and market-rate development. The output of this study will be used to prioritize sites with the greatest redevelopment potential for acquisition, assemblage, and promotion to the development community. It will also be used to make amendments to the site inventory where assumed achievable densities are found to be less financially feasible. Considering new legislation passed in September 2021 that will take effect in January 2022, this study will also explore the potential capacity available under SB10 to inform the city if an SB10 ordinance would have meaningful impact on housing capacity. It will also estimate the potential for SB9 uptake in single-family zones.

Objective: A comprehensive understanding of the redevelopment potential in the city and a prioritization of sites to inform investment decisions

Timeframe: Completion within two years of Housing Element Adoption

Responsible Agency: Community Development Department – Planning Division

Funding Sources: LEAP Grant/General Fund

Program 21: Adopt the Comprehensive Zoning Code Update

Code Alhambra is an ongoing effort to complete a comprehensive update to the city's municipal zoning code. Early findings of the Code Update and the findings of the Housing Element Constraints Analysis determined the existing code is antiquated, difficult to use, and includes development standards that may be constraining development potential. This program directs the city to implement and adopt upzoning and rezoning strategies identified in Program 19 along with the code update's recommended changes to development standards to achieve assumed densities as a part of the Code Alhambra Comprehensive Zoning Code Update. If the analysis of Code Alhambra determines that assumed densities in the adequate sites inventory cannot be achieved through adjustments in development standards, if necessary, the city will adjust the sites inventory to reflect realistic capacity as needed. This program will also include amendments to previous errors in the General Plan Land Use Map that mis-classified a section of East Main Street from Chapel to Almansor as Central Business District instead of General Commercial.

Objective: Improvement in the usability of the zoning code and adoption of amendments necessary to achieve realistic zoned capacity to meet the city's RHNA targets across all income categories.

Timeframe: Adoption in 2023

Responsible Agency: Community Development Department – Planning Division

Funding Sources: SB2 Planning Grant/General Fund

Program 22: Prioritize Affordable Housing Production on City-Owned Land

Offering publicly owned land for affordable housing development can be a useful way to reduce development costs and increase the supply of affordable housing. The city will inventory and assess the city's publicly owned land, and publicly owned land from other public agencies for appropriateness to accommodate affordable housing development. The city will update this inventory on a two-year cycle. This program will:

- Complete transaction for the development of the city-owned 2nd street site for the Mariposa Project with a target for 2023.
- Complete development on the city-owned Chapel site with a target of 2024-25
- Development of the city-owned Water Lots by 2025-26
- Within one-year of the expiration of the current lease at the Alhambra Golf Course, the city will conduct an evaluation of development opportunities at the site. This evaluation may include an assessment of current market conditions, discussions with developers, and community engagement. Development potential will be limited due to existing deed restrictions required by Los Angeles County for the site to remain as open space in perpetuity. Furthermore, the site may also be impacted due to the fact that the site was a former landfill and additional studies would be required. The current lease has an expiration date of 2039 which falls outside of the current Housing Element cycle. It will be important for the city to evaluate the balance of opportunities to meet housing needs and provide open space in the community. The City will continue to monitor the potential for housing development on the Alhambra Golf Course as lease constraints change.
- Engage with the San Gabriel Valley Regional Housing Trust to look for ongoing opportunities to develop sites for affordable housing development in Alhambra.
- Conduct annual outreach with developers and/or brokers to identify sites that are or could be coming available to the market in Alhambra.

Objective: Development of 92 housing units on city-owned land over the planning period.

Timeframe: Ongoing, Specific actions by site addressed in program actions

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, San Gabriel Valley Regional Housing Trust, Housing Asset Fund

Program 23: Adaptive Reuse of Commercial and Industrial Buildings for Residential Use

The city shall encourage and incentivize the adaptive reuse of existing commercial or industrial space for residential uses. The city shall explore flexibility in parking standards, building code, unit size, and open space requirements. The city shall also explore funding opportunities to subsidize seismic upgrades and retrofit requirements, where appropriate.

Objective: Increase existing land efficiency and reuse of underutilized structures for residential use.

Timeframe: Policies and development standards adopted commensurate with the completion of the Zoning Code Update (Program 21)

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, Other

Program 24: Zoning for Missing Middle Housing Types

The city shall review and amend the Zoning Code and applicable design guidelines to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) in the R-2 and R-3 zones to create housing for middle- and moderate-income households. This program is combined with Programs 32 and 33 to encourage missing-middle housing types in the R1 Zone.

Objective: Increase existing land efficiency and reuse of underutilized structures for residential use.

Timeframe: Within three years of adoption of the Housing Element

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, LEAP/REAP Funding

Program 25: Lot Consolidation and Assemblage

Alhambra’s development pattern is highly parcelized with limited nonvacant underutilized parcels of the scale necessary to facilitate affordable housing production. To increase opportunities for redevelopment of affordable housing and ensure a sufficient supply of land to meet lower income RHNA targets, within its legal capacity, the city will help facilitate lot consolidations to combine small lots with larger development sites. Including:

- As a part of the Comprehensive Zoning Code Update, the city will adopt incentives for lot consolidation including, but not limited to, fast-tracking applications, developer outreach, and additional density bonus.
- Expand and revise the flexible development standards incentive for lots over 40,000 square feet. Identify opportunities to expand the incentive beyond the R-3 zone in commercial zones along corridors and in the Downtown Revitalization District. Consider a revision to the size threshold to expand the number of sites eligible for the incentive.
- Subject to available funding, the city will continue identify property acquisition opportunities and land subsidies such as write-downs for affordable housing. Continue the city’s partnership with the San Gabriel Valley Regional Housing Trust to identify opportunities for affordable housing site assemblage.
- The city will publish the site inventory on its website identifying which parcels are most economical for consolidation. This will be informed and updated by the City’s development feasibility study (Program 20). Th city will distribute to affordable housing developers.

Objective: Facilitate parcel assemblage to increase supply of feasible sites for affordable multifamily housing

Timeframe: Adoption of incentives commensurate with adoption of the Zoning Code Update (Program 21). Annual assessment of acquisition opportunities.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: General Fund, Alhambra Housing Asset Fund, Inclusionary Housing Trust Fund

Program 26: Accessory Dwelling Unit Program

The city shall develop a comprehensive ADU program to assist in the facilitation of ADU production in the city. This program will amend the city’s regulations and zoning code to be consistent with recent updates to state law. The city shall evaluate and adjust ADU requirements to promote ADU construction, including parking, height, unit size, allowed ADUs per lot, and setbacks. The ADU program shall also include:

- An ADU Amnesty program for property owners to bring unpermitted ADUs up to code.
- An affordable ADU incentive program offering fee waivers, reductions, deferrals, or streamlined processing for ADUs offered for lower-income households.
- Create and maintain a set of pre-approved building plans to support ADU development and streamline the plan check process for ADUs.
- Expanding on current education and outreach by developing a formal homeowner outreach program.
- A continuation of the city’s ADU monitoring program that produces a report annually at a minimum on ADU production and applications and development. Expand this program to include a method for tracking ADU affordability levels consistent with requirements of Annual Progress Reporting. This report will continue to be published on the City’s website.
- Consistent with language in Program 40: Housing Element Maintenance, the city will continue to monitor ADU production and affordability. If within two years ADUs are not tracking within 25% of assumed capacity with respect to affordability and production, the city will commit to adding site capacity equal to 150% of the observed shortfall within 180 days.

Objective: Update the city’s ADU ordinance to be in compliance with State Law. Approve up to 60 ADUs per year over the planning period.

Timeframe: Within two years of Adoption of the Housing Element, every two years thereafter.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, LEAP/REAP Funding

Mitigation of Potential Development Constraints

Program 27: Reduce Development Constraints for Affordable Housing

Through its ongoing Comprehensive Zoning Code Update, the city will review and amend the code to remove potential constraints to housing production. These include:

- Establishing objective design standards

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- Revise thresholds for Planning Commission review along with Program 29
- Establishing appropriate development standards (parking, height, setbacks, FAR) to ensure that projects could achieve maximum densities assumed in the Housing Element. This process will be refined by the City's Development Feasibility Study in Program 20 to empirically identify specific standards that present the greatest barriers. This will include implementation of parking requirements consistent with AB2097 for sites within a half-mile of the City's two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.
- Provide annual education on land use and development for elected officials including the City Council and Planning Commission.
- Review and revise development standards for Accessory Dwelling Units to improve compatibility with local characteristics.
- Repeal the Valley Boulevard Specific Plan that limits residential development to only a few blocks and to sites greater than 40,000 square feet. Replace with a new zone that allows residential densities consistent with other commercial corridors.
- Revise commercial zones to allow 100 percent residential projects.
- Remove the bedroom tie-in to density calculations for multifamily uses in the zoning code.
- As a part of the zoning code update in Program 21, improve code usability through organization, styling, removing complexity, and developing more clearly defined metrics.
- Establish siting regulations and expand the allowance of Single Room Occupancy (SRO) housing.
- Along with Program 7 and Program 8, the city will assist in the development of housing for extremely-low income households by:
 - Amending the zoning code to remove or modify any subjective requirements for emergency shelters and amend its emergency shelter ordinance to be compliant with state law (completed as a part of the zoning code update expected to be adopted August 2023).
 - Amend the zoning code to clarify and expand the allowance of transitional and supportive housing consistent with state law.
 - Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses.

Along with Program 40, the city will evaluate its zoning code, development standards, and fees mid-Housing Element cycle to identify and address constraints to development of housing.

Objective:

Reduce development constraints for market-rate and affordable housing projects by increasing achievable maximum densities within the zoning code, reducing the total cost of development, or speeding up the development review process.

Timeframe: Commensurate with adoption the Zoning Code Update (Program 21), Consider and revise again at mid-cycle.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Program 28: Housing Production Education Program

Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.

Objective: Improve community understanding of the importance of housing production

Timeframe: Initial program within two years, annual outreach thereafter

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Departmental Budget

Program 29: Development Streamlining

The City's Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. The constraints analysis identified the RPD as a significant constraint on development. The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects. It will also maintain consistency with the Housing Crisis Act and utilize the state's standard preliminary application checklist to facilitate project review. Within the first two years of the planning period the city will:

- Eliminate the Residential Planned Development Permit process.
- Implement a process to streamline development review and objective standards for 100% affordable projects. Along with program 12, this will create a new Affordable Housing Overlay Zone.
- Implement a written procedure for processing projects eligible for streamlined review and approval under SB35.
- Establish objective design and development standards as a part of the zoning code update to comply with SB330. This effort will have evaluated and addressed subjective standards and findings required for approval in the city's zoning code and design guidelines.

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- Increase the term of expiry of approved permits to two years to reduce the reliance on one-year extensions.
- Implement a process to monitor and evaluate actual processing times and continually identify opportunities to streamline the process.
- Continue to identify opportunities to streamline processing procedures, including identifying additional exemptions to the Residential Planned Development Permit process for project's that meet objective criteria.

Objective: Remove regulatory barriers to housing production

Timeframe: Within one to two years

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Affirmatively Furthering Fair Housing (AFFH)

Program 30: Affirmatively Furthering Fair Housing

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. To identify and address impediments to fair housing in the City of Alhambra, the city completed an update to its analysis of impediments to fair housing in 2020. This analysis in conjunction with the Housing Element Analysis of AFFH set the framework for programs and policies to reduce barriers to housing and mitigate displacement risk. Specific actions and objectives of this program include:

Community Education

- Revise practices to improve access to public meetings by conducting meetings at reasonable times, selecting locations that are accessible near transit, and consider other resources such as childcare, food services, and translation services.
- Continue to broadly distribute public announcements through a variety of mediums including social media, websites, community events, e-blasts, city newsletters, and through community partners.
- Actively monitor stakeholder participation and seek stakeholders from underrepresented groups in public engagement processes.
- Include resources to educate the public about Alhambra's Inclusionary Housing Ordinance including maintaining an inventory of inclusionary units.
- Continue to actively promote and expand on fair housing resources on the city's webpage including the Housing Rights Center, Stay Housed LA, and the Los Angeles County Housing Resource Center.

Housing Mobility and Improving Access to Opportunity

- Evaluate opportunities and partnerships to expand housing services to include housing mobility counseling.
- Establish siting recommendations and expand allowance of Single Room Occupancy (SRO) housing (part of Program 27).

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- Remove barriers to housing for persons with special housing needs by amending the zoning code to remove or modify any subjective requirements for emergency shelters, expand the allowance of transitional and supportive housing, and allow Low-Barrier Navigation Centers by right (programs 7 and 8).
- Continue to monitor and enforce the City's Inclusionary Housing Ordinance to promote mixed-income development throughout the city and in areas of opportunity. Consider incentives to promote deeper affordability levels in high opportunity areas.
- Amend the city's Reasonable Accommodations Ordinance to streamline the process by removing the notification process. Continue to promote and process reasonable accommodation requests.
- Continue to use development incentives, density bonuses, financial resources, inclusionary housing policies, and the zoning code to encourage affordable housing that is dispersed throughout the community in areas of high opportunity.
- By the next updated to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in amenities in low and moderate resource areas. The city will prioritize future investments in infrastructure, parks, public art, and open space in low and moderate resource census tracts.
- The city will also coordinate with local and regional agencies to mitigate the impacts of air quality along I-10, exploring opportunities for roadside barriers (sound walls, vegetation).
- State law requires rental property owners to accept Housing Choice Vouchers (HCV) as a source of income for housing payments. The City will organize education materials regarding laws prohibiting the rejection of HCVs and other public assistance programs.

Displacement Risk

- Continue and expand on the City's efforts to encourage preservation of the existing affordable housing stock. (Program 3).
- Implement a unit replacement program for residential demolitions consistent with State Law. (Program 6). Consider incentives to encourage replacement at greater set aside levels.
- Continue to monitor and enforce the City's Inclusionary Housing Ordinance to promote mixed-income development throughout the city and in areas of opportunity.
- As a part of the community education programs, the city will annually create communication materials specifically relating to tenant's rights, available resources, and displacement risk. These materials will be multilingual. The city will concentrate distribution efforts in areas at-risk of displacement and coordinate with local organizations to facilitate access to distribution.

Also refer to the AFFH Housing Program below, reproduced from Figure 123 for specific commitments to other meaningful actions as a part of this program.

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Fair Housing Issue	Contributing Factor	Geographic Target	Meaningful Action	Metric	Milestones and Targets
Fair Housing Enforcement and Outreach Capacity	<ul style="list-style-type: none"> ▪ Lack of language access ▪ Lack of Fair Housing Enforcement and Outreach ▪ Lack of awareness of fair housing laws and advocacy. ▪ Community opposition 	Citywide, tracts with highest non-English speaking population.	<ul style="list-style-type: none"> ▪ Continue to contract with the Housing Rights Center to provide fair housing services and education. ▪ By year-end 2023, develop a program to prioritize access to language access for housing and planning meetings. ▪ By year-end 2024, update citywide survey completed in 2021, offering in English, Spanish, and Traditional Chinese. Include survey questions assessing barriers to public participation. ▪ When holding community meetings, proactively outreach to a wide range of community groups. 	<ul style="list-style-type: none"> ▪ Number of cases served by the housing rights center. ▪ Community participation among non-English speaking residents. 	<ul style="list-style-type: none"> ▪ Target to serve 350 individuals annually through HRC programs. ▪ Include translated announcements in Spanish and Traditional Chinese for outreach on housing related issues. ▪ 100% of announcements will be translated in Spanish and Traditional Chinese for participation from non-English speaking residents on housing related issues. ▪ 100% of participants will have access to translation services to encourage outreach and engagement by non-English speakers. ▪ City will track 100% of requests from non-English speakers seeking translation services for housing programs.
Disproportionate Need for Persons with Disabilities	<ul style="list-style-type: none"> ▪ Availability of units in a range of sizes. ▪ Displacement of residents due to economic pressures. ▪ Demographic factors driving needs for seniors with disabilities. 	Central City, Citywide	<ul style="list-style-type: none"> ▪ Begin educational programs that promote the positives of integrated income neighborhoods to change local attitudes about affordable housing (Program 28). ▪ Implement Program 5 (Inclusionary Housing). ▪ Establish siting requirements for SRO housing (Program 9) ▪ Implement an adaptive reuse program (Program 23) to encourage lower cost housing alternatives. ▪ Implement an aggressive Accessory Dwelling Unit Program 	<ul style="list-style-type: none"> ▪ Units built or dollars collected in in-lieu fees from inclusionary program. ▪ Affordable ADU production ▪ Success in adopting SRO requirements. ▪ Production of SRO units. ▪ Number of units built on city owned land. 	<ul style="list-style-type: none"> ▪ Target of one SRO housing project over the planning period. ▪ Construction of at least 92 lower income units on existing city-owned land. ▪ ADU units in R1 zones consistent with estimate of 60 units annually. ▪ Adoption of SRO ordinance by Summer 2023.

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			<p>(Program 26) to incent production in high resource single-family neighborhoods.</p> <ul style="list-style-type: none"> Complete projects planned on City-owned land (Mariposa, Chapel) by year-end 2025 		
Disproportionate Housing Need	<ul style="list-style-type: none"> Displacement of residents due to economic pressures. Lack of Affordable Housing Units 	Citywide	<ul style="list-style-type: none"> Preserve the City's existing affordable housing stock for low- and moderate- income households (LMI) in the 0 to 80 percent of Area Median Income (AMI) category, with a focus on tracts with an above average concentration of LMI households. Continue to monitor and preserve affordable senior housing units for lower income elderly households throughout the community. By year-end 2024, provide a report to City Council detailing alternatives for mitigating rent increases for lower income residents. 	<ul style="list-style-type: none"> Number of units preserved. Completion of cost control report. 	<ul style="list-style-type: none"> Preservation of 215 units with expiring affordable housing covenants over the planning period. Present a report to City Council with alternatives for adoption of programs mitigating rent increases for lower income residents by 2025. As part of the study, evaluate and establish appropriate metrics toward meaningful and significant mitigation of displacement risk.
Disparities in Access to Opportunity	<ul style="list-style-type: none"> Location of Environmental Factors Location and type of affordable housing and lack of affordable units Access to financial services Lack of investments in specific neighborhoods. Land Use and Zoning Laws 	Northeast Quadrant, Citywide	<ul style="list-style-type: none"> Implement density bonus program that expands on AB1763 into entire downtown revitalization district. Propose expanding program as an affordable housing overlay zone in high-resource areas (Program 12). Contract to provide housing mobility counseling services. By the next update to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in 	<ul style="list-style-type: none"> Trend in TCAC scores by census tract. Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary. Number of 100% affordable projects using density bonus under Program 12. Number of projects or dollars spent in low and moderate resource areas. 	<ul style="list-style-type: none"> Improvement of at least one census tract that is currently lower or moderate resource to a higher tier over the planning period. Target of at least four affordable housing projects utilizing the density bonus program. Spending on place-based programs consistent with actions outlined in Programs 35-38 Target of 20 middle housing units per year in high resource R1 areas.

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			<p>amenities in low and moderate resource areas.</p> <ul style="list-style-type: none"> Programs to implement SB9 (Program 33) and target housing production in the R1 Zone. Place-based programs (Programs 35-38) to direct parks and public safety improvements in low and moderate resource areas. 		
Site Inventory	<ul style="list-style-type: none"> Historic development pattern impact on location of feasible sites. 	R-3 zones. Zones that do not allow housing	<ul style="list-style-type: none"> Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary. 	<ul style="list-style-type: none"> Housing production on sites that did not previously allow housing. Lower Income Housing Production in high-resource areas. 	<ul style="list-style-type: none"> Development of at least 50 units in the EMC zone that will have a portion rezoned to allow housing by-right. Target of 20 middle housing units per year in high-resource R1 areas.

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Objective: Ensure equitable access to opportunity for all persons in the community

Timeframe: Ongoing with timing commitments listed in meaningful actions listed above.

Responsible Agency: Community Development Department – Housing Division, Housing Rights Center

Funding Sources: Departmental Budget, CDBG Funds

Program 31: Fair Housing Programs

The city contracts with the Housing Rights Center to provide fair housing services and landlord-tenant counseling services to residents of Alhambra. A variety of issues are addressed, including evictions, security deposits, rent increases, repairs, and lease/contract issues. As needed, referrals to other agencies and/or appropriate pieces of literature are also distributed regarding fair housing information. The city will continue to contract with the Housing Rights Center or other qualified fair housing service providers to provide fair housing services and landlord-tenant counseling services to residents, landlords, management companies, and others involved in the provision of housing and housing services.

Objective: Education of tenants and landlords of their rights and responsibilities under fair housing laws. Assist approximately 400 persons annually, for a total of 3,200 persons during the 2021-2029 Housing Element planning period.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Housing Division; Housing Rights Center

Funding Sources: CDBG Funds

Program 32: Provide New Housing Choices and Affordability in High Opportunity Areas Through Incentives for SB9 Units in R1-Zone Neighborhoods

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

Objective: Increase middle-housing options in high resource areas and the R1 zone consistent with targets in Program 33.

Timeline: By October 2023

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 33: Establish Target to Increase Housing Production in R1 Zones and Include Mid-Cycle Monitoring

The City shall aim to issue at least 20 building permits per year for additional housing units and types in R1 zones. Review progress towards targets by December 31, 2025 and if targets are not being met, adjust land use strategies as necessary and appropriate within one year.

Objective: Permitting of 20 additional middle-housing housing units per year in the R1 zone.

Timeline: Assess progress by December 31, 2025

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 34: AFFH Monitoring and Review Program

The City will evaluate the progress of the Housing Element programs on an annual basis as part of the Housing Element Annual Progress Report process. Additionally, the City will conduct a comprehensive evaluation of program implementation and effectiveness in 2025 as a mid-cycle assessment. The evaluation, among other items, will address actions to affirmatively further fair housing and zoning on identified sites, including multifamily zoning on sites with residential uses. The City will commit to adjusting programs as necessary based on the results of the evaluation, including but not limited to rezoning, increasing allowable densities, incentives, modifications to development standards or other actions.”

Objective: Ensure the effectiveness of progress toward AFFH goals

Timeframe: Annual APR update and midcycle evaluation in 2025. Adjustments to programs as necessary within one year of evaluation.

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 35: Place-Based Community Improvements - Park Renovations

The City will develop programs and strategies to create place-based investments in areas of concentrated segregation and poverty and lower and moderate resource areas, including investments in infrastructure, services, etc. that contribute to community revitalization.

The City will focus investments and programs in existing parks that are predominately used by BIPOC populations (80.1%) to facilitate revitalization and healthy living conditions. Revitalization and improvements include a minimum of \$4.9 million of investment undertaking renovations and improvements at Burke Heritage Park, Story Park, Alhambra Park, Almansor Park, Emery, and Granada Park. Revitalization and improvements shall be implemented by prioritizing capital improvement projects for these efforts during the annual budgeting process.

Objective: Improve amenities, programming, and quality of life in parks accessible to all residents in the community. Invest a minimum of \$4.9 million in park renovations.

Timeline: From 2022 through 2027

Responsible Agency: Community Development Department, Parks and Recreation Department

Funding Source: General Fund, Grants as available

Program 36: Place-Based Community Improvements – Emery Park

Emery Park is in Alhambra's only low resource census tract. It is developed with amenities including a 2,532 square foot, activity center with a gym, small kitchen facility, storage room, and interior restrooms. There have been some recent improvements. The exterior restrooms were rehabilitated in (2018). The open park area provides picnic table rentals and the City's first all-inclusive playground built in 2017.

The City will continue to provide recreational activities and programs for Pre-K at the Emery Park Youth Center to provide classes related to promote fun activities and social play as well as parenting skills and techniques. Such programs include but are not limited to "Ages and Stages", "Fun with Toddlers", and Two Too Much". Classes will continue to be advertised in the City's annual Leisure Guide published twice a year (Winter/Spring and Summer/Fall).

The City will also develop a strategy for place-based improvements of the Emery Park Youth Center. Specific actions include:

- Repaint in the interior and exterior of Emery Park Youth Center – to be completed by December 2028
- Commence rehabilitation of the Emery Park Youth Center restrooms for a Request for Proposals within the interior of the building – start of project Dec. 2027.

Objective: Place-based investments in lower resource areas

Timeline: Ongoing, annually.

Responsible Agency: Parks and Recreation Department

Funding Source: Los Angeles County Regional Park and Open Space District (Measure A Funds), Department Budget

Program 37: Place-Based Community Improvements – Streetscape and Right of Way Improvements

The City will develop programs and strategies to create place-based improvements through investments in the public right-of-way and public safety improvements in high-traffic areas near transit and in moderate and low resource areas. Specific actions include:

- Installation of lit crosswalk traffic control devices at major intersections that currently have uncontrolled crosswalks. Pedestrian crossing control equipment at the intersections may include flashing beacons (standard beacons per CA-MUTCD or Rapid Rectangular Flashing Beacons (RRFB) or in-road flashing lights along crosswalk lines. Targeted intersections are located along corridors that include or are adjacent to moderate or lower resource areas, or areas that include sites targeted for lower income housing. Targeted intersections include:
 - Main/Meridian
 - Valley/Monterey
 - Main/Marguerita
 - Chapel/Elgin
 - Main/Curtis
 - Valley/Date
 - Main/Vega
 - Main/Olive
 - Valley/Primrose
- Implementation of a new Bike and Pedestrian Transportation Plan. A stated goal of the plan is to “create a methodology for prioritizing projects including identifying need in disadvantaged areas.” The City has already commenced outreach for this project. Input is being gathered from the community on preferred bike lane routes with the intent to connect them to bike paths in adjacent cities and nodes of employment and recreation.
- Eliminate the existing series street lighting distribution system within the Airport Tract neighborhood and convert the lighting to a multi-volt distribution system that will allow the streetlights within the Airport Tract to be converted to LED luminaires.
- Work collaboratively on the implementation of multi-jurisdictional First-Last Mile Improvements for the Valley/Fremont Bus Mobility Hub as recommended in the 710 Mobility Hubs Plan. First- and last-mile improvements within one-quarter mile of bus mobility hubs are a crucial element in ensuring the hubs remain accessible and safe for everyone walking and biking. The improvements associated with the Valley/Fremont Bus Mobility Hub can include:
 - Added pedestrian lighting
 - Added street trees
 - Added/improved pedestrian crosswalks
 - Improved bus stops

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- Added wayfinding
- Added traffic calming

Alhambra will need to ensure this Mobility Hub location and relative features are in alignment with the City's Bike and Pedestrian Improvement Plan and proposed bike network. The Bike/Ped Plan is expected to be completed in the Fall of 2023. Following the completion of the Bike/Ped Plan, it will be incumbent on the City to secure funding for both the Bike/Ped Plan recommendations and the Mobility Hub at Valley/Fremont (if appropriate).

Objective: Improve public safety and access to resources in lower resource areas

Timeline: Ongoing, Bike and Pedestrian Plan to be completed in 2023, phased crosswalk improvements over the planning period prioritized at intersections in low and moderate resource areas as appropriate. Conversion of street lighting systems from 2023 to 2027.

Responsible Agency: Public Works

Funding Sources: General Fund, Department Budget.

Program 38: Place-Based Community Improvements – Valley Boulevard Multimodal Improvements:

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The City will invest in multimodal improvements along the entire length of the Valley Boulevard Corridor. This Corridor includes over 22% of lower income capacity estimated in the Adequate Sites Inventory. These investments will promote non-motorized uses with attractive, convenient active transportation infrastructure including pedestrian and bike enhancements and bus stop improvements. This will include the conversion of public transit stops to more attractive environments with benches, shelters, trashcans, lighting, and bike parking to increase transit use as viable alternatives to automobile travel by improving access to local and regional transit facilities. Together, these features support closing existing gaps to mobility on Valley Boulevard and improving local and regional connectivity. Each site will be measured with recommendations provided for new shelters, furniture, and trash receptacles.

Objective: To improve public safety and transit access in low and moderate resource areas and areas and higher resource areas that are planned for future lower income housing.

Timeline: 2024-2025

Responsible Agency: Public Works

Funding Sources: Prop C funding, secured federal grant of \$1.2 million

Housing Element Maintenance

Program 39: General Plan Updates

The city completed an update of the General Plan in 2019. However, upzoning and rezoning strategies along with other programs will require further updates to ensure internal consistency of the 2021-2029 Housing Element with other elements of the General Plan. The city will address updates to the Land Use, Circulation, Safety, and Environmental Justice elements, and other elements of the General Plan where appropriate.

Objective: Ensure ongoing internal consistency of the General Plan

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Department Budget

Program 40: Housing Element Maintenance

City staff will report to the City Council annually on the progress in implementing the Housing Element. Staff will prepare an Annual Review Statement, per Section 65588 of the Government Code, to evaluate the progress made in implementing housing element policies and programs and in meeting the city's housing goals. Department staff will also monitor progress of Community Development Block Grant (CDBG) and HOME-funded projects through the Consolidated Annual Performance Evaluation Report (CAPER).

This program will also include a mid-cycle Housing Element review. This review will assess production at income levels on inventory sites, ADU production, SB9 production not included in capacity estimates, and existing buffers to ensure RHNA no-net-loss. At this review, if the city is not meeting its housing production goals, it will review and revise Land Use policy, development standards, and review processes. By state law, the City will rezone new sizes or upzone inventory sites to accommodate capacity shortfalls. This mid-cycle review will also assess the effectiveness and implementation of Housing Element Programs, pending and approved projects and identified sites and adjust where appropriate.

An annual review of ADU production is also included in Program 26 and a biennial review of the city's IHO program is included in Program 5.

Because the project referred to as the "The Villages at the Alhambra" represents a sizable share of progress toward RHNA, if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The site will not be utilized for the purposes of no net loss law.

Finally, the mid-cycle review will evaluate the effectiveness of programs and provide a summary of metrics identified in the AFFH program to determine progress made and recommendations for additional actions and expansion of programs where necessary.

Objectives:

- Evaluate and understand housing production by type and affordability.
- Proactively make zone changes to ensure a stable availability of sites to accommodate the city's Regional Housing Needs across all income levels.
- In accordance with Government Code §65589.7, the city will deliver to all public agencies or private entities that provide water or sewer services to properties within Alhambra a copy of the 2021-2029 Housing Element. The city will ensure that it has adopted policies and procedures to prioritize utility hook-ups to developments that include units meeting the needs of lower-income households.
- Ensure that RHNA obligation through pending or proposed projects is realized or alternative sites are made available.

Timeframe: Housing Element distribution on adoption, Mid-cycle review within four years. Annual ADU assessment. Proposed project assessment within two years.

Responsible Agency: Community Development Department – Housing Division

Funding Sources: Departmental Budget

Summary of Quantified Objectives

Figure 125 summarizes the city’s quantified objectives for the 2021-2029 planning period. Many of the city’s programs list specific actions with associated objectives and outcomes. Some programs include quantified objectives relating to unit capacity. These objectives have been aggregated by type consistent with State Housing Element Law. In addition to these quantified objectives, the city plans to assist 3,700 households through code enforcement and fair housing services.

Figure 125: Summary of Quantified Objectives

Source: City of Alhambra

Objectives	Income Levels					Total
	ELI	Very Low	Low	Moderate	Above Mod.	
Production Objective ^A	840	840	966	980	2,029	5,655
Rehabilitation Objective	0	5	2	0	0	7
Conservation/Preservation Objective	0	899		0	0	899
Total	840	2,712		980	2,029	6,564

^A The City of Alhambra is not responsible for physically constructing units. The City’s responsibility is to create a regulatory environment through land use, zoning, incentives, and programs to encourage the private market to develop units across a variety of housing types.

Production Objective. This objective reflects the City’s remaining RHNA after considering current projects approved.

Rehabilitation Objective. This objective is an outcome of the City’s Housing Rehabilitation Program (Program 1). The objective is split between very low and low-income households.

Conservation Objective. This objective refers to the preservation of 366 units of affordable housing units at risk and the maintenance of the current level of assistance from the Section 8 Voucher program (533 vouchers).

Chapter 7: Sites Inventory Summary and Methods

The residential sites inventory identifies land available for new housing development and compares this “capacity” to the city’s Regional Housing Need Allocation (RHNA). California’s Government Code requires the Housing Element to include this inventory demonstrating “adequate sites” that are or will be made available during the planning period to accommodate housing production targets. Jurisdictions are further required to demonstrate that zoning and infrastructure are available or planned to be available to support housing development.

Summary of Alhambra’s Regional Housing Need

To meet its RHNA for the 2021-2029 planning period, the city of Alhambra must show capacity for a minimum of 6,825 units. Among these, approximately 41 percent must be appropriate for lower-income (very low, low) households.

Figure 126: Summary of Alhambra’s Regional Housing Need Allocation

Source: SCAG

Income Level	Number	Percentage
Very Low	1,774	26%
Low	1,036	15%
Moderate	1,079	16%
Above Moderate	2,936	43%
Total	6,825	100%

Site Inventory Organization

While over 52 percent of Alhambra’s gross land area is zoned for residential use, Alhambra is a built-out community with very little vacant land. Alhambra’s 6th Cycle RHNA allocation represents 21.4 percent of the current housing stock, nearly all of which will need to be met by redevelopment and infill capacity. In the 5th Cycle, Alhambra identified 102 sites with capacity for 1,530 units⁴⁹. It is clear that under existing zoning, Alhambra falls well short of having zoned capacity to meet its allocated share of regional housing need for the 2021-2029 planning period. Therefore, we organize the city’s inventory into categories representing existing and potential candidate residential capacity.

Existing Site Capacity

Represents capacity from sites available under existing zoning and policy conditions.

- 1) Projects planned, proposed, or entitled that are expected to be delivered during the planning period.
- 2) Capacity identified within Existing Specific Plan/Master Planned Areas with the potential to be delivered during the planning period.

⁴⁹ Excludes planned and proposed projects

- 3) Vacant sites with zoning that allows for residential development.
- 4) Nonvacant, underutilized sites identified in the 5th Cycle Housing Element that remain undeveloped, have zoning that allows for residential development, and meet our current criteria for exhibiting demonstrated potential for redevelopment at higher density/greater intensity⁵⁰

Potential Candidate Site Capacity

Represents capacity that results from rezoning, upzoning, and other policy and program changes to support and facilitate housing production. Potential candidate capacity includes:

- 1) Projected Accessory Dwelling Unit Capacity.
- 2) Vacant and/or underutilized sites that are not currently zoned to allow for residential uses and will be rezoned to allow residential uses.
- 3) The marginal change in capacity resulting from actions to increase allowed and realized density (upzoning, changes in development standards, incentives) on sites that currently allow residential uses, including existing capacity on sites carried over from the 5th Cycle Sites inventory.

Assumptions and Methodology

Alhambra Zoning Code

The City of Alhambra is in the process of completing a comprehensive zoning code update. We expect that potential candidate site capacity that will be made available through rezones or other zone amendments will be adopted as a part of the code update project. It is expected that this process will be completed sometime in 2022, early in the planning period. Land-use changes that occur at the beginning of the planning period (in contrast to the three-year window that is allowed by State Law) are more likely to have an impact on development and increase the likelihood of redevelopment during the planning period.

Existing Allowed Density

Alhambra's zoning code does not have a minimum density and allows densities up to maximum thresholds. In the Low-Density Residential Zone (R-1) one unit is allowed per lot. In the Medium-Density Residential Zone (R-2), the maximum is 12 units per acre. In many of Alhambra's commercial zones, residential uses are allowed conditionally consistent with the city's High-Density Residential Zone (R-3). This includes the Central Business District (CBD), the Parking Zone (P), and Commercial Planned Development (CPD) zones. The R-3 Zone is designed to facilitate subtle transitions between lower density zones and to facilitate lot aggregation. Allowed densities in R-3 range from 12 to 43 units per acre depending on site size and proximity to lower density zones.

⁵⁰ Some previously identified sites were removed from consideration because they do not meet our definition of having redevelopment potential or they were partially developed, and the remnant portion of the site is not likely to be redevelopable on its own.

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Figure 127. Allowed Densities in High-Density Zones

Source: City of Alhambra

Allowed Density	Condition
12 units per acre	For any parcel located on Curtis or Electric Lane without frontage on any other street.
18 units per acre	All parcels within 50 feet (less street and alley right-of-way) of properties designated as low Density Residential in the General Plan.
24 units per acre	All parcels within 50 feet (less street and alley right-of-way) of properties designated as Medium Density Residential in the General Plan
24 units per acre	Parcel size less than 20,000 square feet and not within 50 feet (less street or alley right-of-way) of properties designated as low or Medium Density Residential in the General Plan
30 units per acre	Parcel size 20,000 square feet or greater and not within 50 feet (less street or alley right-of-way) of properties designated as Low or Medium Density Residential in the General Plan
43 units per acre	Parcel size 20,000 square feet or greater (within areas bounded by Woodward Avenue, Chapel Avenue, Commonwealth Avenue and Atlantic Boulevard or within Central Business District) and not within 50 feet (less street or alley right-of-way) of properties designated Low or Medium Density Residential in the General Plan

The city's high density zoning structure presents both practical and analytical challenges in the context of size and density requirements for meeting lower-income RHNA. Analytically, determining if a parcel is within 50 feet of a lesser zone, considering street and alley right-of-way is an arduous task in a citywide inventory. Where applicable, any parcel directly adjacent or across the street from a lower zone is classified at the lower allowed density. This will result in the most conservative allowed density assumption⁵¹.

Density and Size Requirement for Meeting Lower Income RHNA

California Housing Element law recommends that sites identified as suitable to accommodate lower-income RHNA be zoned at a minimum density of 30 units per acre and be between 0.5 and 10 acres in size unless local development patterns suggest otherwise.

The city does not have an exhibited trend from the 5th Cycle demonstrating the scale and density at which lower-income affordable housing is being developed. However, Alhambra has two projects in the pipeline that are 100% affordable projects on city-owned sites. Both projects are utilizing density bonuses to achieve densities well above the base zone and are located on sites that are less than 0.5 acres in size. Examples of similar projects in peer cities are included in Figure 128.

Alhambra's 6th Cycle sites inventories rely on the 30 units per acre default density. All lower-income sites are greater than 0.5 acres. However, Figure 128 demonstrates that in the region, 100% affordable projects at 60% AMI or lower are feasible on sites less 0.5 acres at densities consistent with what could be achieved in Alhambra within the

Site Size

Sites smaller than half an acre or larger than 10 acres are considered inadequate to accommodate lower-income housing need without demonstrative evidence that such development is realistic and feasible.

Density and Income

Government code section 65583.2(c)(3) establishes a default density of 30 units per acre for Alhambra. This density is deemed appropriate to accommodate lower-income RHNA.

⁵¹ Recommended changes to increase capacity include removing the scaled zoning between the R-3 and R-2 zones.

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Downtown Revitalization District’s proposed standards or in conjunction with the State density bonus. Two of the regionally identified projects in Figure 128 are in Alhambra.

Figure 128. Affordable Housing Projects on Sites Less than a Half-Acre

Source: CoStar

Address	City	Units	Stories	Built	Land Area	Density	Developer
143 Mar Vista Ave	Pasadena	20	3	2016	0.47	43	Westport Construction
236 S Ramona Ave	Monterey Park	31	2	2016	0.31	100	LINC Housing Corporation
1311 N San Fernando Rd	East LA	68	3	2014	0.38	179	McCormack Baron West Coast Development
3348 Tyler Ave	El Monte	20	3	2013	0.35	57	Domus Development, LLC
4260 Eagle Rock Blvd	East LA	56	4	2015	0.45	124	WORKS
3638 Center Ave	El Monte	53	4	UC	0.31	171	The Cesar Chavez Foundation
452-458 Milford Street	Glendale	15	2	Proposed	0.30	50	J P Allen Co
Main & 2nd (Mariposa)	Alhambra	50	5	Proposed	0.42	119	National CORE
Chapel Lot	Alhambra	44	5	Proposed	0.32	138	Related California
400 N Maryland Avenue	Glendale	28	3	Proposed	0.48	58	N/A
11016 Ramona Boulevard	El Monte	50	4	Proposed	0.46	109	Newport Partners

Lot Assemblage

The City of Alhambra is characterized by a highly parcelized land pattern with smaller sites. Sites along most corridors are narrow and, in many cases, are adjacent to low-density residential uses. Under existing zoning, many high-density sites are also adjacent to low-density residential uses and currently require a step-down in maximum allowed density to maintain a subtle form transition that is emphasized in the Land Use Element of the General Plan. Under existing zoning, of all parcels in the city, only 3.8 percent are greater than 0.5 acres in size. Of those, 2.5 percent are zoned to allow residential use, and only 1.1 percent have densities greater than 30 units per acre. These calculations include all parcels regardless of existing development. Much of the land area on larger parcels have productive uses that are not likely to redevelop. Examples include Costco, Home Depot, Kohls, private schools, new car dealerships, and existing condominium development. These calculations underscore the necessity of lot assemblage to achieve sites that have the scale to efficiently deliver new housing, especially affordable housing. The City of Alhambra will promote aggressive policies and programs that directly and indirectly facilitate lot assemblage. Program 25 directs the city to play an active role in lot assemblage. This is an extension of the city’s policy in the 5th cycle that saw 15 development applications with capacity for over 1,700 units on sites with multiple parcels.

Figure 129. Share of all Parcels by Size and Density Threshold, City of Alhambra
 Source: ECONorthwest

	Total of all parcels	Parcels > .5 acres		
		Total	Residential allowed (includes commercial)	Residential allowed (includes commercial) @>30/ac.
Parcels	15,597	593 (3.8%)	395 (2.5%)	178 (1.1%)
Acres	3,873	1,333 (34.4%)	553 (14.3%)	272 (7.0%)

Values in parentheses represent share of all parcels/land area

Assumption of Achievable Density

When conditions are optimal, sites can develop at or near the maximum allowed density, but this is not always the case. To establish an assumption of the rate of maximum density that development is achieving, Figure 130 includes a survey of recent and planned development in Alhambra. This inventory includes 17 projects that were completed through 2020. These were all market rate developments. 17 additional projects are currently under construction or proposed. An additional four projects are included separately because they are partial redevelopments and data available to calculate density was incomplete.

Projects in the survey have developed on average at a rate of 105% of allowed density. This reflects projects that have or are planned to receive density bonuses. Both the Mariposa project and the 103 N Chapel Ave project are on city-owned sites with development commissioned through a developer RFP. The Mariposa project is 100% affordable and is currently under planning commission review. It is within ½ mile of a major transit stop and qualifies for a density bonus under AB1763. The city recently selected a developer proposal for the Chapel project. This project is located within the Downtown Revitalization District. To further promote affordable housing development downtown proximate services and transit, the city is currently working to extend AB1763 density bonus standards across the entire Revitalization District. This is reflected in Program 12.

Development Pattern on Sites Allowing Non-residential Uses. Over the 2013-2021 planning period, the city approved 22 developments on commercial zoned properties. Six of these developments were mixed-use projects that included residential. The lack of residential-only development is the result of commercial zones only allowing residential in conjunction with a commercial use. Program 21 directs the city to adopt the comprehensive zoning code update. This process will remove the requirement that residential development in non-residential zones be in conjunction with commercial uses, allowing 100% residential uses in commercial zones. The city will also incentivize residential development for lower income households in commercial zones by offering incentives and concessions in a manner similar to how incentives and concessions are available for density bonus projects.

Omitting projects that received density bonuses for affordable development, projects completed and proposed are building to an average density of 96 percent of allowed density. Based on these findings, the sites inventory assumes sites can achieve on average **90 percent of allowed density. The assumed rates are slightly lower than observed trends.** For smaller sites that are less than a half-acre (*not lower income sites, no lower income sites less than a half-acre were included*) where infill or refill potential was identified, an average of **70 percent of allowed density was assumed to conservatively reflect the challenges of small site development.**

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Figure 130. Recent Development History and Pipeline, City of Alhambra⁵²

Source: ECONorthwest

Address	Zoning	Acres	Allowed Density	Allowed Units	Units	% of Allowed	Year/status ⁵³	RHNA5 Site
1008 N Monterey St	R-3	0.63	30	16	15	94%	2014	No
210 N Monterey St ⁵⁴	R-3	0.79	43	34	42	124%	2015	97
700 N Atlantic Ave	R-3	0.42	24	9	9	100%	2015	105
798 S Stoneman Ave	R-3	0.67	30	20	18	90%	2015	44
822 N Monterey St	R-3	0.34	18	6	6	100%	2015	No
518 Howard St	P	0.41	30	9	9	100%	2015	No
88 S Garfield Ave	SP	10.6	43	260	260	100%	2016	11
115 E Mclean St	R-3	0.29	24	6	6	100%	2017	13
1203 N Monterey St	R-3	0.38	24	9	8	89%	2017	No
800 N Garfield Ave	R-3	0.49	30	14	14	100%	2018	109
825 S Sierra Vista Ave	R-3	0.21	24	4	4	100%	2019	2
101 N 3rd St	R-3	0.52	43	22	14	64%	2019	No
101 Palmetto Dr	R-3	0.21	24	5	4	80%	2019	No
108 E Mclean St	R-3	3.04	30	91	79	87%	2020	13
117 N Palm Ave	R-3	0.37	24	8	7	88%	2020	71
719 S Stoneman Ave	R-3	0.66	24	15	10	67%	2020	51
1116 N Monterey St	R-3	0.33	24	7	7	100%	2020	No
201 E Bay St	CBD	1.44	43	62	62	100%	UC/Prop.	No
(Mariposa) No Address ⁵⁵	CBD	0.42	24	10	50	400%	UC/Prop.	No
123 S Chapel Ave	CBD	0.93	43	39	37	95%	UC/Prop.	83
101-107 S Chapel Ave	CBD	0.65	43	28	28	100%	UC/Prop.	83
110 S Chapel Ave	R-3	0.91	30	27	24	89%	UC/Prop.	No
510 N 3rd Street	R-3	0.19	24	4	5	125%	UC/Prop.	99
300 E Alhambra Rd	R-3	0.28	18	6	6	100%	UC/Prop.	No
727 S Sierra Vista	R-3	0.21	24	4	4	100%	UC/Prop.	47
123 S Marguerita Ave	R-3	0.17	24	4	4	100%	UC/Prop.	No
1720 Acacia St	R-3	0.23	24	5	5	100%	UC/Prop.	No
749 S Stoneman Ave	R-3	0.45	24	10	10	100%	UC/Prop.	41
103 N Chapel Ave ⁵⁶	CBD	0.32	43	13	44	338%	UC/Prop.	No
234 S Marguerita Ave	R-3	0.54	30	16	11	69%	UC/Prop.	No
720 S Stoneman Ave	R-3	0.30	24	7	7	100%	UC/Prop.	50
1501 S 2nd St	R-3	0.23	24	5	5	100%	UC/Prop.	No
209 Monterey St	R-3	0.41	24	9	9	100%	UC/Prop.	No
1416 Benito Ave	R-3	0.32	24	7	7	100%	UC/Prop.	15
			Total	791	830	105%		
Other Development								
2400 Freemont	SP		RHNA5 Site 10. Specific Plan development of 70 SF Homes					
1118 N Stoneman	R-3		RHNA5 Site 114. Expansion of memory care facility adding 38 beds.					
1412 S Marengo Ave	Split		RHNA5 Site 17. Expansion of existing skilled nursing facility, redevelopment of a site with 125 new townhomes and office space.					
1000 S Fremont	PO		RHNA5 Site 24. Proposed redevelopment of a parking lot and office space to include 790 units in buildings up to 5-stories.					

⁵² Highlighted projects are 100% affordable developments at 60% AMI or below.

⁵³ UC/Prop. = Under Construction or Proposed

⁵⁴ 55+ Senior Restricted

⁵⁵ AB1768 Density Bonus

⁵⁶ Proposed density assumes Alhambra revised density program in Downtown Revitalization District

Pattern of Redevelopment

The pattern of redevelopment in Alhambra over the last cycle can help inform estimates of how redevelopment may occur in the future. However, Alhambra is proposing zoning amendments in the 6th Cycle designed to increase redevelopment likelihood considerably.

The recent development pattern in Alhambra has been largely characterized by densification and redevelopment of underutilized sites in existing high-density residential areas. The magnitude of the increase in densification or densification potential (the number of units built or allowed compared to existing units on a site) is an important indicator of redevelopment likelihood in residential areas. Among recent development or proposed projects surveyed, 25 projects were residential redevelopments. The average project redeveloped at a 3:1 ratio, however, 40 percent of projects redeveloped as low as 2:1.

Figure 131. Densification of Residential Redevelopment, City of Alhambra (2014-current)

Source: ECONorthwest

	Projects	Existing Units	New Units	Densification Factor
Developed/Under Construction	12	40	110	2.75
Proposed	13	36	132	3.60

The inventory in Alhambra's 5th Cycle Housing Element did a reasonable job at identifying redevelopment potential. Over half of the projects identified in Figure 130 were on sites that were identified in the previous inventory. The 5th Cycle inventory included 13 proposed projects, 4 vacant sites, and 98 nonvacant sites. Of the 13 proposed projects, 9 redeveloped at or higher than rates expected. Among the proposed projects that did not move forward, we estimate that three of these projects should not have been included as proposed projects⁵⁷:

- RHNA5 Site 8. R-1 site with an existing structure would not have increased the number of units because only 1 unit is allowed per lot in R-1.
- RHNA5 Site 9. Listed the full build-out of the Atherton Baptist assisted living community's master plan. This is a long-term master plan the full build-out should not have been counted.
- RHNA5 Site 14. City staff reports that this was a mixed-use project based on initial technical conversations with the city. The site is in an industrial zone (IPD) that did not, and currently does not allow housing. The 5th Cycle Housing Element did not include a program to rezone this site to allow for housing. As a vacant site along a strong commercial corridor, this would be a viable site with provisions to provide appropriate entitlements.

RHNA5 sites 8 and 9 are not included in the 6th Cycle Housing Element Inventory because they are not suitable sites. Adjusting for these sites, all but one proposed project moved forward, and **80 percent of the unit capacity on proposed sites developed.**

⁵⁷ Refer to the City of Alhambra 2013-2021 Housing Element Update for site references

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For vacant and nonvacant sites in the 5th Cycle inventory, five sites were identified that should not be included in a sites inventory. An example is RHNA5 Site 49, which included capacity from an internal parking access for the Zen Terrace condominium development. These five sites are not included in the 6th Cycle inventory. Adjusting for these sites, 19 of the remaining 93 developed or have development currently planned or proposed. These 19 sites redeveloped at 124% of their capacity identified in the 5th Cycle. In addition to sites in the 5th cycle inventory, redeveloped occurred or is proposed on 18 additional sites that were not in the previous inventory. Taken together, redevelopment occurred or is proposed on 37 sites. Realized or planned development on these sites is 1,503⁵⁸ units.

Market Context

Alhambra is an inherently built-out community with very little vacant land. Whether through existing residentially zoned sites or zoning amendments to allow housing in more areas, the majority of housing need in the community will be met through redevelopment of existing sites.

Land scarcity, escalating home prices and rents, and low inventories of available units are all factors that collectively result in a market environment that is conducive to redevelopment. Strong redevelopment interest has emerged in Alhambra in recent years, and this section further outlines the extent to which market conditions are likely to support further redevelopment and reuse potential.

Vacant Land Scarcity

A vacant site for the purpose of the Housing Element is defined as a site without any houses, offices, buildings, or other significant improvements on it. Improvements are generally defined as development of the land (such as a paved parking lot, or income production improvements such as crops, high voltage power lines, oil-wells, etc.) or structures on a property that are permanent and add significantly to the value of the property. Alhambra only has 11 parcels totaling 5.5 acres allowing residential uses that meet these criteria. Nine of these parcels are low density (R-1) infill sites with capacity of nine units. According to CoStar, there are no vacant residential sites available for sale in the city⁵⁹.

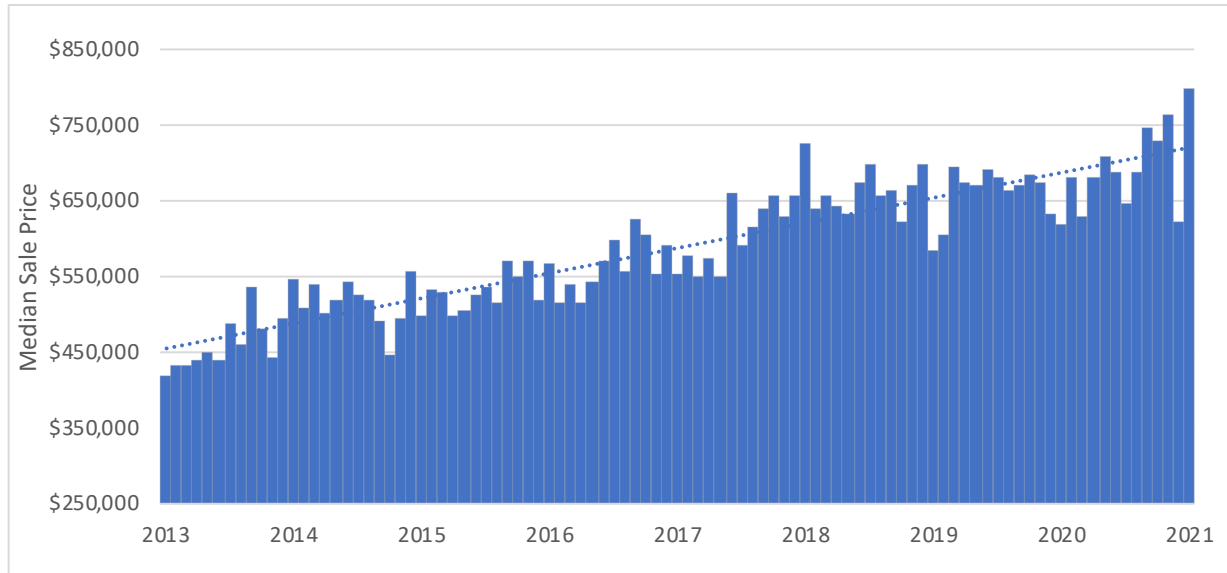
Escalating Residential Prices

For-sale home prices have been increasing rapidly in recent years. Between January 2013 and 2021, median home values have increased by 90 percent. The current median is \$800,000.

⁵⁸ This includes currently proposed projects that are included in the 6th Cycle Housing Element.

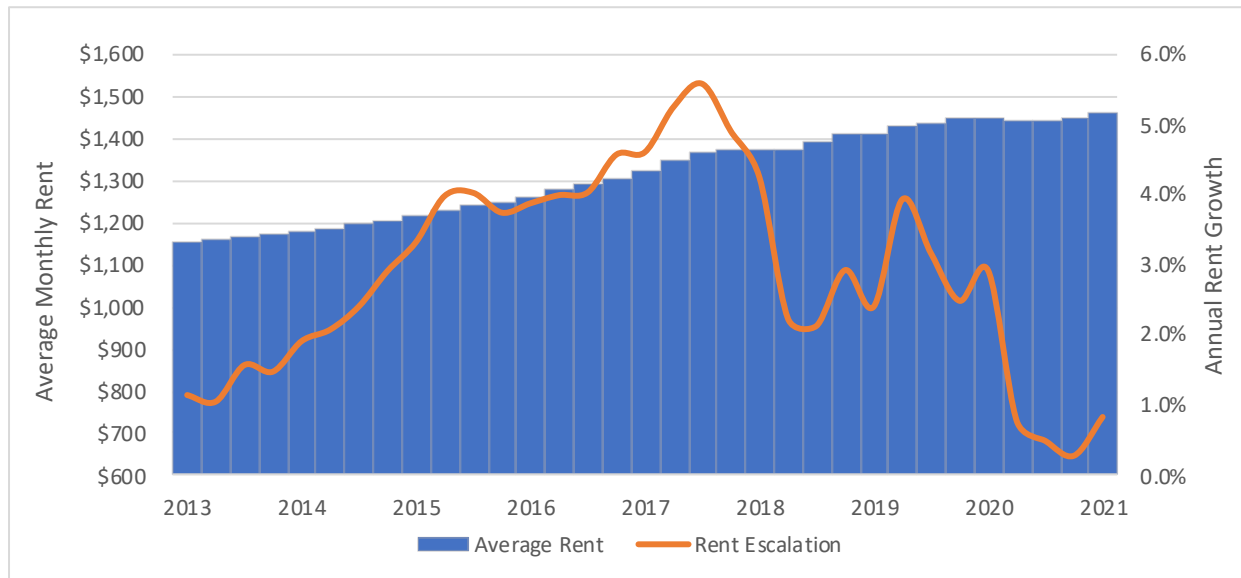
⁵⁹ As of July 2021

Figure 132. Median Sale Price Growth, City of Alhambra
Source: Redfin



In the rental residential market, survey data from CoStar inventories 82 rental properties in Alhambra totaling 8,422 units across all property classes. Since 2013, average unit rental rates have increased by 27 percent. Rent growth stagnated in 2020 during the COVID-19 pandemic. Forecasts estimate that annual rent growth returns to 2 to 3 percent by 2023.

Figure 133. Average Monthly Rent Growth, City of Alhambra
Source: CoStar



Low Inventories

According to Redfin, a national leader in housing data, for-sale housing inventory in Alhambra was at 2.0 months in January 2021. This means that if no additional homes were put on the market, there would be no homes left to sell in 2 months. Inventory below 5 months is representative of a tight market and indicative of future price escalation.

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In the rental market, despite negative impacts of the COVID-19 pandemic, the rental vacancy rate in Alhambra was 4 percent in the first quarter of 2021, according to CoStar. Rental vacancy was below 3 percent prior to the pandemic.

Land Costs

A sample of land sales reported by CoStar since 2016 is included in Figure 134. Most of the properties in this inventory had existing underutilized uses but were sold for the value of land. Land prices are high in Alhambra, ranging from \$2.8 to \$7.0 million per acre or \$65 to \$162 per square foot with an average around \$85 to \$90 per square foot. This finding is consistent with an In-Lieu Fee Study conducted as a part of its Inclusionary Housing Ordinance⁶⁰.

Figure 134. Recent Example Land Sales, City of Alhambra

Source: CoStar

Address	Sale Price	Size (acres)	Sale Date	\$/ Acre	\$/ Sq. Ft.
1412 S Marengo Ave	\$4,538,500	1.11	Dec-20	\$4,088,738.74	\$93.86
747 S Stoneman Ave	\$2,600,000	0.44	Oct-20	\$5,909,090.91	\$135.65
1428 S Marengo Ave	\$32,500,000	8	Jul-18	\$4,062,500.00	\$93.26
229 S 5th St	\$720,000	0.17	Mar-18	\$4,235,294.12	\$97.23
305-315 N Monterey St	\$2,750,000	0.52	Dec-17	\$5,288,461.54	\$121.41
1825 Cedar St	\$1,550,000	0.22	Oct-17	\$7,045,454.55	\$161.74
15 S Chapel Ave	\$1,650,000	0.28	Sep-17	\$5,892,857.14	\$135.28
2400 S Fremont Ave (Midwick)	\$27,316,000	8.8	Feb-17	\$3,104,090.91	\$71.26
1215-1237 E Main St	\$5,500,000	1.2	Dec-16	\$4,583,333.33	\$105.22
107 S Chapel Ave	\$651,000	0.23	Aug-16	\$2,830,434.78	\$64.98
TOTAL	\$79,775,500	20.97		\$3,804,268.00	\$87.33

Existing Capacity

Projects Planned or Proposed

There are currently 19 projects in Alhambra at various stages of planning and entitlement. Among these projects nine are under construction or have received building permits, three are in plan check and five others have been approved. These projects are reported in Figure 135. Where the number of units available by income level is known or estimated by the developer, we use this number as a default allocation. Where the allocation is unknown, we assume that units will be available at moderate or above moderate-income levels. Based on the stages of the planning and entitlement process, staff projects a very high likelihood that all of these projects to become available during the planning with the exception of the 1000 Fremont project (AKA "The Villages"). This project was denied by council in October 2021 due to concerns over the project's approach to environmental mitigation. However, the Planning Commission has stated that it still considers the project, or a project viable with the appropriate mitigating investments. Alternatively, the project would still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units. Therefore, the city assumes 70% of previously identified capacity for this project to reflect a lowered likelihood of delivery within the planning period.

⁶⁰ Keyser Marston Associates. Inclusionary Housing Ordinance: In-Lieu Fee Analysis. January 2021

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Taken together, these projects with the noted adjustment represent 926 units, of which 200 will be available for lower-income households. A brief description of larger projects is also included.

Figure 135. Planned and Proposed Project Inventory, City of Alhambra⁶¹

Source: City of Alhambra

Address	Status	APN	Size	Zoning	Income Level ⁶²			
					VL	LI	MI	AM
201 E Bay St	Under Construction	5345004040, 5345004050, 5345004051, 5345004052, 5345004055	62,833	CBD	0	0	0	62
(Mariposa) No Address	Approved May '21; not submitted for plan check	5344026915	18,399	CBD	50	0	0	0
123 S Chapel Ave	Permits issued August '21	5345004033	40,358	CBD	0	0	0	37
101-107 S Chapel Ave	Permits issued August '21	5345004006, 5345004007, 5345004049	30,379	CBD	0	0	0	28
110 S Chapel Ave	Approved June '20; not submitted for plan check	5345015003	40,476	R-3	0	0	0	24
510 N 3rd Street	In plan check	5337013011	8,402	R-3	0	1	0	4
300 E Alhambra Rd	Under Construction	5337001001	12,390	R-3	0	0	0	6
727 S Sierra Vista Ave	Under Construction	5347021003	9,001	R-3	0	0	0	4
123 S Marguerita Ave	Under Construction	5343010016	7,500	R-3	0	0	0	4
1720 Acacia St	Under Construction	5342026005	10,000	R-3	0	0	0	5
747 - 749 S Stoneman Ave	Under Construction	5347014002, 5347014001	19,424	R-3	0	0	0	10
103 N Chapel Ave	In Planning	5337026907	13,750	CBD	44	0	0	0
234 S Marguerita Ave	Approved August '20; not submitted for plan check	5343017026, 5343017003, 5343017005, 5343017004	38,654	R-3	0	0	0	11
720 S Stoneman Ave	In plan check	5347017020	12,985	R-3	0	0	0	7
1501 S 2nd St	Under construction	5357008020	10,064	R-3	0	0	0	5
209 Monterey St	In plan check	5337022030	17,940	R-3	0	0	0	9
1416 Benito Ave	Approved October '21, not submitted for plan check	5356009004	13,750	R-3	0	0	0	7

⁶¹ Highlighted projects have affordable units by deed-restricted covenants. Other estimates based on statements from developers.

⁶² VL=Very Low Income;

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1000 Fremont	Denied by City Council October '21	5342001006, 5342001007, 5342001008, 5342001009, 5342001010, 5342001019, 5342001021, 5342001022, 5342001023, 5342001024, 5342001025, 5342001026, 5342001027	897,771	PO	0	50*	33*	470*
625 Commonwealth	Master Plan approved	N/A	N/A	R-3	0	55	0	0
TOTAL:					94	106	33	693

* Estimates for this project are 70% of planned development to reflect potential likelihood of timing during the planning period.

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The Villages at The Alhambra



The proposed project is a redevelopment of a 20.61-acre portion of The Alhambra with residential uses and structured parking to support the broader development. The project would retain 902,001 square feet of existing office space, demolish approximately 104,242 square feet of office, industrial and storage buildings, and construct 230 for-sale condominium units and 545 rental residential units. 75 rental units are planned to accommodate residents at the moderate-income level. The project as proposed was recently denied by City Council over environmental mitigation concerns. The site remains a prime redevelopment candidate.

Mariposa



In May 2021, the city approved a development proposal for the proposed Mariposa Affordable Housing Development. The project is a mix of 1- and 2- bedroom units for a total of 50 units in a 7-story building with on-site support services. The project is being developed by American Family Housing. The housing project will be located in downtown Alhambra between 1st and 2nd Street, south of Main Street immediately adjacent to the AT&T property. The project will sit on a 0.42 acre former parking lot. It qualifies for an AB1768 density bonus and will be developed at a density of 119 units per acre.

103 N Chapel Avenue (Related)



In April 2021, the city entered an Exclusive Negotiating Agreement with an affordable housing developer (Related California) for the development of an affordable housing project on a 0.32-acre city-owned site at 103 N Chapel Avenue. The proposed project will be 100% affordable and will include 44 units at low and very low-income levels. A total of 22 units are planned for large families, 11 units for persons struggling with HIV/AIDS, and 11 units for persons experiencing homelessness. The site will be developed at a density of 139 units per acre. This density is not currently allowed on the site, but the city is in the process of amending its zoning ordinance to allow density bonuses consistent with AB1763 throughout the Revitalization District.

Monterey Bay Square (201 E Bay Street)



Monterey Bay Square will be a mixed-use residential and commercial center located on a 1.45-acre site. The site was a consolidation of five separate parcels. The project consists of a six-story mixed-use building with 14,068 square feet of ground-floor retail (3,650 square foot retail and five floors of for-sale residential totaling 62 units). A second building will include a 7-level parking structure with 6,500 square feet of ground-floor retail. The project is developing at 100 percent of allowed density at 43 units per acre. It is expected to be completed in late 2021 or early 2022.

123 Chapel Avenue



The project is a redevelopment of an existing underutilized commercial building on a 0.93-acre site. The project is a commercial/residential mixed-use development that will consist of 3,212 square feet of ground-floor office, and 3 floors residential condos totaling 37 units. The project is developing at 40 units per acre.

101 – 107 Chapel Avenue



The mixed-use commercial/residential project will consist of a 1,000 square foot office area and a 492 square foot residential lobby. A total of 28 residential units will be built on the second, third, and fourth floors. The project site was a consolidation of three separate parcels totaling 30,397 square feet. This consolidation pushed the project over the city's 20,000 square foot threshold to qualify for additional density up to 43 units per acre. The site is developing at 40 units per acre.

Atherton Baptist Homes (625 Commonwealth Avenue)



Atherton Baptist Homes is a multi-life stage community offering independent living, assisted living, and skilled nursing facilities. Atherton's 20-year master plan includes plans to develop 220 additional units on the site. This capacity was included in the city's 5th Cycle Housing Element inventory, but no units were developed in the cycle. In 2017 Atherton amended its development agreement with the city to allow for greater flexibility in the phasing and timing of its site development (Ordinance 4716, 2017). Atherton intends to plan future development in response to market needs. We do not expect all 220 units to develop over the planning period. Given the uncertainty of future development, we assume only 25 percent of build-out capacity may develop over the planning period.

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Specific Plan Capacity

Specific Plans have been highly effective in facilitating development in Alhambra. Among Alhambra's 10 Specific Plans, nine have been fully developed. In addition, of four opportunity sites identified in the West Main Corridor Master Plan, three have fully developed. Alhambra has two plan areas, West Main Master Plan and Valley Boulevard Specific Plan, with remaining development capacity with the potential to develop/redevelop over the planning period.

West Main Corridor Master Plan (2006)

The West Main Corridor Master Plan identified four opportunity sites along the West Main Corridor between 5th Street and 2nd Street. Among these, the only remaining undeveloped site is Site 4. This 1.6-acre site was included as a proposed project in the 5th Cycle Housing Element inventory with a 90-unit capacity consistent with the plan. The site remains a viable redevelopment opportunity.

Valley Boulevard Specific Plan (1990)

The Valley Boulevard Specific Plan (VBSP) was developed in 1990 to guide development and redevelopment of the Valley Boulevard Corridor. The Plan extends along Valley Boulevard from Westmont Drive to New Avenue. It includes 413 parcels totaling 131.5 acres. The plan is divided into five districts and seven land use designations. Residential uses are allowed in the RSP designation, which allows residential development at 43 units per acre. Lot assembly is specifically encouraged in the VBSP:

"An important element of the land use policy is to encourage the assembly or "joining together" of smaller lots into larger parcels, thus discouraging sprawl or strip commercial. In this way, new development can more efficiently utilize the land contained within the planning area. For example,

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a larger development can benefit from the economy of scale, with increased setbacks, more efficient parking, better on-site circulation and better overall design.”

However, the RSP designation also has a 40,000 square foot minimum lot size for residential development. As it stands, only four blocks within the RSP have contiguous parcels capable of meeting the 40,000 square foot threshold, effectively making residential development highly unlikely along Valley Boulevard. This condition is in stark contrast to policies and programs in the city’s 5th Cycle Housing Element, which promotes housing development along Valley Boulevard.

Because the Valley Boulevard Specific Plan is antiquated and generally not supportive of housing production, Program 19 directs the city to conduct a new Specific Plan for Valley Boulevard or remove the existing Specific Plan and rezone the corridor to be more effective at promoting housing production. For this reason, the sites inventory does not include VBSP capacity here. Instead, housing capacity along Valley Boulevard is treated as potential candidate capacity.

The removal of VBSP from existing capacity estimates means that the only remaining specific plan capacity in the city is opportunity Site 4 in the West Main Corridor Master Plan.

Figure 136. Existing Specific Plan Capacity

Source: City of Alhambra

ID	AIN	Lot Size	Zone/SP	Site Size	Allow. Den.	Existing Use	Real Cap. %	Assumed Capacity
SP.1	5338034901	7,637	WMCMP-P	64,451	43	Parking lot	90%	57
	5338034900	15,009	WMCMP-P		43	Parking lot		
	5338034016	6,387	WMCMP-CPD		43	Com. Storefront		
	5338034015	6,625	WMCMP-CPD		43	Com. Storefront		
	5338034014	6,948	WMCMP-CPD		43	Com. Prof. Building		
	5338034037	7,159	WMCMP-CPD		43	Com. Storefront		
	5338034036	3,099	WMCMP-CPD		43	Com. Storefront		
	5338034035	11,587	WMCMP-CPD		43	Com. Storefront		

Existing Vacant Site Capacity

The City of Alhambra has very little existing vacant land available for residential uses. There are only 11 vacant sites totaling 5.5 acres. Most of this capacity is on R-1 sites. At existing zoning, these sites have the capacity for 59 residential units.

Figure 137. Existing Vacant Site Capacity

Source: ECONorthwest and City of Alhambra

ID	AIN	Zoning	Size	Max Density	Realistic Capacity	Realistic Units
V.1	5345017015	R-3	0.87	24	90%	41
	5345018901	R-3	1.03			
V.2	5352020006	R-3	0.14	24	90%	3
V.3	5351019028	R-1	0.16	1	100%	1
V.4	5351019027	R-1	0.16	1	100%	1

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V.5	5351021034	R-1	0.12	1	100%	1
V.6	5353013020	R-1	0.14	1	100%	1
V.7	5346015004	R-1	0.19	1	100%	1
V.8	5322008007	R-1	1.44	5	100%	5
V.9	5322008038	R-1	0.57	2	100%	2
V.10	5322008037	R-1	0.42	2	100%	2
V.11	5322008036	R-1	0.26	1	100%	1
		Total	5.5			59 units

A R-1 allows for one unit per lot. Density calculations reflect lot split potential consistent with neighboring lot sizes.

Existing Nonvacant Underutilized Site Capacity

These sites are those that were previously identified to meet the city's RHNA in the 5th Cycle but were not developed. Using available information, we did not identify any new constraints on these sites that were not previously identified. These sites were evaluated for their appropriateness to remain in the inventory under current conditions. Examples of sites that were removed include sites that do not meet current state criteria for redevelopment inclusion, remnant portions of sites that were part of an assemblage that was partially developed and are not likely to redevelop on their own, and sites that did not redevelop but did have some meaningful improvement that makes redevelopment less likely. This process removed all or portions of nine previously identified sites.

Taken together there are 64 sites that were previously identified and remain appropriate to include in the inventory. Under existing zoning these sites have the total theoretical capacity for 606 units. Among these, 277 are at densities suitable for lower-income units. In the 5th Cycle, all sites with lower income capacity were allocated to lower income units. In this cycle, lower-income is allocated only to a portion of lower-income sites to reflect the likelihood that mixed-income properties have better potential to deliver lower-income units.

Figure 138. Summary of Existing Residential Capacity

Source: ECONorthwest and City of Alhambra

Category	Theoretical Capacity	Existing Units	Realistic %	Realistic Net-new Capacity ⁶³
RHNA5 Existing Capacity	606	145	90%	412

Lower Income Sites Identified in the Previous Housing Element

California Housing Element law states that a nonvacant site identified in the previous planning period and a vacant site that has been identified in the previous two consecutive planning periods cannot be used to accommodate lower-income RHNA unless the site is subject to a policy in the Housing Element that requires rezoning within three years of the start of the planning period to allow residential uses by right for projects where at least 20 percent of the units are made affordable to lower-income households.⁶⁴ Some sites designated for lower-income housing have been used in previous housing element cycles and are denoted as such in the inventory. Housing

⁶³ Calculated as the maximum achievable capacity on RHNA5 sites for determination of RHNA shortfall. Actual capacity included on RHNA5 site reported in Figure 103 includes the impact of upzoning on these sites as well as the calculation of development likelihood as described in the methodology below.

⁶⁴ Government Code Section 65583.2(c)

Element Program 18 commits the city to allow residential uses by right on these sites consistent with State law.

Potential Candidate Capacity

Existing residential capacity defined above falls well short of meeting the city’s RHNA targets. Taken together, The city of Alhambra has existing capacity of 1,691 units with only 471 units allocated on sites suitable to accommodate lower-income development. **This leaves a residual shortfall of 5,134 units.**

Figure 139. Summary of Existing Residential Capacity

Source: ECONorthwest and City of Alhambra

Capacity Type	Lower	Moderate	Above Mod.	Total
Proposed	200	33	693	926
Specific Plan	24	14	19	57
Vacant	0	19	40	59
Existing Nonvacant Capacity	226	83	103	412
Total	450	149	855	1,454
<i>6th Cycle RHNA</i>	<i>2,810</i>	<i>1,079</i>	<i>2,936</i>	<i>6,825</i>
Residual Shortfall	2,360	930	2,081	5,371

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Market conditions are conducive to redevelopment in Alhambra, but redevelopment is not occurring at a pace consistent with the city’s RHNA target. The ratio of available zoned capacity relative to existing developed density is a contributing factor. In other words, the maximum value that could be created by redevelopment is commonly not sufficient to outperform the existing use. An increase in allowed capacity that translates into greater residual land values can improve this condition. Other governmental and nongovernmental constraints have also been identified.

Residential capacity defined in this section is reflective of actions the city will take to increase residential capacity and remove constraints through policies, programs, and land use amendments to promote redevelopment.

Accessory Dwelling Units (ADUs)

ADUs are an effective housing type that leverages existing infrastructure and can increase residential capacity in single-family neighborhoods that are typically located in high-resource areas. ADUs can be successful in eliminating overcrowding in existing households and serving multigenerational housing needs. ADU production has accelerated in California in recent years following State legislation in 2017 and 2019 that limited local restrictions on ADUs.

The City of Alhambra enforces State ADU guidelines and Program 10 of the 5th Cycle Housing Element directs the city to offer development assistance and monitor ADU trends. The city maintains a bi-annual report tracking ADU production. ADU interest and activity has accelerated in recent years. Between January 2017 and December 2020, the city received 170 ADU development applications. In 2020 it received 67 applications, an 87.5 percent increase in the annual rate from the previous years. The city’s May 2020 status report shows that of the initial 104 applications between 2017 and 2019, 16 units had been completed, 37 were under construction, and 23 were in plan check. A total of 10 applications had expired or been withdrawn and the remainder were in planning review.

Estimated ADU Capacity

HCD allows jurisdictions to rely on a safe harbor calculation of projected ADU capacity where meaningful analysis supporting an alternative assumption cannot be provided. This calculation allows jurisdictions to project forward the local trend in ADU construction since 2018. For this analysis The City evaluated and updated ADU reporting to HCD and its internal records. The city maintains its own biannual report of ADU applications and permitting activity⁶⁵. This data shows that in the two-year period from 2018 to 2019, the city received 67 unique ADU applications. In the subsequent two-year period, applications more than doubled to 158 applications. By year end in 2022 the city had received 227 application and permitted 109 ADUs. Extrapolated across a two-year period this would equate to 299 applications and 182 permitted ADUs in 2021 and 2022 Given this trajectory it would be reasonable to assume that Alhambra would receive at least 100 to 150 applications annually over the planning period considering an implementation of a strong ADU program detailed in Program 26. The city would have to convert 50 to 75 percent of applications to permits to achieve its ADU production target of 60 units per year.

Comparing applications to permitted units across any given year is challenging because an application received each year may not be permitted in the same year (for example, an application submitted in December 2020 would not be permitted until 2021.

Figure 140. Summary of ADU Activity

Source: ECONorthwest and City of Alhambra

Year	Applications	Permitted ⁶⁶
2018	36	27
2019	31	30
2020	86	19
2021	72	73
2022	227	109

Over the 6th Cycle, Alhambra intends to redouble its efforts to promote ADU production in the 6th Cycle. Program 26 commits the city to updating its ADU ordinance and to study and implement a comprehensive ADU program to accelerate ADU production.

Combined with new programs, the development pattern in Alhambra is very suitable for ADU development. The characteristics of properties that saw ADU production in Alhambra between 2017 and 2019 were studied. This survey included 50 properties and revealed common characteristics of ADU sites in Alhambra:

- Sites with R-1 or R-2 zoning
- Existing improvements built prior to 1960
- Lots that were bigger than 6,000 square feet and less than 12,000 square feet
- Existing lot coverage between 15 and 45 percent

⁶⁵ <https://www.cityofalhambra.org/262/Accessory-Dwelling-Unit-ADU>

⁶⁶ Comparing applications to permitted units across any given year is challenging because an application received each year may not be permitted in the same year (for example, an application submitted in December 2020 would not be permitted until 2021.

- Lots with a detached garage

We compared these characteristics to the universe of R-1 and R-2 sites in Alhambra to calculate that there are 7,396 qualified lots in Alhambra that meet all these criteria. This represents total ADU potential in Alhambra. Alhambra’s ability to convert just 0.75 to 1.25 percent of these lots annually would result in 443 to 740 ADUs over the planning period, which is in line with trends under existing policies. It is reasonable to assume the city could expect to produce 480 ADUs over the planning period.

We attempted to conduct a survey of ADU rental data in Alhambra to determine ADU affordability, but there were no meaningful observations. In lieu of local data, SCAG has produced a regional survey outlining ADU affordability levels that we use as a foundation.

Figure 141. Summary of Estimated ADU Capacity

Source: ECONorthwest, SCAG, and City of Alhambra

	Extremely Low/Very Low	Low	Moderate	Above Mod.	Total	% of qualified lots
% ⁶⁷	17%	43%	6%	34%	100%	N/A
Units	82	206	30	162	480	6.5%

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ADU capacity assumed in this sites inventory is reflective of stronger policies and programs to support ADU development. Given uncertainty of these impacts on actual production, **Program 26 commits the city to continue to conduct an annual ADU production survey and Program 40 includes a mid-cycle evaluation of ADU production and an adjustment to its capacity estimates if ADU production falls well short of estimates.**

New Nonvacant Infill/Redevelopment Capacity

New redevelopment capacity is estimated as the result of proposed amendments to the city’s zoning code to increase allowed density in existing residential areas and allow housing where it is not currently allowed. Program 19 commits the city to make these zone changes and study necessary amendments to development standards to achieve assumed densities as a part of its ongoing Comprehensive Zoning Code update. We expect that flexibility or changes in height limits, parking requirements, and FAR would be necessary to achieve higher redevelopment densities in some areas. Implementing these changes early in the planning period as a part of the Code Update increases the likelihood of redevelopment. Proposed amendments include:

- 1) Increasing maximum density in the R-2 zone from 12 to 18 units/ac to encourage middle-housing typologies. This change is strengthened by Program 24 to encourage middle-housing.
- 2) Increase maximum density in R-3 to 24 units/ac for sites under 10,000 square feet. Allow density up to 43 units/ac for sites larger than 10,000 square feet.
- 3) Removing density reductions in the R-3 zone for adjacency to R-2. Preserve density reduction in R-3 for adjacency to R-1 at a maximum of 24 units/ac and density reduction to 12 units/ac along Electric Lane.

⁶⁷ Allocations from SCAG survey of regional ADU affordability

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- 4) Increase maximum density in the CPD and P zones outside of the Downtown from 30 to 48 units/ac.
- 5) Increase maximum density in the area bounded by Atlantic Boulevard, West Woodward Avenue, West Commonwealth Avenue, and Chapel Avenue from 43 to 64 units/ac.
- 6) Allow housing in the EMC zone at a maximum density of 30 units/ac between Chapel Avenue and Granada Avenue.
- 7) Allow housing in the PO zone along Garfield Boulevard consistent with the R-3 zone.
- 8) Repeal the Valley Boulevard Specific Plan and replace with a new zone and development standards allowing housing along the corridor at a maximum density of 43 units/ac.
- 9) Allow limited housing types in the IPD zone at a maximum density of 43 units/ac.

Figure 142. Summary of Proposed Land Use Changes

Source: ECONorthwest and City of Alhambra

Zone	Current Maximum Density	Proposed Maximum Density
R-2	12/ac	18/ac
R-3 (not include adjacent zone reductions)	24/ac (less than 20,000 sq. ft.) 30/ac (greater than 20,000 sq. ft.)	24/ac (less than 10,000 sq. ft.) 43/ac (greater than 10,000 sq. ft.)
CPD/P	24/ac (less than 20,000 sq. ft.) 30/ac (greater than 20,000 sq. ft.)	48/ac
CBD	43/ac	64/ac
EMC	Not allowed	30/ac
PO (Garfield)	Not allowed	24/ac (less than 10,000 sq. ft.) 43/ac (greater than 10,000 sq. ft.)
VBSP (RSP)	43/ac (greater than 40,000 sq. ft.)	43/ac
IPD	Not allowed	43/ac

Underutilized Nonvacant Site Capacity Model Methodology

Because larger sites are more flexible and allow for economies of scale, they tend to attract greater interest from housing developers and are more likely to redevelop. **Alhambra’s zoning code also incentivizes larger site development through greater allowed densities and minimum project size for ownership product.** The parcelized nature of Alhambra’s development pattern presents a challenge for redevelopment, and the assemblage of parcels into more scalable development sites will play a significant role in development moving forward.

To identify assemblage opportunities, the city developed an algorithmic spatial model to estimate capacity on nonvacant sites in the context of proposed zoning and programming actions. This approach looks at land development the way a developer would, by identifying sites that maximize value, and looking to acquire or assemble adjacent only

Efforts to Support Lot Consolidation

Under Goal 3.0 of the city’s 5th Cycle Housing Element, Program 7 and Program 8 included program objectives to support lot consolidation through processing assistance, counseling, and technical assistance, and within the CBD, encouraging lot consolidation for mixed-use development and facilitate the assembly of land and recycling of underutilized properties. Support for lot consolidation is embedded in the city’s zoning and development standards. As previously discussed, high-density residential zones have higher allowed densities for sites greater than 20,000 square feet. The city also requires for-sale condominium development have a minimum of six units. In the 6th Cycle Housing Element, the city is further strengthening its lot consolidation policy by Program 25.

when it would the potential value of the development. Proposed rezoning allows for new capacity by allowing housing in more places. Proposed upzoning increases capacity in two ways. First, increases in allowed density increases capacity on sites that are currently market feasible. Secondly, the increase in density can create value that makes redevelopment more likely on sites that previously had lower redevelopment potential. The model considers current market conditions that are supportable for redevelopment and the city's efforts to promote lot consolidation through its policies and programs.

Modeling Framework

This process begins with the universe of parcels in Alhambra and excludes parcels from consideration, removing parcels with proposed projects, sites from the previous inventory, open space, public facilities, and R-1 parcels with existing residential. Within the model each parcel is spatially assembled with all its neighboring parcels (and its neighbors' neighbors, etc.) that are located on the same city block until all possible permutations of contiguous parcel assemblages have been created. Assemblages do not mix zones (e.g., an R-2 parcel will not be assembled with an R-3 parcel, even if they are touching), and must be contiguous (they do not cross from one city block to another).

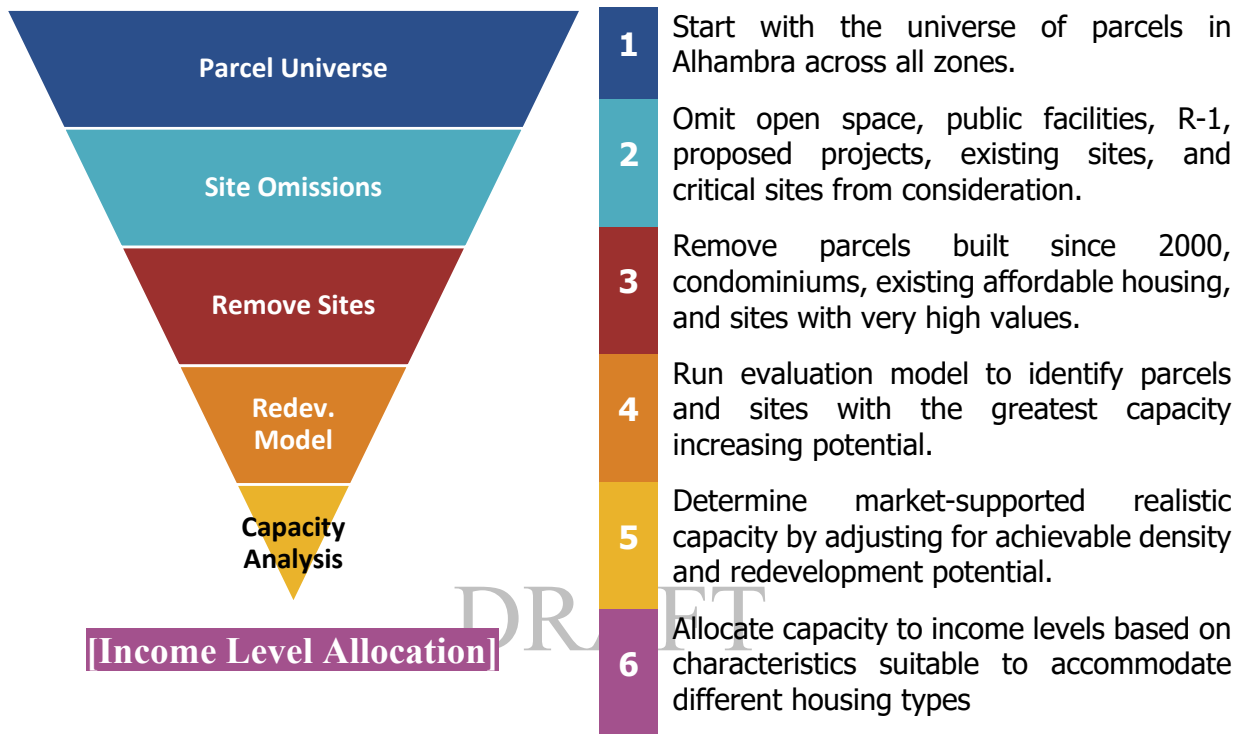
This process creates tens of thousands of new hypothetical parcels and site assemblages, for which are calculated the new allowed density based on the assemblage's zoning designation (with proposed amendments) and its surface area. In order to more accurately align with housing market characteristics and promote sites with the greatest redevelopment likelihood, the model again filters to select *only* assemblages that:

- Omit parcels that were manually identified as having critical economic or other likely impediments that would make redevelopment very unlikely. Taken together 116 parcels totaling 164 acres were omitted outright.
- Have constituent parcels with improvements built before 2000. 94 percent of all parcels in the model had improvements built before 1980.
- Limit the number of assembled parcels to four or less consistent with recent patterns⁶⁸. 93 percent of all assemblages has three or fewer parcels. Parcels with assemblages factored into likelihood calculations.
- For existing residential uses, including a redevelopment factor (increase in net units) of 2.5 or greater in the R-2 zone and 3.0 or greater in all other zones.

From the remaining assemblages, the model selects the most efficient assemblages (in terms of net new units) on each block that do not overlap with one another and calculates the total number of net-new units by zone, for each site. The effectiveness of this approach is an identification of optimal parcels or parcel assemblages that deliver the greatest increase in redevelopment capacity and realistic development likelihood. By deploying a model that identifies assemblages that optimize an increase in value, the site inventory can assist the city in identifying opportunities to facilitate lot consolidation and serve as a resource for the market. Taken together the model identified 1,300 unique sites or assemblages totaling 23,491 units of theoretical capacity. However, this calculation does not include the rate at which sites can develop to maximum density or the likelihood that redevelopment to residential uses could replace in-place value of an existing use.

⁶⁸ Subsequent manual amendments to sites was made manually on sites where greater assemblage was likely.

Figure 143. Candidate New Non-Vacant Site Identification Methodology
 Source: ECONorthwest



Capacity Analysis: Impediments and Redevelopment Likelihood

To further establish the realistic market-supportive capacity of sites identified in the model, we evaluated each site across a series of factors that are indicative of realistic capacity and redevelopment potential. These include:

1. Development Likelihood Adjustment

Existing uses are the primary impediment to redevelopment. Many of the sites with known impediments due to social, economic, and cultural factors were already removed from consideration (i.e., newly renovated structures, high-performing auto dealerships and shopping centers, historic buildings, institutional uses). Development likelihood is further determined based on the following factors:

Age of Existing Improvements. All tax lots where the primary structure was built within the last 20 years were omitted outright. Tax lots with older structures were considered more likely to redevelop.

Redevelopment Indicators. Common metrics that are indicative of redevelopment potential are land to improvement ratio (L: I) and total value per square foot. L: I measure the value of land relative to improvements. The greater the ratio the more likely development is to occur. Value per square foot calculates the assessed in-place value of both land and improvements per square foot of land. This rate is compared to thresholds observed in the market for what developers are paying for redevelopment sites. All sites were scored based on these criteria. Sites that score strongly in both metrics are considered the strongest candidates for redevelopment. Sites scoring poorly are not considered reuse sites.

Figure 144. Redevelopment Factor Scoring
Source: ECONorthwest

L: I Ratio	Total Value Per-Square Foot of Land		
	< \$65	\$65 - \$90	>\$90
> 2.0	Strong	High	Medium
1.0 - 1.99	High	Medium	Low
< 1.0	Medium	Low	Weak

- For commercial zones, only sites with strong, high, and some medium redevelopment potential are eligible for inclusion as sites. Along with new standards that allow 100% residential in commercial zones, and weak market conditions for commercial office, this limits to the sample to the sites that are most likely to develop for residential uses. All low and weak scoring sites were not included at all.
- For residential zones (R-2, R-3), only sites in the strong and high categories were included. All other sites were not included.

Commercial Office Market

- Delivered only 40k sf in last decade
- Over 250k sf for sale or vacant
- Only two Class A buildings in the market
- Class A rents are 15 percent below the submarket average, 30 percent below regional average.

Source: CoStar (2022)

Residential Redevelopment Factor. As a baseline in the model, only residential sites that had the ability to increase capacity by 2.5x in the R-2 zone and 3.0x in the R-3 zone were included for consideration in the inventory. However, candidate sites were further limited to those with a 4.0x factor for R-3 sites and 3.0x factor for R-2 sites. For example, for an R-3 site to be considered at all, it must have the ability to accommodate a minimum of 4.0x the existing number of units on the site. R-2 sites are further constrained. We assume a 50% factor of *remaining sites* to account for lower rates of residential recycle.

Existing Use. Condominium development and existing affordable housing was omitted outright. To the extent data was available, non-residential uses considered the character and nature of the existing use. **Where available, site location, lease data, vacancy rates, recent transactions, tenant profile, improvement quality, and site utilization were also considered to manually revise site inventory where appropriate.**

1. Realistic Capacity Adjustment

Figure 130 previously reported that development in Alhambra is currently able to build to 90% of maximum capacity on average. This rate is assumed in this analysis. However, a subset of sites identified are relatively small, irregular, or otherwise constrained that may limit the ability to reach higher maximum densities. **For sites that are smaller than a half-acre and have a maximum of 30 units/ac or more, realistic capacity is reduced to 70% of maximum.**

Figure 145 includes some example capacity calculations based on these assumptions.

Figure 145. Example Capacity Calculations

Source: ECONorthwest

Zone	Size (ac.)	Allowed units/ac	Max Capacity	Redev. Factor	Realistic Capacity	Redev. Strength	Assumed Capacity ⁶⁹	Notes
R-3	1.00	43	43.0	4.0	90%	High (80%)	31	Standard calculation for High
CBD	1.00	64	64.0	4.0	90%	Med (50%)	29	Standard calculation for Med
R-3	1.00	43	43.0	4.0	90%	Med (50%)	19	Standard calculation for High
R-3	1.00	43	43.0	3.5	90%	High (80%)	0	Redev. Factor < 4, site not included
R-3	0.45	43	19.4	4.0	70%	High (80%)	11	Lower realistic capacity for small size with high DUA
R-2	0.30	18	5.4	3.5	90%	High (80%)	2	Capacity reduced for R-2 residential recycle

Development Trends on Nonvacant Sites

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Nonvacant sites selected for inclusion in the inventory according to the methodology described above have been chosen because they represent the best opportunities to add units to the city’s housing stock based on criteria consistent with redevelopment potential. To exhibit how some of these criteria relate to historical development patterns and the range of potential future redevelopment opportunities, we include some example nonvacant redevelopment projects below. When interpreting this information, it is also important to recall that through the implementation of the Housing Plan in this Housing Element, the city will be making significant regulatory changes that will alter the historical development pattern and make development more feasible in many zones (i.e. increasing allowed densities, removing commercial space requirement in mixed-use zones, expanding flexibility in development standards, reducing parking requirements).

In the examples below, we use the best available information to demonstrate observed redevelopment trends on nonvacant sites and how factors present at successful redevelopment projects relate to those used to nonvacant candidate sites in the inventory. This exercise relied heavily on point-in-time observations from aerial photography and data from the Los Angeles County Assessor’s office. Below we present:

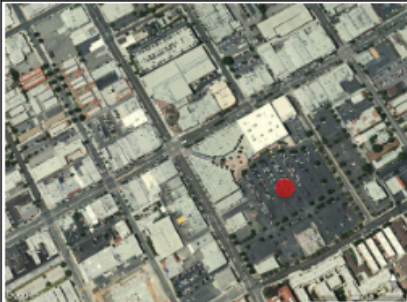
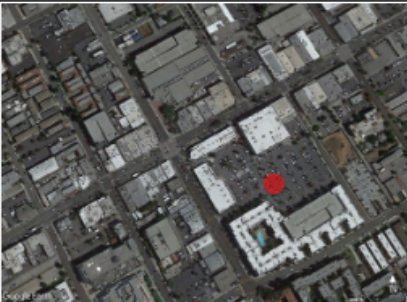

Previous Use. An evaluation of available information on the previous use of a redeveloped property.




New Use. Characteristics of the new use that the property was redeveloped to.

Inventory Example. An example of a site in the current inventory that has characteristics similar to the observed trend.



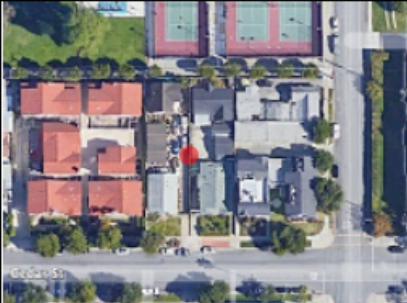
⁶⁹ Rounded

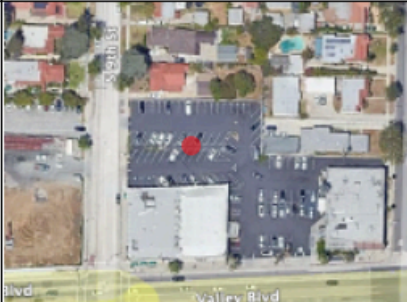
ATTACHMENT 4.E

Example 1: Large-scale Commercial Redevelopment (88 S Garfield Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Underutilized shopping center (30-35 years old)	The project was redeveloped through a Specific Plan to a mixed-use development with retail and 260 residential units at 100% of allowed density.	Use: Underutilized shopping center (28 years old) high vacancy
Allowed Density: 43/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 1.0		Redevelopment: Land to improvement ratio above 1.0
Price: Sold at \$52 psf		Price: Assessed at \$29 psf
Commercial parcel assemblage: Yes		Commercial parcel assemblage: Yes



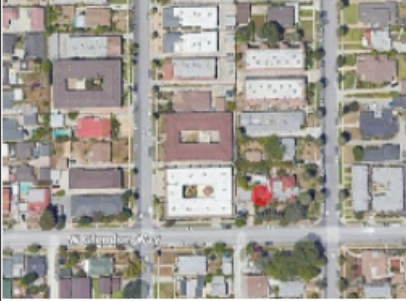
Example 2: Excess Parking Lot Redevelopment, Irregular Lot (210 Monterey Street)		
Previous Use	New Use	Inventory Example
		
Use: Underutilized parking lot. Irregular parcel (0.79 acres)	The project was redeveloped into a 55+ senior housing center with 42 units.	Use: Underutilized parking lot. Irregular parcel (0.89 acres)
Allowed Density: 43/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0		Redevelopment: Land to improvement ratio above 2.0
Price: Assessed at \$47 psf		Price: Assessed at \$29 psf

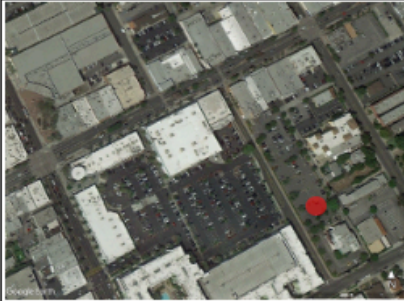

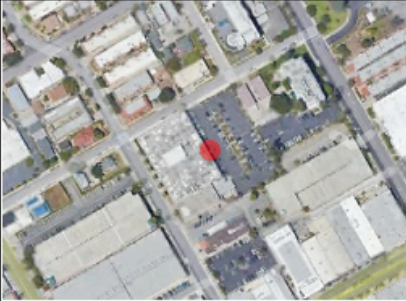
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Example 3: Small Lot Consolidation with Multiple Units (117 North Palm Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Two adjacent parcels with three units in single-family homes (100+ years old)	Redevelopment of two single-family lots into a seven unit condominium project.	Use: Two adjacent parcels with three units in single-family homes (100+ years old)
Two lot assemblage (0.37 acres)		Two lot assemblage (0.41 acres)
Allowed Density: 24/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; redev. factor = 2.6		Redevelopment: Land to improvement ratio above 2.0; redev. factor = 6.4
Price: Assessed at \$108 psf		Price: Assessed at \$28 psf



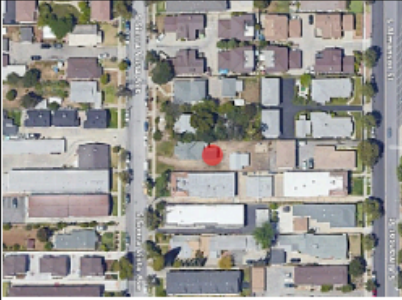
Example 4: Excess Parking Infill (115 E Mclean Street)		
Previous Use	New Use	Inventory Example
		
Use: Storage and parking space adjacent to high-density residential uses. (40+ years old)	Redevelopment of a regular shaped lot with low value parking and storage improvements into a six unit residential development	Use: Parking space adjacent to high-density residential uses. (70+ years old)
Two lot assemblage(0.29 acres)		Single parcel (0.51 acres)
Allowed Density: 24/ac.		Allowed Density: 43/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0		Redevelopment: Land to improvement ratio above 2.0
Price: Assessed at \$63 psf		Price: Assessed at \$29 psf

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Example 5: Multiple Lot Consolidation in R-3 Zone (800 N Garfield Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Three adjacent single family lots with three units (age unknown).	Redevelopment of three parcels, each with single family homes, into a 14-unit multifamily development at 100% of allowed density.	Use: Two adjacent single-family lots with two units (99 years old)
Three lot assemblage (0.49 acres)		Two lot assemblage (0.60 acres)
Allowed Density: 30/ac.		Allowed Density: 18/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 4.6		Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 5.5
Price: Assembled parcel sold for \$1.85 million (\$87 psf)		Price: Assessed at \$16 psf

Example 6: Redevelopment of Underutilized Freestanding Commercial (201 E Bay Street)		
Previous Use	New Use	Inventory Example
		
Use: Parking lots along with a single-tenant freestanding commercial building (30 years old)	Redevelopment of a freestanding retail building (demolished) and parking lots into a 62 unit multifamily project and parking garage. Project is currently under construction.	Use: Parking lots along with a single-tenant freestanding commercial building (54 years old)
Five lot assemblage (1.44 acres)		Five lots (single owner) (2.2 acres)
Allowed Density: 43/ac.		Allowed Density: 64/ac. (proposed)
Price: Sold at \$130 psf in 2017		Price: Assessed at \$71

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Example 7: Single lot Redevelopment of Single-Family (825 Sierra Vista Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Single-family residence on a standard 0.21 acre lot (over 100 years old)	Redevelopment of the existing single-family residence (demolished) into four units.	Use: Single-family residence on a standard 0.21 acre lot (over 100 years old)
Standard single-family lot (0.21 acres)		Standard single-family lot (0.21 acres)
Allowed Density: 24/ac.		Allowed Density: 43/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 4.0		Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 6.0
Assessed at \$22 psf		Assessed at \$45 psf

Summary of Potential Candidate Site Analysis

The combination of comprehensive rezoning and upzoning strategies identified in Program 19 results in significant increases in realistic market supportive residential capacity in Alhambra. In total, changes resulted in 1,299 sites totaling 23,470 units of maximum theoretical capacity. **Only a share this capacity is located on sites with any potential to redevelop.** Our model identified 509 sites with theoretical capacity for 8,983 units, roughly 38% of total theoretical capacity. Many of these sites are small, or residential recycle sites in the R-2 and R-3 zones. Further adjustments to capacity were included to reflect realistic capacity and redevelopment potential. Taken together, adjusted capacity on these sites is 5,571 units.

Site capacity is dispersed throughout zones across the city. Nearly all sites that met the minimum threshold for lower-income allocation (between .5 and 10 acres, minimum density of 30/ac) were necessary to address lower-income RHNA need.

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Figure 146. Summary of Potential Candidate Nonvacant Sites

Source: ECONorthwest

	Sites	Parcels	Theoretical Capacity
In Model	1,299	2,742	23,470
On Potential Candidate Sites included in inventory	509	1,113	8,983
Share of Model	39%	41%	38%
Counted Capacity	5,556		
Share of Site Capacity	62%		
Share of Model Capacity	24%		

Zone	Lower	Moderate	Above Mod.	Total
CBD/P	249	84	170	502
CPD	753	208	425	1,386
EMC	110	32	65	207
PO	274	94	204	571
Valley	689	223	470	1,389
IPD	140	31	54	225
R-2	23	61	344	428
R-3	123	222	512	871
Total	2,360	954	2,243	5,556

Adequacy of Site Inventory

Once proposed zoning amendments are in place for sites in the inventory to be rezoned, the city can meet or exceed its RHNA for the 2021-2029 planning period. Figure 147 summarizes the sites inventory and RHNA status. Detailed information for each site is included in Appendix A.

Figure 147. Site Capacity by Source and Income Level. RHNA Surplus/Shortfall

Source: ECONorthwest

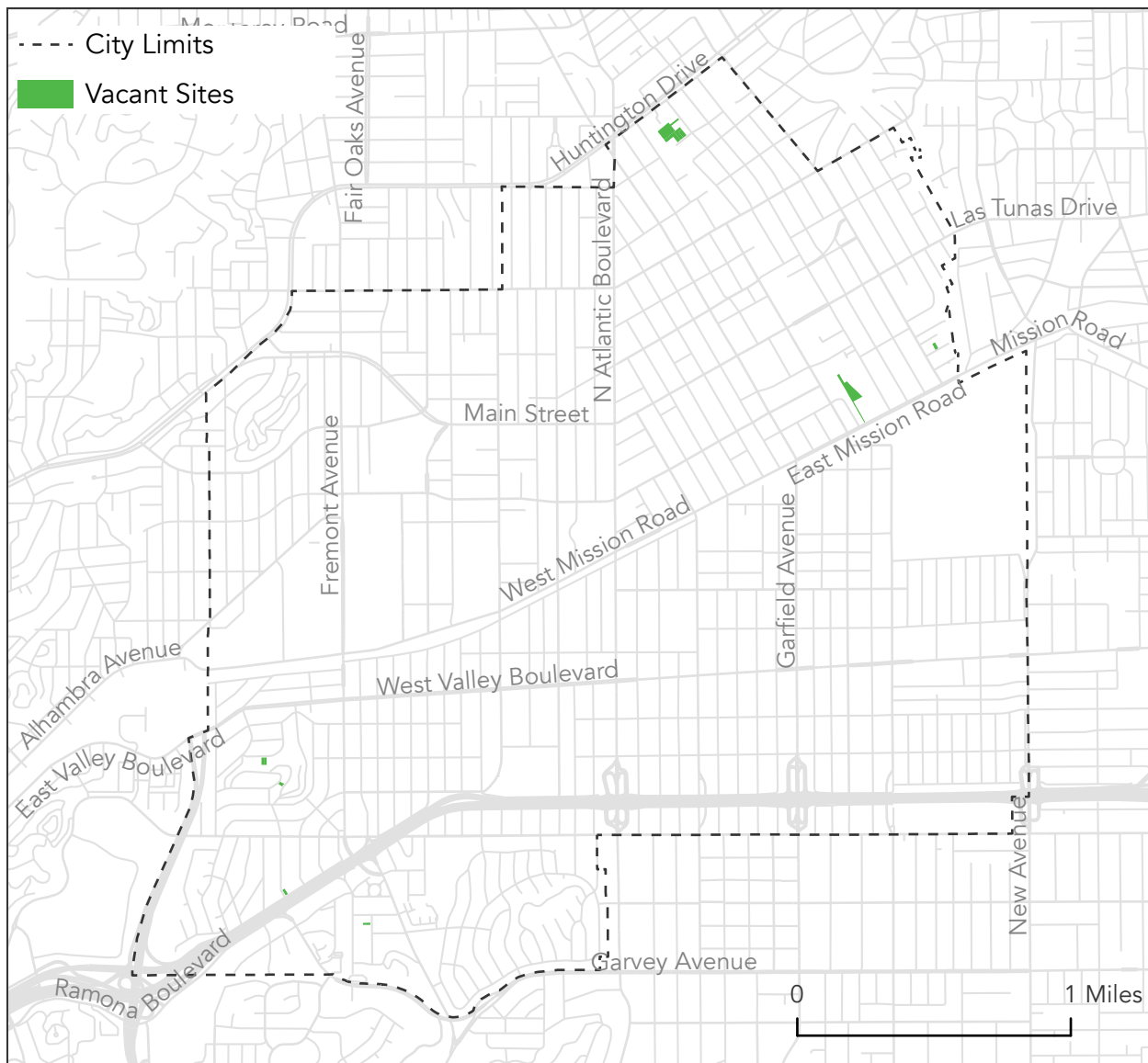
Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above Mod. Income	
Proposed Projects	94	106	33	693	926
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	113	214	11	142	480
New Sites	1,543	831	951	2,237	5,562
Total Sites	1,802	1,331	1,120	3,389	7,642
2021-2029 RHNA	1,774	1,036	1,079	2,936	6,825
Surplus/Shortfall	28	295	41	453	817

^A Includes capacity from increases in allowed density on existing sites

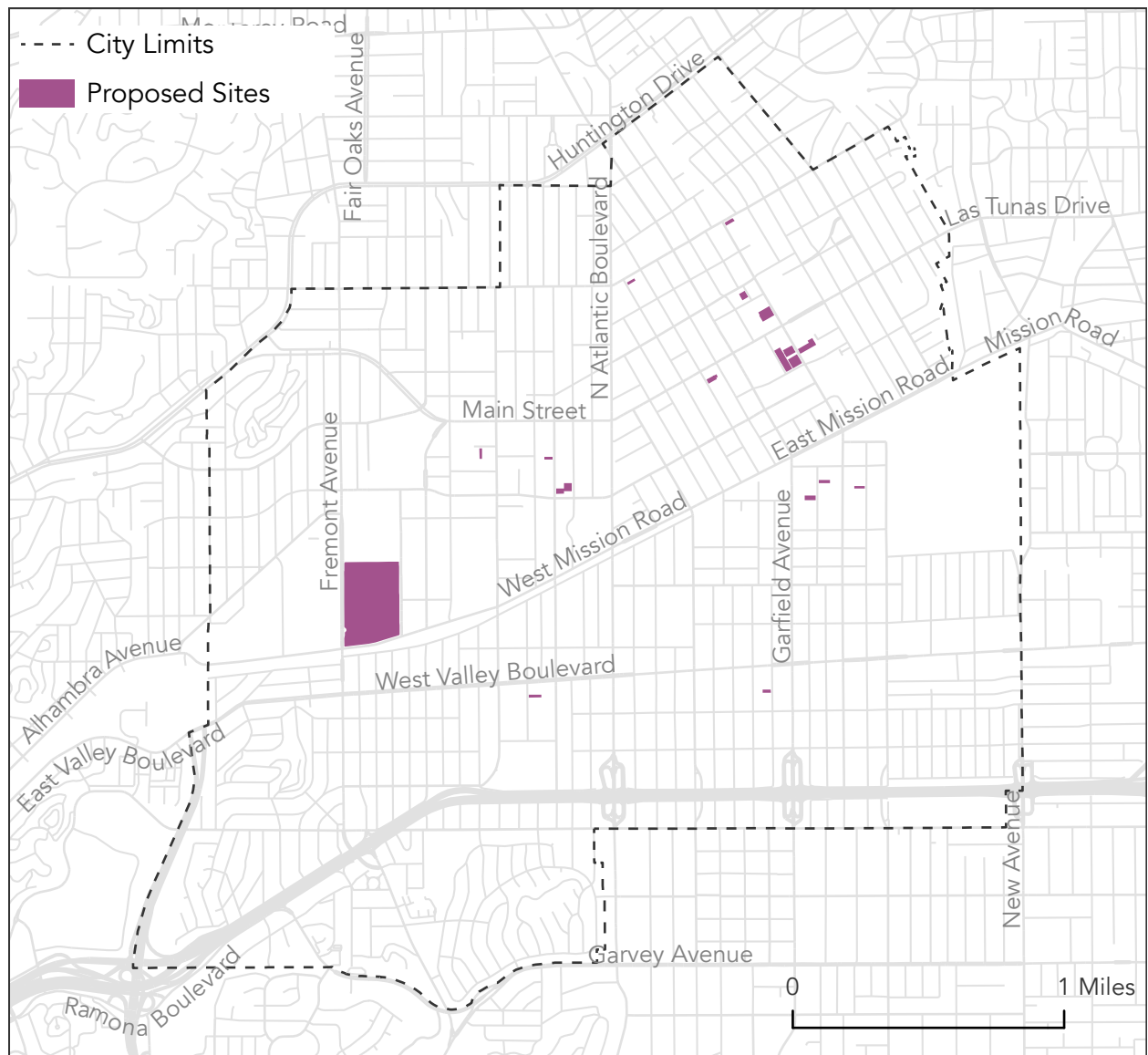
APPENDIX A
SITES INVENTORY

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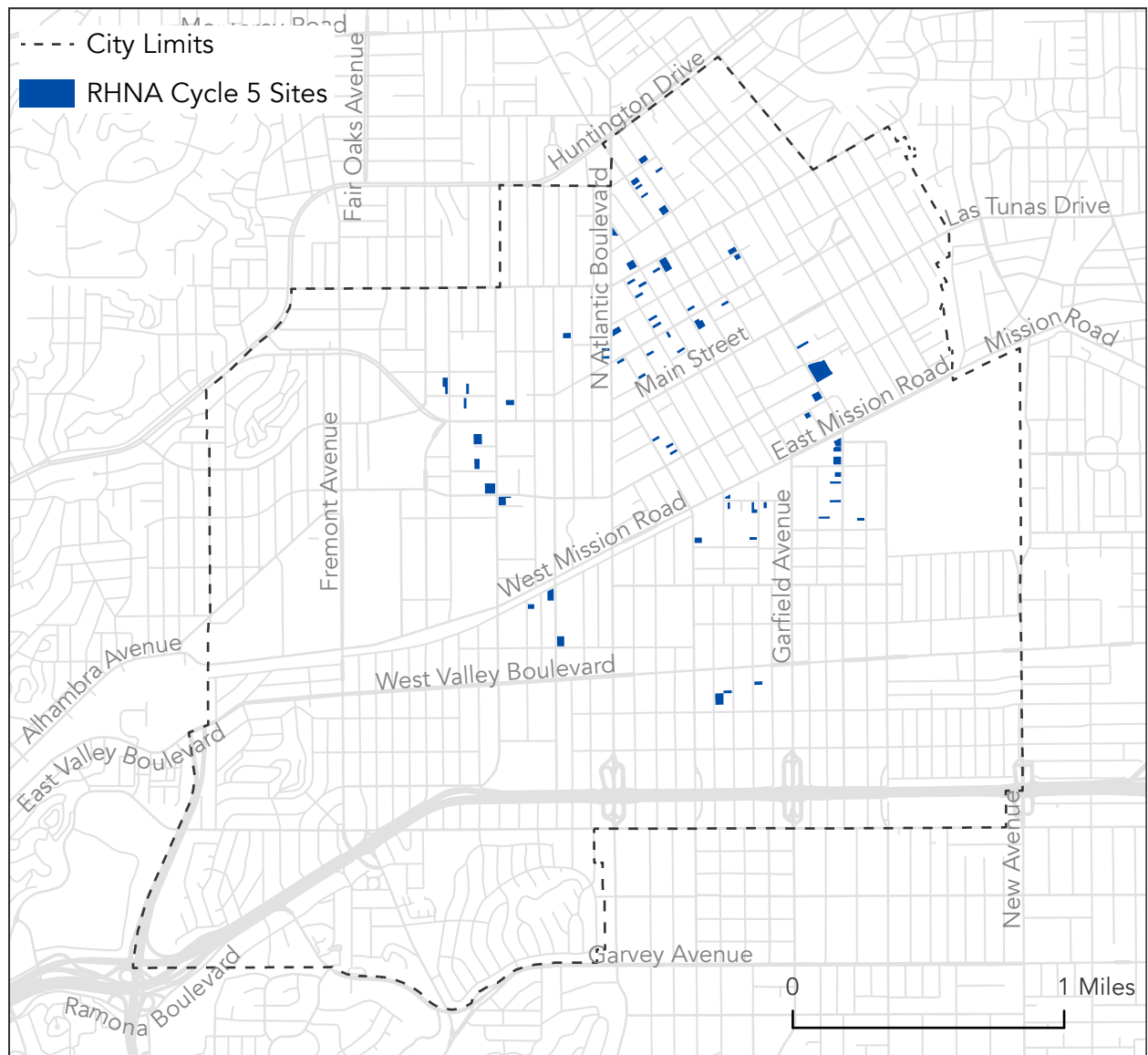
Map of Existing Vacant Sites



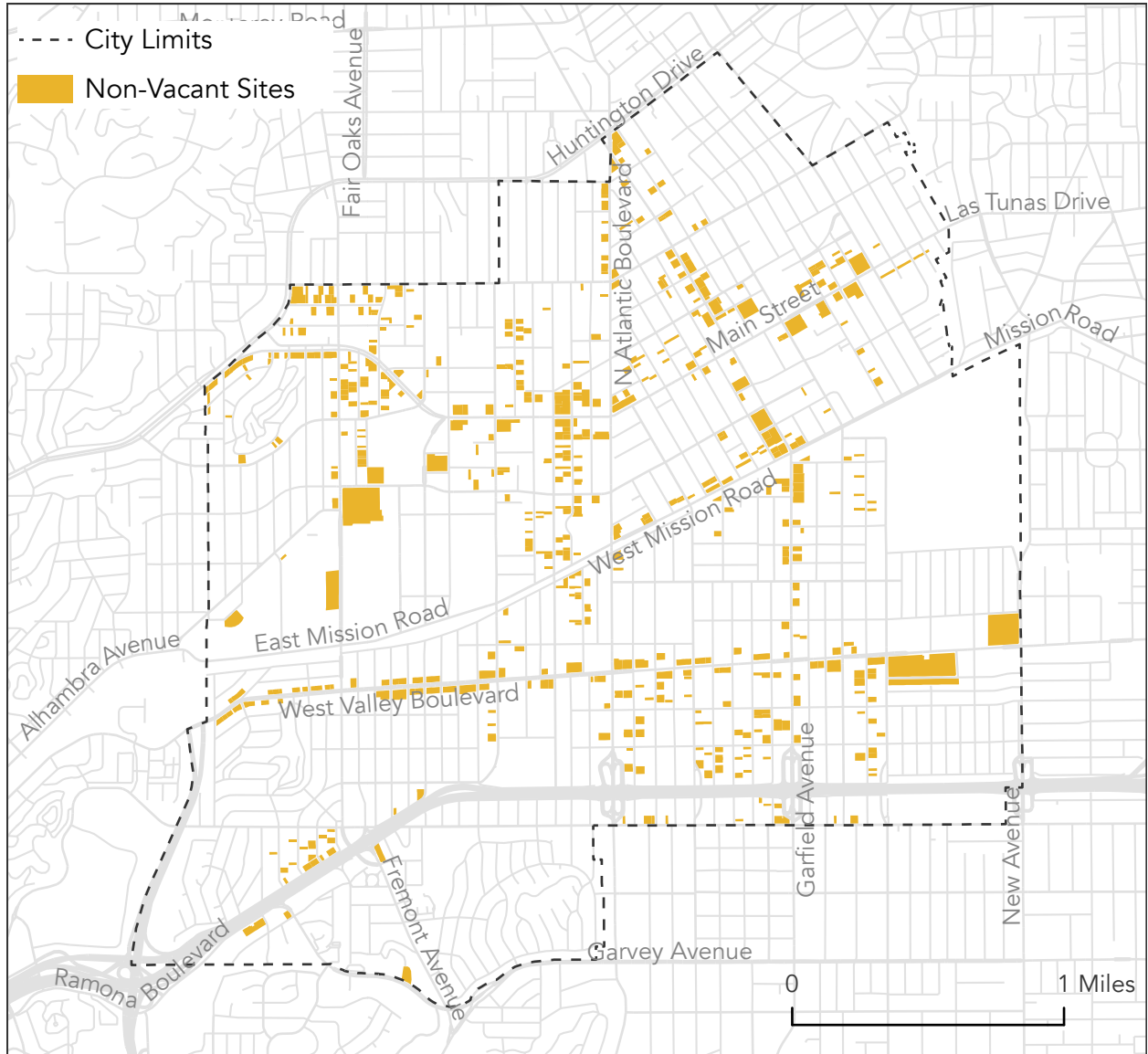
Map of Planned and Proposed Projects



Map of Existing Nonvacant Sites (from RHNA5 Inventory)



Map of New Nonvacant Sites



ATTACHMENT 4.E

Detailed Site Inventory Table

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Use Year	Imp Ratio	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
															In Place Value/SF	Redev Ratio	Land : Imp Ratio	Score				Lower	Mod.	Above
V.1	5345017015	0.87	N/A	High Density Residential	R-3	Vacant	1.90	Vacant	No	24	41	100%	N/A	No imp.	\$4.99	No res.	N/A	41	Above Moderate	0	0	41		
V.1	5345018901	1.03	N/A	High Density Residential	R-3	Vacant	1.90	Vacant	No	24	41	100%	N/A	No imp.	\$4.99	No res.	N/A	41	Above Moderate	0	0	41		
V.2	5352020006	0.14	N/A	High Density Residential	R-3	Vacant	0.14	Vacant	No	24	3	90%	N/A	No imp.	\$4.52	No res.	N/A	3	Above Moderate	0	0	1		
V.3	5351019028	0.16	N/A	Low Density Residential	R-1	Vacant	0.16	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$8.72	No res.	N/A	1	Above Moderate	0	0	1		
V.4	5351019027	0.16	N/A	Low Density Residential	R-1	Vacant	0.16	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$8.72	No res.	N/A	1	Above Moderate	0	0	1		
V.5	5351021034	0.12	N/A	Low Density Residential	R-1	Vacant	0.12	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$11.62	No res.	N/A	1	Above Moderate	0	0	1		
V.6	5353013020	0.14	2419 LA CRESCENTA AVE	Low Density Residential	R-1	Vacant	0.14	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$34.10	No res.	N/A	1	Above Moderate	0	0	1		
V.7	5346015004	0.19	N/A	Low Density Residential	R-1	Vacant	0.19	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$56.05	No res.	N/A	1	Above Moderate	0	0	1		
V.8	5322008007	1.44	N/A	Low Density Residential	R-1	Vacant	1.44	Vacant	No	1 per lot	5	100%	N/A	No imp.	\$8.39	No res.	N/A	5	Above Moderate	0	0	5		
V.9	5322008038	0.57	407 E PINE ST	Low Density Residential	R-1	Vacant	0.57	Vacant	No	1 per lot	2	100%	N/A	No imp.	\$2.05	No res.	N/A	2	Above Moderate	0	0	2		
V.10	5322008037	0.42	415 E PINE ST	Low Density Residential	R-1	Vacant	0.42	Vacant	No	1 per lot	2	100%	N/A	No imp.	\$2.78	No res.	N/A	2	Above Moderate	0	0	2		
V.11	5322008036	0.26	N/A	Low Density Residential	R-1	Vacant	0.26	Vacant	No	1 per lot	1	100%	N/A	No imp.	\$4.48	No res.	N/A	1	Above Moderate	0	0	1		
SP.1	5338034901	0.18	N/A	Parking	P	Parking Lot	1.48	Specific Plan	No	56	82	70%	1989	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034900	0.34	N/A	Parking	P	Parking Lot	1.48	Specific Plan	No	56	82	70%	1989	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034016	0.15	441 W MAIN ST	General Commercial	CBD	Commercial - Store	1.48	Specific Plan	No	56	82	70%	1965	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034015	0.15	433 W MAIN ST	General Commercial	CBD	Commercial - Store Combination	1.48	Specific Plan	No	56	82	70%	1965	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034014	0.16	425 W MAIN ST	General Commercial	CBD	Commercial - Professional Building	1.48	Specific Plan	No	56	82	70%	1965	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034037	0.16	411 W MAIN ST	General Commercial	CBD	Commercial - Store	1.48	Specific Plan	No	56	82	70%	1922	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034036	0.07	409 W MAIN ST	General Commercial	CBD	Commercial - Store	1.48	Specific Plan	No	56	82	70%	1922	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
SP.1	5338034035	0.27	401 W MAIN ST	General Commercial	CBD	Commercial - Store Combination	1.48	Specific Plan	No	56	82	70%	1922	0.8	\$46.43	No res.	Strong	57	Mixed	24	14	19		
R.1	5357006023	0.20	1433 S 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.20	RHNAS Existing	No	24	5	90%	1941	1.6	\$30.77	5.0	High	3	Mod./Above Mod.	0	1	2		
R.2	5357008011	0.24	1420 S 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1923	4.2	\$19.49	10.0	Strong	6	Mod./Above Mod.	0	2	4		
R.3	5350027002	0.12	904 BENTO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1948	1.5	\$71.67	5.0	High	4	Mod./Above Mod.	0	1	3		
R.3	5350027003	0.12	908 BENTO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1924	1.5	\$71.67	5.0	High	4	Mod./Above Mod.	0	1	3		
R.4	5347003002	0.17	708 S 6TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.34	RHNAS Existing	No	43	15	70%	1924	4.0	\$70.13	7.5	High	7	Mod./Above Mod.	0	2	5		
R.4	5347003003	0.17	704 S 6TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.34	RHNAS Existing	No	43	15	70%	1923	4.0	\$70.13	7.5	High	7	Mod./Above Mod.	0	2	5		
R.5	5347007012	0.16	921 S 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.16	RHNAS Existing	No	24	4	90%	1932	2.4	\$33.94	4.0	Strong	3	Mod./Above Mod.	0	1	2		
R.6	5347022006	0.13	833 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.13	RHNAS Existing	No	24	3	90%	1924	2.0	\$7.96	3.0	Strong	2	Mod./Above Mod.	0	1	1		
R.7	5347018020	0.20	830 S STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.20	RHNAS Existing	No	24	5	90%	1936	3.0	\$23.79	5.0	Strong	4	Mod./Above Mod.	0	1	3		
R.8	5347005007	0.14	314 PALMETTO DR	High Density Residential	R-3	Residential - Single Family Residence	0.14	RHNAS Existing	No	24	3	90%	1927	4.3	\$7.08	3.0	Strong	2	Mod./Above Mod.	0	1	1		
R.9	5347006013	0.16	204 PALMETTO DR	High Density Residential	R-3	Residential - Single Family Residence	0.34	RHNAS Existing	No	43	15	70%	1941	1.4	\$32.44	7.5	High	7	Mod./Above Mod.	0	2	5		
R.9	5347006011	0.18	811 S 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.34	RHNAS Existing	No	43	15	70%	1939	1.4	\$32.44	7.5	High	7	Mod./Above Mod.	0	2	5		
R.10	5347009006	0.17	110 PALMETTO DR	High Density Residential	R-3	Residential - Single Family Residence	0.39	RHNAS Existing	No	24	9	90%	1925	1.5	\$25.49	4.5	High	5	Mod./Above Mod.	0	2	3		
R.10	5347018012	0.22	801 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	RHNAS Existing	No	24	9	90%	1913	1.5	\$25.49	4.5	High	5	Mod./Above Mod.	0	2	3		
R.11	5347004001	0.14	301 PALMETTO DR	High Density Residential	R-3	Residential - Single Family Residence	0.14	RHNAS Existing	No	24	3	90%	1951	4.0	\$81.34	3.0	High	1	Moderate	0	1	0		
R.12	5347017008	0.21	721 S CHAPEL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.21	RHNAS Existing	No	24	5	90%	1940	1.6	\$44.73	2.5	High	2	Mod./Above Mod.	0	1	1		
R.13	5347017010	0.13	711 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.25	RHNAS Existing	No	43	11	70%	1924	1.7	\$53.02	5.5	High	5	Mod./Above Mod.	0	2	3		
R.13	5347017011	0.13	709 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.25	RHNAS Existing	No	43	11	70%	1924	1.7	\$53.02	5.5	High	5	Mod./Above Mod.	0	2	3		
R.14	5347013011	0.17	127 PARK ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.52	RHNAS Existing	No	43	22	90%	1974	1.0	\$62.98	3.7	High	12	Lower Mixed	8	1	3		
R.14	5347013012	0.17	131 PARK ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.52	RHNAS Existing	No	43	22	90%	1958	1.0	\$62.98	3.7	High	12	Lower Mixed	8	1	3		
R.14	5347013013	0.17	623 S CHAPEL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.52	RHNAS Existing	No	43	22	90%	1923	1.0	\$62.98	3.7	High	12	Lower Mixed	8	1	3		
R.15	5344012030	0.17	221 S 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1910	1.3	\$8.28	4.0	High	2	Mod./Above Mod.	0	1	1		
R.16	5347013015	0.15	611 S CHAPEL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.30	RHNAS Existing	No	43	13	70%	1922	3.7	\$41.33	4.3	Strong	7	Mod./Above Mod.	0	2	5		
R.16	5347013016	0.15	607 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.30	RHNAS Existing	No	43	13	70%	1922	3.7	\$41.33	4.3	Strong	7	Mod./Above Mod.	0	2	5		
R.17	5344012027	0.17	209 S 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1912	3.5	\$33.62	4.0	Strong	3	Mod./Above Mod.	0	1	2		
R.18	5347013018	0.16	519 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	No	43	17	70%	2003	2.7	\$44.73	5.7	Strong	10	Mod./Above Mod.	0	3	7		
R.18	5347013017	0.13	603 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	No	43	17	70%	1922	2.7	\$44.73	5.7	Strong	10	Mod./Above Mod.	0	3	7		
R.18	5347013019	0.12	517 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	No	43	17	70%	1922	2.7	\$44.73	5.7	Strong	10	Mod./Above Mod.	0	3	7		
R.19	5344012006	0.17	200 S 6TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1922	1.6	\$7.57	4.0	High	2	Mod./Above Mod.	0	1	1		
R.20	5345010033	0.13	120 E BEACON ST	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1910	1.1	\$42.83	5.0	High	4	Mod./Above Mod.	0	1	3		
R.20	5345010002	0.11	118 E BEACON ST	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1909	1.1	\$42.83	5.0	High	4	Mod./Above Mod.	0	1	3		
R.21	5338004012	0.20	23 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	43	16	70%	1943	2.8	\$50.84	5.3	Strong	9	Mod./Above Mod.	0	3	6		
R.21	5338004013	0.18	21 N BUSHNELL AVE	Automotive Commercial	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	43	16	70%	1938	2.8	\$50.84	5.3	Strong	9	Mod./Above Mod.	0	3	6		
R.22	5339021013	0.23	1816 VINE ST	High Density Residential	R-3	Residential - Single Family Residence	0.23	RHNAS Existing	No	43	10	70%	1913	4.0	\$49.71	10.0	Strong	6	Mod./Above Mod.	0	2	4		

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio			Lower	Mod.	Above Mod.	
R.23	5339022023	0.23	1815 VINE ST	High Density Residential	R-3	Residential - Single Family Residence	0.23	RHNAS Existing	No	24	5	90%	1909	4.0	\$52.34	5.0	Strong	4	Mod./Above Mod.	0	1	3
R.24	5338034011	0.18	104 N 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1912	4.0	\$63.18	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.25	5338031007	0.18	139 N 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1906	2.6	\$33.83	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.26	5338023003	0.18	305 N ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1926	2.9	\$17.88	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.27	5338035033	0.17	124 N 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1913	3.5	\$6.83	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.28	5338023013	0.18	317 N ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1913	2.4	\$24.37	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.29	5337015024	0.18	105 N 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1913	5.9	\$7.42	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.30	5345015004	0.28	106 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.28	RHNAS Existing	No	43	12	70%	1921	3.7	\$20.97	12.0	Strong	8	Mod./Above Mod.	0	2	6
R.31	5338015015	0.18	325 N CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	RHNAS Existing	No	43	15	70%	1914	4.4	\$47.59	7.5	Strong	9	Mod./Above Mod.	0	3	6
R.31	5338015048	0.17	323 N CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	RHNAS Existing	No	43	15	70%	1910	4.4	\$47.59	7.5	Strong	9	Mod./Above Mod.	0	3	6
R.32	5337015904	0.14	N/A	High Density Residential	R-3	Parking Lot	0.14	RHNAS Existing	No	24	3	90%	N/A	No imp.	\$0.00	No res.	Strong	3	Mod./Above Mod.	0	1	2
R.33	5338029012	0.27	338 N ATLANTIC BLVD	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.44	RHNAS Existing	No	43	19	70%	1925	2.6	\$29.10	6.3	Strong	11	Mod./Above Mod.	0	3	8
R.33	5338029011	0.17	340 N ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.44	RHNAS Existing	No	43	19	70%	1905	2.6	\$29.10	6.3	Strong	11	Mod./Above Mod.	0	3	8
R.34	5337014020	0.21	310 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.21	RHNAS Existing	No	24	5	90%	1922	2.0	\$48.75	5.0	High	3	Mod./Above Mod.	0	1	2
R.35	5337020032	0.59	N/A	High Density Residential	R-3	Parking Lot	0.59	RHNAS Existing	No	43	25	90%	N/A	No imp.	\$0.00	No res.	Strong	23	Lower Mixed	15	3	5
R.36	5337014017	0.21	320 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.21	RHNAS Existing	No	24	5	90%	1921	15.1	\$6.14	5.0	Strong	4	Mod./Above Mod.	0	1	3
R.37	5337080039	0.18	304 N 1ST ST	Office Professional	R-3	Commercial - Parking Lot (Commercial Use Property)	0.18	RHNAS Existing	No	24	4	90%	1996	7.1	\$35.87	No res.	Strong	4	Mod./Above Mod.	0	1	3
R.38	5337021011	0.18	213 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.18	RHNAS Existing	No	24	4	90%	1915	1.1	\$34.94	4.0	High	2	Mod./Above Mod.	0	1	1
R.39	5337013005	0.20	501 N 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	No	43	17	70%	1933	3.7	\$33.47	8.5	Strong	11	Mod./Above Mod.	0	3	8
R.39	5337013017	0.20	414 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	No	43	17	70%	1926	3.7	\$33.47	8.5	Strong	11	Mod./Above Mod.	0	3	8
R.40	5337013011	0.19	510 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	24	9	90%	1925	3.9	\$18.09	4.5	Strong	6	Mod./Above Mod.	0	2	4
R.40	5337011003	0.18	505 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	24	9	90%	1924	3.9	\$18.09	4.5	Strong	6	Mod./Above Mod.	0	2	4
R.41	5321025009	0.18	609 N 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.54	RHNAS Existing	No	43	23	90%	1925	3.1	\$10.46	7.7	Strong	18	Lower Mixed	12	2	4
R.41	5321025008	0.18	615 N 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.54	RHNAS Existing	No	43	23	90%	1923	3.1	\$10.46	7.7	Strong	18	Lower Mixed	12	2	4
R.41	5321025010	0.18	605 N 2ND ST	High Density Residential	R-3	Residential - Single Family Residence	0.54	RHNAS Existing	No	43	23	90%	1921	3.1	\$10.46	7.7	Strong	18	Lower Mixed	12	2	4
R.42	5337004015	0.13	337 N CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1922	2.7	\$31.68	5.0	Strong	6	Mod./Above Mod.	0	2	4
R.42	5337004014	0.11	341 N CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	RHNAS Existing	No	43	10	70%	1920	2.7	\$31.68	5.0	Strong	6	Mod./Above Mod.	0	2	4
R.43	5337003022	0.12	405 N CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	43	16	70%	1922	3.0	\$22.42	5.3	Strong	9	Mod./Above Mod.	0	3	6
R.43	5337003023	0.12	401 N CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	43	16	70%	1922	3.0	\$22.42	5.3	Strong	9	Mod./Above Mod.	0	3	6
R.43	5337003024	0.14	215 E GRAND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	RHNAS Existing	No	43	16	70%	1922	3.0	\$22.42	5.3	Strong	9	Mod./Above Mod.	0	3	6
R.44	5321023001	0.23	813 N 2ND ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.23	RHNAS Existing	No	43	10	70%	1940	2.3	\$47.09	5.0	Strong	6	Mod./Above Mod.	0	2	4
R.45	5322012009	0.17	910 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	Yes	24	4	90%	1907	1.9	\$81.51	4.0	High	2	Mod./Above Mod.	0	1	1
R.46	5322012006	0.17	922 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1911	3.6	\$8.35	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.47	5322012003	0.17	1006 N GARFIELD AVE, UNIT B	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	RHNAS Existing	No	43	15	70%	1910	7.9	\$7.19	5.0	Strong	8	Mod./Above Mod.	0	2	6
R.47	5322012004	0.17	930 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	RHNAS Existing	No	43	15	70%	1908	7.9	\$7.19	5.0	Strong	8	Mod./Above Mod.	0	2	6
R.48	5322015065	0.17	927 N MONTEREY ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	RHNAS Existing	No	24	4	90%	1921	2.8	\$34.62	4.0	Strong	3	Mod./Above Mod.	0	1	2
R.49	5357006003	0.20	1512 S 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.81	RHNAS Existing	Yes	43	35	90%	1939	2.3	\$61.17	5.8	Strong	26	Lower Mixed	17	3	6
R.49	5357006006	0.20	1500 S 5TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.81	RHNAS Existing	Yes	43	35	90%	1924	2.3	\$61.17	5.8	Strong	26	Lower Mixed	17	3	6
R.49	5357006004	0.20	1510 S 5TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.81	RHNAS Existing	Yes	43	35	90%	1923	2.3	\$61.17	5.8	Strong	26	Lower Mixed	17	3	6
R.49	5357006005	0.20	1504 S 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.81	RHNAS Existing	Yes	43	35	90%	1923	2.3	\$61.17	5.8	Strong	26	Lower Mixed	17	3	6
R.50	5350022034	0.16	1106 S MARGUERITA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.63	RHNAS Existing	Yes	43	27	90%	1929	1.2	\$52.38	3.9	High	14	Lower Mixed	9	1	4
R.50	5350022035	0.15	1110 S MARGUERITA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.63	RHNAS Existing	Yes	43	27	90%	1926	1.2	\$52.38	3.9	High	14	Lower Mixed	9	1	4
R.50	5350022028	0.16	1104 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.63	RHNAS Existing	Yes	43	27	90%	1925	1.2	\$52.38	3.9	High	14	Lower Mixed	9	1	4
R.50	5350022027	0.15	1100 S MARGUERITA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.63	RHNAS Existing	Yes	43	27	90%	1924	1.2	\$52.38	3.9	High	14	Lower Mixed	9	1	4
R.51	5350027013	0.11	801 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	Yes	43	25	90%	1939	2.1	\$46.62	4.2	Strong	17	Lower Mixed	11	2	4
R.51	5350027016	0.12	815 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	Yes	43	25	90%	1939	2.1	\$46.62	4.2	Strong	17	Lower Mixed	11	2	4
R.51	5350027017	0.12	817 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	Yes	43	25	90%	1939	2.1	\$46.62	4.2	Strong	17	Lower Mixed	11	2	4
R.51	5350027014	0.11	807 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	Yes	43	25	90%	1923	2.1	\$46.62	4.2	Strong	17	Lower Mixed	11	2	4
R.51	5350027015	0.11	809 S MARGUERITA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.58	RHNAS Existing	Yes	43	25	90%	1923	2.1	\$46.62	4.2	Strong	17	Lower Mixed	11	2	4
R.52	5343005004	0.15	300 S MARENGO AVE	High Density Residential	R-3	Commercial - Store Combination	0.59	RHNAS Existing	Yes	43	25	90%	1928	1.9	\$55.70	5.0	High	14	Lower Mixed	9	1	4
R.52	5343005001	0.15	312 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.59	RHNAS Existing	Yes	43	25	90%	1922	1.9	\$55.70	5.0	High	14	Lower Mixed	9	1	4
R.52	5343005002	0.15	310 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.59	RHNAS Existing	Yes	43	25	90%	1922	1.9	\$55.70	5.0	High	14	Lower Mixed	9	1	4
R.52	5343005003	0.15	304 S MARENGO AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.59	RHNAS Existing	Yes	43	25	90%	1922	1.9	\$55.70	5.0	High	14	Lower Mixed	9	1	4

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio			Lower	Mod.	Above Mod.	
R.53	5342027035	0.17	221 S MARENGO AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.92	RHNAS Existing	Yes	43	39	90%	1923	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.53	5342027037	0.08	1709 W COMMONWEALTH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.92	RHNAS Existing	Yes	43	39	90%	1923	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.53	5342027036	0.14	225 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.92	RHNAS Existing	Yes	43	39	90%	1922	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.53	5342027033	0.17	1713 W COMMONWEALTH AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.92	RHNAS Existing	Yes	43	39	90%	1921	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.53	5342027034	0.23	217 S MARENGO AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.92	RHNAS Existing	Yes	43	39	90%	1912	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.53	5342027038	0.13	231 S MARENGO AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.92	RHNAS Existing	Yes	43	39	90%	1909	1.7	\$27.10	3.3	High	19	Lower Mixed	12	2	5
R.54	5342026025	0.23	1725 PEPPER ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.46	RHNAS Existing	Yes	43	20	70%	1921	3.5	\$10.49	6.7	Strong	12	Mod./Above Mod.	0	3	9
R.54	5342026024	0.23	1801 PEPPER ST	High Density Residential	R-3	Residential - Single Family Residence	0.46	RHNAS Existing	Yes	43	20	70%	1913	3.5	\$10.49	6.7	Strong	12	Mod./Above Mod.	0	3	9
R.55	5342025022	0.23	1805 ACACIA	High Density Residential	R-3	Residential - Single Family Residence	0.73	RHNAS Existing	Yes	43	32	90%	1913	5.7	\$8.06	6.4	Strong	24	Lower Mixed	15	3	6
R.55	5342025023	0.23	1801 ACACIA	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.73	RHNAS Existing	Yes	43	32	90%	1911	5.7	\$8.06	6.4	Strong	24	Lower Mixed	15	3	6
R.55	5342025024	0.28	1723 ACACIA	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.73	RHNAS Existing	Yes	43	32	90%	N/A	5.7	\$8.06	6.4	Strong	24	Lower Mixed	15	3	6
R.56	5345007021	0.18	317 S CHAPEL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.54	RHNAS Existing	Yes	43	23	90%	1935	1.7	\$33.96	5.8	High	14	Lower Mixed	9	1	4
R.56	5345007020	0.18	323 S CHAPEL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.54	RHNAS Existing	Yes	43	23	90%	1920	1.7	\$33.96	5.8	High	14	Lower Mixed	9	1	4
R.56	5345007022	0.18	313 S CHAPEL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.54	RHNAS Existing	Yes	43	23	90%	1915	1.7	\$33.96	5.8	High	14	Lower Mixed	9	1	4
R.57	5339019002	0.09	125 N RAYMOND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	No	43	25	90%	1924	3.1	\$52.37	4.2	Strong	17	Lower Mixed	11	2	4
R.57	5339019003	0.09	121 N RAYMOND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	No	43	25	90%	1924	3.1	\$52.37	4.2	Strong	17	Lower Mixed	11	2	4
R.57	5339019004	0.09	117 N RAYMOND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	No	43	25	90%	1922	3.1	\$52.37	4.2	Strong	17	Lower Mixed	11	2	4
R.57	5339019021	0.14	115 N RAYMOND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.58	RHNAS Existing	No	43	25	90%	1907	3.1	\$52.37	4.2	Strong	17	Lower Mixed	11	2	4
R.57	5339019020	0.16	2003 WINE ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.58	RHNAS Existing	No	43	25	90%	1906	3.1	\$52.37	4.2	Strong	17	Lower Mixed	11	2	4
R.58	5337009011	0.14	508 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.89	RHNAS Existing	Yes	43	38	90%	1930	2.5	\$57.44	5.4	Strong	28	Lower Mixed	18	3	7
R.58	5337009012	0.17	504 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.89	RHNAS Existing	Yes	43	38	90%	1925	2.5	\$57.44	5.4	Strong	28	Lower Mixed	18	3	7
R.58	5337009014	0.17	428 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.89	RHNAS Existing	Yes	43	38	90%	1924	2.5	\$57.44	5.4	Strong	28	Lower Mixed	18	3	7
R.58	5337009013	0.17	500 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.89	RHNAS Existing	Yes	43	38	90%	1922	2.5	\$57.44	5.4	Strong	28	Lower Mixed	18	3	7
R.58	5337009026	0.24	14 W ALHAMBRA RD	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.89	RHNAS Existing	Yes	43	38	90%	1922	2.5	\$57.44	5.4	Strong	28	Lower Mixed	18	3	7
R.59	5322013020	0.17	15 E MCLEAN ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.50	RHNAS Existing	Yes	43	22	90%	1948	1.7	\$68.74	3.7	High	12	Lower Mixed	8	1	3
R.59	5322013019	0.14	805 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.50	RHNAS Existing	Yes	43	22	90%	1921	1.7	\$68.74	3.7	High	12	Lower Mixed	8	1	3
R.59	5322013018	0.19	809 N STONEMAN AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.50	RHNAS Existing	Yes	43	22	90%	1890	1.7	\$68.74	3.7	High	12	Lower Mixed	8	1	3
R.60	5322010022	0.22	1104 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	Yes	43	17	70%	1924	3.2	\$66.23	8.5	High	8	Mod./Above Mod.	0	2	6
R.60	5322010023	0.18	1100 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	RHNAS Existing	Yes	43	17	70%	1923	3.2	\$66.23	8.5	High	8	Mod./Above Mod.	0	2	6
R.61	5345014016	2.31	220 S CHAPEL AVE	High Density Residential	R-3	Institutional - Church	2.79	RHNAS Existing	Yes	43	120	90%	1982	0.3	\$9.71	No res.	High	86	Lower Mixed	54	12	20
R.61	5345014902	0.48	N/A	High Density Residential	R-3	Parking Lot	2.79	RHNAS Existing	No	43	120	90%	N/A	0.3	\$9.71	No res.	High	86	Lower Mixed	54	12	20
NV.1	5254011039	0.20	2901 MONTEZUMA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.38	Nonvacant New	No	25.8	10	90%	1947	2.6	\$39.54	5.0	Strong	7	Mod./Above Mod.	0	2	5
NV.1	5254011038	0.17	2907 MONTEZUMA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.38	Nonvacant New	No	25.8	10	90%	1946	2.6	\$39.54	5.0	Strong	7	Mod./Above Mod.	0	2	5
NV.2	5254013049	0.17	3000 W RAMONA RD	General Commercial	CPD	Institutional - Church	1.43	Nonvacant New	No	48	69	90%	1956	0.1	\$33.56	69.0	Medium	31	Lower Mixed	20	4	7
NV.2	5254013052	1.26	3000 W RAMONA RD	General Commercial	CPD	Institutional - Church	1.43	Nonvacant New	No	48	69	90%	1956	0.1	\$33.56	69.0	Medium	31	Lower Mixed	20	4	7
NV.3	5255001017	0.14	2015 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1930	1.7	\$53.86	3.0	High	1	Above Mod.	0	0	1
NV.4	5255001020	0.15	220 W RAMONA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1920	2.8	\$47.30	3.0	Strong	1	Above Mod.	0	0	1
NV.5	5255001021	0.16	2008 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.31	Nonvacant New	No	18	6	90%	1947	1.1	\$20.29	3.0	High	2	Above Mod.	0	0	2
NV.5	5255001030	0.16	2012 S 2ND ST, APT A	Medium Density Residential	R-2	Residential - Single Family Residence	0.31	Nonvacant New	No	18	6	90%	1947	1.1	\$20.29	3.0	High	2	Above Mod.	0	0	2
NV.6	5255001036	0.17	2036 S 2ND ST	Office Professional	PO	Residential - Double, Duplex, or Two Units	0.90	Nonvacant New	No	43	39	90%	1923	0.8	\$12.61	7.8	Medium	15	Lower Mixed	10	2	3
NV.6	5255001026	0.17	2032 S 2ND ST	Office Professional	PO	Residential - Three Units (Any Combination)	0.90	Nonvacant New	No	43	39	90%	1921	0.8	\$12.61	7.8	Medium	15	Lower Mixed	10	2	3
NV.6	5255001040	0.56	N/A	Medical Office	PD	Parking Lot	0.90	Nonvacant New	No	43	39	90%	N/A	0.8	\$12.61	7.8	Medium	15	Lower Mixed	10	2	3
NV.7	5255013018	0.17	209 E HELLMAN AVE	Low Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1941	1.9	\$44.25	3.0	High	1	Above Mod.	0	0	1
NV.8	5255022021	0.17	309 E HELLMAN AVE	Low Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1939	3.1	\$44.72	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.8	5255022022	0.18	313 E HELLMAN AVE	Low Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1938	3.1	\$44.72	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.8	5255022023	0.18	317 E HELLMAN AVE	Low Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1937	3.1	\$44.72	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.9	5256001034	0.17	913 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1945	1.0	\$48.93	3.0	High	1	Above Mod.	0	0	1
NV.10	5256004058	0.18	805 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1937	1.3	\$43.48	3.3	High	3	Mod./Above Mod.	0	1	2
NV.10	5256004057	0.18	809 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1932	1.3	\$43.48	3.3	High	3	Mod./Above Mod.	0	1	2
NV.10	5256004056	0.18	813 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1925	1.3	\$43.48	3.3	High	3	Mod./Above Mod.	0	1	2
NV.11	5256004059	0.19	801 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1940	1.3	\$16.99	3.0	High	1	Above Mod.	0	0	1
NV.12	5256004071	0.18	709 W HELLMAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1941	2.5	\$34.75	3.0	Strong	1	Above Mod.	0	0	1
NV.13	5256007053	0.15	2034 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	1.3	\$6.14	3.0	High	1	Above Mod.	0	0	1
NV.14	5291011016	0.15	503 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1929	2.3	\$64.62	3.0	Strong	1	Above Mod.	0	0	1
NV.15	5291011020	0.14	517 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.45	Nonvacant New	No	18	8	90%	1951	2.4	\$28.44	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.15	5291011018	0.15	509 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.45	Nonvacant New	No	18	8	90%	1939	2.4	\$28.44	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.15	5291011019	0.16	515 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.45	Nonvacant New	No	18	8	90%	1939	2.4	\$28.44	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.16	5291012038	0.13	619 S FREMONT AVE	General Commercial	CPD	Commercial - Office Building	0.53	Nonvacant New	No	48	25	90%	1963	2.2	\$62.25	4.2	Strong	17	Lower Mixed	11	2	4
NV.16	5291012037	0.13	621 S FREMONT AVE	General Commercial	CPD	Residential - Three Units (Any Combination)	0.53	Nonvacant New	No	48	25	90%	1956	2.2	\$62.25	4.2	Strong	17	Lower Mixed	11	2	4
NV.16	5291012036	0.13	625 S FREMONT AVE	General Commercial	CPD	Residential - Three Units (Any Combination)	0.53	Nonvacant New	No	48	25	90%	1956	2.2	\$62.25	4.2	Strong	17	Lower Mixed	11	2	4
NV.16	5291012035	0.13	629 S FREMONT AVE	General Commercial	CPD	Commercial - Store	0.53	Nonvacant New	No	48	25	90%	1956	2.2	\$62.25	4.2	Strong	17	Lower Mixed	11	2	4

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio				Lower	Mod.	Above Mod.
NV.17	5291024017	0.42	3201 W MISSION RD	Parking	P	Commercial - Parking Lot (Commercial Use Property)	1.74	Nonvacant New	No	48	84	90%	1982	No imp.	\$19.70	No res.	Strong	76	Lower Mixed	48	10	18
NV.17	5291024021	1.32	3201 W MISSION RD	Parking	P	Commercial - Parking Lot (Commercial Use Property)	1.74	Nonvacant New	No	48	84	90%	1982	No imp.	\$19.70	No res.	Strong	76	Lower Mixed	48	10	18
NV.18	5291026019	0.14	N/A	Parking	P	Commercial - Commercial	0.34	Nonvacant New	No	48	16	70%	N/A	3.8	\$17.75	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.19	5292001003	0.19	2604 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1936	2.6	\$23.16	3.5	Strong	2	Above Mod.	0	0	2
NV.19	5292001004	0.19	2606 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1922	2.6	\$23.16	3.5	Strong	2	Above Mod.	0	0	2
NV.20	5292001008	0.19	2626 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1936	2.8	\$47.75	3.5	Strong	2	Above Mod.	0	0	2
NV.20	5292001007	0.19	2622 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1929	2.8	\$47.75	3.5	Strong	2	Above Mod.	0	0	2
NV.21	5292001017	0.19	2721 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1924	1.2	\$52.95	3.5	High	2	Above Mod.	0	0	2
NV.21	5292001013	0.20	2720 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.38	Nonvacant New	No	18	7	90%	1922	1.2	\$52.95	3.5	High	2	Above Mod.	0	0	2
NV.22	5292001021	0.18	2705 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1925	3.7	\$43.31	3.5	Strong	2	Above Mod.	0	0	2
NV.22	5292001020	0.19	2709 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1922	3.7	\$43.31	3.5	Strong	2	Above Mod.	0	0	2
NV.23	5292001022	0.19	2701 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1925	1.9	\$7.74	3.0	High	1	Above Mod.	0	0	1
NV.24	5292001025	0.19	2609 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.46	Nonvacant New	No	18	8	90%	1926	3.6	\$37.10	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.24	5292001024	0.27	2615 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.46	Nonvacant New	No	18	8	90%	1923	3.6	\$37.10	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.25	5292001028	0.14	2601 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1936	1.4	\$61.29	3.0	High	2	Above Mod.	0	0	2
NV.25	5292001026	0.19	2605 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1926	1.4	\$61.29	3.0	High	2	Above Mod.	0	0	2
NV.26	5292002002	0.19	2604 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.40	Nonvacant New	No	18	7	90%	1927	5.6	\$34.38	3.5	Strong	2	Above Mod.	0	0	2
NV.26	5292002003	0.21	2608 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.40	Nonvacant New	No	18	7	90%	1923	5.6	\$34.38	3.5	Strong	2	Above Mod.	0	0	2
NV.27	5292002004	0.18	2614 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1922	4.7	\$11.73	3.0	Strong	1	Above Mod.	0	0	1
NV.28	5292002009	0.19	2708 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1922	2.4	\$15.61	3.5	Strong	2	Above Mod.	0	0	2
NV.28	5292002010	0.19	2712 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1922	2.4	\$15.61	3.5	Strong	2	Above Mod.	0	0	2
NV.29	5292002023	0.16	2825 W GRAND AVE	High Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1923	2.3	\$45.02	3.0	Strong	1	Above Mod.	0	0	1
NV.30	5292003013	0.18	2804 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1925	6.0	\$37.38	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.30	5292003014	0.17	2808 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1922	6.0	\$37.38	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.30	5292003012	0.18	2800 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.53	Nonvacant New	No	18	10	90%	1922	6.0	\$37.38	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.31	5292003017	0.18	2820 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1922	3.2	\$37.50	3.0	Strong	1	Above Mod.	0	0	1
NV.32	5292003020	0.18	2904 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1922	4.0	\$54.67	3.0	Strong	1	Above Mod.	0	0	1
NV.33	5292004001	0.15	2632 W MAIN ST	General Commercial	CPD	Commercial - Store	0.71	Nonvacant New	No	48	34	90%	1948	1.9	\$71.01	No res.	Medium	15	Lower Mixed	10	2	3
NV.33	5292004025	0.28	9 S FREMONT AVE	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	0.71	Nonvacant New	No	48	34	90%	1977	1.9	\$71.01	No res.	Medium	15	Lower Mixed	10	2	3
NV.33	5292004003	0.15	2618 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.71	Nonvacant New	No	48	34	90%	1951	1.9	\$71.01	No res.	Medium	15	Lower Mixed	10	2	3
NV.33	5292004002	0.14	2624 W MAIN ST	General Commercial	CPD	Commercial - Store	0.71	Nonvacant New	No	48	34	90%	1926	1.9	\$71.01	No res.	Medium	15	Lower Mixed	10	2	3
NV.34	5292004022	0.14	109 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1922	4.3	\$29.97	3.0	Strong	1	Above Mod.	0	0	1
NV.35	5292005015	0.14	129 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.42	Nonvacant New	No	18	8	90%	1948	1.9	\$57.37	4.0	High	3	Mod./Above Mod.	0	1	2
NV.35	5292005016	0.14	201 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.42	Nonvacant New	No	18	8	90%	1946	1.9	\$57.37	4.0	High	3	Mod./Above Mod.	0	1	2
NV.35	5292005017	0.14	205 S FREMONT AVE	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.42	Nonvacant New	No	18	8	90%	N/A	1.9	\$57.37	4.0	High	3	Mod./Above Mod.	0	1	2
NV.36	5292005024	0.16	233 S FREMONT AVE	Medium Density Residential	R-2	Commercial - Office Building	0.31	Nonvacant New	No	18	6	90%	1977	1.3	\$35.31	6.0	High	2	Above Mod.	0	0	2
NV.36	5292005023	0.14	229 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.31	Nonvacant New	No	18	6	90%	1953	1.3	\$35.31	6.0	High	2	Above Mod.	0	0	2
NV.37	5292007002	0.17	2724 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.42	Nonvacant New	No	48	20	70%	1962	3.7	\$92.81	No res.	High	11	Mod./Above Mod.	0	3	8
NV.37	5292007003	0.11	2718 W MAIN ST	General Commercial	CPD	Commercial - Store	0.42	Nonvacant New	No	48	20	70%	1949	3.7	\$92.81	No res.	High	11	Mod./Above Mod.	0	3	8
NV.37	5292007001	0.14	2736 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.42	Nonvacant New	No	48	20	70%	1930	3.7	\$92.81	No res.	High	11	Mod./Above Mod.	0	3	8
NV.38	5292007015	0.16	2700 W MAIN ST	General Commercial	CPD	Commercial - Professional Building	0.30	Nonvacant New	No	48	14	70%	1923	2.0	\$60.73	No res.	Strong	10	Mod./Above Mod.	0	3	7
NV.38	5292007014	0.14	N/A	General Commercial	CPD	Commercial - Commercial	0.30	Nonvacant New	No	48	14	70%	N/A	2.0	\$60.73	No res.	Strong	10	Mod./Above Mod.	0	3	7
NV.39	5292008001	0.14	2834 W MAIN ST	General Commercial	CPD	Commercial - Store	0.29	Nonvacant New	No	48	14	70%	1948	1.5	\$9.94	No res.	High	8	Mod./Above Mod.	0	2	6
NV.39	5292008002	0.15	N/A	General Commercial	CPD	Commercial - Commercial	0.29	Nonvacant New	No	48	14	70%	N/A	1.5	\$9.94	No res.	High	8	Mod./Above Mod.	0	2	6
NV.40	5292008003	0.14	2818 W MAIN ST	General Commercial	CPD	Industrial - Light Manufacturing	0.45	Nonvacant New	No	48	22	70%	1957	0.8	\$56.64	22.0	Medium	7	Mod./Above Mod.	0	2	5
NV.40	5292008005	0.17	2800 W MAIN ST	General Commercial	CPD	Commercial - Non-Auto Service and Repair Shop, Paint Shop, or Laundry	0.45	Nonvacant New	No	48	22	70%	1948	0.8	\$56.64	22.0	Medium	7	Mod./Above Mod.	0	2	5
NV.40	5292008004	0.14	2812 W MAIN ST	General Commercial	CPD	Commercial - Store Combination	0.45	Nonvacant New	No	48	22	70%	1923	0.8	\$56.64	22.0	Medium	7	Mod./Above Mod.	0	2	5
NV.41	5292010010	0.16	2921 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1947	1.8	\$49.52	3.0	High	2	Above Mod.	0	0	2
NV.41	5292010011	0.16	2925 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1936	1.8	\$49.52	3.0	High	2	Above Mod.	0	0	2
NV.42	5292010013	0.15	2935 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1935	2.7	\$42.80	3.0	Strong	1	Above Mod.	0	0	1
NV.43	5292010029	0.17	3141 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1939	4.0	\$56.45	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.43	5292010027	0.17	3133 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1929	4.0	\$56.45	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.43	5292010028	0.20	3137 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1923	4.0	\$56.45	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.44	5292015005	0.14	126 WESTMONT DR	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1924	6.4	\$30.80	3.0	Strong	1	Above Mod.	0	0	1
NV.45	5292017001	0.16	2934 W MAIN ST	General Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.27	Nonvacant New	No	48	13	70%	1962	1.2	\$82.23	6.5	Medium	4	Mod./Above Mod.	0	1	3
NV.45	5292017002	0.11	2926 W MAIN ST	General Commercial	CPD	Residential - Double, Duplex, or Two Units																

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Site ID	A/N	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio			Lower	Mod.	Above Mod.	
NV.49	5292019045	0.55	3120 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.70	Nonvacant New	No	48	34	90%	1956	1.6	\$26.42	No res.	High	24	Lower Mixed	15	3	6
NV.49	5292019004	0.08	3136 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.70	Nonvacant New	No	48	34	90%	1954	1.6	\$26.42	No res.	High	24	Lower Mixed	15	3	6
NV.49	5292019005	0.07	N/A	General Commercial	CPD	Commercial - Commercial	0.70	Nonvacant New	No	48	34	90%	N/A	1.6	\$26.42	No res.	High	24	Lower Mixed	15	3	6
NV.50	5292019009	0.07	3086 W MAIN ST	General Commercial	CPD	Commercial - Store Combination	0.51	Nonvacant New	No	48	24	90%	1947	2.2	\$53.37	12.0	Strong	20	Lower Mixed	13	2	5
NV.50	5292019011	0.13	3070 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.51	Nonvacant New	No	48	24	90%	1982	2.2	\$53.37	12.0	Strong	20	Lower Mixed	13	2	5
NV.50	5292019012	0.19	3056 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.51	Nonvacant New	No	48	24	90%	1964	2.2	\$53.37	12.0	Strong	20	Lower Mixed	13	2	5
NV.50	5292019010	0.13	3080 W MAIN ST	General Commercial	CPD	Commercial - Store	0.51	Nonvacant New	No	48	24	90%	1948	2.2	\$53.37	12.0	Strong	20	Lower Mixed	13	2	5
NV.51	5292019022	0.06	3000 W MAIN ST	General Commercial	CPD	Commercial - Store	0.12	Nonvacant New	No	48	6	70%	1938	44.2	\$36.07	No res.	Strong	4	Mod./Above Mod.	0	1	3
NV.51	5292019021	0.06	N/A	General Commercial	CPD	Commercial - Commercial	0.12	Nonvacant New	No	48	6	70%	N/A	44.2	\$36.07	No res.	Strong	4	Mod./Above Mod.	0	1	3
NV.52	5292019023	0.14	23 HAMPDEN TER	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1955	2.4	\$93.50	3.0	High	1	Above Mod.	0	0	1
NV.53	5292019032	0.16	3037 SHERWOOD AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1924	4.0	\$65.77	3.0	High	1	Above Mod.	0	0	1
NV.54	5292020001	0.07	3240 W MAIN ST	General Commercial	CPD	Commercial - Office Building	0.22	Nonvacant New	No	48	11	70%	1960	11.6	\$32.28	No res.	Strong	8	Mod./Above Mod.	0	2	6
NV.54	5292020002	0.07	3240 W MAIN ST	General Commercial	CPD	Residential - Single Family Residence	0.22	Nonvacant New	No	48	11	70%	1960	11.6	\$32.28	No res.	Strong	8	Mod./Above Mod.	0	2	6
NV.54	5292020003	0.07	3240 W MAIN ST	General Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.22	Nonvacant New	No	48	11	70%	1928	11.6	\$32.28	No res.	Strong	8	Mod./Above Mod.	0	2	6
NV.55	5292020004	0.07	3240 W MAIN ST	General Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.51	Nonvacant New	No	48	25	90%	1951	2.9	\$16.58	No res.	Strong	23	Lower Mixed	15	3	5
NV.55	5292020005	0.07	3240 W MAIN ST	General Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.51	Nonvacant New	No	48	25	90%	1951	2.9	\$16.58	No res.	Strong	23	Lower Mixed	15	3	5
NV.55	5292020006	0.37	3224 W MAIN ST	General Commercial	CPD	Institutional - Church	0.51	Nonvacant New	No	48	25	90%	1939	2.9	\$16.58	No res.	Strong	23	Lower Mixed	15	3	5
NV.56	5292020021	0.23	3221 SHERWOOD AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.23	Nonvacant New	No	18	4	90%	1925	1.5	\$41.67	4.0	High	1	Above Mod.	0	0	1
NV.57	5292021001	0.16	3218 SHERWOOD AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1927	2.3	\$19.23	3.0	Strong	1	Above Mod.	0	0	1
NV.58	5321020014	0.18	1005 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1922	4.1	\$33.07	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.58	5321020013	0.17	1003 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1910	4.1	\$33.07	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.59	5321020027	0.22	1129 N GARFIELD AVE	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	0.51	Nonvacant New	No	48	25	90%	1984	0.6	\$54.98	25.0	Medium	11	Lower Mixed	7	1	3
NV.59	5321020028	0.14	1111 N GARFIELD AVE	General Commercial	CPD	Commercial - Store	0.51	Nonvacant New	No	48	25	90%	1968	0.6	\$54.98	25.0	Medium	11	Lower Mixed	7	1	3
NV.59	5321020026	0.15	1116 N ATLANTIC BLVD	General Commercial	CPD	Commercial - Store	0.51	Nonvacant New	No	48	25	90%	1968	0.6	\$54.98	25.0	Medium	11	Lower Mixed	7	1	3
NV.60	5321021016	0.18	804 N 1ST ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.34	Nonvacant New	No	43	15	70%	1925	2.6	\$48.06	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.60	5321021015	0.17	810 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1911	2.6	\$48.06	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.61	5321022026	0.15	815 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1925	3.4	\$38.76	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.61	5321022017	0.17	812 N 2ND ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.32	Nonvacant New	No	43	14	70%	1924	3.4	\$38.76	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.62	5321025024	0.08	301 W ALHAMBRA RD	General Commercial	CPD	Residential - Single Family Residence	0.47	Nonvacant New	No	48	22	70%	1922	4.2	\$22.17	5.5	Strong	13	Mod./Above Mod.	0	4	9
NV.62	5321025026	0.09	612 N ATLANTIC BLVD	General Commercial	CPD	Residential - Single Family Residence	0.47	Nonvacant New	No	48	22	70%	1922	4.2	\$22.17	5.5	Strong	13	Mod./Above Mod.	0	4	9
NV.62	5321025028	0.09	600 N ATLANTIC BLVD	General Commercial	CPD	Commercial - Office Building	0.47	Nonvacant New	No	48	22	70%	1924	4.2	\$22.17	5.5	Strong	13	Mod./Above Mod.	0	4	9
NV.62	5321025025	0.12	608 N ATLANTIC BLVD	General Commercial	CPD	Residential - Single Family Residence	0.47	Nonvacant New	No	48	22	70%	1923	4.2	\$22.17	5.5	Strong	13	Mod./Above Mod.	0	4	9
NV.62	5321025027	0.08	309 W ALHAMBRA RD	General Commercial	CPD	Residential - Single Family Residence	0.47	Nonvacant New	No	48	22	70%	1922	4.2	\$22.17	5.5	Strong	13	Mod./Above Mod.	0	4	9
NV.63	5321026002	0.14	609 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1920	3.7	\$58.30	3.0	Strong	1	Above Mod.	0	0	1
NV.64	5321026036	0.16	615 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1988	2.9	\$60.86	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.64	5321026005	0.16	621 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1921	2.9	\$60.86	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.64	5321026004	0.16	617 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1921	2.9	\$60.86	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.65	5321026007	0.16	699 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1908	2.4	\$50.44	3.0	Strong	2	Above Mod.	0	0	2
NV.65	5321026008	0.17	703 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1905	2.4	\$50.44	3.0	Strong	2	Above Mod.	0	0	2
NV.66	5321026014	0.16	815 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1921	2.2	\$26.57	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.66	5321026013	0.16	811 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1921	2.2	\$26.57	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.66	5321026015	0.16	817 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1904	2.2	\$26.57	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.67	5321028004	0.16	837 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1921	5.6	\$32.10	3.0	Strong	1	Above Mod.	0	0	1
NV.68	5321029002	0.18	925 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.66	Nonvacant New	No	18	12	90%	1922	2.5	\$55.90	3.0	Strong	4	Mod./Above Mod.	0	1	3
NV.68	5321029039	0.29	1003 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.66	Nonvacant New	No	18	12	90%	1920	2.5	\$55.90	3.0	Strong	4	Mod./Above Mod.	0	1	3
NV.68	5321029003	0.18	921 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.66	Nonvacant New	No	18	12	90%	1911	2.5	\$55.90	3.0	Strong	4	Mod./Above Mod.	0	1	3
NV.69	5321029004	0.18	917 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1911	4.0	\$58.69	3.0	Strong	1	Above Mod.	0	0	1
NV.70	5321029008	0.18	901 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.55	Nonvacant New	No	18	10	90%	1912	2.4	\$34.99	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.70	5321029006	0.18	911 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.55	Nonvacant New	No	18	10	90%	1911	2.4	\$34.99	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.70	5321029007	0.18	907 N ATLANTIC BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.55	Nonvacant New	No	18	10	90%	1910	2.4	\$34.99	3.3	Strong	3	Mod./Above Mod.	0	1	2
NV.71	5322010025	0.13	117 E PINE ST	High Density Residential	R-3	Residential - Single Family Residence	0.25	Nonvacant New	No	43	11	70%	1923	3.5	\$51.82	5.5	Strong	6	Mod./Above Mod.	0	2	4
NV.71	5322010024	0.13	115 E PINE ST	High Density Residential	R-3	Residential - Single Family Residence	0.25	Nonvacant New	No	43	11	70%	1922	3.5	\$51.82	5.5	Strong	6	Mod./Above Mod.	0	2	4
NV.72	5322011010	0.11	1116 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.23	Nonvacant New	No	43	10	70%	1922	2.1	\$55.05	5.0	Strong	6	Mod./Above Mod.	0	2	4
NV.72	5322011012	0.12	1112 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.23	Nonvacant New	No	43	10	70%	1922	2.1	\$55.05	5.0	Strong	6	Mod./Above Mod.	0	2	4
NV.73	5322011020	0.30	1205 N STONEMAN AVE	High Density Residential	R-3	Commercial - Parking Lot (Commercial Use Property)	0.30	Nonvacant New	No	43	13	70%	1963	27.7	\$29.17	No res.	Strong	9	Mod./Above Mod.	0	3	6
NV.74																						

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Site ID	A/N	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio				Lower	Mod.	Above Mod.
NV.75	5322013022	0.25	833 N STONEMAN AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.42	Nonvacant New	No	43	18	70%	1919	2.7	\$16.61	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.75	5322013011	0.17	907 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	43	18	70%	1909	2.7	\$16.61	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.76	5322015060	0.17	900 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1915	3.5	\$51.33	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.76	5322015059	0.18	904 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1911	3.5	\$51.33	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.77	5322031008	0.14	111 E ALHAMBRA RD	High Density Residential	R-3	Residential - Single Family Residence	0.27	Nonvacant New	No	43	12	70%	1915	3.9	\$33.85	6.0	Strong	7	Mod./Above Mod.	0	2	5
NV.77	5322031009	0.13	115 E ALHAMBRA RD	High Density Residential	R-3	Residential - Single Family Residence	0.27	Nonvacant New	No	43	12	70%	1913	3.9	\$33.85	6.0	Strong	7	Mod./Above Mod.	0	2	5
NV.78	5322031013	0.15	133 E ALHAMBRA RD	High Density Residential	R-3	Residential - Single Family Residence	0.31	Nonvacant New	No	43	13	70%	1936	3.0	\$71.16	4.3	High	6	Mod./Above Mod.	0	2	4
NV.78	5322031012	0.17	123 E ALHAMBRA RD	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.31	Nonvacant New	No	43	13	70%	1925	3.0	\$71.16	4.3	High	6	Mod./Above Mod.	0	2	4
NV.79	5322032002	0.16	706 N GARFIELD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.16	Nonvacant New	No	24	4	90%	1921	2.4	\$31.95	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.80	5322032024	0.17	709 N STONEMAN AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.49	Nonvacant New	No	43	21	70%	1969	2.1	\$67.53	4.2	High	9	Mod./Above Mod.	0	3	6
NV.80	5322032001	0.15	712 N GARFIELD AVE	High Density Residential	R-3	Commercial - Office Building	0.49	Nonvacant New	No	43	21	70%	1945	2.1	\$67.53	4.2	High	9	Mod./Above Mod.	0	3	6
NV.80	5322032025	0.17	721 N STONEMAN AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.49	Nonvacant New	No	43	21	70%	1911	2.1	\$67.53	4.2	High	9	Mod./Above Mod.	0	3	6
NV.81	5336016008	0.16	25 N VALENCIA ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1904	1.4	\$27.32	3.0	High	1	Above Mod.	0	0	1
NV.82	5336021016	0.17	106 N CORDOVA ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1921	2.7	\$8.33	3.0	Strong	1	Above Mod.	0	0	1
NV.83	5336022011	0.27	105 N CORDOVA ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1921	2.6	\$54.17	4.5	Strong	3	Mod./Above Mod.	0	1	2
NV.83	5336022010	0.21	25 N CORDOVA ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1914	2.6	\$54.17	4.5	Strong	3	Mod./Above Mod.	0	1	2
NV.84	5336022013	0.19	115 N CORDOVA ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1921	5.4	\$7.29	3.0	Strong	1	Above Mod.	0	0	1
NV.85	5336022024	0.17	30 N HIDALGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1911	3.1	\$62.24	3.0	Strong	1	Above Mod.	0	0	1
NV.86	5336023010	0.15	111 N HIDALGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1913	2.3	\$76.10	3.0	High	3	Mod./Above Mod.	0	1	2
NV.86	5336023011	0.15	107 N HIDALGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1912	2.3	\$76.10	3.0	High	3	Mod./Above Mod.	0	1	2
NV.86	5336023027	0.21	106 N ALMANSOR ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1911	2.3	\$76.10	3.0	High	3	Mod./Above Mod.	0	1	2
NV.87	5336023012	0.18	103 N HIDALGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1913	2.2	\$59.79	3.0	Strong	1	Above Mod.	0	0	1
NV.88	5336023025	0.19	100 N ALMANSOR ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1912	4.2	\$26.01	3.5	Strong	2	Above Mod.	0	0	2
NV.88	5336023026	0.18	102 N ALMANSOR ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1911	4.2	\$26.01	3.5	Strong	2	Above Mod.	0	0	2
NV.89	5336023028	0.18	118 N ALMANSOR ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1912	2.3	\$40.41	3.0	Strong	1	Above Mod.	0	0	1
NV.90	5337007006	0.17	420 N GARFIELD AVE	Office Professional	PO	Commercial - Professional Building	0.52	Nonvacant New	No	43	22	90%	1965	1.2	\$53.09	3.7	High	12	Lower Mixed	8	1	3
NV.90	5337007005	0.17	428 N GARFIELD AVE	Office Professional	PO	Residential - Five or More Units or Apartments (Any Combination)	0.52	Nonvacant New	No	43	22	90%	1963	1.2	\$53.09	3.7	High	12	Lower Mixed	8	1	3
NV.90	5337007007	0.18	418 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.52	Nonvacant New	No	43	22	90%	1910	1.2	\$53.09	3.7	High	12	Lower Mixed	8	1	3
NV.91	5337007009	0.18	412 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.86	Nonvacant New	No	43	37	90%	1917	0.5	\$15.81	18.5	Medium	16	Lower Mixed	10	2	4
NV.91	5337007026	0.51	1 E GRAND AVE	Office Professional	PO	Institutional - Church	0.86	Nonvacant New	No	43	37	90%	1914	0.5	\$15.81	18.5	Medium	16	Lower Mixed	10	2	4
NV.91	5337007008	0.17	416 N GARFIELD AVE	Office Professional	PO	Institutional - Church	0.86	Nonvacant New	No	43	37	90%	1904	0.5	\$15.81	18.5	Medium	16	Lower Mixed	10	2	4
NV.92	5337008005	0.17	320 N GARFIELD AVE	Office Professional	PO	Commercial - Office Building	0.70	Nonvacant New	No	43	30	90%	1961	3.0	\$85.06	No res.	High	22	Lower Mixed	14	3	5
NV.92	5337008004	0.18	320 N GARFIELD AVE	Office Professional	PO	Commercial - Parking Lot (Commercial Use Property)	0.70	Nonvacant New	No	43	30	90%	1961	3.0	\$85.06	No res.	High	22	Lower Mixed	14	3	5
NV.92	5337008003	0.35	330 N GARFIELD AVE	Office Professional	PO	Commercial - Professional Building	0.70	Nonvacant New	No	43	30	90%	1950	3.0	\$85.06	No res.	High	22	Lower Mixed	14	3	5
NV.93	5337008008	0.17	308 N GARFIELD AVE	Office Professional	PO	Residential - Double, Duplex, or Two Units	0.70	Nonvacant New	No	43	30	90%	1921	5.6	\$48.09	7.5	Strong	23	Lower Mixed	15	3	5
NV.93	5337008007	0.18	314 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.70	Nonvacant New	No	43	30	90%	1911	5.6	\$48.09	7.5	Strong	23	Lower Mixed	15	3	5
NV.93	5337008009	0.18	304 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.70	Nonvacant New	No	43	30	90%	N/A	5.6	\$48.09	7.5	Strong	23	Lower Mixed	15	3	5
NV.93	5337008006	0.17	316 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.70	Nonvacant New	No	24	17	90%	1906	5.6	\$48.09	4.3	Strong	12	Mod./Above Mod.	0	3	9
NV.94	5337008010	0.12	300 N GARFIELD AVE	Office Professional	PO	Commercial - Store	0.12	Nonvacant New	No	24	3	90%	1929	7.7	\$123.97	No res.	Medium	1	Moderate	0	1	0
NV.95	5337008014	0.09	330 N GARFIELD AVE	High Density Residential	R-3	Commercial - Parking Lot (Commercial Use Property)	0.43	Nonvacant New	No	43	19	70%	1953	5.5	\$63.29	9.5	Strong	12	Mod./Above Mod.	0	3	9
NV.95	5337008013	0.17	337 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	43	19	70%	1922	5.5	\$63.29	9.5	Strong	12	Mod./Above Mod.	0	3	9
NV.95	5337008015	0.17	331 N STONEMAN AVE	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	43	19	70%	N/A	5.5	\$63.29	9.5	Strong	12	Mod./Above Mod.	0	3	9
NV.96	5337008033	0.14	325 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.55	Nonvacant New	No	24	13	90%	1921	3.6	\$22.43	3.3	Strong	8	Mod./Above Mod.	0	2	6
NV.96	5337008034	0.22	327 N GARFIELD AVE	Office Professional	PO	Residential - Double, Duplex, or Two Units	0.55	Nonvacant New	No	43	24	90%	1923	3.6	\$22.43	6.0	Strong	18	Lower Mixed	12	2	4
NV.96	5337008025	0.19	333 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.55	Nonvacant New	No	43	24	90%	1905	3.6	\$22.43	6.0	Strong	18	Lower Mixed	12	2	4
NV.97	5337008029	0.18	305 N GARFIELD AVE	Office Professional	PO	Commercial - Professional Building	2.32	Nonvacant New	No	43	100	90%	1961	0.7	\$14.47	No res.	Medium	45	Lower Mixed	28	6	11
NV.98	5337009003	0.17	505 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.55	Nonvacant New	No	43	24	90%	1923	3.3	\$37.15	3.0	Strong	14	Lower Mixed	9	1	4
NV.98	5337009001	0.21	2 W ALHAMBRA RD	Office Professional	PO	Residential - Five or More Units or Apartments (Any Combination)	0.55	Nonvacant New	No	43	24	90%	1923	3.3	\$37.15	3.0	Strong	14	Lower Mixed	9	1	4
NV.98	5337009002	0.17	509 N GARFIELD AVE	Office Professional	PO	Residential - Double, Duplex, or Two Units	0.55	Nonvacant New	No	43	24	90%	1923	3.3	\$37.15	3.0	Strong	14	Lower Mixed	9	1	4
NV.99	5337009006	0.18	423 N GARFIELD AVE	Office Professional	PO	Residential - Double, Duplex, or Two Units	0.53	Nonvacant New	No	43	23	90%	1948	2.2	\$42.66	3.8	Strong	15	Lower Mixed	10	2	3
NV.99	5337009007	0.18	419 N GARFIELD AVE	Office Professional	PO	Residential - Single Family Residence	0.53	Nonvacant New	No	43	23	90%	1935	2.2	\$42.66	3.8	Strong	15	Lower Mixed	10	2	3
NV.99	5337009005	0.17	427 N GARFIELD AVE	Office Professional	PO	Residential - Three Units (Any Combination)	0.53	Nonvacant New	No	43	23	90%	1923	2.2	\$42.66	3.8	Strong	15	Lower Mixed	10	2	3
NV.100	5337009025	0.35	401 N GARFIELD AVE	Office Professional	PO	Commercial - Professional Building	0.35	Nonvacant New	No	43	15	70%	1958	4.0	\$70.45	No res.	High	8	Mod./Above Mod.	0	2	6
NV.101	5337011008	0.18	415 N 1ST ST	High Density Residential	R-3	Residential - Single Family Residence	0.38	Nonvacant New	No	43	16	70%	1923	4.0	\$21.94	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.101	5337011018	0.20	105 W GRAND AVE	High Density Residential	R-3	Residential - Single Family Residence	0.38	Nonvacant New	No	43	16	70%	1920	4.0	\$21.94	8.0						

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Site ID	A/N	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio			Lower	Mod.	Above Mod.	
NV.105	5337015083	0.19	122 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	64	24	70%	1999	1.0	\$42.15	4.8	High	11	Mod./Above Mod.	0	3	8
NV.105	5337015032	0.18	123 N 2ND ST	High Density Residential	R-3	Residential - Four Units (Any Combination)	0.37	Nonvacant New	No	64	24	70%	1974	1.0	\$42.15	4.8	High	11	Mod./Above Mod.	0	3	8
NV.106	5337017022	0.36	16 N 2ND ST	Central Business District	CBD	Commercial - Office Building	0.54	Nonvacant New	No	64	35	90%	1936	1.8	\$41.72	35.0	High	24	Lower Mixed	15	3	6
NV.106	5337017009	0.18	17 N 1ST ST	Central Business District	CBD	Commercial - Non-Auto Service and Repair Shop, Paint Shop, or Laundry	0.54	Nonvacant New	No	64	35	90%	1922	1.8	\$41.72	35.0	High	24	Lower Mixed	15	3	6
NV.107	5337020008	0.08	157 N GARFIELD AVE	Central Business District	CBD	Commercial - Professional Building	0.93	Nonvacant New	No	64	59	90%	1937	1.3	\$53.19	59.0	High	42	Lower Mixed	27	5	10
NV.107	5337020010	0.17	201 N GARFIELD AVE	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	0.93	Nonvacant New	No	64	59	90%	N/A	1.3	\$53.19	59.0	High	42	Lower Mixed	27	5	10
NV.107	5337020033	0.30	N/A	Central Business District	CBD	Commercial - Store Combination	0.93	Nonvacant New	No	64	59	90%	N/A	1.3	\$53.19	59.0	High	42	Lower Mixed	27	5	10
NV.107	5337020020	0.37	151 N GARFIELD AVE	Central Business District	CBD	Commercial - Restaurant, Cocktail Lounge	0.93	Nonvacant New	No	64	59	90%	1968	1.3	\$53.19	59.0	High	42	Lower Mixed	27	5	10
NV.108	5337020029	0.38	N/A	Office Professional	PO	Commercial - Parking Lot (Commercial Use Property)	0.38	Nonvacant New	No	43	16	70%	1951	49.0	\$56.65	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.109	5337021008	0.17	18 E WOODWARD AVE	High Density Residential	R-3	Residential - Five or More Units or Apartments (Any Combination)	0.31	Nonvacant New	No	64	20	70%	1959	0.6	\$67.21	2.0	Low	1	Moderate	0	1	0
NV.110	5337022015	0.09	118 E WOODWARD AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	Nonvacant New	No	64	16	70%	1924	1.8	\$17.63	16.0	High	8	Mod./Above Mod.	0	2	6
NV.110	5337022059	0.15	N/A	High Density Residential	R-3	Commercial - Office Building	0.24	Nonvacant New	No	64	16	70%	N/A	1.8	\$17.63	16.0	High	8	Mod./Above Mod.	0	2	6
NV.111	5337023001	0.26	150 N GARFIELD AVE	Central Business District	CBD	Commercial - Office Building	0.34	Nonvacant New	No	64	22	70%	1956	2.0	\$33.93	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.111	5337023002	0.08	18 ELGIN ST	Central Business District	CBD	Residential - Single Family Residence	0.34	Nonvacant New	No	64	22	70%	N/A	2.0	\$33.93	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.112	5337023015	0.09	24 ELGIN ST	Central Business District	CBD	Commercial - Office Building	0.20	Nonvacant New	No	64	13	70%	1924	3.1	\$130.04	6.5	Medium	4	Mod./Above Mod.	0	1	3
NV.112	5337023016	0.12	117 N STONEMAN AVE	Central Business District	CBD	Residential - Single Family Residence	0.20	Nonvacant New	No	64	13	70%	1886	3.1	\$130.04	6.5	Medium	4	Mod./Above Mod.	0	1	3
NV.113	5337030122	0.31	N/A	High Density Residential	R-3	Commercial - Parking Lot (Commercial Use Property)	1.06	Nonvacant New	No	43	46	90%	1994	7.9	\$12.33	No res.	Strong	41	Lower Mixed	26	5	10
NV.113	5337030131	0.30	N/A	High Density Residential	R-3	Commercial - Parking Lot (Commercial Use Property)	1.06	Nonvacant New	No	43	46	90%	N/A	7.9	\$12.33	No res.	Strong	41	Lower Mixed	26	5	10
NV.113	5337030004	0.45	27 N ALMANSOR ST	Central Business District	R-3	Residential - Single Family Residence	1.06	Nonvacant New	No	43	46	90%	N/A	7.9	\$12.33	No res.	Strong	41	Lower Mixed	26	5	10
NV.114	5338002010	0.17	319 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1948	4.1	\$44.79	3.0	Strong	2	Above Mod.	0	0	2
NV.114	5338002009	0.18	315 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1929	4.1	\$44.79	3.0	Strong	2	Above Mod.	0	0	2
NV.115	5338002020	0.16	405 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1935	2.0	\$55.84	3.0	High	3	Mod./Above Mod.	0	1	2
NV.115	5338002019	0.17	401 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1933	2.0	\$55.84	3.0	High	3	Mod./Above Mod.	0	1	2
NV.115	5338002018	0.17	333 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1929	2.0	\$55.84	3.0	High	3	Mod./Above Mod.	0	1	2
NV.116	5338002021	0.17	409 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1933	3.7	\$64.61	3.0	Strong	1	Above Mod.	0	0	1
NV.117	5338003017	0.15	144 N MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1926	3.6	\$61.21	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.117	5338003020	0.22	140 N MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1922	3.6	\$61.21	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.118	5338003036	0.15	201 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.33	Nonvacant New	No	43	14	70%	1927	2.0	\$41.30	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.118	5338003035	0.18	205 N BUSHNELL AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.33	Nonvacant New	No	43	14	70%	1926	2.0	\$41.30	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.119	5338004015	0.20	15 N BUSHNELL AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.20	Nonvacant New	No	48	9	70%	1952	2.1	\$28.80	4.5	Strong	5	Mod./Above Mod.	0	2	3
NV.120	5338005007	0.17	21 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.34	Nonvacant New	No	48	17	70%	1922	2.1	\$38.27	8.5	Strong	11	Mod./Above Mod.	0	3	8
NV.120	5338005008	0.17	27 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.34	Nonvacant New	No	48	17	70%	1919	2.1	\$38.27	8.5	Strong	11	Mod./Above Mod.	0	3	8
NV.121	5338005009	0.17	29 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.68	Nonvacant New	No	48	33	90%	1921	2.8	\$25.87	2.8	Strong	19	Lower Mixed	12	2	5
NV.121	5338005010	0.17	33 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.68	Nonvacant New	No	48	33	90%	1920	2.8	\$25.87	2.8	Strong	19	Lower Mixed	12	2	5
NV.122	5338006022	0.17	210 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1938	1.2	\$28.49	7.5	High	7	Mod./Above Mod.	0	2	5
NV.122	5338006023	0.17	206 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1925	1.2	\$28.49	7.5	High	7	Mod./Above Mod.	0	2	5
NV.123	5338006027	0.17	128 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1937	2.7	\$44.38	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.123	5338006026	0.14	130 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1934	2.7	\$44.38	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.124	5338006030	0.17	114 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1938	1.7	\$43.61	7.5	High	7	Mod./Above Mod.	0	2	5
NV.124	5338006031	0.17	110 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1924	1.7	\$43.61	7.5	High	7	Mod./Above Mod.	0	2	5
NV.125	5338006033	0.17	102 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1938	3.1	\$38.03	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.125	5338006032	0.17	106 N BUSHNELL AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1927	3.1	\$38.03	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.126	5338007002	0.17	312 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1938	1.1	\$41.06	3.0	High	2	Above Mod.	0	0	2
NV.126	5338007003	0.17	308 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.34	Nonvacant New	No	18	6	90%	1927	1.1	\$41.06	3.0	High	2	Above Mod.	0	0	2
NV.127	5338007007	0.17	408 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1930	3.4	\$18.23	3.0	Strong	2	Above Mod.	0	0	2
NV.127	5338007008	0.16	404 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1928	3.4	\$18.23	3.0	Strong	2	Above Mod.	0	0	2
NV.128	5338007011	0.17	332 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1928	4.0	\$61.76	3.0	Strong	2	Above Mod.	0	0	2
NV.128	5338007010	0.17	336 N BUSHNELL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1927	4.0	\$61.76	3.0	Strong	2	Above Mod.	0	0	2
NV.129	5338007018	0.17	323 N ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	6	90%	1907	9.2	\$16.36	3.0	Strong	2	Above Mod.	0	0	2
NV.129	5338007017	0.19	325 N ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	6	90%	1903	9.2	\$16.36	3.0	Strong	2	Above Mod.	0	0	2
NV.130	5338009010	0.18	425 N MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.18	Nonvacant New	No	24	4	90%	1913	2.6	\$6.85	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.131	5338012008	0.18	26 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.52	Nonvacant New	No	48	25	90%	1951	4.3	\$57.89	3.1	Strong	15	Lower Mixed	10	2	3
NV.131	5338012007	0.17	22 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Five or More Units or Apartments (Any Combination)	0.52	Nonvacant New	No	48	25	90%	1948	4.3	\$57.89	3.1	Strong	15	Lower Mixed	10	2	3
NV.131	5338012009	0.17	30 N ELECTRIC AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.52	Nonvacant New	No	48	25	90%	1920	4.3	\$57.89	3.1	Strong	15	Lower Mixed	10	2	3
NV.132	5338013021	0.39	15 N CURTIS AVE	Automotive Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	1.0															

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Site ID	A/N	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1997	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio				Lower	Mod.	Above Mod.
NV.136	5338013014	0.19	33 N CURTIS AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.60	Nonvacant New	No	48	29	90%	1906	4.0	\$41.37	14.5	Strong	24	Lower Mixed	15	3	6
NV.136	5338013015	0.19	103 N CURTIS AVE	High Density Residential	CPD	Residential - Single Family Residence	0.60	Nonvacant New	No	48	29	90%	1905	4.0	\$41.37	14.5	Strong	24	Lower Mixed	15	3	6
NV.136	5338013008	0.22	32 S MARGUERITA AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.60	Nonvacant New	No	48	29	90%	N/A	4.0	\$41.37	14.5	Strong	24	Lower Mixed	15	3	6
NV.137	5338014013	0.17	203 N CURTIS AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.34	Nonvacant New	No	43	15	70%	1921	3.6	\$60.71	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.137	5338014014	0.17	207 N CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1912	3.6	\$60.71	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.138	5338017034	0.17	1210 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1923	2.3	\$7.10	3.0	Strong	1	Above Mod.	0	0	1
NV.139	5338019019	0.19	209 N OLIVE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1927	2.3	\$8.23	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.139	5338019005	0.18	210 N CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1908	2.3	\$8.23	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.140	5338020006	0.21	24 N CURTIS AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.41	Nonvacant New	No	48	20	70%	1965	2.5	\$59.20	3.3	Strong	10	Mod./Above Mod.	0	3	7
NV.140	5338020007	0.21	28 N CURTIS AVE	Automotive Commercial	CPD	Residential - Five or More Units or Apartments (Any Combination)	0.41	Nonvacant New	No	48	20	70%	1963	2.5	\$59.20	3.3	Strong	10	Mod./Above Mod.	0	3	7
NV.141	5338020029	0.56	108 N CURTIS AVE	High Density Residential	R-3	Commercial - Parking Lot (Commercial Use Property)	0.56	Nonvacant New	No	25.8	14	90%	1968	11.6	\$4.84	No res.	Strong	13	Mod./Above Mod.	0	4	9
NV.142	5338021009	0.18	24 N OLIVE AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.56	Nonvacant New	No	48	27	90%	1915	2.4	\$7.43	6.8	Strong	21	Lower Mixed	14	2	5
NV.142	5338021010	0.18	18 N OLIVE AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.56	Nonvacant New	No	48	27	90%	1924	2.4	\$7.43	6.8	Strong	21	Lower Mixed	14	2	5
NV.142	5338021037	0.21	16 N OLIVE AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.56	Nonvacant New	No	48	27	90%	1900	2.4	\$7.43	6.8	Strong	21	Lower Mixed	14	2	5
NV.143	5338024011	0.19	1119 SAINT CHARLES TER	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1959	2.0	\$26.81	3.0	High	3	Mod./Above Mod.	0	1	2
NV.143	5338024012	0.17	1115 SAINT CHARLES TER	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1928	2.0	\$26.81	3.0	High	3	Mod./Above Mod.	0	1	2
NV.143	5338024010	0.14	1125 SAINT CHARLES TER	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1911	2.0	\$26.81	3.0	High	3	Mod./Above Mod.	0	1	2
NV.144	5338025008	0.17	515 N ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.17	Nonvacant New	No	24	4	90%	1920	2.3	\$6.93	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.145	5338026055	0.35	526 N ATLANTIC BLVD	General Commercial	CPD	Commercial - Store Combination	0.50	Nonvacant New	No	48	24	70%	1929	1.5	\$65.68	No res.	Medium	8	Mod./Above Mod.	0	2	6
NV.145	5338026056	0.15	308 W ALHAMBRA RD	General Commercial	CPD	Commercial - Commercial	0.50	Nonvacant New	No	48	24	70%	N/A	1.5	\$65.68	No res.	Medium	8	Mod./Above Mod.	0	2	6
NV.146	5338031002	0.18	123 N 5TH ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.36	Nonvacant New	No	64	23	70%	1954	1.3	\$37.82	5.8	High	11	Mod./Above Mod.	0	3	8
NV.146	5338031001	0.18	119 N 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.36	Nonvacant New	No	64	23	70%	1907	1.3	\$37.82	5.8	High	11	Mod./Above Mod.	0	3	8
NV.147	5338033013	0.16	528 HOWARD ST	Parking	P	Institutional - Homes for Aged and Others	0.74	Nonvacant New	No	64	47	90%	1938	1.8	\$33.10	23.5	High	32	Lower Mixed	20	4	8
NV.147	5338033012	0.17	522 HOWARD ST	Parking	P	Residential - Double, Duplex, or Two Units	0.74	Nonvacant New	No	64	47	90%	1922	1.8	\$33.10	23.5	High	32	Lower Mixed	20	4	8
NV.148	5338033016	0.37	N/A	Parking	P	Commercial - Commercial	0.37	Nonvacant New	No	64	24	70%	N/A	No Imp.	\$21.75	No res.	Strong	17	Mod./Above Mod.	0	5	12
NV.149	5338033033	0.59	535 W MAIN ST	General Commercial	CPD	Industrial - Light Manufacturing	1.48	Nonvacant New	No	64	95	90%	1928	1.8	\$36.23	No res.	High	68	Lower Mixed	43	9	16
NV.149	5338033018	0.14	617 W MAIN ST	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	1.48	Nonvacant New	No	64	95	90%	1925	1.8	\$36.23	No res.	High	68	Lower Mixed	43	9	16
NV.149	5338033034	0.76	N/A	General Commercial	CPD	Commercial - Car Wash	1.48	Nonvacant New	No	64	95	90%	N/A	1.8	\$36.23	No res.	High	68	Lower Mixed	43	9	16
NV.150	5338034001	0.18	116 N 5TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	64	22	70%	1908	1.5	\$9.78	11.0	High	11	Mod./Above Mod.	0	3	8
NV.151	5338034004	0.17	128 N 5TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	64	23	70%	1937	3.1	\$35.04	5.8	Strong	13	Mod./Above Mod.	0	4	9
NV.151	5338034003	0.18	126 N 5TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	64	23	70%	1921	3.1	\$35.04	5.8	Strong	13	Mod./Above Mod.	0	4	9
NV.152	5338034019	0.18	22 N 5TH ST	Parking	P	Residential - Five or More Units or Apartments (Any Combination)	0.35	Nonvacant New	No	64	23	70%	1976	0.8	\$51.46	3.3	Medium	6	Mod./Above Mod.	0	2	4
NV.152	5338034033	0.18	17 N 4TH ST	Parking	P	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	64	23	70%	1922	0.8	\$51.46	3.3	Medium	6	Mod./Above Mod.	0	2	4
NV.153	5338024024	0.18	123 N 4TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.18	Nonvacant New	No	64	11	70%	1909	2.3	\$90.00	5.5	High	5	Mod./Above Mod.	0	2	3
NV.154	5339001010	0.20	2420 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1939	3.4	\$47.89	3.5	Strong	2	Above Mod.	0	0	2
NV.154	5339001011	0.20	2416 W ALHAMBRA RD	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1923	3.4	\$47.89	3.5	Strong	2	Above Mod.	0	0	2
NV.155	5339001019	0.16	305 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1927	3.0	\$46.13	3.0	Strong	2	Above Mod.	0	0	2
NV.155	5339001021	0.17	301 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1927	3.0	\$46.13	3.0	Strong	2	Above Mod.	0	0	2
NV.156	5339001022	0.18	2409 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1925	1.8	\$30.60	3.5	High	2	Above Mod.	0	0	2
NV.156	5339001023	0.18	2415 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1924	1.8	\$30.60	3.5	High	2	Above Mod.	0	0	2
NV.157	5339001029	0.18	2505 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1933	2.0	\$34.73	3.5	Strong	2	Above Mod.	0	0	2
NV.157	5339001030	0.18	2509 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1923	2.0	\$34.73	3.5	Strong	2	Above Mod.	0	0	2
NV.158	5339002022	0.19	2428 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1926	2.1	\$26.58	3.5	Strong	2	Above Mod.	0	0	2
NV.158	5339002023	0.19	2424 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1921	2.1	\$26.58	3.5	Strong	2	Above Mod.	0	0	2
NV.159	5339002026	0.18	2412 BIRCH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1925	2.9	\$52.15	3.0	Strong	2	Above Mod.	0	0	2
NV.159	5339002028	0.16	217 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1923	2.9	\$52.15	3.0	Strong	2	Above Mod.	0	0	2
NV.160	5339002029	0.14	213 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1924	4.0	\$72.25	3.0	High	1	Above Mod.	0	0	1
NV.161	5339003027	0.17	105 N PRIMROSE AVE	General Commercial	CPD	Residential - Three Units (Any Combination)	0.17	Nonvacant New	No	48	8	70%	1948	1.8	\$87.53	2.7	Medium	2	Mod./Above Mod.	0	1	1
NV.162	5339003032	0.09	2411 W MAIN ST	General Commercial	CPD	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.52	Nonvacant New	No	48	25	90%	1962	3.2	\$26.88	6.3	Strong	19	Lower Mixed	12	2	5
NV.162	5339003031	0.12	2407 W MAIN ST	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	0.52	Nonvacant New	No	48	25	90%	1962	3.2	\$26.88	6.3	Strong	19	Lower Mixed	12	2	5
NV.162	5339003030	0.14	2401 W MAIN ST	General Commercial	CPD	Commercial - Store Combination	0.52	Nonvacant New	No	48	25	90%	1925	3.2	\$26.88	6.3	Strong	19	Lower Mixed	12	2	5
NV.162	5339003029	0.17	15 N PRIMROSE AVE	General Commercial	CPD	Residential - Four Units (Any Combination)	0.52	Nonvacant New	No	48	25	90%	1920	3.2	\$26.88	6.3	Strong	19	Lower Mixed	12	2	5
NV.163	5339004003	0.23	2524 W MAIN ST	General Commercial	CPD	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.23	Nonvacant New	No	48	11	70%	1977	7.3	\$50.69	No res.	Strong	8	Mod./Above Mod.	0	2	6
NV.164	5339004004	0.19	15 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1955	4.0	\$69.01	3.0	High	1	Above Mod.	0	0	1
NV.165	5339004007	0.19	25 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%										

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio				Lower	Mod.	Above Mod.
NV.169	5339005002	0.19	117 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1938	3.4	\$59.14	3.5	Strong	2	Above Mod.	0	0	2
NV.169	5339005003	0.19	121 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1938	3.4	\$59.14	3.5	Strong	2	Above Mod.	0	0	2
NV.170	5339005007	0.19	207 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1941	4.0	\$55.75	3.5	Strong	2	Above Mod.	0	0	2
NV.170	5339005008	0.19	209 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1923	4.0	\$55.75	3.5	Strong	2	Above Mod.	0	0	2
NV.171	5339005021	0.17	200 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1946	3.7	\$28.65	3.0	Strong	2	Above Mod.	0	0	2
NV.171	5339005020	0.17	204 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1920	3.7	\$28.65	3.0	Strong	2	Above Mod.	0	0	2
NV.172	5339005022	0.17	128 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1951	2.3	\$40.37	3.0	Strong	2	Above Mod.	0	0	2
NV.172	5339005023	0.17	126 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1938	2.3	\$40.37	3.0	Strong	2	Above Mod.	0	0	2
NV.173	5339005024	0.18	120 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1941	3.8	\$31.97	3.0	Strong	2	Above Mod.	0	0	2
NV.173	5339005025	0.17	116 S FREMONT AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1922	3.8	\$31.97	3.0	Strong	2	Above Mod.	0	0	2
NV.174	5339006019	0.18	204 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1941	2.4	\$45.58	3.0	Strong	2	Above Mod.	0	0	2
NV.174	5339006007	0.15	117 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1924	2.4	\$45.58	3.0	Strong	2	Above Mod.	0	0	2
NV.175	5339006008	0.15	121 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	4.0	\$51.94	3.0	Strong	1	Above Mod.	0	0	1
NV.176	5339006015	0.14	224 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1948	3.7	\$39.73	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.176	5339006014	0.13	2413 POPLAR BLVD	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1943	3.7	\$39.73	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.176	5339006016	0.20	220 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.48	Nonvacant New	No	18	9	90%	1942	3.7	\$39.73	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.177	5339007023	0.69	2424 W MAIN ST	General Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.87	Nonvacant New	No	48	42	90%	1960	2.8	\$8.16	14.0	Strong	35	Lower Mixed	22	4	9
NV.177	5339007001	0.18	2400 W MAIN ST	General Commercial	CPD	Residential - Single Family Residence	0.87	Nonvacant New	No	48	42	90%	1911	2.8	\$8.16	14.0	Strong	35	Lower Mixed	22	4	9
NV.178	5339007011	0.18	108 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1924	2.7	\$30.93	3.5	Strong	2	Above Mod.	0	0	2
NV.178	5339007010	0.18	112 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1912	2.7	\$30.93	3.5	Strong	2	Above Mod.	0	0	2
NV.179	5339007013	0.18	100 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	7	90%	1923	3.6	\$9.57	3.5	Strong	2	Above Mod.	0	0	2
NV.179	5339007012	0.18	104 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	7	90%	1923	3.6	\$9.57	3.5	Strong	2	Above Mod.	0	0	2
NV.180	5339008005	0.07	N/A	General Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.45	Nonvacant New	No	48	22	70%	1956	1.6	\$26.37	No res.	High	12	Mod./Above Mod.	0	3	9
NV.180	5339008001	0.21	2310 W MAIN ST	General Commercial	CPD	Institutional - Church	0.45	Nonvacant New	No	48	22	70%	1955	1.6	\$26.37	No res.	High	12	Mod./Above Mod.	0	3	9
NV.180	5339008002	0.17	2330 W MAIN ST	General Commercial	CPD	Commercial - Store Combination	0.45	Nonvacant New	No	48	22	70%	1924	1.6	\$26.37	No res.	High	12	Mod./Above Mod.	0	3	9
NV.181	5339008003	0.06	2350 W MAIN ST	General Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.32	Nonvacant New	No	48	15	70%	1954	2.8	\$33.99	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.181	5339008004	0.26	8 S PRIMROSE AVE	General Commercial	CPD	Commercial - Store Combination	0.32	Nonvacant New	No	48	15	70%	1954	2.8	\$33.99	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.182	5339008011	0.15	28 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.51	Nonvacant New	No	18	9	90%	1923	3.0	\$46.56	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.182	5339008013	0.18	106 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.51	Nonvacant New	No	18	9	90%	1923	3.0	\$46.56	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.182	5339008012	0.18	102 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.51	Nonvacant New	No	18	9	90%	1922	3.0	\$46.56	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.183	5339008014	0.15	108 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1922	2.9	\$36.65	3.0	Strong	1	Above Mod.	0	0	1
NV.184	5339009009	0.22	2250 W MAIN ST	General Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.22	Nonvacant New	No	48	11	70%	1954	1.5	\$59.68	No res.	High	6	Mod./Above Mod.	0	2	4
NV.185	5339009021	0.16	124 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1928	4.0	\$64.71	3.0	Strong	2	Above Mod.	0	0	2
NV.185	5339009022	0.16	128 S PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1928	4.0	\$64.71	3.0	Strong	2	Above Mod.	0	0	2
NV.186	5339010044	0.27	2201 W MAIN ST	Automotive Commercial	CPD	Commercial - Office Building	0.72	Nonvacant New	No	48	34	90%	1990	2.2	\$41.09	34.0	Strong	30	Lower Mixed	19	4	7
NV.186	5339010009	0.44	2289 W MAIN ST	General Commercial	CPD	Commercial - Store	0.72	Nonvacant New	No	48	34	90%	1932	2.2	\$41.09	34.0	Strong	30	Lower Mixed	19	4	7
NV.187	5339012019	0.15	120 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	2.4	\$23.23	3.0	Strong	1	Above Mod.	0	0	1
NV.188	5339013009	0.13	2311 W GRAND AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1926	1.4	\$8.71	3.0	High	2	Above Mod.	0	0	2
NV.188	5339013010	0.19	204 N PRIMROSE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1923	1.4	\$8.71	3.0	High	2	Above Mod.	0	0	2
NV.189	5339014007	0.25	2306 W ALHAMBRA RD	High Density Residential	R-3	Residential - Four Units (Any Combination)	0.67	Nonvacant New	No	39.79	27	90%	1924	2.7	\$40.94	4.5	Strong	19	Lower Mixed	12	2	5
NV.189	5339014009	0.17	421 LA FRANCE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.67	Nonvacant New	No	39.79	27	90%	1924	2.7	\$40.94	4.5	Strong	19	Lower Mixed	12	2	5
NV.189	5339014008	0.25	425 LA FRANCE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.67	Nonvacant New	No	39.79	27	90%	1922	2.7	\$40.94	4.5	Strong	19	Lower Mixed	12	2	5
NV.190	5339014011	0.18	413 LA FRANCE AVE	High Density Residential	R-3	Residential - Double Duplex, or Two Units	0.35	Nonvacant New	No	43	15	70%	1948	2.4	\$60.68	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.190	5339014010	0.17	419 LA FRANCE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1928	2.4	\$60.68	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.191	5339015010	0.17	430 LA FRANCE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.17	Nonvacant New	No	24	4	90%	1937	2.3	\$40.90	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.192	5339016002	0.17	413 N PALM AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1922	1.9	\$50.43	7.5	High	7	Mod./Above Mod.	0	2	5
NV.192	5339016001	0.17	417 N PALM AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1922	1.9	\$50.43	7.5	High	7	Mod./Above Mod.	0	2	5
NV.193	5339016017	0.17	304 LA FRANCE AVE	High Density Residential	R-3	Residential - Single Family Residence	0.17	Nonvacant New	No	24	4	90%	1924	4.0	\$38.46	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.194	5339018003	0.21	2009 CEDAR ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	1.04	Nonvacant New	No	43	45	90%	1921	1.7	\$27.45	6.4	High	27	Lower Mixed	17	3	7
NV.194	5339018004	0.21	2013 CEDAR ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	1.04	Nonvacant New	No	43	45	90%	1914	1.7	\$27.45	6.4	High	27	Lower Mixed	17	3	7
NV.195	5339019010	0.16	2116 CEDAR ST	High Density Residential	R-3	Residential - Single Family Residence	0.16	Nonvacant New	No	24	4	90%	1913	1.5	\$11.54	4.0	High	2	Mod./Above Mod.	0	1	1
NV.196	5339021042	0.42	1901 W MAIN ST	Automotive Commercial	CPD	Commercial - Bank, Savings and Loan	0.87	Nonvacant New	No	48	42	90%	1989	1.3	\$49.37	No res.	High	30	Lower Mixed	19	4	7
NV.196	5339021036	0.28	1843 W MAIN ST	Automotive Commercial	CPD	Commercial - Store	0.87	Nonvacant New	No	48	42	90%	1922	1.3	\$49.37	No res.	High	30	Lower Mixed	19	4	7
NV.196	5339021020	0.17	1851 W MAIN ST	Automotive Commercial	CPD	Commercial - Commercial	0.87	Nonvacant New	No	48	42	90%	N/A	1.3	\$49.37	No res.	High	30	Lower Mixed	19	4	7
NV.197	5339021023	0.22	N/A	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.45	Nonvacant New	No	48	21	70%	1946	34.2	\$5.66	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.197	5339021024	0.22	1831 W MAIN ST	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.45	Nonvacant New	No	48	21	70%	N/A	34.2	\$5.66	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.198	5339021040	0.71	1723 W MAIN ST	Automotive Commercial	CPD	Commercial - Store	0.71	Nonvacant New	No	48	34	90%	1976	1.8	\$40.69	No res.	High	24	Lower Mixed	15	3	6
NV.199	5342006023	0.17	430 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1952	4.1	\$53.22	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.199	5342006024	0.17	432 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1944	4.1	\$53.22	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.199	5342006025	0.17	436 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1944	4.1	\$53.22	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.200	5342006026	0.17	500 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1950	14.6	\$16.33	3.0	Strong	1	Above Mod.	0	0	1
NV.201	5342007007	0.12	N/A	Medium Density Residential	R-2	Residential - Single Family Residence	0.24	Nonvacant New	No	18	4	90%	1926	6.9	\$50.91	4.0	Strong	1	Above Mod.	0	0	1
NV.201</																						

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio				Lower	Mod.	Above Mod.
NV.202	5342008005	0.16	316 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1915	4.0	\$63.48	3.0	Strong	1	Above Mod.	0	0	1
NV.203	5342008008	0.16	328 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1946	4.0	\$49.12	3.0	Strong	1	Above Mod.	0	0	1
NV.204	5342008012	0.16	404 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1946	3.1	\$21.30	3.0	Strong	1	Above Mod.	0	0	1
NV.205	5342008016	0.17	420 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1949	1.1	\$15.20	3.0	High	3	Mod./Above Mod.	0	1	2
NV.205	5342008014	0.16	412 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1947	1.1	\$15.20	3.0	High	3	Mod./Above Mod.	0	1	2
NV.205	5342008015	0.16	416 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1926	1.1	\$15.20	3.0	High	3	Mod./Above Mod.	0	1	2
NV.206	5342008017	0.17	424 ELM ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1950	9.8	\$28.02	3.0	Strong	1	Above Mod.	0	0	1
NV.207	5342022033	0.23	146 S PALM AVE	Industrial	IPD	Commercial - Parking Lot (Commercial Use Property)	2.98	Nonvacant New	No	43	128	90%	1975	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022034	0.23	127 S RAYMOND AVE	Industrial	IPD	Commercial - Parking Lot (Commercial Use Property)	2.98	Nonvacant New	No	43	128	90%	1975	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022036	0.23	103 S PALM AVE	Industrial	IPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.98	Nonvacant New	No	43	128	90%	1973	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022037	0.23	128 S PALM AVE	Industrial	IPD	Industrial - Light Manufacturing	2.98	Nonvacant New	No	43	128	90%	1968	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022035	1.84	146 S PALM AVE	Industrial	IPD	Industrial - Light Manufacturing	2.98	Nonvacant New	No	43	128	90%	1926	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022056	0.04	N/A	N/A	IPD	Industrial - Light Manufacturing	2.98	Nonvacant New	No	43	128	90%	N/A	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022054	0.13	N/A	Industrial	IPD	Industrial - Light Manufacturing	2.98	Nonvacant New	No	43	128	90%	N/A	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.207	5342022053	0.06	N/A	Industrial	IPD	Industrial - Light Manufacturing	2.98	Nonvacant New	No	43	128	90%	N/A	0.8	\$48.81	No res.	Medium	58	Lower Mixed	36	8	14
NV.208	5342025029	0.14	1705 ACACIA	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.29	Nonvacant New	No	43	12	70%	1932	2.3	\$90.36	4.0	High	5	Mod./Above Mod.	0	2	3
NV.208	5342025030	0.14	1701 ACACIA	High Density Residential	R-3	Residential - Single Family Residence	0.29	Nonvacant New	No	43	12	70%	1912	2.3	\$90.36	4.0	High	5	Mod./Above Mod.	0	2	3
NV.209	5342025032	0.86	1910 W MAIN ST	Automotive Commercial	CPD	Commercial - Bank, Savings and Loan	1.31	Nonvacant New	No	48	63	90%	1969	1.6	\$58.76	No res.	High	45	Lower Mixed	28	6	11
NV.209	5342025049	0.22	1834 W MAIN ST	Automotive Commercial	CPD	Commercial - Store	1.31	Nonvacant New	No	48	63	90%	1923	1.6	\$58.76	No res.	High	45	Lower Mixed	28	6	11
NV.209	5342025033	0.22	N/A	Automotive Commercial	EMC	Commercial - Parking Lot (Commercial Use Property)	1.31	Nonvacant New	No	30	39	90%	1974	1.6	\$58.76	No res.	High	28	Lower Mixed	18	3	7
NV.210	5342026006	0.23	1724 ACACIA	High Density Residential	R-3	Residential - Single Family Residence	0.23	Nonvacant New	No	43	10	70%	1910	189.0	\$23.23	10.0	Strong	6	Mod./Above Mod.	0	2	4
NV.211	5342027002	0.05	211 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.17	Nonvacant New	No	24	4	90%	1922	2.5	\$53.37	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.211	5342027116	0.11	1700 PEPPER ST	High Density Residential	R-3	Residential - Single Family Residence	0.17	Nonvacant New	No	24	4	90%	N/A	2.5	\$53.37	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.212	5342027013	0.23	1808 PEPPER ST	High Density Residential	R-3	Residential - Single Family Residence	0.23	Nonvacant New	No	43	10	70%	1906	4.0	\$37.80	10.0	Strong	6	Mod./Above Mod.	0	2	4
NV.213	5342027029	0.23	1801 W COMMONWEALTH AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.46	Nonvacant New	No	43	20	70%	1935	1.9	\$42.53	4.0	High	8	Mod./Above Mod.	0	2	6
NV.213	5342027030	0.23	1723 W COMMONWEALTH AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.46	Nonvacant New	No	43	20	70%	1917	1.9	\$42.53	4.0	High	8	Mod./Above Mod.	0	2	6
NV.214	5343003017	0.15	423 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1928	9.2	\$40.50	3.0	Strong	1	Above Mod.	0	0	1
NV.215	5343003021	0.17	503 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1923	3.6	\$32.98	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.215	5343003022	0.17	509 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1912	3.6	\$32.98	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.215	5343003037	0.17	501 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1910	3.6	\$32.98	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.216	5343003024	0.17	517 S ELECTRIC AVE, # A	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1920	2.1	\$48.95	3.0	Strong	2	Above Mod.	0	0	2
NV.216	5343003023	0.17	513 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1912	2.1	\$48.95	3.0	Strong	2	Above Mod.	0	0	2
NV.217	5343003062	0.12	405 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1923	3.4	\$55.30	3.0	Strong	1	Above Mod.	0	0	1
NV.217	5343003063	0.03	N/A	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	N/A	3.4	\$55.30	3.0	Strong	1	Above Mod.	0	0	1
NV.218	5343003066	0.15	333 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	2.3	\$49.02	3.0	Strong	1	Above Mod.	0	0	1
NV.219	5343005006	0.16	1613 MAPLE CT	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1924	3.7	\$24.66	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.219	5343005005	0.16	1615 MAPLE CT	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1922	3.7	\$24.66	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.220	5343007023	0.28	200 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.28	Nonvacant New	No	43	12	70%	1903	2.0	\$46.60	12.0	High	6	Mod./Above Mod.	0	2	4
NV.221	5343007024	0.28	204 S MARENGO AVE	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.42	Nonvacant New	No	43	18	70%	1908	4.7	\$12.84	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.221	5343007025	0.14	208 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	43	18	70%	1902	4.7	\$12.84	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.222	5343008036	1.52	1526 W MAIN ST	Automotive Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	1.80	Nonvacant New	No	48	86	90%	1993	0.5	\$14.65	No res.	Medium	39	Lower Mixed	25	5	9
NV.222	5343008037	0.28	N/A	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.80	Nonvacant New	No	48	86	90%	N/A	0.5	\$14.65	No res.	Medium	39	Lower Mixed	25	5	9
NV.223	5343011015	0.15	133 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.33	Nonvacant New	No	43	14	70%	1923	2.2	\$6.83	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.223	5343010018	0.17	131 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.33	Nonvacant New	No	43	14	70%	1912	2.2	\$6.83	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.224	5343012008	0.16	328 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	6	90%	1930	1.2	\$27.76	3.0	High	2	Above Mod.	0	0	2
NV.224	5343012022	0.20	329 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	6	90%	1925	1.2	\$27.76	3.0	High	2	Above Mod.	0	0	2
NV.225	5343012010	0.16	400 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1923	4.0	\$54.63	3.0	Strong	1	Above Mod.	0	0	1
NV.226	5343013013	0.18	519 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	7	90%	1910	2.3	\$62.92	3.5	Strong	2	Above Mod.	0	0	2
NV.226	5343013018	0.18	518 S ELECTRIC AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.36	Nonvacant New	No	18	7	90%	1909	2.3	\$62.92	3.5	Strong	2	Above Mod.	0	0	2
NV.227	5343014002	0.18	527 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1976	2.5	\$42.39	3.5	Strong	2	Above Mod.	0	0	2
NV.227	5343014001	0.18	523 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.37	Nonvacant New	No	18	7	90%	1910	2.5	\$42.39	3.5	Strong	2	Above Mod.	0	0	2
NV.228	5343014006	0.18	611 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1895	3.5	\$20.53	3.0	Strong	1	Above Mod.	0	0	1
NV.229	5343015002	0.16	432 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1940	4.0	\$60.48	3.0	Strong	2	Above Mod.	0	0	2
NV.229	5343015003	0.16	500 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1939	4.0	\$60.48	3.0	Strong	2	Above Mod.	0	0	2
NV.230	5343015008	0.16	520 S MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.32	Nonvacant New	No	18	6	90%	1925	2.0	\$52.65	3.0	High	2	Above Mod.</			

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1997	Allowed DU/A	Max Allowed Capacity	Realistic Capacity	Site Factors						Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio	Reuse Potential Score	Net Capacity	Affordability Level	Lower	Mod.	Above Mod.
NV.236	5343016010	0.17	317 S CURTIS AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1939	4.0	\$65.16	3.0	High	2	Above Mod.	0	0	2
NV.236	5343016013	0.17	316.5 MARGUERITA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1924	4.0	\$65.16	3.0	High	2	Above Mod.	0	0	2
NV.237	5343017008	0.17	215 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1914	5.0	\$46.71	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.237	5343017007	0.17	221 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1908	5.0	\$46.71	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.238	5343017010	0.17	207 S CURTIS AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	43	15	70%	1955	1.1	\$31.28	5.0	High	7	Mod./Above Mod.	0	2	5
NV.238	5343017019	0.17	208.5 MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1906	1.1	\$31.28	5.0	High	7	Mod./Above Mod.	0	2	5
NV.239	5343017013	0.20	129 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1911	2.9	\$40.96	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.239	5343017014	0.17	125 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1909	2.9	\$40.96	8.0	Strong	10	Mod./Above Mod.	0	3	7
NV.240	5343018029	0.17	118.5 MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1923	2.2	\$42.85	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.240	5343017015	0.17	122 S MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1921	2.2	\$42.85	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.241	5343017024	0.19	228.5 MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.37	Nonvacant New	No	43	16	70%	1936	2.8	\$82.59	5.3	High	7	Mod./Above Mod.	0	2	5
NV.241	5343017023	0.17	226.5 MARGUERITA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.37	Nonvacant New	No	43	16	70%	1914	2.8	\$82.59	5.3	High	7	Mod./Above Mod.	0	2	5
NV.242	5343018003	0.06	18 S MARGUERITA AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	N/A	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.242	5343018030	0.23	1320 W MAIN ST	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	1977	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.242	5343018031	0.35	1300 W MAIN ST	Automotive Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	1.04	Nonvacant New	No	48	50	90%	1927	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.242	5343018002	0.16	14 S MARGUERITA AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	1960	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.242	5343018001	0.19	1334 W MAIN ST	Automotive Commercial	CPD	Commercial - Store	1.04	Nonvacant New	No	48	50	90%	1922	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.242	5343018004	0.06	1330 W MAIN ST	Automotive Commercial	CPD	Commercial - Store	1.04	Nonvacant New	No	48	50	90%	1921	2.6	\$44.61	No res.	Strong	45	Lower Mixed	28	6	11
NV.243	5343018009	0.17	119 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1913	1.8	\$35.29	5.0	High	7	Mod./Above Mod.	0	2	5
NV.243	5343018010	0.17	117 S CURTIS AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	43	15	70%	1907	1.8	\$35.29	5.0	High	7	Mod./Above Mod.	0	2	5
NV.244	5343018026	0.17	106.5 MARGUERITA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1922	2.4	\$45.23	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.244	5343018012	0.17	111 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1910	2.4	\$45.23	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.245	5343018016	0.17	25 S CURTIS AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.35	Nonvacant New	No	48	17	70%	1919	3.5	\$27.32	5.7	Strong	10	Mod./Above Mod.	0	3	7
NV.245	5343018015	0.17	29 S CURTIS AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	48	17	70%	1907	3.5	\$27.32	5.7	Strong	10	Mod./Above Mod.	0	3	7
NV.246	5343018022	0.17	26 S MARGUERITA AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.69	Nonvacant New	No	48	33	90%	1920	2.7	\$45.63	6.6	Strong	25	Lower Mixed	16	3	6
NV.246	5343018017	0.17	21 S CURTIS AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.69	Nonvacant New	No	48	33	90%	1908	2.7	\$45.63	6.6	Strong	25	Lower Mixed	16	3	6
NV.246	5343018021	0.17	22 S MARGUERITA AVE	Automotive Commercial	CPD	Residential - Double, Duplex, or Two Units	0.69	Nonvacant New	No	48	33	90%	1921	2.7	\$45.63	6.6	Strong	25	Lower Mixed	16	3	6
NV.246	5343018023	0.17	30 S MARGUERITA AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.69	Nonvacant New	No	48	33	90%	1920	2.7	\$45.63	6.6	Strong	25	Lower Mixed	16	3	6
NV.247	5343018019	0.18	15 S CURTIS AVE	Automotive Commercial	CPD	Residential - Five or More Units or Apartments (Any Combination)	0.35	Nonvacant New	No	48	17	70%	1922	2.3	\$79.72	2.1	High	5	Mod./Above Mod.	0	2	3
NV.247	5343018018	0.17	19 S CURTIS AVE	Automotive Commercial	CPD	Residential - Three Units (Any Combination)	0.35	Nonvacant New	No	48	17	70%	1910	2.3	\$79.72	2.1	High	5	Mod./Above Mod.	0	2	3
NV.248	5343019014	0.19	30 S CURTIS AVE	Automotive Commercial	CPD	Residential - Five or More Units or Apartments (Any Combination)	0.55	Nonvacant New	No	48	27	90%	1990	0.8	\$47.15	4.5	Medium	9	Lower Mixed	6	1	2
NV.248	5343019013	0.19	26 S CURTIS AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.55	Nonvacant New	No	48	27	90%	1922	0.8	\$47.15	4.5	Medium	9	Lower Mixed	6	1	2
NV.248	5343019016	0.17	33 S OLIVE AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.55	Nonvacant New	No	48	27	90%	N/A	0.8	\$47.15	4.5	Medium	9	Lower Mixed	6	1	2
NV.249	5343019020	0.34	19 S OLIVE AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	0.52	Nonvacant New	No	48	25	90%	1991	No imp.	\$44.60	No res.	Strong	23	Lower Mixed	15	3	5
NV.249	5343019015	0.17	25 S OLIVE AVE	Automotive Commercial	CPD	Residential - Single Family Residence	0.52	Nonvacant New	No	48	25	90%	N/A	No imp.	\$44.60	No res.	Strong	23	Lower Mixed	15	3	5
NV.250	5343019023	0.23	1246 W MAIN ST	Automotive Commercial	CPD	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.23	Nonvacant New	No	48	11	70%	1964	360.2	\$43.48	No res.	Strong	8	Mod./Above Mod.	0	2	6
NV.251	5343020012	0.19	124 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.19	Nonvacant New	No	24	5	90%	1912	3.2	\$9.40	5.0	Strong	4	Mod./Above Mod.	0	1	3
NV.252	5343021004	0.19	214 S CURTIS AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.38	Nonvacant New	No	43	16	70%	1912	4.5	\$17.34	5.3	Strong	9	Mod./Above Mod.	0	3	6
NV.252	5343021003	0.19	210 S CURTIS AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.38	Nonvacant New	No	43	16	70%	1910	4.5	\$17.34	5.3	Strong	9	Mod./Above Mod.	0	3	6
NV.253	5343021009	0.17	234 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	Nonvacant New	No	43	17	70%	1910	3.9	\$36.62	8.5	Strong	11	Mod./Above Mod.	0	3	8
NV.253	5343021008	0.21	232 S CURTIS AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	Nonvacant New	No	43	17	70%	1907	3.9	\$36.62	8.5	Strong	11	Mod./Above Mod.	0	3	8
NV.254	5343022021	0.17	21 S ATLANTIC BLVD	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	1989	14.3	\$12.16	No res.	Strong	45	Lower Mixed	28	6	11
NV.254	5343022022	0.50	20 S OLIVE AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	1950	14.3	\$12.16	No res.	Strong	45	Lower Mixed	28	6	11
NV.254	5343022012	0.37	20 S OLIVE AVE	Automotive Commercial	CPD	Commercial - Parking Lot (Commercial Use Property)	1.04	Nonvacant New	No	48	50	90%	1950	14.3	\$12.16	No res.	Strong	45	Lower Mixed	28	6	11
NV.255	5343025001	0.17	316 S CURTIS AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1941	1.2	\$40.92	3.0	High	1	Above Mod.	0	0	1
NV.256	5343025016	0.22	328 S CURTIS AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1947	3.2	\$44.51	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.256	5343025003	0.20	324 S CURTIS AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1941	3.2	\$44.51	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.256	5343025002	0.17	320 S CURTIS AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1927	3.2	\$44.51	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.257	5343025007	0.17	1120 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1920	3.1	\$49.25	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.257	5343025008	0.17	1124 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1920	3.1	\$49.25	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.257	5343025006	0.17	1118 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1909	3.1	\$49.25	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.258	5343025013	0.17	1216 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1923	1.5	\$28.87	3.0	High	3	Mod./Above Mod.	0	1	2
NV.258	5343025014	0.17	1220 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1914	1.5	\$28.87	3.0	High	3	Mod./Above Mod.	0	1	2
NV.258	5343025015	0.16	1224 W COMMONWEALTH AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1907	1.5	\$28.87	3.0	High	3	Mod./Above Mod.	0	1	2
NV.259																						

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio			Lower	Mod.	Above Mod.	
NV.264	5344005012	0.17	420 S 7TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1923	1.1	\$7.37	3.0	High	3	Mod./Above Mod.	0	1	2
NV.264	5344005020	0.15	421 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1923	1.1	\$7.37	3.0	High	3	Mod./Above Mod.	0	1	2
NV.264	5344005011	0.17	424 S 7TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1923	1.1	\$7.37	3.0	High	3	Mod./Above Mod.	0	1	2
NV.265	5344005019	0.15	425 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	4.0	\$38.71	3.0	Strong	1	Above Mod.	0	0	1
NV.266	5344014024	0.18	428 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1919	4.0	\$49.61	3.0	Strong	1	Above Mod.	0	0	1
NV.267	5344015007	0.17	420 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1927	2.5	\$31.20	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.267	5344015008	0.17	424 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1921	2.5	\$31.20	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.267	5344015014	0.17	423 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1910	2.5	\$31.20	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.268	5344015013	0.17	425 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1910	2.0	\$50.87	3.0	High	1	Above Mod.	0	0	1
NV.269	5344015022	0.25	500 S 5TH ST	High Density Residential	R-3	Residential - Three Units (Any Combination)	0.51	Nonvacant New	No	34.4	18	90%	1932	2.3	\$33.42	6.0	Strong	14	Lower Mixed	9	1	4
NV.269	5344015021	0.26	401 W MISSION RD	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.51	Nonvacant New	No	34.4	18	90%	1919	2.3	\$33.42	6.0	Strong	14	Lower Mixed	9	1	4
NV.270	5344020003	0.12	309 W MISSION RD	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	34.4	15	70%	1940	3.7	\$16.60	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.270	5344020021	0.31	500 S 4TH ST	High Density Residential	R-3	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.43	Nonvacant New	No	34.4	15	70%	1940	3.7	\$16.60	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.271	5344021005	0.19	415 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1928	2.4	\$46.04	3.5	Strong	2	Above Mod.	0	0	2
NV.271	5344021006	0.19	417 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1926	2.4	\$46.04	3.5	Strong	2	Above Mod.	0	0	2
NV.272	5344021019	0.23	424 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.45	Nonvacant New	No	18	8	90%	1939	1.2	\$7.78	4.0	High	3	Mod./Above Mod.	0	1	2
NV.272	5344021008	0.23	425 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.45	Nonvacant New	No	18	8	90%	1924	1.2	\$7.78	4.0	High	3	Mod./Above Mod.	0	1	2
NV.273	5344022008	0.20	300 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.20	Nonvacant New	No	18	4	90%	1922	2.0	\$47.10	4.0	High	1	Above Mod.	0	0	1
NV.274	5344022016	0.37	308 S 3RD ST	Medium Density Residential	R-2	Residential - Five or More Units or Apartments (Any Combination)	0.93	Nonvacant New	No	18	17	90%	1903	1.4	\$42.80	3.4	High	5	Mod./Above Mod.	0	2	3
NV.275	5344024005	0.08	222 W MAIN ST	Central Business District	CBD	Commercial - Store	0.16	Nonvacant New	No	64	10	70%	1921	1.8	\$10.89	10.0	High	5	Mod./Above Mod.	0	2	3
NV.275	5344024004	0.08	224 W MAIN ST	Central Business District	CBD	Commercial - Store	0.16	Nonvacant New	No	64	10	70%	1921	1.8	\$10.89	10.0	High	5	Mod./Above Mod.	0	2	3
NV.276	5344025011	0.41	132 W MAIN ST	Central Business District	CBD	Commercial - Restaurant, Cocktail Lounge	0.41	Nonvacant New	No	64	26	70%	1972	2.8	\$25.23	No res.	Strong	18	Mod./Above Mod.	0	5	13
NV.277	5344029005	0.17	421 S 1ST ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1906	2.6	\$36.36	3.0	Strong	1	Above Mod.	0	0	1
NV.278	5344028016	0.17	418 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1924	1.2	\$35.95	3.0	High	2	Above Mod.	0	0	2
NV.278	5344028007	0.17	417 S 1ST ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.34	Nonvacant New	No	18	6	90%	1909	1.2	\$35.95	3.0	High	2	Above Mod.	0	0	2
NV.279	5344029026	1.21	409 S GARFIELD AVE	Office Professional	PO	Institutional - Homes for Aged and Others	1.58	Nonvacant New	No	43	68	90%	1959	0.9	\$40.71	17.0	Medium	29	Lower Mixed	18	4	7
NV.279	5344029008	0.37	403 S GARFIELD AVE	Office Professional	PO	Residential - Three Units (Any Combination)	1.58	Nonvacant New	No	43	68	90%	1941	0.9	\$40.71	17.0	Medium	29	Lower Mixed	18	4	7
NV.280	5344029010	0.17	404 S 1ST ST	Office Professional	PO	Residential - Single Family Residence	0.50	Nonvacant New	No	43	22	90%	1920	2.8	\$57.18	11.0	Strong	18	Lower Mixed	12	2	4
NV.280	5344029011	0.17	408 S 1ST ST	Office Professional	PO	Residential - Single Family Residence	0.50	Nonvacant New	No	43	22	90%	N/A	2.8	\$57.18	11.0	Strong	18	Lower Mixed	12	2	4
NV.280	5344029009	0.16	400 S 1ST ST	Office Professional	PO	Residential - Single Family Residence	0.50	Nonvacant New	No	24	12	90%	1961	2.8	\$57.18	6.0	Strong	9	Mod./Above Mod.	0	3	6
NV.281	5344029017	0.17	432 S 1ST ST	Office Professional	PO	Residential - Three Units (Any Combination)	0.34	Nonvacant New	No	43	15	70%	1924	1.7	\$50.96	3.8	High	6	Mod./Above Mod.	0	2	4
NV.281	5344029016	0.17	428 S 1ST ST	Office Professional	PO	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1923	1.7	\$50.96	3.8	High	6	Mod./Above Mod.	0	2	4
NV.282	5344029028	0.18	504 S 1ST ST	Office Professional	PO	Commercial - Professional Building	0.35	Nonvacant New	No	43	15	70%	1968	3.5	\$40.97	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.282	5344029018	0.17	500 S 1ST ST	Office Professional	PO	Commercial - Professional Building	0.35	Nonvacant New	No	43	15	70%	1953	3.5	\$40.97	7.5	Strong	9	Mod./Above Mod.	0	3	6
NV.283	5344029029	0.34	501 S GARFIELD AVE	Office Professional	PO	Commercial - Store	0.66	Nonvacant New	No	43	28	90%	1947	1.9	\$27.26	No res.	High	20	Lower Mixed	13	2	5
NV.283	5344029021	0.32	511 S GARFIELD AVE	Office Professional	PO	Commercial - Restaurant, Cocktail Lounge	0.66	Nonvacant New	No	43	28	90%	1947	1.9	\$27.26	#Div/Of	High	20	Lower Mixed	13	2	5
NV.284	5344030007	0.35	314 S 1ST ST	Office Professional	PO	Commercial - Parking Lot (Commercial Use Property)	2.43	Nonvacant New	No	43	104	90%	1973	1.6	\$45.16	No res.	High	75	Lower Mixed	47	10	18
NV.284	5344030014	1.39	324 S 1ST ST	Office Professional	PO	Commercial - Bank, Savings and Loan	2.43	Nonvacant New	No	43	104	90%	1973	1.6	\$45.16	No res.	High	75	Lower Mixed	47	10	18
NV.284	5344030006	0.69	20 W COMMONWEALTH AVE	Office Professional	PO	Institutional - Church	2.43	Nonvacant New	No	43	104	90%	1926	1.6	\$45.16	No res.	High	75	Lower Mixed	47	10	18
NV.285	5344031003	0.09	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	0.28	Nonvacant New	No	64	18	70%	1947	1.8	\$68.78	No res.	Medium	6	Mod./Above Mod.	0	2	4
NV.285	5344031001	0.09	40 W BAY STATE ST	Central Business District	CBD	Commercial - Office Building	0.28	Nonvacant New	No	64	18	70%	1947	1.8	\$68.78	No res.	Medium	6	Mod./Above Mod.	0	2	4
NV.285	5344031002	0.09	36 W BAY STATE ST	Central Business District	CBD	Commercial - Bank, Savings and Loan	0.28	Nonvacant New	No	64	18	70%	1937	1.8	\$68.78	No res.	Medium	6	Mod./Above Mod.	0	2	4
NV.286	5344023007	0.32	1 W BAY STATE ST	Central Business District	CBD	Commercial - Bank, Savings and Loan	1.32	Nonvacant New	No	64	85	90%	1955	1.5	\$57.64	No res.	High	61	Lower Mixed	38	8	15
NV.286	5344032008	0.32	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	1.32	Nonvacant New	No	64	85	90%	1955	1.5	\$57.64	No res.	High	61	Lower Mixed	38	8	15
NV.286	5344032010	0.69	121 S GARFIELD AVE	Central Business District	CBD	Commercial - Store	1.32	Nonvacant New	No	64	85	90%	1939	1.5	\$57.64	No res.	High	61	Lower Mixed	38	8	15
NV.287	5344033005	0.12	19 S GARFIELD AVE	Central Business District	CBD	Commercial - Store	0.33	Nonvacant New	No	64	21	70%	1989	1.5	\$77.97	21.0	Medium	7	Mod./Above Mod.	0	2	5
NV.287	5344033007	0.07	35 S GARFIELD AVE	Central Business District	CBD	Commercial - Store	0.33	Nonvacant New	No	64	21	70%	1946	1.5	\$77.97	21.0	Medium	7	Mod./Above Mod.	0	2	5
NV.287	5344033006	0.14	25 S GARFIELD AVE	Central Business District	CBD	Commercial - Restaurant, Cocktail Lounge	0.33	Nonvacant New	No	64	21	70%	1911	1.5	\$77.97	21.0	Medium	7	Mod./Above Mod.	0	2	5
NV.288	5345004041	0.14	15 S CHAPEL AVE	Central Business District	CBD	Commercial - Office Building	0.37	Nonvacant New	No	64	24	70%	1937	0.8	\$21.40	No res.	Medium	8	Mod./Above Mod.	0	2	6
NV.288	5345004044	0.14	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	0.37	Nonvacant New	No	64	24	70%	N/A	0.8	\$21.40	No res.	Medium	8	Mod./Above Mod.	0	2	6
NV.288	5345004053	0.09	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	0.37	Nonvacant New	No	64	24	70%	N/A	0.8	\$21.40	No res.	Medium	8	Mod./Above Mod.	0	2	6
NV.289	5345004054	0.08	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	0.08	Nonvacant New	No	64	5	70%	N/A	No imp.	\$0.00	No res.	Strong	4	Mod./Above Mod.	0	1	3
NV.290	5345007028	0.16	204 E COMMONWEALTH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.32	Nonvacant New	No	43	14	70%	1923	4.0	\$33.99	7.0	Strong	8	Mod./Above Mod.	0	2	6
NV.291	5345009007	0.17	420 S GARFIELD AVE	High Density Residential	PO	Commercial - Store	0.17	Nonvacant New	No	24	4	90%	1948	5.3	\$48.29	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.292	5345009011	0.17	502 S GARFIELD AVE	Office Professional	PO	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.40	Nonvacant New	No	43	17	70%	1950	3.4	\$46.04	17.0	Strong	11	Mod./Above Mod.	0	3	8

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio			Lower	Mod.	Above Mod.	
NV.299	5346006011	0.17	15 S EL MOLINO ST	Parking	P	Residential - Five or More Units or Apartments (Any Combination)	0.34	Nonvacant New	No	30	10	90%	1980	1.5	\$68.80	2.0	Medium	2	Mod./Above Mod.	0	1	1
NV.299	5346006006	0.17	N/A	Parking	P	Commercial - Parking Lot (Commercial Use Property)	0.34	Nonvacant New	No	30	10	90%	1950	1.5	\$68.80	2.0	Medium	2	Mod./Above Mod.	0	1	1
NV.300	5346008007	0.08	15 S VEGA ST	Parking	P	Residential - Single Family Residence	0.26	Nonvacant New	No	30	8	90%	1926	3.6	\$61.73	4.0	Strong	5	Mod./Above Mod.	0	2	3
NV.300	5346008012	0.17	14 S EL MOLINO ST	Parking	P	Residential - Single Family Residence	0.26	Nonvacant New	No	30	8	90%	1923	3.6	\$61.73	4.0	Strong	5	Mod./Above Mod.	0	2	3
NV.301	5346009018	0.08	16 S VEGA ST	Parking	P	Residential - Single Family Residence	2.49	Nonvacant New	No	30	75	90%	1926	2.0	\$20.67	75.0	Strong	67	Lower Mixed	42	9	16
NV.302	5347002010	0.26	801 S 4TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.26	Nonvacant New	No	43	11	70%	1924	2.3	\$47.02	5.5	Strong	6	Mod./Above Mod.	0	2	4
NV.303	5347003010	0.18	917 S 4TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.35	Nonvacant New	No	43	15	70%	1924	3.7	\$6.00	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.303	5347003011	0.17	921 S 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1924	3.7	\$6.00	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.304	5347005025	0.21	816 S 4TH ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.36	Nonvacant New	No	43	15	70%	1942	2.4	\$32.11	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.304	5347005027	0.15	812 S 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.36	Nonvacant New	No	43	15	70%	1923	2.4	\$32.11	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.305	5347008006	0.21	101 PALMETTO DR	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.43	Nonvacant New	No	43	18	70%	1941	2.3	\$46.72	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.305	5347008005	0.21	105 PALMETTO DR	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.43	Nonvacant New	No	43	18	70%	1929	2.3	\$46.72	4.5	Strong	10	Mod./Above Mod.	0	3	7
NV.306	5347008014	0.17	741 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.37	Nonvacant New	No	43	16	70%	1983	2.9	\$70.73	16.0	High	8	Mod./Above Mod.	0	2	6
NV.306	5347008015	0.20	737 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.37	Nonvacant New	No	43	16	70%	1970	2.9	\$70.73	16.0	High	8	Mod./Above Mod.	0	2	6
NV.307	5347008017	0.34	731 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.86	Nonvacant New	No	43	37	90%	1966	3.1	\$57.41	No res.	Strong	33	Lower Mixed	21	4	8
NV.307	5347008026	0.17	733 S GARFIELD AVE	Medical Office	PO	Commercial - Non-Auto Service and Repair Shop, Paint Shop, or Laundry	0.86	Nonvacant New	No	43	37	90%	1959	3.1	\$57.41	No res.	Strong	33	Lower Mixed	21	4	8
NV.307	5347008018	0.34	725 S GARFIELD AVE	Medical Office	PO	Commercial - Store	0.86	Nonvacant New	No	43	37	90%	1946	3.1	\$57.41	No res.	Strong	33	Lower Mixed	21	4	8
NV.308	5347009037	0.11	909 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.41	Nonvacant New	No	43	18	70%	1951	3.4	\$55.60	18.0	Strong	12	Mod./Above Mod.	0	3	9
NV.308	5347009036	0.11	901 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.41	Nonvacant New	No	43	18	70%	1951	3.4	\$55.60	18.0	Strong	12	Mod./Above Mod.	0	3	9
NV.308	5347009091	0.19	835 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.41	Nonvacant New	No	43	18	70%	1912	3.4	\$55.60	18.0	Strong	12	Mod./Above Mod.	0	3	9
NV.309	5347021005	0.21	721 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.21	Nonvacant New	No	43	9	70%	1927	2.0	\$44.23	4.5	High	4	Mod./Above Mod.	0	1	3
NV.310	5347013001	0.26	9 PARK ST	General Commercial	CPD	Commercial - Store Combination	0.26	Nonvacant New	No	48	12	70%	1923	1.9	\$51.94	12.0	High	6	Mod./Above Mod.	0	2	4
NV.311	5347014015	0.44	700 S GARFIELD AVE	General Commercial	CPD	Industrial - Light Manufacturing	0.80	Nonvacant New	No	48	39	90%	1946	1.2	\$10.19	No res.	High	28	Lower Mixed	18	3	7
NV.311	5347014014	0.25	710 S GARFIELD AVE	General Commercial	CPD	Commercial - Commercial	0.80	Nonvacant New	No	48	39	90%	1931	1.2	\$10.19	No res.	High	28	Lower Mixed	18	3	7
NV.311	5347014016	0.11	710 S GARFIELD AVE	General Commercial	CPD	Commercial - Store	0.80	Nonvacant New	No	48	39	90%	1925	1.2	\$10.19	No res.	High	28	Lower Mixed	18	3	7
NV.312	5347014017	0.45	714 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.90	Nonvacant New	No	43	39	90%	1960	3.3	\$54.64	19.5	Strong	33	Lower Mixed	21	4	8
NV.312	5347014018	0.22	722 S GARFIELD AVE	Medical Office	PO	Commercial - Store Combination	0.90	Nonvacant New	No	43	39	90%	1951	3.3	\$54.64	19.5	Strong	33	Lower Mixed	21	4	8
NV.312	5347014019	0.23	726 S GARFIELD AVE	Medical Office	PO	Commercial - Store Combination	0.90	Nonvacant New	No	43	39	90%	1946	3.3	\$54.64	19.5	Strong	33	Lower Mixed	21	4	8
NV.313	5347014064	0.29	736 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.88	Nonvacant New	No	43	38	90%	1947	2.5	\$40.77	3.2	Strong	23	Lower Mixed	15	3	5
NV.313	5347014020	0.29	730 S GARFIELD AVE	Medical Office	PO	Residential - Five or More Units or Apartments (Any Combination)	0.88	Nonvacant New	No	43	38	90%	1946	2.5	\$40.77	3.2	Strong	23	Lower Mixed	15	3	5
NV.313	5347014022	0.30	740 S GARFIELD AVE	Medical Office	PO	Residential - Five or More Units or Apartments (Any Combination)	0.88	Nonvacant New	No	43	38	90%	N/A	2.5	\$40.77	3.2	Strong	23	Lower Mixed	15	3	5
NV.314	5347014063	0.44	750 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	1.03	Nonvacant New	No	43	44	90%	1995	0.5	\$17.32	14.7	Medium	18	Lower Mixed	12	2	4
NV.314	5347015016	0.30	800 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	1.03	Nonvacant New	No	43	44	90%	1939	0.5	\$17.32	14.7	Medium	18	Lower Mixed	12	2	4
NV.314	5347015017	0.30	808 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	1.03	Nonvacant New	No	43	44	90%	1922	0.5	\$17.32	14.7	Medium	18	Lower Mixed	12	2	4
NV.315	5347015023	0.09	11 LOS HIGOS ST	Medical Office	PO	Residential - Single Family Residence	0.34	Nonvacant New	No	43	15	70%	1968	5.6	\$39.88	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.315	5347015024	0.25	848 S GARFIELD AVE	Medical Office	PO	Commercial - Service Station	0.34	Nonvacant New	No	43	15	70%	N/A	5.6	\$39.88	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.316	5347016001	0.15	14 LOS HIGOS ST	Medical Office	PO	Commercial - Parking Lot (Commercial Use Property)	0.15	Nonvacant New	No	24	4	90%	1974	7.9	\$22.20	No res.	Strong	4	Mod./Above Mod.	0	1	3
NV.317	5347020004	0.19	641 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1910	1.9	\$35.94	7.0	High	3	Mod./Above Mod.	0	1	2
NV.318	5347020022	0.09	309 PARK ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.43	Nonvacant New	No	18	8	90%	1924	1.7	\$45.30	4.0	High	3	Mod./Above Mod.	0	1	2
NV.318	5347020023	0.19	632 S CHAPEL AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.43	Nonvacant New	No	18	8	90%	1912	1.7	\$45.30	4.0	High	3	Mod./Above Mod.	0	1	2
NV.319	5347022014	0.21	753 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.41	Nonvacant New	No	43	18	70%	1933	2.7	\$7.18	9.0	Strong	11	Mod./Above Mod.	0	3	8
NV.320	5348004001	0.15	1001 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.15	Nonvacant New	No	24	4	90%	1937	3.7	\$73.91	4.0	High	2	Mod./Above Mod.	0	1	1
NV.321	5348004004	0.15	1013 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.44	Nonvacant New	No	43	19	70%	1963	1.4	\$69.25	19.0	Medium	6	Mod./Above Mod.	0	2	4
NV.321	5348004033	0.14	1005 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.44	Nonvacant New	No	43	19	70%	1952	1.4	\$69.25	19.0	Medium	6	Mod./Above Mod.	0	2	4
NV.321	5348004003	0.15	1009 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.44	Nonvacant New	No	43	19	70%	1940	1.4	\$69.25	19.0	Medium	6	Mod./Above Mod.	0	2	4
NV.322	5348004026	0.14	1017 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.43	Nonvacant New	No	43	18	70%	1938	1.5	\$59.97	6.0	High	8	Mod./Above Mod.	0	2	6
NV.322	5348004027	0.14	1025 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.43	Nonvacant New	No	43	18	70%	1935	1.5	\$59.97	6.0	High	8	Mod./Above Mod.	0	2	6
NV.322	5348004006	0.15	1021 S GARFIELD AVE	Medical Office	PO	Residential - Single Family Residence	0.43	Nonvacant New	No	43	18	70%	1935	1.5	\$59.97	6.0	High	8	Mod./Above Mod.	0	2	6
NV.323	5348005001	0.39	1000 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.39	Nonvacant New	No	43	17	70%	1947	2.5	\$48.57	No res.	Strong	12	Mod./Above Mod.	0	3	9
NV.324	5348005003	0.13	1014 S GARFIELD AVE	Medical Office	PO	Commercial - Professional Building	0.59	Nonvacant New	No	43	25	90%	1955	2.1	\$37.59	25.0	Strong	22	Lower Mixed	14	3	5
NV.324	5348005005	0.30	1020 S GARFIELD AVE	Medical Office	PO	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.59	Nonvacant New	No	43	25	90%	1932	2.1	\$37.59	25.0	Strong	22	Lower Mixed	14	3	5
NV.324	5348005004	0.17	11 E ADAMS AVE	Medical Office	PO	Commercial - Commercial	0.59	Nonvacant New	No	43	25	90%	1922	2.1	\$37.59	25.0	Strong	22	Lower Mixed	14	3	5
NV.325	5348009002	0.15	1104 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.46	Nonvacant New	No	43	20	70%	1960	2.0	\$57.44	10.0	High	10	Mod./Above Mod.	0	3	7
NV.325	5348009001	0.17	1100 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.46	Nonvacant New	No	43	20	70%	1936	2.0	\$57.44	10.0	High	10	Mod./Above Mod.	0	3	7
NV.325	5348009029	0.15	1108 S GARFIELD AVE	Medical Office	PO	Commercial - Office Building	0.46	Nonvacant New	No	43	20	70%	1924	2.0	\$57.44	10.0	High	10	Mod./Above Mod.	0	3	7
NV.326	5348009009	0.15	1132 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	0.45	Nonvacant New	No	43	20	70%	1949	1.4	\$40.33	3.3	High	8	Mod./Above Mod.	0	2	6
NV.326	5348009008	0.15	1128 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	0.45	Nonvacant New	No	43	20	70%	1939	1.4	\$40.33	3.3	High	8	Mod./Above Mod.	0	2	6
NV.326	5348009007	0.15	1126 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	0.45	Nonvacant New	No	43	20	70%	1938	1.4	\$40.33	3.3	High	8	Mod./Above Mod.	0	2	6
NV.327	5348015015	0.13	525 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.55	Nonvacant New	No	43	23	90%	1985	2.1	\$82.07	5.8	High	14	Lower Mixed	9	1	4
NV.327	5348015016	0.13	517 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.55	Nonvacant New	No	43	23	90%	1951	2.1	\$82.07	5.8	High	14	Lower Mixed	9	1	4
NV.327	5348015032	0.28	539 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.55	Nonvacant New	No	43	23	90%	1946	2.1	\$82.07	5.8	High	14	Lower Mixed	9	1	4

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio			Lower	Mod.	Above Mod.	
NV.328	5348015017	0.13	511 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.30	Nonvacant New	No	43	13	70%	1960	3.0	\$27.40	No res.	Strong	9	Mod./Above Mod.	0	3	6
NV.328	5348015018	0.17	501 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.30	Nonvacant New	No	43	13	70%	1941	3.0	\$27.40	No res.	Strong	9	Mod./Above Mod.	0	3	6
NV.329	5348017012	0.28	1244 S 4TH ST	Specific Plan	Valley	Residential - Double, Duplex, or Two Units	0.46	Nonvacant New	No	43	20	70%	1939	2.4	\$57.40	6.7	Strong	12	Mod./Above Mod.	0	3	9
NV.329	5348017011	0.18	1240 S 4TH ST	Low Density Residential	Valley	Residential - Single Family Residence	0.46	Nonvacant New	No	43	20	70%	1936	2.4	\$57.40	6.7	Strong	12	Mod./Above Mod.	0	3	9
NV.330	5348018013	0.28	259 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.84	Nonvacant New	No	43	36	90%	1972	2.4	\$63.22	No res.	Strong	32	Lower Mixed	20	4	8
NV.330	5348018014	0.14	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.84	Nonvacant New	No	43	36	90%	1972	2.4	\$63.22	No res.	Strong	32	Lower Mixed	20	4	8
NV.330	5348018015	0.43	203 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.84	Nonvacant New	No	43	36	90%	1936	2.4	\$63.22	No res.	Strong	32	Lower Mixed	20	4	8
NV.331	5348019023	0.17	1205 S GARFIELD AVE	Medical Office	Valley	Residential - Single Family Residence	0.51	Nonvacant New	No	43	22	90%	1940	2.8	\$28.47	7.3	Strong	17	Lower Mixed	11	2	4
NV.331	5348019024	0.17	1201 S GARFIELD AVE	Medical Office	Valley	Commercial - Professional Building	0.51	Nonvacant New	No	43	22	90%	1940	2.8	\$28.47	7.3	Strong	17	Lower Mixed	11	2	4
NV.331	5348019022	0.17	1209 S GARFIELD AVE	Medical Office	Valley	Residential - Double, Duplex, or Two Units	0.51	Nonvacant New	No	43	22	90%	1940	2.8	\$28.47	7.3	Strong	17	Lower Mixed	11	2	4
NV.332	5348020016	0.20	1225 S STONEMAN AVE	Low Density Residential	Valley	Residential - Single Family Residence	0.35	Nonvacant New	No	43	15	70%	1936	3.9	\$48.73	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.332	5348020023	0.15	N/A	Medical Office	Valley	Commercial - Commercial	0.35	Nonvacant New	No	43	15	70%	N/A	3.9	\$48.73	15.0	Strong	10	Mod./Above Mod.	0	3	7
NV.333	5348022014	0.27	241 E VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.51	Nonvacant New	No	43	22	90%	1971	1.6	\$45.60	No res.	High	16	Lower Mixed	10	2	4
NV.333	5348022012	0.15	223 E VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.51	Nonvacant New	No	43	22	90%	1927	1.6	\$45.60	No res.	High	16	Lower Mixed	10	2	4
NV.333	5348022013	0.08	227 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.51	Nonvacant New	No	43	22	90%	1923	1.6	\$45.60	No res.	High	16	Lower Mixed	10	2	4
NV.334	5349006038	0.18	1232 S CHAPEL AVE	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.34	Nonvacant New	No	43	15	70%	1979	101.7	\$80.50	No res.	High	8	Mod./Above Mod.	0	2	6
NV.334	5349006039	0.16	1236 S CHAPEL AVE	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.34	Nonvacant New	No	43	15	70%	1979	101.7	\$80.50	No res.	High	8	Mod./Above Mod.	0	2	6
NV.335	5349006044	0.24	325 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.79	Nonvacant New	No	43	34	90%	1979	1.5	\$112.81	No res.	Strong	31	Lower Mixed	20	4	7
NV.335	5349006043	0.08	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.79	Nonvacant New	No	43	34	90%	1950	1.5	\$112.81	No res.	Strong	31	Lower Mixed	20	4	7
NV.336	5350007018	0.38	601 W VALLEY BLVD	Specific Plan	Valley	Commercial - Service Station	0.76	Nonvacant New	No	43	33	90%	1971	2.2	\$64.90	No res.	Strong	30	Lower Mixed	19	4	7
NV.336	5350007017	0.25	647 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.76	Nonvacant New	No	43	33	90%	1969	2.2	\$64.90	No res.	Strong	30	Lower Mixed	19	4	7
NV.336	5350007015	0.12	625 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.76	Nonvacant New	No	43	33	90%	1939	2.2	\$64.90	No res.	Strong	30	Lower Mixed	19	4	7
NV.337	5350008008	0.24	825 W VALLEY BLVD	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.94	Nonvacant New	No	43	40	90%	1964	0.8	\$52.47	No res.	Medium	18	Lower Mixed	12	2	4
NV.337	5350008015	0.23	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.94	Nonvacant New	No	43	40	90%	1947	0.8	\$52.47	No res.	Medium	18	Lower Mixed	12	2	4
NV.337	5350008016	0.47	841 W VALLEY BLVD	Specific Plan	Valley	Commercial - Bank, Savings and Loan	0.94	Nonvacant New	No	43	40	90%	1938	0.8	\$52.47	No res.	Medium	18	Lower Mixed	12	2	4
NV.338	5350013001	0.18	700 S ATLANTIC BLVD	High Density Residential	R-3	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.59	Nonvacant New	No	31	18	90%	1964	3.4	\$42.35	4.5	Strong	13	Lower Mixed	9	1	3
NV.338	5350013002	0.13	916 FRONT ST	High Density Residential	R-3	Residential - Single Family Residence	0.59	Nonvacant New	No	31	18	90%	1948	3.4	\$42.35	4.5	Strong	13	Lower Mixed	9	1	3
NV.338	5350013004	0.28	704 S ATLANTIC BLVD	High Density Residential	R-3	Commercial - Store Combination	0.59	Nonvacant New	No	31	18	90%	1922	3.4	\$42.35	4.5	Strong	13	Lower Mixed	9	1	3
NV.339	5350013007	0.23	804 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.23	Nonvacant New	No	26	6	90%	1922	3.5	\$56.69	6.0	Strong	5	Mod./Above Mod.	0	2	3
NV.340	535016035	0.23	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.76	Nonvacant New	No	43	33	90%	1947	35.8	\$43.54	No res.	Strong	30	Lower Mixed	19	4	7
NV.340	535016034	0.06	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.76	Nonvacant New	No	43	33	90%	1947	35.8	\$43.54	No res.	Strong	30	Lower Mixed	19	4	7
NV.340	5350016027	0.19	919 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.76	Nonvacant New	No	43	33	90%	1926	35.8	\$43.54	No res.	Strong	30	Lower Mixed	19	4	7
NV.340	5350016042	0.27	901 W VALLEY BLVD	Specific Plan	EMC	Commercial - Commercial	0.76	Nonvacant New	No	30	23	90%	N/A	35.8	\$43.54	No res.	Strong	21	Lower Mixed	14	2	5
NV.341	5350016037	0.22	1224 S ATLANTIC BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.76	Nonvacant New	No	43	33	90%	1976	1.4	\$83.17	No res.	Medium	15	Lower Mixed	10	2	3
NV.341	5350016038	0.19	1013 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.76	Nonvacant New	No	43	33	90%	1975	1.4	\$83.17	No res.	Medium	15	Lower Mixed	10	2	3
NV.341	5350016036	0.35	937 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store Combination	0.76	Nonvacant New	No	43	33	90%	1923	1.4	\$83.17	No res.	Medium	15	Lower Mixed	10	2	3
NV.342	5350018013	0.13	1008 EDITH AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.40	Nonvacant New	No	34	14	70%	1949	2.0	\$29.08	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.342	5350018014	0.14	1012 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	Nonvacant New	No	34	14	70%	1938	2.0	\$29.08	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.342	5350018018	0.13	1016 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.40	Nonvacant New	No	34	14	70%	1938	2.0	\$29.08	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.343	5350019004	0.13	820 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	Nonvacant New	No	34	13	70%	1947	4.2	\$32.46	4.3	Strong	7	Mod./Above Mod.	0	2	5
NV.343	5350019051	0.13	824 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	Nonvacant New	No	34	13	70%	1938	4.2	\$32.46	4.3	Strong	7	Mod./Above Mod.	0	2	5
NV.343	5350020030	0.13	816 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.39	Nonvacant New	No	34	13	70%	1910	4.2	\$32.46	4.3	Strong	7	Mod./Above Mod.	0	2	5
NV.344	5350019049	0.14	922 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34	14	70%	1956	3.5	\$14.58	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.344	5350019037	0.12	928 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34	14	70%	1938	3.5	\$14.58	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.344	5350019040	0.16	930 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34	14	70%	1928	3.5	\$14.58	4.7	Strong	8	Mod./Above Mod.	0	2	6
NV.345	5350021053	0.28	817 CURTIS LN	High Density Residential	R-3	Residential - Single Family Residence	0.58	Nonvacant New	No	43	25	90%	1939	4.3	\$34.50	6.3	Strong	19	Lower Mixed	12	2	5
NV.345	5350021004	0.16	1222 FRONT ST	High Density Residential	R-3	Residential - Single Family Residence	0.58	Nonvacant New	No	43	25	90%	1938	4.3	\$34.50	6.3	Strong	19	Lower Mixed	12	2	5
NV.345	5350021003	0.14	1226 FRONT ST	High Density Residential	R-3	Residential - Single Family Residence	0.58	Nonvacant New	No	43	25	90%	1938	4.3	\$34.50	6.3	Strong	19	Lower Mixed	12	2	5
NV.346	5350021012	0.11	801 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.41	Nonvacant New	No	38	16	70%	1948	2.1	\$47.16	5.3	Strong	9	Mod./Above Mod.	0	3	6
NV.346	5350021008	0.18	800 CURTIS LN	High Density Residential	R-3	Residential - Single Family Residence	0.41	Nonvacant New	No	38	16	70%	1947	2.1	\$47.16	5.3	Strong	9	Mod./Above Mod.	0	3	6
NV.346	5350021013	0.12	807 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.41	Nonvacant New	No	38	16	70%	1940	2.1	\$47.16	5.3	Strong	9	Mod./Above Mod.	0	3	6
NV.347	5350021021	0.13	816 CURTIS LN	High Density Residential	R-3	Residential - Single Family Residence	0.24	Nonvacant New	No	12	3	70%	1947	3.0	\$42.09	5.0	Strong	1	Mod./Above Mod.	0	0	1
NV.347	5350021019	0.11	827 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.24	Nonvacant New	No	12	3	70%	1940	3.0	\$42.09	5.0	Strong	1	Mod./Above Mod.	0	0	1
NV.348	5350021026	0.13	828 CURTIS LN	High Density Residential	R-3	Residential - Single Family Residence	0.25	Nonvacant New	No	39	10	70%	1947	2.3	\$58.74	5.0	Strong	6	Mod./Above Mod.	0	2	4
NV.348	5350021024	0.11	903 EDITH AVE	High Density Residential	R-3	Residential - Single Family Residence	0.25	Nonvacant New	No	39	10	70%	1940	2.3	\$58.74	5.0	Strong	6	Mod./Above Mod.			

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors					Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio	Lower				Mod.	Above Mod.	
NV.353	5350024014	0.32	1435 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.32	Nonvacant New	No	43	14	70%	1973	1.2	\$49.09	No res.	High	8	Mod./Above Mod.	0	2	6	
NV.354	5350028002	0.13	1630 FRONT ST	High Density Residential	R-3	Residential - Single Family Residence	0.29	Nonvacant New	No	43	13	70%	1942	5.2	\$65.93	6.5	High	6	Mod./Above Mod.	0	2	4	
NV.354	5350028004	0.16	1626 FRONT ST	High Density Residential	R-3	Residential - Single Family Residence	0.29	Nonvacant New	No	43	13	70%	1941	5.2	\$65.93	6.5	High	6	Mod./Above Mod.	0	2	4	
NV.355	5350029020	0.15	1617 W SHORR ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.30	Nonvacant New	No	39	12	70%	1936	1.1	\$29.35	4.0	High	5	Mod./Above Mod.	0	2	3	
NV.355	5350029021	0.15	1110 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.30	Nonvacant New	No	39	12	70%	1936	1.1	\$29.35	4.0	High	5	Mod./Above Mod.	0	2	3	
NV.356	5350030011	0.14	1205 BENITO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.44	Nonvacant New	No	38	16	70%	1948	1.9	\$42.81	4.0	High	7	Mod./Above Mod.	0	2	5	
NV.356	5350030032	0.16	1612 W SHORR ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.44	Nonvacant New	No	38	16	70%	1937	1.9	\$42.81	4.0	High	7	Mod./Above Mod.	0	2	5	
NV.356	5350030005	0.14	1201 BENITO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.44	Nonvacant New	No	38	16	70%	1937	1.9	\$42.81	4.0	High	7	Mod./Above Mod.	0	2	5	
NV.357	5350030025	0.14	1300 S MARENGO AVE	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.54	Nonvacant New	No	43	23	90%	1973	0.7	\$20.07	No res.	Medium	10	Lower Mixed	7	1	2	
NV.357	5350030026	0.18	1653 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.54	Nonvacant New	No	43	23	90%	1961	0.7	\$20.07	No res.	Medium	10	Lower Mixed	7	1	2	
NV.357	5350030024	0.21	1673 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.54	Nonvacant New	No	43	23	90%	1926	0.7	\$20.07	No res.	Medium	10	Lower Mixed	7	1	2	
NV.358	5350031008	0.17	1209 S MARENGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1939	2.9	\$37.73	3.0	Strong	3	Mod./Above Mod.	0	1	2	
NV.358	5350031011	0.17	1215 S MARENGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1929	2.9	\$37.73	3.0	Strong	3	Mod./Above Mod.	0	1	2	
NV.358	5350031013	0.17	1217 S MARENGO AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1917	2.9	\$37.73	3.0	Strong	3	Mod./Above Mod.	0	1	2	
NV.359	5350031024	0.54	1701 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	1.10	Nonvacant New	No	43	47	90%	1979	2.3	\$69.30	2.8	High	22	Lower Mixed	14	3	5	
NV.359	5350031022	0.57	1749 W VALLEY BLVD	Specific Plan	Valley	Commercial - Hotel and Motel	1.10	Nonvacant New	No	43	47	90%	1957	2.3	\$69.30	2.8	High	22	Lower Mixed	14	3	5	
NV.360	5351003004	0.05	3031 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.15	Nonvacant New	No	24	4	90%	1971	1.1	\$37.00	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.360	5351003002	0.05	3025 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.15	Nonvacant New	No	24	4	90%	1963	1.1	\$37.00	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.360	5351003003	0.05	3027 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.15	Nonvacant New	No	24	4	90%	1946	1.1	\$37.00	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.361	5351004032	0.17	1425 WESTMINSTER AVE	Specific Plan	Valley	Commercial - Store Combination	0.64	Nonvacant New	No	43	28	90%	1966	1.2	\$27.00	No res.	High	20	Lower Mixed	13	2	5	
NV.361	5351004014	0.11	1419 WESTMINSTER AVE	Specific Plan	Valley	Commercial - Store Combination	0.64	Nonvacant New	No	43	28	90%	1957	1.2	\$27.00	No res.	High	20	Lower Mixed	13	2	5	
NV.361	5351003001	0.36	3017 W VALLEY BLVD	Specific Plan	Valley	Institutional - Church	0.64	Nonvacant New	No	43	28	90%	N/A	1.2	\$27.00	No res.	High	20	Lower Mixed	13	2	5	
NV.362	5351005029	0.11	2889 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.26	Nonvacant New	No	43	11	70%	1963	1.7	\$45.27	No res.	High	6	Mod./Above Mod.	0	2	4	
NV.362	5351005014	0.05	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.26	Nonvacant New	No	43	11	70%	1963	1.7	\$45.27	No res.	High	6	Mod./Above Mod.	0	2	4	
NV.362	5351005028	0.10	2897 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.26	Nonvacant New	No	43	11	70%	1961	1.7	\$45.27	No res.	High	6	Mod./Above Mod.	0	2	4	
NV.363	5351005020	0.05	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.21	Nonvacant New	No	24	5	90%	1966	4.4	\$77.29	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.363	5351005019	0.05	2917 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.21	Nonvacant New	No	24	5	90%	1946	4.4	\$77.29	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.363	5351005017	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.21	Nonvacant New	No	24	5	90%	N/A	4.4	\$77.29	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.363	5351005018	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.21	Nonvacant New	No	24	5	90%	N/A	4.4	\$77.29	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.364	5351006018	0.05	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.22	Nonvacant New	No	24	5	90%	1966	2.8	\$15.43	No res.	Strong	5	Mod./Above Mod.	0	2	3	
NV.364	5351006038	0.11	2801 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.22	Nonvacant New	No	24	5	90%	1923	2.8	\$15.43	No res.	Strong	5	Mod./Above Mod.	0	2	3	
NV.364	5351006017	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.22	Nonvacant New	No	24	5	90%	N/A	2.8	\$15.43	No res.	Strong	5	Mod./Above Mod.	0	2	3	
NV.365	5351006039	0.16	2833 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.32	Nonvacant New	No	43	14	70%	1971	2.3	\$55.88	No res.	Strong	10	Mod./Above Mod.	0	3	7	
NV.365	5351006024	0.05	2837 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.32	Nonvacant New	No	43	14	70%	1965	2.3	\$55.88	No res.	Strong	10	Mod./Above Mod.	0	3	7	
NV.365	5351006040	0.11	2845 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.32	Nonvacant New	No	43	14	70%	1949	2.3	\$55.88	No res.	Strong	10	Mod./Above Mod.	0	3	7	
NV.366	5351006034	0.05	2885 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.11	Nonvacant New	No	24	3	90%	1955	1.3	\$60.52	No res.	High	2	Mod./Above Mod.	0	1	1	
NV.366	5351006033	0.06	2881 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.11	Nonvacant New	No	24	3	90%	1946	1.3	\$60.52	No res.	High	2	Mod./Above Mod.	0	1	1	
NV.367	5351009016	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.16	Nonvacant New	No	24	4	90%	1960	1.7	\$13.88	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.367	5351009017	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.16	Nonvacant New	No	24	4	90%	1960	1.7	\$13.88	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.367	5351009015	0.05	2619 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.16	Nonvacant New	No	24	4	90%	1950	1.7	\$13.88	No res.	High	3	Mod./Above Mod.	0	1	2	
NV.368	5351009020	0.10	2639 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.21	Nonvacant New	No	24	5	90%	1952	1.7	\$54.50	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.368	5351009018	0.05	2627 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store Combination	0.21	Nonvacant New	No	24	5	90%	1931	1.7	\$54.50	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.368	5351009019	0.05	2633 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.21	Nonvacant New	No	24	5	90%	1924	1.7	\$54.50	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.369	5351009023	0.16	2723 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.46	Nonvacant New	No	43	20	70%	1950	1.5	\$66.74	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.369	5351009025	0.25	2729 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.46	Nonvacant New	No	43	20	70%	1949	1.5	\$66.74	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.369	5351009024	0.05	2725 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.46	Nonvacant New	No	43	20	70%	1948	1.5	\$66.74	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.370	5351011007	0.05	2874 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.21	Nonvacant New	No	24	5	90%	1962	1.4	\$11.06	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.370	5351011006	0.05	N/A	Specific Plan	Valley	Commercial - Commercial	0.21	Nonvacant New	No	24	5	90%	1949	1.4	\$11.06	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.370	5351011028	0.10	N/A	Specific Plan	Valley	-	0.21	Nonvacant New	No	24	5	90%	N/A	1.4	\$11.06	No res.	High	4	Mod./Above Mod.	0	1	3	
NV.371	5351012001	0.05	2930 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.31	Nonvacant New	No	43	13	70%	1963	2.4	\$88.76	No res.	High	7	Mod./Above Mod.	0	2	5	
NV.371	5351012029	0.15	2938 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.31	Nonvacant New	No	43	13	70%	1957	2.4	\$88.76	No res.	High	7	Mod./Above Mod.	0	2	5	
NV.371	5351011026	0.10	2926 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.31	Nonvacant New	No	43	13	70%	1955	2.4	\$88.76	No res.	High	7	Mod./Above Mod.	0	2	5	
NV.372	5351012028	0.15	2970 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.47	Nonvacant New	No	43	20	70%	1967	1.0	\$28.09	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.372	5351012027	0.26	2990 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.47	Nonvacant New	No	43	20	70%	1967	1.0	\$28.09	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.372	5351012009	0.05	2964 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.47	Nonvacant New	No	43	20	70%	1966	1.0	\$28.09	No res.	Medium	7	Mod./Above Mod.	0	2	5	
NV.373	5351016001	0.30	3000 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.41	Nonvacant New	No														

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Site ID	A/N	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors						Income Level			
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio	Reuse Potential Score	Net Capacity	Affordability Level	Lower	Mod.	Above Mod.
NV.376	5351016013	0.16	3084 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.32	Nonvacant New	No	43	14	70%	1949	2.3	\$33.78	No res.	Strong	10	Mod./Above Mod.	0	3	7
NV.376	5351016011	0.10	3072 W VALLEY BLVD	Specific Plan	Valley	Industrial - Heavy Manufacturing	0.32	Nonvacant New	No	43	14	70%	1940	2.3	\$33.78	No res.	Strong	10	Mod./Above Mod.	0	3	7
NV.376	5351016012	0.06	3078 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store Combination	0.32	Nonvacant New	No	43	14	70%	1926	2.3	\$33.78	No res.	Strong	10	Mod./Above Mod.	0	3	7
NV.377	5352018004	0.17	2201 ORANGE GROVE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1925	4.0	\$57.28	3.0	Strong	1	Above Mod.	0	0	1
NV.378	5352020005	0.15	2823 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.15	Nonvacant New	No	24	4	90%	1910	4.1	\$5.09	4.0	Strong	3	Mod./Above Mod.	0	1	2
NV.379	5352020012	0.18	2224 ORANGE GROVE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1940	1.3	\$34.30	3.0	High	2	Above Mod.	0	0	2
NV.379	5352020013	0.18	2228 ORANGE GROVE AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1911	1.3	\$34.30	3.0	High	2	Above Mod.	0	0	2
NV.380	5352020017	0.18	2217 S MERIDIAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1930	2.9	\$30.64	3.0	Strong	1	Above Mod.	0	0	1
NV.381	5352021016	0.17	2117 S MERIDIAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1929	2.1	\$6.66	3.0	Strong	1	Above Mod.	0	0	1
NV.382	5352024018	0.15	2715 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	34.4	15	70%	1928	2.7	\$42.31	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.382	5352024001	0.15	2717 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	34.4	15	70%	1924	2.7	\$42.31	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.382	5352024002	0.14	2721 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.43	Nonvacant New	No	34.4	15	70%	1924	2.7	\$42.31	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.383	5352024011	0.18	2128 S MERIDIAN AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1923	6.1	\$23.24	3.0	Strong	1	Above Mod.	0	0	1
NV.384	5352024020	0.14	2705 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34.4	15	70%	1949	3.5	\$42.14	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.384	5352024021	0.14	2701 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34.4	15	70%	1938	3.5	\$42.14	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.384	5352024019	0.14	2709 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.42	Nonvacant New	No	34.4	15	70%	1922	3.5	\$42.14	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.385	5352024022	0.33	2205 LA PALOMA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.33	Nonvacant New	No	18	6	90%	1926	1.7	\$43.60	6.0	High	2	Above Mod.	0	0	2
NV.386	5352024027	0.17	2117 LA PALOMA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1938	1.9	\$8.64	3.3	High	3	Mod./Above Mod.	0	1	2
NV.386	5352024026	0.18	2121 LA PALOMA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1929	1.9	\$8.64	3.3	High	3	Mod./Above Mod.	0	1	2
NV.386	5352024025	0.19	2125 LA PALOMA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.54	Nonvacant New	No	18	10	90%	1924	1.9	\$8.64	3.3	High	3	Mod./Above Mod.	0	1	2
NV.387	5352025003	0.20	2108 LA PALOMA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.20	Nonvacant New	No	18	4	90%	1954	1.3	\$7.64	4.0	High	1	Above Mod.	0	0	1
NV.388	5352025015	0.14	2605 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.44	Nonvacant New	No	34.4	15	70%	1941	3.4	\$33.54	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.388	5352025013	0.15	2615 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.44	Nonvacant New	No	34.4	15	70%	1922	3.4	\$33.54	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.388	5352025014	0.14	2611 W RAMONA RD	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.44	Nonvacant New	No	34.4	15	70%	1914	3.4	\$33.54	5.0	Strong	8	Mod./Above Mod.	0	2	6
NV.389	5352025018	0.18	2117 EL PASEO	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1924	4.1	\$53.45	3.5	Strong	2	Above Mod.	0	0	2
NV.389	5352025019	0.20	2115 EL PASEO	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1909	4.1	\$53.45	3.5	Strong	2	Above Mod.	0	0	2
NV.390	5352025022	0.18	2101 EL PASEO	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1921	4.8	\$12.35	3.0	Strong	1	Above Mod.	0	0	1
NV.391	5352025023	0.15	2625 W RAMONA RD	High Density Residential	R-3	Residential - Single Family Residence	0.15	Nonvacant New	No	24	4	90%	1947	1.6	\$29.57	4.0	High	2	Mod./Above Mod.	0	1	1
NV.392	5352030018	0.18	2004 EDGWOOD DR	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1957	4.0	\$53.63	3.0	Strong	1	Above Mod.	0	0	1
NV.393	535204012	0.55	1919 S PALM AVE	Medium Density Residential	R-2	Institutional - School (Private)	0.55	Nonvacant New	No	18	10	90%	1937	1.5	\$43.53	5.0	High	4	Mod./Above Mod.	0	1	3
NV.394	5352042023	0.82	2120 S FREMONT AVE	General Commercial	CPD	Commercial - Store	0.90	Nonvacant New	No	48	43	90%	1977	3.6	\$122.11	43.0	Medium	19	Lower Mixed	12	2	5
NV.394	5352040001	0.07	2116 S FREMONT AVE	General Commercial	CPD	Residential - Single Family Residence	0.90	Nonvacant New	No	48	43	90%	1957	3.6	\$122.11	43.0	Medium	19	Lower Mixed	12	2	5
NV.395	5355002032	0.27	2013 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.70	Nonvacant New	No	43	30	90%	1965	4.7	\$31.12	7.5	Strong	23	Lower Mixed	15	3	5
NV.395	5355002017	0.15	2001 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.70	Nonvacant New	No	43	30	90%	1948	4.7	\$31.12	7.5	Strong	23	Lower Mixed	15	3	5
NV.395	5355002014	0.28	2025 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.70	Nonvacant New	No	43	30	90%	1934	4.7	\$31.12	7.5	Strong	23	Lower Mixed	15	3	5
NV.396	5355003014	0.13	2117 W VALLEY BLVD	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.69	Nonvacant New	No	43	30	90%	1970	1.9	\$68.58	No res.	Strong	27	Lower Mixed	17	3	7
NV.396	5355003015	0.13	2117 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.69	Nonvacant New	No	43	30	90%	1947	1.9	\$68.58	No res.	Strong	27	Lower Mixed	17	3	7
NV.396	5355003016	0.28	2101 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.69	Nonvacant New	No	43	30	90%	1946	1.9	\$68.58	No res.	Strong	27	Lower Mixed	17	3	7
NV.397	5355004013	0.06	2227 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.28	Nonvacant New	No	43	12	70%	1953	3.4	\$86.86	No res.	High	7	Mod./Above Mod.	0	2	5
NV.397	5355004014	0.07	2225 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.28	Nonvacant New	No	43	12	70%	1951	3.4	\$86.86	No res.	High	7	Mod./Above Mod.	0	2	5
NV.397	5355004030	0.15	2233 W VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.28	Nonvacant New	No	43	12	70%	1946	3.4	\$86.86	No res.	High	7	Mod./Above Mod.	0	2	5
NV.398	5355004015	0.13	2219 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.42	Nonvacant New	No	43	18	70%	1952	1.5	\$62.08	9.0	High	9	Mod./Above Mod.	0	3	6
NV.398	5355004016	0.14	2209 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.42	Nonvacant New	No	43	18	70%	1949	1.5	\$62.08	9.0	High	9	Mod./Above Mod.	0	3	6
NV.398	5355004017	0.15	2207 W VALLEY BLVD	Specific Plan	Valley	Commercial - Non-Auto Service and Repair Shop, Paint Shop, or Laundry	0.42	Nonvacant New	No	43	18	70%	1947	1.5	\$62.08	9.0	High	9	Mod./Above Mod.	0	3	6
NV.399	5355005028	0.27	2301 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.40	Nonvacant New	No	43	17	70%	1967	3.9	\$53.44	17.0	Strong	11	Mod./Above Mod.	0	3	8
NV.399	5355005013	0.13	2311 W VALLEY BLVD	Specific Plan	Valley	Commercial - Professional Building	0.40	Nonvacant New	No	43	17	70%	1943	3.9	\$53.44	17.0	Strong	11	Mod./Above Mod.	0	3	8
NV.400	5355007022	0.17	2505 W VALLEY BLVD	Specific Plan	Valley	Industrial - Warehousing, Distribution, Storage	0.48	Nonvacant New	No	43	21	70%	1944	2.4	\$56.12	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.400	5355007021	0.31	2505 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.48	Nonvacant New	No	43	21	70%	1941	2.4	\$56.12	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.401	5355009034	0.37	2350 W VALLEY BLVD	Specific Plan	Valley	Commercial - Bank, Savings and Loan	0.91	Nonvacant New	No	43	39	90%	1976	2.0	\$93.77	No res.	High	28	Lower Mixed	18	3	7
NV.401	5355009039	0.54	2300 W VALLEY BLVD	Specific Plan	Valley	Industrial - Warehousing, Distribution, Storage	0.91	Nonvacant New	No	43	39	90%	1976	2.0	\$93.77	No res.	High	28	Lower Mixed	18	3	7
NV.402	5355009036	0.19	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	1.19	Nonvacant New	No	43	51	90%	1955	0.4	\$22.81	No res.	Medium	23	Lower Mixed	15	3	5
NV.402	5355009037	0.19	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	1.19	Nonvacant New	No	43	51	90%	1955	0.4	\$22.81	No res.	Medium	23	Lower Mixed	15	3	5
NV.402	5355009035	0.80	2200 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	1.19	Nonvacant New	No	43	51	90%	1946	0.4	\$22.81	No res.	Medium	23	Lower Mixed	15	3	5
NV.403	5355010037	0.15	2140 W VALLEY BLVD	Specific Plan	Valley	Commercial - Professional Building	0.30	Nonvacant New	No	43	13	70%	1986	1.5	\$66.53	6.5	Medium	4	Mod./Above Mod.	0	1	3
NV.403	5355010002	0.15	2130 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.30	Nonvacant New	No													

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors					Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land: Imp Ratio	In Place Value/SF	Redev Ratio	Lower				Mod.	Above Mod.	
NV.407	5356001001	0.55	1800 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	1.15	Nonvacant New	No	43	49	90%	1967	2.5	\$60.70	24.5	Strong	42	Lower Mixed	27	5	10	
NV.407	5356001028	0.43	1820 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	1.15	Nonvacant New	No	43	49	90%	1926	2.5	\$60.70	24.5	Strong	42	Lower Mixed	27	5	10	
NV.407	5356001077	0.17	1410 S ETHEL AVE	Specific Plan	Valley	Residential - Single Family Residence	1.15	Nonvacant New	No	43	49	90%	1918	2.5	\$60.70	24.5	Strong	42	Lower Mixed	27	5	10	
NV.408	5356005009	0.18	1529 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.18	Nonvacant New	No	24	4	90%	1927	4.2	\$7.02	4.0	Strong	3	Mod./Above Mod.	0	1	2	
NV.409	5356005019	0.18	1615 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.55	Nonvacant New	No	25.8	14	90%	1930	2.6	\$58.31	4.7	Strong	10	Mod./Above Mod.	0	3	7	
NV.409	5356005021	0.18	1619 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.55	Nonvacant New	No	25.8	14	90%	1924	2.6	\$58.31	4.7	Strong	10	Mod./Above Mod.	0	3	7	
NV.409	5356005017	0.18	1611 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.55	Nonvacant New	No	25.8	14	90%	1921	2.6	\$58.31	4.7	Strong	10	Mod./Above Mod.	0	3	7	
NV.410	5356006004	0.11	1728 W VALLEY BLVD	Specific Plan	Valley	Commercial - Office Building	0.54	Nonvacant New	No	43	23	90%	1963	1.6	\$70.65	5.8	Medium	9	Lower Mixed	6	1	2	
NV.410	5356006028	0.28	1744 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.54	Nonvacant New	No	43	23	90%	1947	1.6	\$70.65	5.8	Medium	9	Lower Mixed	6	1	2	
NV.410	5356006003	0.15	1710 W VALLEY BLVD	Specific Plan	Valley	Residential - Four Units (Any Combination)	0.54	Nonvacant New	No	43	23	90%	1922	1.6	\$70.65	5.8	Medium	9	Lower Mixed	6	1	2	
NV.411	5356006022	0.19	1511 S MARENGO AVE	High Density Residential	R-3	Residential - Single Family Residence	0.19	Nonvacant New	No	24	5	90%	1942	1.9	\$8.62	5.0	High	3	Mod./Above Mod.	0	1	2	
NV.412	5356010002	0.23	1411 S MARGUERITA AVE	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.41	Nonvacant New	No	43	18	70%	1978	1.8	\$12.32	6.0	High	8	Mod./Above Mod.	0	2	6	
NV.412	5356010001	0.19	1404 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.41	Nonvacant New	No	43	18	70%	1952	1.8	\$12.32	6.0	High	8	Mod./Above Mod.	0	2	6	
NV.413	5356010011	0.20	1420 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.59	Nonvacant New	No	43	26	90%	1968	1.4	\$69.09	No res.	Medium	12	Lower Mixed	8	1	3	
NV.413	5356010005	0.19	1430 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.59	Nonvacant New	No	43	26	90%	1961	1.4	\$69.09	No res.	Medium	12	Lower Mixed	8	1	3	
NV.413	5356010012	0.20	1424 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store Combination	0.59	Nonvacant New	No	43	26	90%	1924	1.4	\$69.09	No res.	Medium	12	Lower Mixed	8	1	3	
NV.414	5356010015	0.27	1536 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.27	Nonvacant New	No	43	11	70%	1926	2.7	\$104.10	11.0	Medium	4	Mod./Above Mod.	0	1	3	
NV.415	5356016048	0.21	1703 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.73	Nonvacant New	No	25.8	19	90%	1929	1.6	\$27.20	4.8	High	11	Mod./Above Mod.	0	3	8	
NV.415	5356016050	0.26	1715 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.73	Nonvacant New	No	25.8	19	90%	1923	1.6	\$27.20	4.8	High	11	Mod./Above Mod.	0	3	8	
NV.415	5356016049	0.26	1709 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.73	Nonvacant New	No	25.8	19	90%	1922	1.6	\$27.20	4.8	High	11	Mod./Above Mod.	0	3	8	
NV.416	5356018012	0.13	1525 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.26	Nonvacant New	No	43	11	70%	1923	1.9	\$48.57	5.5	High	5	Mod./Above Mod.	0	2	3	
NV.416	5356018009	0.13	1521 S ATLANTIC BLVD	High Density Residential	R-3	Residential - Single Family Residence	0.26	Nonvacant New	No	43	11	70%	1922	1.9	\$48.57	5.5	High	5	Mod./Above Mod.	0	2	3	
NV.417	5356018015	0.06	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.25	Nonvacant New	No	43	11	70%	1960	1.9	\$75.71	No res.	Medium	4	Mod./Above Mod.	0	1	3	
NV.417	5356018035	0.12	1156 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.25	Nonvacant New	No	43	11	70%	1931	1.9	\$75.71	No res.	Medium	4	Mod./Above Mod.	0	1	3	
NV.418	5356018016	0.13	1142 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.13	Nonvacant New	No	24	3	90%	1932	8.2	\$43.21	No res.	Strong	3	Mod./Above Mod.	0	1	2	
NV.419	5356018017	0.13	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.41	Nonvacant New	No	43	18	70%	1963	2.3	\$65.88	No res.	High	10	Mod./Above Mod.	0	3	7	
NV.419	5356018019	0.14	1112 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.41	Nonvacant New	No	43	18	70%	1953	2.3	\$65.88	No res.	High	10	Mod./Above Mod.	0	3	7	
NV.419	5356018018	0.14	1124 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.41	Nonvacant New	No	43	18	70%	1931	2.3	\$65.88	No res.	High	10	Mod./Above Mod.	0	3	7	
NV.420	5357001015	0.19	1505 S 9TH ST	Medium Density Residential	Valley	Residential - Three Units (Any Combination)	0.57	Nonvacant New	No	43	25	90%	1940	2.3	\$62.16	4.2	Strong	17	Lower Mixed	11	2	4	
NV.420	5357001014	0.18	1503 S 9TH ST	Medium Density Residential	Valley	Residential - Single Family Residence	0.57	Nonvacant New	No	43	25	90%	1928	2.3	\$62.16	4.2	Strong	17	Lower Mixed	11	2	4	
NV.420	5357001016	0.20	1509 S 9TH ST	Medium Density Residential	Valley	Residential - Double, Duplex, or Two Units	0.57	Nonvacant New	No	43	25	90%	1927	2.3	\$62.16	4.2	Strong	17	Lower Mixed	11	2	4	
NV.421	5357001032	0.16	1500 S ATLANTIC BLVD	High Density Residential	Valley	Residential - Three Units (Any Combination)	0.49	Nonvacant New	No	43	21	70%	1923	1.1	\$40.86	3.0	High	8	Mod./Above Mod.	0	2	6	
NV.421	5357001042	0.16	1504 S ATLANTIC BLVD	High Density Residential	Valley	Residential - Double, Duplex, or Two Units	0.49	Nonvacant New	No	43	21	70%	1923	1.1	\$40.86	3.0	High	8	Mod./Above Mod.	0	2	6	
NV.421	5357001021	0.18	1508 S ATLANTIC BLVD	High Density Residential	Valley	Residential - Double, Duplex, or Two Units	0.49	Nonvacant New	No	43	21	70%	1923	1.1	\$40.86	3.0	High	8	Mod./Above Mod.	0	2	6	
NV.422	5357002010	0.20	1416 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.20	Nonvacant New	No	18	4	90%	1932	3.7	\$48.25	4.0	Strong	1	Above Mod.	0	0	1	
NV.423	5357002026	0.19	1515 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	4	90%	1924	5.4	\$16.04	4.0	Strong	1	Above Mod.	0	0	1	
NV.424	5357003001	0.17	742 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.98	Nonvacant New	No	43	42	90%	1974	1.5	\$72.51	No res.	Medium	19	Lower Mixed	12	2	5	
NV.424	5357003029	0.80	700 W VALLEY BLVD	Specific Plan	Valley	Commercial - Restaurant, Cocktail Lounge	0.98	Nonvacant New	No	43	42	90%	1966	1.5	\$72.51	No res.	Medium	19	Lower Mixed	12	2	5	
NV.425	5357003009	0.17	1422 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1939	1.5	\$23.16	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.425	5357003008	0.17	1420 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1931	1.5	\$23.16	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.425	5357003007	0.17	1416 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1927	1.5	\$23.16	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.426	5357003014	0.17	1516 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1925	1.3	\$24.08	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.426	5357003012	0.17	1508 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1924	1.3	\$24.08	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.426	5357003013	0.17	1512 S 8TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1924	1.3	\$24.08	3.0	High	3	Mod./Above Mod.	0	1	2	
NV.427	5357003026	0.17	1517 S 7TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1924	2.7	\$35.68	3.0	Strong	1	Above Mod.	0	0	1	
NV.428	5357004006	0.17	600 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.42	Nonvacant New	No	43	18	70%	1972	2.1	\$109.36	No res.	Medium	6	Mod./Above Mod.	0	2	4	
NV.428	5357004005	0.13	600 W VALLEY BLVD	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.42	Nonvacant New	No	43	18	70%	1964	2.1	\$109.36	No res.	Medium	6	Mod./Above Mod.	0	2	4	
NV.428	5357004004	0.13	622 W VALLEY BLVD	Specific Plan	Valley	Commercial - Professional Building	0.42	Nonvacant New	No	43	18	70%	1941	2.1	\$109.36	No res.	Medium	6	Mod./Above Mod.	0	2	4	
NV.429	5357004007	0.18	1413 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1939	4.4	\$7.75	3.0	Strong	1	Above Mod.	0	0	1	
NV.430	5357004014	0.17	1511 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1924	2.0	\$33.36	3.0	Strong	1	Above Mod.	0	0	1	
NV.431	5357006044	0.40	400 W VALLEY BLVD	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.54	Nonvacant New	No	43	23	90%	1967	9.1	\$85.70	No res.	High	17	Lower Mixed	11	2	4	
NV.431	5357006014	0.14	424 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.54	Nonvacant New	No	43	23	90%	1926	9.1	\$85.70	No res.	High	17	Lower Mixed	11	2	4	
NV.432	5357006016	0.11	448 W VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.22	Nonvacant New	No	24	5	90%	1921	2.0	\$62.43	No res.	Strong	5	Mod./Above Mod.	0	2	3	
NV.432	5357006015	0.11	434 W VALLEY BLVD	Specific Plan	Valley	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.22	Nonvacant New	No	43	10	70%	1961	2.0	\$62.43	No res.	Strong	7	Mod./Above Mod.	0	2	5	
NV.433	5357006018	0.20	1521 S 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.40	Nonvacant New	No	34.4	14	70%	1927	2.0	\$35.10	7.0	High	7	Mod./Above Mod.	0	2	5	
NV.433	5357006017	0.20	1525 S 4TH ST	High Density Residential	R-3	Residential - Single Family Residence	0.40	Nonvacant New	No	34.4	14	70%	1910	2.0	\$35.10	7.0	High	7	Mod./Above Mod.	0	2	5	
NV.434	5357008013	0.21	1412 S 3RD ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.60	Nonvacant New	No	43	26	90%	1988	1.1	\$50.78	4.3	High	14	Lower Mixed	9	1	4	
NV.434	5357008023	0.21	1419 S 2ND ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.60	Nonvacant New	No	43	26	90%	1939	1.1	\$50.78	4.3	High	14	Lower Mixed	9	1	4	
NV.434	5357008024	0.19	1415 S 2ND ST	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.60	Nonvacant New	No	43	26	90%	1924	1.1	\$50.78	4.3	High	14	Lower Mixed	9	1	4	
NV.435	5357009011	0.20	1414 S 2ND ST	Medical Office	Valley	Commercial - Parking Lot (Commercial Use Property)	0.99	Nonvacant New	No	43	43	90%	1965	1.6	\$190.95	8.6	High	27	Lower Mixed	17	3	7	
NV.435	5357009010	0.20	1418 S 2ND ST	Medical Office	Valley	Residential - Four Units (Any Combination)	0.99	Nonvacant New	No	43	43	90%	1924	1.6	\$190.95	8.6	High	27	Lower Mixed	17	3	7	
NV.																							

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors					Reuse Potential Score	Net Capacity	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio	Affordability Level			Lower	Mod.	Above Mod.
NV.437	5357010021	0.21	1617 S GARFIELD AVE, NO 1-5	Medical Office	PO	Residential - Five or More Units or Apartments (Any Combination)	0.69	Nonvacant New	No	43	30	90%	1977	1.0	\$41.80	4.3	Medium	10	Lower Mixed	7	1	2
NV.437	5357010014	0.25	1627 S GARFIELD AVE	Medical Office	PO	Residential - Single Family Residence	0.69	Nonvacant New	No	43	30	90%	1922	1.0	\$41.80	4.3	Medium	10	Lower Mixed	7	1	2
NV.437	5357010022	0.23	1619 S GARFIELD AVE	Medical Office	PO	Residential - Single Family Residence	0.69	Nonvacant New	No	43	30	90%	1913	1.0	\$41.80	4.3	Medium	10	Lower Mixed	7	1	2
NV.438	5357011004	0.20	1628 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.20	Nonvacant New	No	18	4	90%	1920	1.7	\$45.78	4.0	High	1	Above Mod.	0	0	1
NV.439	5357011010	0.19	1604 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.72	Nonvacant New	No	18	13	90%	1948	3.2	\$25.93	3.3	Strong	4	Mod./Above Mod.	0	1	3
NV.439	5357011019	0.31	1601 S 2ND ST	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.72	Nonvacant New	No	18	13	90%	1911	3.2	\$25.93	3.3	Strong	4	Mod./Above Mod.	0	1	3
NV.439	5357011011	0.22	1600 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.72	Nonvacant New	No	18	13	90%	1910	3.2	\$25.93	3.3	Strong	4	Mod./Above Mod.	0	1	3
NV.440	5357011013	0.21	1715 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.60	Nonvacant New	No	18	11	90%	1926	2.2	\$15.75	5.5	Strong	4	Mod./Above Mod.	0	1	3
NV.440	5357011012	0.39	1719 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.60	Nonvacant New	No	18	11	90%	1923	2.2	\$15.75	5.5	Strong	4	Mod./Above Mod.	0	1	3
NV.441	5357011025	0.29	1609 S 2ND ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.49	Nonvacant New	No	18	9	90%	1913	1.8	\$54.02	3.0	High	3	Mod./Above Mod.	0	1	2
NV.441	5357011020	0.20	1608 S 3RD ST	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.49	Nonvacant New	No	18	9	90%	1911	1.8	\$54.02	3.0	High	3	Mod./Above Mod.	0	1	2
NV.442	5357012005	0.20	1704 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.40	Nonvacant New	No	18	7	90%	1939	1.4	\$32.65	3.5	High	2	Above Mod.	0	0	2
NV.442	5357012004	0.20	1708 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.40	Nonvacant New	No	18	7	90%	1930	1.4	\$32.65	3.5	High	2	Above Mod.	0	0	2
NV.443	5357012014	0.21	1715 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.41	Nonvacant New	No	18	7	90%	1938	1.4	\$35.17	3.5	High	2	Above Mod.	0	0	2
NV.443	5357012015	0.21	1709 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.41	Nonvacant New	No	18	7	90%	1924	1.4	\$35.17	3.5	High	2	Above Mod.	0	0	2
NV.444	5357014021	0.18	1617 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1940	1.8	\$30.77	3.5	High	2	Above Mod.	0	0	2
NV.444	5357014008	0.20	1616 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1928	1.8	\$30.77	3.5	High	2	Above Mod.	0	0	2
NV.445	5357014012	0.15	1600 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.15	Nonvacant New	No	18	3	90%	1923	4.0	\$78.28	3.0	High	1	Above Mod.	0	0	1
NV.446	5357017006	0.20	1616 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1930	1.9	\$31.12	3.7	High	4	Mod./Above Mod.	0	1	3
NV.446	5357017004	0.20	1608 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1925	1.9	\$31.12	3.7	High	4	Mod./Above Mod.	0	1	3
NV.446	5357017005	0.20	1612 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1924	1.9	\$31.12	3.7	High	4	Mod./Above Mod.	0	1	3
NV.447	5357017009	0.20	1700 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.58	Nonvacant New	No	18	11	90%	1936	1.8	\$5.92	3.7	High	4	Mod./Above Mod.	0	1	3
NV.447	5357017011	0.19	1708 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.58	Nonvacant New	No	18	11	90%	1925	1.8	\$5.92	3.7	High	4	Mod./Above Mod.	0	1	3
NV.447	5357017010	0.20	1706 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.58	Nonvacant New	No	18	11	90%	1925	1.8	\$5.92	3.7	High	4	Mod./Above Mod.	0	1	3
NV.448	5357018030	0.20	1709 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1923	1.3	\$20.78	3.7	High	4	Mod./Above Mod.	0	1	3
NV.448	5357018037	0.19	1701 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1923	1.3	\$20.78	3.7	High	4	Mod./Above Mod.	0	1	3
NV.448	5357018009	0.20	1705 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1923	1.3	\$20.78	3.7	High	4	Mod./Above Mod.	0	1	3
NV.449	5357019002	0.14	1801 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.14	Nonvacant New	No	18	3	90%	1928	1.7	\$39.28	3.0	High	1	Above Mod.	0	0	1
NV.450	5357019010	0.19	1833 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1929	2.5	\$36.27	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.450	5357019008	0.20	1825 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1926	2.5	\$36.27	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.450	5357019009	0.20	1829 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1923	2.5	\$36.27	3.7	Strong	4	Mod./Above Mod.	0	1	3
NV.451	5357020010	0.19	1832 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1928	1.5	\$17.83	5.5	High	4	Mod./Above Mod.	0	1	3
NV.451	5357020011	0.20	1836 S 9TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.59	Nonvacant New	No	18	11	90%	1927	1.5	\$17.83	5.5	High	4	Mod./Above Mod.	0	1	3
NV.451	5357020034	0.20	N/A	Medium Density Residential	R-2	-	0.59	Nonvacant New	No	18	11	90%	N/A	1.5	\$17.83	5.5	High	4	Mod./Above Mod.	0	1	3
NV.452	5357023025	0.12	1828 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1957	1.7	\$34.60	3.0	High	3	Mod./Above Mod.	0	1	2
NV.452	5357023006	0.18	1820 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1924	1.7	\$34.60	3.0	High	3	Mod./Above Mod.	0	1	2
NV.452	5357023005	0.20	1824 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.50	Nonvacant New	No	18	9	90%	1912	1.7	\$34.60	3.0	High	3	Mod./Above Mod.	0	1	2
NV.453	5357023011	0.19	1800 S 6TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1910	1.3	\$34.60	3.0	High	1	Above Mod.	0	0	1
NV.454	5357023012	0.17	1845 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1923	2.7	\$33.81	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.454	5357023014	0.18	1837 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1923	2.7	\$33.81	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.454	5357023013	0.18	1841 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1922	2.7	\$33.81	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.455	5357023021	0.17	1809 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.17	Nonvacant New	No	18	3	90%	1913	2.0	\$37.39	3.0	High	1	Above Mod.	0	0	1
NV.456	5357024010	0.18	1832 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1922	3.3	\$21.04	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.456	5357024009	0.17	1836 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1920	3.3	\$21.04	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.456	5357024011	0.17	1828 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1913	3.3	\$21.04	3.0	Strong	3	Mod./Above Mod.	0	1	2
NV.457	5357024030	0.18	1812 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1922	2.9	\$22.15	4.5	Strong	3	Mod./Above Mod.	0	1	2
NV.457	5357024014	0.17	1816 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.52	Nonvacant New	No	18	9	90%	1918	2.9	\$22.15	4.5	Strong	3	Mod./Above Mod.	0	1	2
NV.457	5357024031	0.17	N/A	Medium Density Residential	R-2	-	0.52	Nonvacant New	No	18	9	90%	N/A	2.9	\$22.15	4.5	Strong	3	Mod./Above Mod.	0	1	2
NV.458	5357024017	0.14	1804 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1923	3.0	\$34.38	3.0	Strong	2	Above Mod.	0	0	2
NV.458	5357024018	0.21	1800 S 5TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1917	3.0	\$34.38	3.0	Strong	2	Above Mod.	0	0	2
NV.459	5357025005	0.18	1844 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1925	3.7	\$13.24	3.0	Strong	2	Above Mod.	0	0	2
NV.459	5357025006	0.17	1840 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.35	Nonvacant New	No	18	6	90%	1922	3.7	\$13.24	3.0	Strong	2	Above Mod.	0	0	2
NV.460	5357025012	0.19	1816 S 4TH ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1916	1.4	\$6.45	3.0	High	1	Above Mod.	0	0	1
NV.461	5357025020	0.18	1837 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18	3	90%	1922	3.1	\$33.70	3.0	Strong	1	Above Mod.	0	0	1
NV.462	5357025026	0.18	1813 S 3RD ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.18	Nonvacant New	No	18												

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Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/\$F	Redev Ratio				Lower	Mod.	Above Mod.
NV.466	5359001008	0.16	1422 S GARFIELD AVE	Medical Office	Valley	Commercial - Parking Lot (Commercial Use Property)	0.37	Nonvacant New	No	43	16	70%	1995	8.8	\$55.90	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.466	5359001042	0.21	1416 S GARFIELD AVE	Medical Office	Valley	Commercial - Store Combination	0.37	Nonvacant New	No	43	16	70%	1949	8.8	\$55.90	No res.	Strong	11	Mod./Above Mod.	0	3	8
NV.467	5359002002	0.13	112 E VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.48	Nonvacant New	No	43	21	70%	1947	4.4	\$64.60	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.467	5359002001	0.22	100 E VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.48	Nonvacant New	No	43	21	70%	1942	4.4	\$64.60	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.467	5359002003	0.13	120 E VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	0.48	Nonvacant New	No	43	21	70%	1903	4.4	\$64.60	No res.	Strong	15	Mod./Above Mod.	0	4	11
NV.468	5359002004	0.10	126 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.38	Nonvacant New	No	43	16	70%	1929	1.2	\$44.53	No res.	High	9	Mod./Above Mod.	0	3	6
NV.468	5359002006	0.19	134 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.38	Nonvacant New	No	43	16	70%	1927	1.2	\$44.53	No res.	High	9	Mod./Above Mod.	0	3	6
NV.468	5359002005	0.10	130 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	0.38	Nonvacant New	No	43	16	70%	1927	1.2	\$44.53	No res.	High	9	Mod./Above Mod.	0	3	6
NV.469	5359003034	0.26	1415 S CHAPEL AVE	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	1.40	Nonvacant New	No	43	60	90%	1964	6.6	\$21.08	No res.	Strong	54	Lower Mixed	34	7	13
NV.469	5359003032	0.73	204 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	1.40	Nonvacant New	No	43	60	90%	1923	6.6	\$21.08	No res.	Strong	54	Lower Mixed	34	7	13
NV.469	5359003033	0.23	N/A	Specific Plan	Valley	Commercial - Commercial	1.40	Nonvacant New	No	43	60	90%	N/A	6.6	\$21.08	No res.	Strong	54	Lower Mixed	34	7	13
NV.469	5359003031	0.18	200 E VALLEY BLVD	Specific Plan	Valley	mmercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	1.40	Nonvacant New	No	24	34	90%	1947	6.6	\$21.08	No res.	Strong	31	Mod./Above Mod.	0	8	23
NV.470	5359004023	0.23	1423 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.71	Nonvacant New	No	18	13	90%	1940	2.8	\$28.45	4.3	Strong	5	Mod./Above Mod.	0	2	3
NV.470	5359004024	0.23	1429 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.71	Nonvacant New	No	18	13	90%	1940	2.8	\$28.45	4.3	Strong	5	Mod./Above Mod.	0	2	3
NV.470	5359004022	0.25	1419 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.71	Nonvacant New	No	18	13	90%	1926	2.8	\$28.45	4.3	Strong	5	Mod./Above Mod.	0	2	3
NV.471	5359004027	0.23	1501 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.69	Nonvacant New	No	18	12	90%	1941	2.7	\$34.48	4.0	Strong	4	Mod./Above Mod.	0	1	3
NV.471	5359004025	0.23	1431 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.69	Nonvacant New	No	18	12	90%	1941	2.7	\$34.48	4.0	Strong	4	Mod./Above Mod.	0	1	3
NV.471	5359004026	0.22	1435 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.69	Nonvacant New	No	18	12	90%	1941	2.7	\$34.48	4.0	Strong	4	Mod./Above Mod.	0	1	3
NV.472	5359004030	0.22	1513 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.22	Nonvacant New	No	18	4	90%	1930	2.7	\$32.37	4.0	Strong	1	Above Mod.	0	0	1
NV.473	5359005008	0.20	1416 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1938	3.5	\$23.55	3.5	Strong	2	Above Mod.	0	0	2
NV.473	5359005009	0.19	1420 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1938	3.5	\$23.55	3.5	Strong	2	Above Mod.	0	0	2
NV.474	5359005010	0.20	1424 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1940	1.4	\$14.87	3.5	High	2	Above Mod.	0	0	2
NV.474	5359005011	0.19	1428 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1938	1.4	\$14.87	3.5	High	2	Above Mod.	0	0	2
NV.475	5359005020	0.19	1524 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1940	2.4	\$19.79	3.5	Strong	2	Above Mod.	0	0	2
NV.475	5359005019	0.20	1505 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.39	Nonvacant New	No	18	7	90%	1923	2.4	\$19.79	3.5	Strong	2	Above Mod.	0	0	2
NV.476	5359021005	0.19	1616 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1925	3.2	\$47.89	3.5	Strong	2	Above Mod.	0	0	2
NV.476	5359021006	0.19	1620 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1925	3.2	\$47.89	3.5	Strong	2	Above Mod.	0	0	2
NV.477	5359021028	0.28	1713 S ALMANSOR ST	Medium Density Residential	R-2	Residential - Single Family Residence	0.57	Nonvacant New	No	18	10	90%	1935	1.5	\$17.89	3.3	High	3	Mod./Above Mod.	0	1	2
NV.478	5359022011	0.16	1605 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.16	Nonvacant New	No	18	3	90%	1936	1.5	\$29.80	3.0	High	1	Above Mod.	0	0	1
NV.479	5359025012	0.16	1716 S GARFIELD AVE	Medical Office	PO	Residential - Three Units (Any Combination)	0.48	Nonvacant New	No	43	21	70%	1949	1.2	\$52.29	3.0	High	8	Mod./Above Mod.	0	2	6
NV.479	5359025011	0.16	1712 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	0.48	Nonvacant New	No	43	21	70%	1938	1.2	\$52.29	3.0	High	8	Mod./Above Mod.	0	2	6
NV.479	5359025013	0.17	1720 S GARFIELD AVE	Medical Office	PO	Residential - Double, Duplex, or Two Units	0.48	Nonvacant New	No	43	21	70%	1937	1.2	\$52.29	3.0	High	8	Mod./Above Mod.	0	2	6
NV.480	5359028019	0.23	1815 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Double, Duplex, or Two Units	0.69	Nonvacant New	No	18	12	90%	1930	1.8	\$28.46	3.0	High	4	Mod./Above Mod.	0	1	3
NV.480	5359028021	0.23	1821 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.69	Nonvacant New	No	18	12	90%	1929	1.8	\$28.46	3.0	High	4	Mod./Above Mod.	0	1	3
NV.480	5359028020	0.23	1817 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.69	Nonvacant New	No	18	12	90%	1928	1.8	\$28.46	3.0	High	4	Mod./Above Mod.	0	1	3
NV.481	5359029002	0.19	1804 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1930	1.3	\$42.78	3.5	High	2	Above Mod.	0	0	2
NV.481	5359029003	0.19	1808 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1928	1.3	\$42.78	3.5	High	2	Above Mod.	0	0	2
NV.482	5359029004	0.19	1812 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1950	4.0	\$25.40	3.5	Strong	2	Above Mod.	0	0	2
NV.482	5359029005	0.19	1816 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.38	Nonvacant New	No	18	7	90%	1941	4.0	\$25.40	3.5	Strong	2	Above Mod.	0	0	2
NV.483	5359029010	0.19	1836 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1938	4.0	\$22.79	3.0	Strong	1	Above Mod.	0	0	1
NV.484	5359029012	0.19	1844 S SIERRA VISTA AVE	Medium Density Residential	R-2	Residential - Single Family Residence	0.19	Nonvacant New	No	18	3	90%	1942	1.1	\$24.43	3.0	High	1	Above Mod.	0	0	1
NV.485	5359005001	0.20	400 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	1.08	Nonvacant New	No	43	46	90%	1961	1.2	\$121.86	No res.	High	33	Lower Mixed	21	4	8
NV.485	5359005041	0.70	448 E VALLEY BLVD	Specific Plan	Valley	Commercial - Bank, Savings and Loan	1.08	Nonvacant New	No	43	46	90%	1960	1.2	\$121.86	No res.	High	33	Lower Mixed	21	4	8
NV.485	5359005002	0.17	408 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	1.08	Nonvacant New	No	43	46	90%	1955	1.2	\$121.86	No res.	High	33	Lower Mixed	21	4	8
NV.486	5353019011	1.13	1621 GARVEY AVE	Medium Density Residential	R-2	Institutional - Children's Day Care Center	1.13	Nonvacant New	No	18	20	90%	N/A	No imp.	\$2.21	No res.	High	9	Mod./Above Mod.	0	3	6
NV.487	5337021021	0.48	N/A	Central Business District	R-3	Commercial - Parking Lot (Commercial Use Property)	1.20	Nonvacant New	No	64	77	90%	N/A	3.2	\$113.17	No res.	High	55	Lower Mixed	35	7	13
NV.487	5337021020	0.71	210 N GARFIELD AVE	Central Business District	R-3	Commercial - Office Building	1.20	Nonvacant New	No	64	77	90%	N/A	3.2	\$113.17	No res.	High	55	Lower Mixed	35	7	13
NV.488	5338020028	1.34	21 N OLIVE AVE	Automotive Commercial	CPD	Institutional - Church	1.34	Nonvacant New	No	48	65	90%	1928	0.2	\$25.75	13.0	High	43	Lower Mixed	27	6	10
NV.489	5292001015	0.26	200 N HUNTINGTON DR	Medium Density Residential	R-2	Commercial - Supermarket	1.89	Nonvacant New	No	43	81	90%	1966	1.0	\$17.86	81.0	High	36	Lower Mixed	23	5	8
NV.489	5292001016	1.63	2810 W ALHAMBRA DR	Medium Density Residential	R-2	Commercial - Supermarket	1.89	Nonvacant New	No	43	81	90%	1966	1.0	\$17.86	81.0	High	36	Lower Mixed	23	5	8
NV.490	5337025009	0.24	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	2.29	Nonvacant New	No	64	146	90%	N/A	No imp.	\$0.00	No res.	Strong	131	Lower Mixed	82	18	31
NV.490	5337025008	0.97	N/A	Central Business District	CBD	Commercial Building	2.29	Nonvacant New	No	64	146	90%	N/A	No imp.	\$0.00	No res.	Strong	131	Lower Mixed	82	18	31
NV.490	5337026025	0.68	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	2.29	Nonvacant New	No	64	146	90%	N/A	No imp.	\$0.00	No res.	Strong	131	Lower Mixed	82	18	31
NV.490	5337026026	0.31	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	2.29	Nonvacant New	No	64	146	90%	N/A	No imp.	\$0.00	No res.	Strong	131	Lower Mixed	82	18	31
NV.490	5337026909	0.09	N/A	Central Business District	CBD	Commercial - Parking Lot (Commercial Use Property)	2.29	Nonvacant New	No	64</												

ATTACHMENT 4.E

Site ID	AIN	Parcel Size	Address	GP	Zone	Existing Use	Site Size	Category	AB1397	Allowed DUA	Max Allowed Capacity	Realistic Capacity	Site Factors				Reuse Potential Score	Net Capacity	Affordability Level	Income Level		
													Use Year Built	Land Imp Ratio	In Place Value/SF	Redev Ratio				Lower	Mod.	Above Mod.
Nv.491	535007002	0.51	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	0.51	Nonvacant New	No	43	22	90%	1967	23.8	\$17.12	No res.	Strong	20	Lower Mixed	13	2	5
Nv.492	5342031040	0.10	N/A	Industrial	IPD	Industrial - Parking Lot (Industrial Use Property)	4.31	Nonvacant New	No	43	185	90%	1945	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342031038	0.38	1021 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1943	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342031041	0.31	1031 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1942	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342031039	0.80	1105 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1942	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342031004	0.87	1003 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1939	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342032007	0.49	1109 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1939	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342032008	0.48	1111 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	1923	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.492	5342031042	0.87	1011 S FREMONT AVE	Industrial	IPD	Industrial - Light Manufacturing	4.31	Nonvacant New	No	43	185	90%	N/A	3.5	\$37.83	No res.	Strong	167	Lower Mixed	104	23	40
Nv.493	5349001022	8.19	1495 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Neighborhood, Community)	8.19	Nonvacant New	No	43	352	90%	N/A	127.0	\$29.24	No res.	Medium	158	Lower Mixed	98	22	38
Nv.494	5359006016	0.85	1000 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1963	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006037	1.67	600 E VALLEY BLVD	Specific Plan	Valley	Commercial - Store	15.97	Nonvacant New	No	43	687	90%	1963	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006039	0.28	726 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Neighborhood, Community)	15.97	Nonvacant New	No	43	687	90%	1963	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006038	0.36	748 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1962	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006011	3.59	1000 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006017	0.09	N/A	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006018	0.43	920 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006019	0.66	830 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006020	0.63	800 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006027	0.36	1020 E VALLEY BLVD	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006045	6.60	N/A	Specific Plan	Valley	Commercial - Parking Lot (Commercial Use Property)	15.97	Nonvacant New	No	43	687	90%	1958	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006021	0.09	N/A	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	N/A	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006025	0.12	N/A	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	N/A	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.494	5359006026	0.23	N/A	Specific Plan	Valley	Commercial - Shopping Center (Regional)	15.97	Nonvacant New	No	43	687	90%	N/A	0.5	\$13.29	229.0	Medium	308	Lower Mixed	191	43	74
Nv.495	5342005026	4.88	2400 W COMMONWEALTH AVE	General Commercial	CPD	Commercial - Supermarket	14.11	Nonvacant New	No	48	677	90%	1997	1.1	\$29.19	677.0	Medium	304	Lower Mixed	189	42	73
Nv.495	5342005028	0.63	2528 W COMMONWEALTH AVE	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	14.11	Nonvacant New	No	48	677	90%	1995	1.1	\$29.19	677.0	Medium	304	Lower Mixed	189	42	73
Nv.495	5342005027	0.64	2588 W COMMONWEALTH AVE	General Commercial	CPD	Commercial - Restaurant, Cocktail Lounge	14.11	Nonvacant New	No	48	677	90%	1995	1.1	\$29.19	677.0	Medium	304	Lower Mixed	189	42	73
Nv.495	5342005030	5.65	N/A	General Commercial	CPD	Commercial - Shopping Center (Regional)	14.11	Nonvacant New	No	48	677	90%	N/A	1.1	\$29.19	677.0	Medium	304	Lower Mixed	189	42	73
Nv.495	534210031	2.31	N/A	Regional Commercial	CPD	Commercial - Shopping Center (Regional)	14.11	Nonvacant New	No	48	677	90%	N/A	1.1	\$29.19	677.0	Medium	304	Lower Mixed	189	42	73
Nv.496	5338035007	0.18	115 N 3RD ST	High Density Residential	R-3	Residential - Single Family Residence	0.18	Nonvacant New	No	64	11	70%	1920	4.0	\$42.34	11.0	Strong	7	Mod./Above Mod.	0	2	5
Nv.497	5338035011	0.17	29 N 3RD ST	High Density Residential	R-3	Residential - Four Units (Any Combination)	0.17	Nonvacant New	No	64	11	70%	1924	6.3	\$114.81	2.8	Medium	2	Mod./Above Mod.	0	1	1
Nv.498	5345009022	0.58	507 S STONEMAN AVE	Office Professional	PO	Commercial - Non-Auto Service and Repair Shop, Paint Shop, or Laundry	0.58	Nonvacant New	No	43	25	90%	1911	1.7	\$59.57	No res.	High	18	Lower Mixed	12	2	4
Nv.499	5347017002	0.25	745 S CHAPEL AVE	High Density Residential	R-3	Residential - Four Units (Any Combination)	0.25	Nonvacant New	No	43	11	70%	1928	2.2	\$35.07	2.8	Strong	5	Mod./Above Mod.	0	2	3
Nv.500	5347022032	0.21	823 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.21	Nonvacant New	No	43	9	70%	1939	3.7	\$23.89	9.0	Strong	6	Mod./Above Mod.	0	2	4
Nv.501	5347026006	0.21	808 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Single Family Residence	0.21	Nonvacant New	No	43	9	70%	1925	6.0	\$45.14	9.0	Strong	6	Mod./Above Mod.	0	2	4
Nv.502	5347026011	0.22	820 S SIERRA VISTA AVE	High Density Residential	R-3	Residential - Double, Duplex, or Two Units	0.22	Nonvacant New	No	43	9	70%	1916	5.2	\$71.84	4.5	High	4	Mod./Above Mod.	0	1	3
Nv.503	5336021041	0.22	25 N GRANADA AVE	Medium Density Residential	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1979	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021040	0.22	21 N GRANADA AVE	Medium Density Residential	EMC	Commercial - Parking Lot (Commercial Use Property)	2.43	Nonvacant New	No	30	73	90%	1979	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021023	0.06	801 E MAIN ST, REAR	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1969	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021039	0.35	17 N GRANADA AVE	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1969	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021038	0.43	807 E MAIN ST	Parking	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1963	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021027	0.17	817 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1962	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021028	0.65	801 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1947	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.503	5336021026	0.34	835 E MAIN ST	General Commercial	EMC	Commercial - Auto, Recreation Equipment, Construction Equipment Sales and Serv	2.43	Nonvacant New	No	30	73	90%	1939	0.7	\$23.73	9.1	Strong	59	Lower Mixed	37	8	14
Nv.504	5336023053	0.13	645 E MAIN ST	General Commercial	EMC	Commercial - Restaurant, Cocktail Lounge	0.43	Nonvacant New	No	30	13	90%	1992	2.0	\$104.23	13.0	Strong	11	Mod./Above Mod.	0	3	8
Nv.504	5336023007	0.28	625 E MAIN ST	General Commercial	EMC	Commercial - Office Building	0.43	Nonvacant New	No	30	13	90%	1955	2.0	\$104.23	13.0	Strong	11	Mod./Above Mod.	0	3	8
Nv.504	5336023009	0.02	N/A	Parking	EMC	Commercial - Parking Lot (Commercial Use Property)	0.43	Nonvacant New	No	30	13	90%	1955	2.0	\$104.23	13.0	Strong	11	Mod./Above Mod.	0	3	8
Nv.505	5336023035	0.47	18 N ALMANSOR ST	General Commercial	EMC	Commercial - Parking Lot (Commercial Use Property)	0.47	Nonvacant New	No	30	14	90%	1986	14.8	\$20.53	No res.	Strong	13	Mod./Above Mod.	0	4	9
Nv.506																						
Nv.506																						
REMOVED																						
Nv.507	5345022021	0.54	7 S HIDALGO AVE	General Commercial	EMC	Commercial - Store Combination	0.54	Nonvacant New	No	30	16	90%	1926	2.1	\$30.15	No res.	Strong	14	Lower Mixed	9	1	4
Nv.508	5345016014	0.34	21 S ALMANSOR ST	General Commercial	EMC	Commercial - Parking Lot (Commercial Use Property)	1.30	Nonvacant New	No	30	39	90%	1964	1.2	\$11.64	No res.	Medium	18	Lower Mixed	12	2	4
Nv.508	5345016004	0.96	512 E MAIN ST	General Commercial	EMC	Institutional - Cemetery, Mausoleum, Mortuary	1.30	Nonvacant New	No	30	39	90%	1942	1.2	\$11.64	No res.	Medium	18	Lower Mixed	12	2	4
Nv.509	5345015016	0.21	360 E MAIN ST	Central Business District	EMC	Commercial - Restaurant, Cocktail Lounge	2.43	Nonvacant New	No	30	73	90%	1999	2.2	\$32.24	No res.	Strong	66	Lower Mixed	41	9	16
Nv.509	5345015071	0.71	300 E MAIN ST	Central Business District	EMC	Commercial - Bank, Savings and Loan	2.43	Nonvacant New	No	30	73	90%	1974</									

ATTACHMENT 5

PUBLIC COMMENTS
FROM 7-DAY REVIEW PERIOD
(SEPTEMBER 21-28, 2023)

ATTACHMENT 5

From: [Henry Fung](#)
To: [Housing Element](#)
Subject: [Alhambra HE] Housing Element Message - new submission
Date: Tuesday, September 26, 2023 4:17:43 PM

Henry Fung just submitted your form: Housing Element Message
on [Alhambra HE](#)

Message Details:

First Name: Henry

Last Name: Fung

Email: calwatch@gmail.com

Message: To whom it may concern, As I mentioned to the Planning Commission at the public hearing, the State has already conditionally certified the April 2023 draft of the housing element, and further changes would put it into jeopardy. The letters refer to the Planning Commissions comments of September 18, 2023. I respond to the Planning Commission's recommendations as follows: A. Reintroducing the Residential Planned Development process: I shared staff's and the consultant's concern that retaining a discretionary process introduces uncertainty, creates issues in allowing for subjective standards to be used in approval, and does not reduce barriers to affirmatively furthering fair housing. Planning commissioners seemed to insist that HCD put this guidance down in writing, it is stated numerous times that a housing element has to review the barriers to housing development and address them. While HCD may not explicitly reject the process, it is clear that a much more substantive discussion of how the RPD process does not delay housing or reduce the number of units built must be included in a Housing Element before it can be added. Timelines for action and rewriting the standards so that they can be applied

ATTACHMENT 5

objectively will need to be included in the Zoning Code update, which is not currently present. Barring including replacement language, which will trigger another round of back and forth with HCD, as well as a necessary increase in the consultant's budget to engage in this discussion, I urge the City Council to not include this language in the draft Housing Element. B, C, D, F, G, I - Although I do not support any changes in language, I also believe these are essentially nonsubstantive changes and this should not be a reason HCD rejects or asks for revision for the housing element. E, H - Development Standards and 100% residential in commercial zones - This is a substantive change in the Housing Element and the city will need to determine how much this will impact housing production. It should be noted that often the ground floor businesses in "mixed use development" in other jurisdictions remain empty. Many residential landlords and housing developers do not have the same expertise in marketing commercial ground floor properties. Some of the potential types of commercial development, like certain types of restaurants and bars, are incompatible with residential living. There is an opportunity to activate the ground floor space similarly, for example there is not much difference between a health club/exercise room as an amenity for building residents compared to one open to the public. Or the ground floor space could be used for parking for the residents instead of forcing them to build an additional level and added cost. The developers should determine whether mixed use or 100% commercial is appropriate for their project, regardless of whether the project is in a general commercial zone or the CBD or EMC zones. I would urge HCD to request backup for the changes and a recalculation of capacity to show that this change does not affect the units projected in the Housing Element. Sincerely, Henry Fung

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ATTACHMENT 5

From: [Marisol Grier](#)
To: [Housing Element](#)
Subject: Comments for Public Review
Date: Wednesday, September 27, 2023 10:21:41 AM
Attachments: [attachment-2.png](#)
[attachment-3.png](#)
[Sept housing element - marisol public comments .pdf](#)



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Good Morning,
Please see attached my comments to be included for public review and to be on the record.
Thank You
Marisol Grier
815 Lindaraxa Park N
(626)487-6849

September 26, 2023

To: Mayor, Council Members, Planning Commissioners and City Manager

Fr: Marisor Grier, Alhambra Resident

Re: Public Review on the Housing Element - Edit Request for Page 9

Thank you for the opportunity to address concerns regarding the public draft of the Housing Element and its purpose to serve as an envisioning policy tool for what residents would like to see in our City of Alhambra.

Still Missing: Vision & Plan for Gateway Mixed-Use Redevelopment on East Main Corridor (EMC)

Residents along the East Main Street Corridor, through extensive public engagement and comments in formal and informal platforms, have requested the Housing Element reflect the General Plan and include the vision of an “Old Town Alhambra” in the East Main Corridor as part of a vibrant economic, transportation and housing redevelopment on the eastern gateway to the city.

Stating so in the Housing Element would inform the zoning update for the commercial corridor between the Central Business District (CBD) and the eastern border to the City of San Gabriel. It would also create opportunities for redevelopment grants, multi-modal transportation development, and the commercial infrastructure needed to support an influx in population due to increased affordable housing along the east main corridor (EMC) and the central business district (CBD).

To be clear, the vision for an “Old Town Alhambra” type of themed commercial development is not mutually exclusive with the addition of affordable housing. In fact, increasing housing and population will require a complementary build-up of commercial infrastructure.

REQUESTED EDIT to Housing Element bullet item on page 9:

REMOVE:

- A compromise between contrasting positions on East Main. The Housing Element includes rezoning a portion of East Main from Chapel to Granada at densities suitable for lower-income housing. Housing was not allowed on properties east of Granada. Based on the parcellation of this segment and the character of existing buildings, this was determined as the most appropriate segment for an “Old Town Alhambra” district.

REPLACE with:

- The Housing Element includes rezoning a portion of East Main, from Chapel to Almansor, at densities suitable for low-income housing, by rejoining it to the Central Business District. Through recent state law changes, mixed-use housing is now allowed on the East Main Street Corridor. Based on the parcellation of this segment, the character of existing buildings, historic references of the area, its close proximity to low-density housing, and as a gateway entrance/exit to the city, the East Main Street Corridor was determined an appropriate segment for an “Old Town Alhambra”

ATTACHMENT 5

district with opportunities for multi-modal transportation improvements to ease traffic and increase pedestrian safety.

Here's why:

Align with General Plan Land Use Goals

As active participants in the update of the General Plan, we were pleased to support the General Plan's **Land Use Goals including LU 5, as an intention to increase investment in the East Main Street Corridor (EMC)**. Especially because formal recognition of this eastern entry into the city as a "**Gateway**", qualifies it for special development considerations. A definition of "Gateway" is an entrance that heralds the approach of a new landscape and defines the arrival point as a destination. The goal of gateway planning is to arrange this landscape so that it rewards the viewer with a sense of arrival and a positive image of the place. When one approaches a city or a town by bus or car, the sequence of views from the road determines one's first impressions of a place. If we think of a gateway as an entrance corridor, then gateway planning means linking this sequence of views together with common elements that give the corridor its own identity.

Alhambra's History as Inspiration for Americana is based in the East Main Street Corridor

It is time Alhambra gets to keep its well-deserved identity via the East Main Street Corridor by leveraging and preserving its significant contribution to the San Gabriel Valley as it is adjacent to the Alhambra Wash, vital to the indigenous people and critical to the site location of the San Gabriel Mission, as a life-sustaining water source for them to drink and grow crops.

The entire Alhambra Tract includes some of the historic neighborhoods built in the city of Alhambra with the homes boasting the original character of the era as the new homes were constructed. As well as noted artists gathering to capture life in the Americana era. During the 50s to 60s the East Main Street Corridor was the inspiration for many artists at the time, most famously **Norman Rockwell**, who would work at Mr. Clyde Forsythe's home and was one of the eight artists that comprised an artist's enclave that became known as "Artists' Alley" and "Little Bohemia" over on Champion St. in the early 1900's.

Mr. Clyde Forsythe, owned the home at 520 N Almanson St. in Lindaraxa Park, where Mr. Rockwell would gather inspiration and working from his studio above the garage. Many of Rockwell's works were created in and inspired by Alhambra as he captured American scenes that celebrated life in the United States. Alhambra was a fundamental inspiration for those images of middle-American families enjoying strolls together on sidewalks, parades, and barber shops and most famously described as portraying Americans as humble, God-fearing people who enjoy a strong prosperous family life.

That is how Alhambra was foundationally portrayed and today is a diverse community that displays a beautiful place that attracts families and, through community gathering spaces, create strong family bonds.

That is who Alhambra was at it's core and that is who we are now. We are a wonderfully diverse community that still longs to create a strong community through our welcoming city, our families, neighbors, civic leaders, and the police & fire services that protect us. We want to re-instill that sentiment

ATTACHMENT 5

into our community infrastructure and leave visitors with that same feeling of a taste of what Alhambra life is all about.

With a nostalgic corridor that highlights our beginnings as a nod to humble Americans who come here to build community, we can preserve our history and our adjacent historic neighborhoods that reflect the beautiful architecture and character of what was originally established. We find that in a purposeful way, the neighborhoods created adjacent to East Main St. for accessibility of goods, and services, meeting together with neighbors for parades and other gathering events. With vision, and leadership, we can recreate this community connection space through gateway planning on the East Main Corridor, again.

Low-density residential housing requires a buffer from high-density high-rise buildings

As per the current zoning code, the East Main Street Corridor is commercial only. Well, we know that once a commercial is taken away it does not come back. The East Main Corridor is a “Gateway” as noted above. We as residents are concerned about the empty lots and want to be notified regarding the developments/ projects being proposed on East Main since they are adjacent to our homes.

Residents are concerned about proposals for outsized development in the area. More recently, in April 2019 residents came to this very chamber to passionately protest the outsized development on the Bewley Cadillac dealer lot, at 801/807 E. Main St., which was denied authorization.

The combination of these experiences prompted residents to question what it is **WE DO WANT** in developing the East Main Street Corridor there had been no vision.

As a matter of fact, in the General Plan pg 44-45, we notice there are plans for other parts of the city. However, it was clear that East Main had been neglected in planning documents until residents requested a specific plan as an overlay with the vision of an Old Town Alhambra.

This is reflected in the resident's comments and supports the LU1-LU8 Implementations. It upholds as an integral transportation artery for neighbors in adjacent cities to drive through or drive to our Alhambra stores, and entertainment areas and it receives what feels like minimal attention from city leaders. Businesses struggle and there are empty storefronts that have been so for decades! At a time of emergency, such as the recent hurricane and earthquake on the same day/weekend, it becomes clear current and future residents need more, not less, commercial infrastructure.

What Residents Do Want on East Main Street

Instead of outsized development, residents suggest the city leverage the history of the city to reconnect to our neighbors and increase the vibrancy and economic viability of the area through an “Old Town Alhambra” district.

We acknowledge and thank the Planning Commission for the current effort to allow the development of an Old Town Alhambra “east of Granada Avenue.” That is, unfortunately, not sufficient for the same reason housing in that area is not feasible — the small lot sizes, limited parking, and lack of development investment by the city. Now, thanks to new state laws, the compartmentalization of the East Main Street Corridor as represented in the draft Housing Element is no longer needed to accommodate mixed-use housing.

ATTACHMENT 5

With recent state laws designed to increase housing development like SB6, the East Main Street Corridor is no longer limited to commercial-only development. This represents opportunities for the development of housing that is affordable to people who work in Alhambra. It also means that mixed-use development of housing and commercial can infuse the development of an Old Town Alhambra district.

As such, **there is no reason to extend the “Central” Business District (CBD) east to Granada Ave.**

Additionally, it can **leverage AB 2097 and develop a multimodal transportation hub on this portion of the heavily utilized Main Street.**

In light of AB2097 and SB6, allowing mixed use development on all commercial corridors in the city, the proximity to low-density residential neighborhoods on both the north and south sides of East Main Street, and the goal of developing the area for an Old Town Alhambra district, it would be appropriate to **limit heights in this area to 30’ mixed-use housing and for retail as other cities have done.**

Residents, not just Developers, are Vested in the Future of Alhambra Too

I am committed to Alhambra. Like my neighbors, I too am vested in Alhambra through property ownership and by raising my children and grandchildren here. Personally, we chose Alhambra because my mother lives with us and she loved the proximity to Main St. and wanted to be able to walk to the bank, drug and grocery stores, and also with her grandchildren to the school and the park. But now, it’s too dangerous for her to walk near Main Street on her own because traffic is too fast and too often results in pedestrian accidents or fatalities.

As a real estate agent, our home values are important to me and all of our Alhambra residents. However, it is equally important to us that use of our tax dollars reflects the quality of life standards we expect within our city.

It is vital communities have accessible places to gather where we can all enjoy the city in which we call home. Friendly, inviting spaces that differ from larger developments will give a respite for residents as well as visitors. We know this equation works because we can compare it to other cities that have adopted this same format. Many others that have adopted this plan include bike paths, perpendicular parking, and shared open lots to not congest residential streets known as “compact development”.

It is easy to see how a community thrives when it lives, works, and shops within its city as do property values. We are not asking to reinvent the wheel — we are just asking to enhance and add to our community too. I believe together we can truly make Alhambra a premier city that includes amenities, upgrade our schools, and create guidelines for safety from which we all can benefit.

Vision Plan Articulated in the Housing Element is the Seed for an Old Town Alhambra

It's time for Alhambra to invest in its own community experience. An Old Town Alhambra and creating pedestrian-friendly, “complete streets” and providing the retail infrastructure new housing will require.

The future of Alhambra starts here ... with the Housing Element as a policy tool for city staff to use as guidance. I have attended plenty of city public hearing, council and commission meetings to know that

ATTACHMENT 5

you care about Alhambra's future and its residents. ***Now is the time to make the commitment the residents have asked for time and time again.***

Please help make East Main Street a great "new" part of Alhambra's economic future with a full commitment to converting the East Main Street Corridor to an Old Town development district, limiting mixed-use building heights, adding multimodal and pedestrian-friendly streetscapes and design elements that create a collaborative and cohesive business and housing district.

###

ATTACHMENT 5

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 1st Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 5:03:43 PM
Attachments: [attachment-1.png](#)
[attachment-2.png](#)



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(1st comment)

I support all of the Planning Commission's recommendations on the 4th Draft of the Housing element and request that they be incorporated into the document.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

ATTACHMENT 5

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 2nd Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 5:22:38 PM
Attachments: [attachment-1.png](#)
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(2nd comment)

I recommend that the two identical charts in the Draft 4 Housing Element titled "**Site Capacity by Source and Income Level. RHNA Surplus/Shortfall**" have the numbers adjusted to reflect the Planning Commission's recommended addition of the 400 S. Atlantic Bl. 2.51 acre parcel (APN 5344-002-044 - part of the closed Bob Wondries Ford site). This chart can be found at two places in Draft 4 Housing Element, namely

- (a) as Table 2 on page number 12
- (b) as Figure 147 on page number 265.

Thanks.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

ATTACHMENT 5

From: [Lewis McCammon](#)
To: [Housing Element](#)
Subject: 3rd Comment on Revised HE Draft (Sept. 21-28 Comment Period)
Date: Thursday, September 28, 2023 6:03:19 PM
Attachments: [attachment-1.png](#)
[attachment-2.png](#)



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(3rd comment)

I strongly recommend that the last sentence be deleted from Program 21 Adopt the comprehensive Zoning Code Update (Draft 4 page 219). This sentence reads:

"This program will also include amendments to previous errors in the General Plan Land Use Map that mis-classified a section of East Main Street from Chapel to Almansor as Central Business District instead of General Commercial."

Two reasons for this suggested deletion:

(a) This sentence as currently included actually serves to ***restrict*** the number of housing units that could be produced on sites in this area like Site NV509 (density 30DU/acre vs. 64 DU/acre) in this area. As such, the deletion of this sentence would have no negative impact on the total number of housing units that can be produced and could possibly [pending the results of discussion in (b) below] increase the number of such housing units that can be produced.

(b) This change has not yet been the subject of substantive discussion by the Planning Commission and more properly needs to be left flexible for such discussion in the ongoing Zoning Code Update process. Such further Zoning Code Update discussion could also consider other alternatives such as having the area here south of Main St. between the San Pascual Wash and Chapel Av. be treated separately and by having that area be either (1) confirmed as part of the CBD or, alternatively, (2) confirmed as general commercial (EMC) but with different height and/or stories and/or density. I feel that this is an important substantive discussion to have.

Thanks for considering this.

Lewis McCammon
105 N. Cordova St.
Alhambra, CA, 91801-2708
(626) 363-3516
leweldizamccammon@earthlink.net

ATTACHMENT 5

ATTACHMENT 5

From: [Shirley Tatsuno](#)
To: [Housing Element](#)
Subject: Affordable Housing
Date: Thursday, September 28, 2023 7:32:39 PM
Attachments: [attachment-2.png](#)
[attachment-3.png](#)
[9.28.2023 Housing Element.pdf](#)



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Hello,

Attached are my comments.

Thank you,
Shirley Tatsuno

ATTACHMENT 5

Dear ECONorthwest,

My name is Shirley Tatsuno. I would like to discuss affordable housing which is an important part of the Housing Element. As several residents have mentioned, I think it was a mistake not to consult affordable housing developers. I was thinking about this. Would there be affordable housing developers interested? For example, on my street, 5th Street, where 4 are proposed developers would have to pay \$1 Million dollar plus for a property and then pay for demolishment. What about property tax? Will all the affordable housing developments have reductions? The proposed developments also includes moderate and above moderate units. In the Alhambra Inclusionary Housing, "(A) All inclusionary units shall be reasonably dispersed throughout the residential development; shall be proportional, in number, bedroom size and location, to the market rate units; and shall be comparable with the market rate units in terms of the base design, appearance, materials and finished quality." Does this apply to these projects? If it does, with 9 out of the 26 units for the moderate or above moderate income units appealing to them, will the 17 low income units be built in a similar fashion? Does this make financial sense?

For some background I am an affordable housing advocate in Alhambra and I also have volunteered for 10 years and continue doing this as a core member of Family Promise at my church, Evergreen Baptist Church of LA. Family Promise is a church shelter program for homeless families. Especially because of my experience with these families who are often low income single moms with children, I know how hard it is to find housing for these families. I especially would like to see low income families with children have safe and good housing in Alhambra.

However, it is the city's desire to cut out the Planning Commission and public discussion to speed the process to build housing more quickly that concerns me. I do not agree with this. As I have said, there are 4 majority affordable housing developments possibilities on my street. Ramona Elementary School is across the street. All Alhambra schools with affordable housing across the street should have the same agreement for the types of people who will not be allowed to live there as Mariposa Affordable Housing Development has because Alhambra High School is across the street. So many low income people need supportive services. Will it be provided? Across the street and nearby from the proposed housing is a preschool with lots of "No Smoking" signs which honestly now are for the smoking restaurant workers. But Ramona has put black netting on the north side fence of the playground to prevent homeless people from watching or taking photos of the children. Safety must be maintained.

My deceased husband Brian and I worked hard for 35 years and I continue to provide a safe, clean environment at my apartment. As a matter of fact, 2 of my tenants moved to our apartment from Monterey Park because their cars parked in their carports had been broken into several times. I often pick up trash around my property and I do not want to be picking up or seeing human feces or syringes. I want to continue to have a clean, safe environment in our area for my tenants, neighbors, the Ramona School children, teachers, workers and myself.

Sincerely,
Shirley Tatsuno

ATTACHMENT 5

I am a Habitat for Humanity donor. Their mission to build homes for low income families which they become homeowners of, is important to me. Habitat for Humanity is one of the beneficiaries of my Trust. Last week I went to my second home opening. It is heartwarming to know a Latino family of parents with 3 children who lived in a one bedroom apartment rental, will now live in a very nice 3 bedroom home in Altadena. In Alhambra, I am hoping Habitat for Humanity will be able to build homes perhaps on a church property. If this were to happen, I hope Alhambra will welcome and work with them. God willing, I live for 10 plus years but I have requested they build or remodel a home in Alhambra with seed money from my Trust. If it does not work out they will go to another neighboring city. We will see what happens.

ATTACHMENT 5

From: [Rossana Javier](#)
To: [Housing Element](#)
Subject: Public Review Draft Release - My Comments
Date: Thursday, September 28, 2023 9:15:18 PM

Re. 2019-2029 Alhambra Housing Element

Dear City of Alhambra,

One week to review a document over 200 pages was grossly insufficient; I would have greatly appreciated having more time to review this important, far-reaching document.

I have a few comments based on the extremely limited amount of time I had to review key points of the aforementioned document:

- I DO like the 4 stated goals under Priority 4,"1. Expand Fair Housing Choice and Access 2. Expand Affordable Housing Opportunities 3. Maintain Safe and Green Neighborhoods 4. Mitigate Gentrification and Displacement " 2 thumbs up!
- I DO like the table on Pages 186-7 "Figure 123: Meaningful action the City will pursue to overcome identified patterns and trends from the AFFH assessment of contributing factors to fair housing issues." Thank you so much for listening to us and incorporating our feedback! I especially appreciate the acknowledgement of the need for more affordable housing for the disabled and for the education of the community. I am living with my mother and am currently on disability. If I had to pay rent on my own, I would likely be homeless. Why? Social Security Disability pays me only a mere fraction of what I used to earn in architecture or construction management; I receive under \$1400/month. That is basically the cheapest cost to rent a studio somewhere, usually in a high crime area. E.g. a studio in Boyle Heights in a project with many gang member residents is over \$1200/month. SROs on Skid Row are over \$1000/month. Our Alhambra neighbors are renting a 2 bedroom house for over \$2500/month.
- There were repeated mentions to future developments based off the main corridors of Main Street and Valley Blvd. My concern: There are many single family dwellings along both these thoroughfares. New developments should preferably be on the south side of the street, where they will not infringe upon residents solar rights. Existing residents must have their sunlight and access to views preserved. They should NOT be blocked by monolithic developments.
- As much as we designers would like to encourage the use of public transportation via limiting the number of parking spaces provided in new multi-family developments and infill developments, this just is NOT REALISTIC, and to me as an intern architect and former construction management professional, represents EXTREMELY POOR PLANNING AND DESIGN.
 - It is an imposition on existing neighborhoods and residents, further worsening some parking situations which are already very difficult. I grew up in Echo Park, in a neighborhood of mostly single family residences. As more apartments and condos were built, parking became more limited. The property next to my childhood home was sold to a developer who created 4-story condos, which include 3 stories plus roof decks. Not only is it completely out of scale for the neighborhood, it completely obstructs the sunlight and existing views to downtown L.A. It is an absolutely hideous monstrosity, and dominates the entire neighborhood. The parking there is now an absolute nightmare. I'm disabled and mobility challenged. Where am I supposed to park when visiting family? PLEASE DO NOT DO THIS TO ALHAMBRA.
 - Public transportation in L.A. and L.A. County are still lousy. For example, a 15-30 drive to Glendale takes 2-3 hours by bus. Therefore, it is highly naive and unrealistic to expect persons to give up their vehicles just because the development does not include parking or sufficient parking spaces. Most persons rely on their vehicle to live: going to work, going to appointments, visiting loved ones, running errands. What will happen if parking is excluded

ATTACHMENT 5

or diminished is exactly what happened in my old neighborhood: create nightmares for all residents, old and new alike. Disabled and mobility challenged persons like me especially need our parking spaces. PROVIDE AMPLE AND SUFFICIENT PARKING SPACES FOR RESIDENTS. DO NOT SHORTCHANGE RESIDENTS ON PARKING SPACES. Not enough room in the budget? Then cut the number of units and refuse to pander to deep-pocketed developers; it's that simple.

- On Page 12, the AHE states "significant changes in response to public comment include: A rezoning and upzoning strategy that increases allowed densities in all zones that currently allow housing and allows housing in most areas that do not currently allow housing."
 - I disagree. I do not like nor do I condone increasing densities in R1 areas with single family dwellings, with the exception of an ADU, limited to 2 stories or split-level, including any balcony/porch/terrace, or conversion to a duplex.
 - I DO, however, generally agree with the overall strategies listed under Program 19, pages 217-8. any increase in densities along Valley Blvd. should be per my comments above.
- Also on Page 12, another change made to the AHE includes the "Reduction in the reliance on ADUs to meet RHNA targets. "
 - I disagree. This is an extremely bad idea. ADU's are a great way to increase housing availability while maintaining the character of the neighborhoods. As they would be spread out over the city, the problem of oversized, megalithic developments overpowering and encroaching on existing residents and neighborhoods can thus be avoided or minimized.
- More moderate income housing should be built and less "above moderate" income housing. Persons' incomes have not kept up with inflation, and many businesses failed during the Covid shutdowns, leading to layoffs and unemployment. People are spending 50% or more of their incomes on rent, and homelessness has increased. Please help provide a solution to our housing problem instead of creating more unaffordable housing that only the well-off can afford.

Thank you for your time and consideration; it is very much appreciated.

Best regards,
Rossana Javier, Associate AIA

ATTACHMENT 5

From: [Kaly](#)
To: housingelement@cityofalhambra.org
Subject: Review of the draft
Date: Thursday, September 28, 2023 9:30:40 PM

Good evening,

There was not enough time to read through the entire document to meet today's deadline for comment.

Two items, nevertheless:

1. I do not understand if this document adequately summarizes the proposed zoning requirements or not.
2. I am concerned that privately held development will not accomplish the goal of increasing low income housing stock.

Kaly Trezos

ATTACHMENT 5

From: [Olga Alarid](#)
To: HousingElement@cityofalhambra.org
Subject: EMC and CBD boundary
Date: Thursday, September 28, 2023 10:07:27 PM

Dear Housing Element,

Many neighbors have attended many meetings so we hope we are finally heard since these decisions impact where we live. Where we have families and raise the next generation of Alhambra neighbors. So these decisions are critical to what we value the most, our homes.

We ask the the commercial business district boundary please be changed to Almamsor westward where the area is dense with larger businesses and large apartments. It make sense. Please consider East Main Corridor from Almamsor east to the San Gabriel Border. The area is less dense and surrounded by mainly single family homes.

From Almamsor westward, there are large lots that can absorb the majority of affordable housing such as the huge mainly empty lot where the Ranch 99 Market is located next to Almamsor and the huge empty lot on Chapel and Main. Those areas make sense since the area is mainly marked by apartments and other businesses.

Thank you
Olga

ATTACHMENT 6

MATRIX OF PUBLIC COMMENTS
FROM 7-DAY REVIEW PERIOD
(SEPTEMBER 21-28, 2023)

ATTACHMENT 6

Public Comment Theme	Response or Action
<p><i>This table organizes and summarizes key themes from the 7-day Public Comment Period (September 21st through September 28th) for the City of Alhambra's Draft Housing Element Update. A summary of amendments made to the Draft Housing Element are noted. Where amendments were not made, a rationale for why amendments were not required is provided.</i></p>	
<p>Questions about the city's IHO policy's impact on housing feasibility.</p>	<p>The IHO was studied before adoption. The mid-cycle review will include a review of the IHO's impact on delivering affordable units.</p>
<p>Questions about circumventing the Planning Commission and public discussion.</p>	<p>The proposed program in the Housing Element is to eliminate the RPD process and establish objective criteria for project approval. The program would not eliminate planning commission hearings on projects but would require public comment and review decisions to be made based on objective criteria.</p>
<p>Questions about the location of affordable housing in relation to schools and other areas.</p>	<p>These questions are in direct contrast to state mandated and best practices requirements to affirmatively further fair housing and provide access to opportunity for all residents.</p>
<p>Support for the Planning Commission's recommendations</p>	<p>Support is noted and the recommendations are being forwarded to City Council for consideration.</p>
<p>Suggestion that capacity estimates be adjusted to reflect additional potential capacity at the Wondries Ford site.</p>	<p>If the addition of the Wondries site is accepted by City Council, this amendment will be made.</p>
<p>Suggestion that Program 21 be amended to remove language that references previous errors to the General Plan Land Use Map and actions to remedy.</p>	<p>The suggestion is noted for consideration by the City Council.</p>
<p>Desire to see the Housing Element include language on vision from the General Plan and align with General Plan goals.</p>	<p>HCD's review of the Housing Element has found that it does not conflict with the General Plan.</p>
<p>Concern that private development cannot accommodate housing need by itself.</p>	<p>The Housing Element is a planning document, and the city does not develop housing. The Housing Element includes many programs for how the city can support housing development through private and non-profit partners.</p>
<p>A desire to see the Commercial Business District boundary changed from Almansor westward to the existing boundary.</p>	<p>This comment is noted.</p>
<p>Concerns over new multifamily development creating a burden on street parking.</p>	<p>The Housing Element recommends amendments to parking ratios consistent with AB 2097.</p>
<p>Concern over increasing densities in the R1 zone.</p>	<p>The Housing Element does not include increased densities in the R1 zone outside of changes to state law, specifically SB 9.</p>

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Desire to see more moderate-income housing built.	HCD has found that the Housing Element includes sufficient capacity to accommodate moderate-income housing need. The Element also includes programs to encourage missing-middle housing types.
Concerns over the reduction in reliance on ADUs to accommodate housing need.	The initial draft of the Housing Element included a target of 600 ADUs to accommodate housing need. This number was revised downward to the current level as directed by HCD. The Housing Element includes a program to complete a mid-cycle review of ADU development and adjust capacity estimates as appropriate based on actual development activity.
A desire to not reinstate the RPD process consistent with the Planning Commission's recommendations.	This comment is noted.
Disagreement with Planning Commission recommendations B, C, D, F, G, and I.	This comment is noted.
A desire to not consider the Planning Commission's recommendation to require ground floor commercial in some zones.	This comment is noted.

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4TH DRAFT 2021-2029 HOUSING ELEMENT
(APRIL 16, 2023; REVIEWED BY HCD – REDLINED VERSION)

City of Alhambra

2021-2029 Housing Element ~~Initial HCD Review Draft~~ Adopted Draft 34 (requires readoption)

DRAFT

~~February~~ ~~October 2021~~ April 14, 2023

Prepared for: City of Alhambra

~~Draft Report for Initial HCD Review~~

Version 4 for HCD Review



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List of Acronyms

HCD	California State Department of Housing and Community Development
HNA	Housing Needs Assessment
HUD	U.S. Department of Housing and Urban Development
RHNA	Regional Housing Needs Assessment
SCAG	Southern California Association of Governments
CHAS	Comprehensive Housing Affordability Strategy
ACS	American Community Survey
AMI	Area Median Income
LAHSA	Los Angeles Homeless Services Authority
LA CADA	Los Angeles Centers for Alcohol and Drug Abuse
CAPER	Consolidated Annual Progress Report
ADU	Accessory Dwelling Unit
JADU	Junior Accessory Dwelling Unit
FAR	Floor Area Ratio
AI	Analysis of Impediments
AFFH	Affirmatively Furthering Fair Housing
AAGR	Average Annual Growth Rate

Chapter 1: Introduction

Community Context

Alhambra remains a unique community with a small town feel in an urban setting. Often referred to as the “Gateway to the San Gabriel Valley,” it is situated on the western edge of the San Gabriel Valley. It shares a western boundary with Los Angeles and the northern terminus of the Long Beach Freeway (I-710). It is bordered by South Pasadena and San Marino to the north, San Gabriel to the east, and Monterey Park to the south. In the south, the San Bernardino freeway (I-10) traverses the city from east to west.

Housing in Alhambra originally consisted almost entirely of single-family homes. However, as the city grew, and vacant land became increasingly limited, higher-density housing was necessary to accommodate a growing population. During the 1960s, modern apartment buildings began to replace single-family residential structures, and now nearly half of the housing stock in the city consists of multi-family housing (44 percent). Today, Alhambra is a built-out community with very little vacant land. Residential land uses account for 52 percent of the city’s current land area.

Role of the Housing Element

The 2021 Housing Element is the guiding document for Alhambra’s housing policy direction. Grounded in the principals of the General Plan, The Housing Element ensures that the city establishes policies, procedures, and incentives in its land use planning and development activities that result in the maintenance and expansion of the housing supply to adequately accommodate households currently living and expected to live in Alhambra. Consistent with the General Plan, this Housing Element focuses on strong and stable residential neighborhoods and the recycling of land to higher densities in areas designated for high-density residential. With this Housing Element, the city is amplifying its commitment to provide a range of housing types that are suitable for the needs of all of its residents and provide equitable access to the resources the community has to offer.

Summary of State Housing Legislation

Background

The Housing Element of the General Plan identifies and analyzes the city’s existing and projected housing needs and contains a detailed outline and plan of the city’s goals, policies, quantified objectives, and programs for the preservation, improvement, and development of housing for a sustainable future. The Housing Element is one of the seven mandatory General Plan elements. The Housing Element identifies ways in which housing needs of current and future residents can be met.

State Requirements

California State Housing Element Law (California Government Code Article 10.6) establishes the requirements for the Housing Element of the General Plan. Specifically, Government Code Section

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65588 requires that local governments review and revise the Housing Element of their comprehensive General Plans not less than once every eight years.

The California Legislature has determined that a primary housing goal for the State is ensuring every resident has a decent home and suitable living environment. Section 65580 of the Government Code describes the goals in detail:

- A. The availability of housing is of vital statewide importance, and the early attainment of decent housing and a suitable living environment for every Californian, including farmworkers, is a priority of the highest order.
- B. The early attainment of this goal requires cooperative participation of government and the private sector in an effort to expand housing opportunities and accommodate the housing needs of Californians in all economic levels.
- C. The provision of housing affordable to low- and moderate-income households requires the cooperation of all levels of the government.
- D. Local and state governments have a responsibility to use the powers vested in them to facilitate the improvement and development of housing to make adequate provision for housing needs of all economic segments of the community.
- E. The Legislature recognizes that in carrying out this responsibility, each local government also has the responsibility to consider economic, environmental, and fiscal factors; examine community goals set forth in the general plan; and to cooperate with other local governments and the State in addressing regional housing needs.
- F. Designating and maintaining a supply of land and adequate sites suitable, feasible, and available for the development of housing sufficient to meet the locality's housing need for all income levels is essential to achieving the state's housing goals and the purposes of this article.

Relationship to Other General Plan Elements

The Alhambra General Plan was updated and adopted in 2019. It includes six chapters covering seven mandated elements. This Housing Element Update represents the eighth element of the Alhambra General Plan. The Housing Element is the primary blueprint for the city's housing policies, programs, and resources, but other elements of the General plan influence housing. For example, both the Land Use and Circulation Elements set policies that impact how and where housing can be met.

Table 1. General Plan Elements and Chapters

Mandated General Plan Element	Alhambra General Plan Chapter
Land Use	Land Use and Community Design Covers Land Use
Circulation	Mobility Covers Circulation
Open Space	Quality of Life Covers Open Space and Environmental Justice
Conservation	Resources Covers Conservation
Safety	Infrastructure and Services Covers Conservation
Noise	Health & Safety Covers Safety, Noise, and Environmental Justice

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Environmental Justice	Addressed in Health and Safety Section
Housing	N/A

The programs and policies in the Housing Element are directly related to, and build upon, the General Plan. All elements of the General Plan must maintain internal consistency. In the adoption process, the city will identify policies in other General Plan elements that require amendment to maintain internal consistency. In the future, as other elements of the General Plan are updated and revised, the Housing Element will also be reviewed to ensure General Plan consistency is maintained.

Public Participation

Public engagement is a critical part of the City of Alhambra's 6th Cycle Housing Element Update. Under State law, local governments are directed to be diligent in soliciting input from as many segments of the community as possible. Beyond requirements, this step is essential in the information gathering process so that the city's programs and policies reflect the values of the community, within the context of city's planning targets.

Early on, community engagement focused on disseminating information about the project. This included advertising the project, discussing the schedule, discussing what the project entails, and a large educational component. As the Housing Element is regulated by the State, it was important to educate the public about the lay of the land, rules and regulations the city is bound to, and consequences of failing to secure a certified Housing Element on time. Given that housing development can be a contentious topic, public education about the RHNA (how it is calculated, and the options available to the city to accommodate it) are important.

The latter half of the Housing Element Update focused on soliciting information from the public to ensure that draft products met their needs, goals, and desires for housing in the community—within the bounds of the Housing Element regulations set forth by the State.

The following community engagement tools were used for both information dissemination and solicitation.

- A standalone project website was developed to post information about the project, updates, calendar dates, surveys, and previous presentation materials. Community members could sign up for the project distribution list and solicit comments to the project mailbox.
- Project fliers were created for printing and posting at community-based organizations and at City Hall to build exposure for community members with challenging internet access.
- Project information was distributed to curated lists of community organizations and existing media including:
 - The city's "Alhambra Announcements" Newsletter and the Alhambra Chamber of Commerce's "Around Alhambra" Newsletter.
 - Publication in the city Parks and Leisure Guide.
 - An email distribution list established for the city's parallel zoning code update.

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- Over the course of the project the city's marketing team promoted over 100 mentions on the city's Social Media platforms.
- Two public study sessions in Fall 2020 with the City Council and Planning Commission.
- Two community workshops focusing on housing needs and suitability of housing policy alternatives.
- An interactive live survey and online survey posted to the project website, offered in Spanish, English, and Traditional Chinese.
- Five community town hall meetings in April 2021, one in each Council District and sponsored by the representative Councilor.
- Planning Commission and City Council study sessions in May 2021, August 2021 and September 2021, respectively.

Impact of COVID-19

While every effort was made to ensure that the Housing Element Update process was inclusive and open, COVID-19 and the prohibition of in-person gatherings nonetheless impacted public participation. Relying on a mostly digital method of public engagement required the following enhancements to traditional public participation:

- Expanded time between notice periods and meetings, as well as multiple notices.
- Clearly crafted instructions for accessing call-in and videoconferencing links.
- Call-in options for all videoconferences to assist residents without computer access.
- Allowing public comment through email or video conferencing chat functions.
- Recording and promptly posting meeting materials so they are available to the public

Summary of Comments from Outreach

The city received comments in both oral and written formats, in addition to responses to an online survey that was made available in English, Spanish, and Traditional Chinese. An initial set of comments were collected and received prior to drafting the housing element. These comments supported the initial development of the housing element. An additional set of comments were also received during the 60-day public review period. A summary of major themes from comments received is provided below:

- While most residents expressed that they were at least somewhat satisfied with their housing situation, most also reported affordability as a top concern. Residents are concerned about increases in home prices and rents. They expressed a desire to located more affordable housing near reliable transit.
- The city has had a parallel project to explore the future of the East Main Corridor. This topic dominated many of the conversations throughout the update process. Alhambra contrasting community perspectives about East Main. One contingent does not want to allow housing at all on East Main. This was driven by preference for an "Old Town Alhambra" commercial district on East Main Corridor. Another contingent discussed that the East Main area is among the highest resource areas of Alhambra and not allowing housing would be exclusionary.

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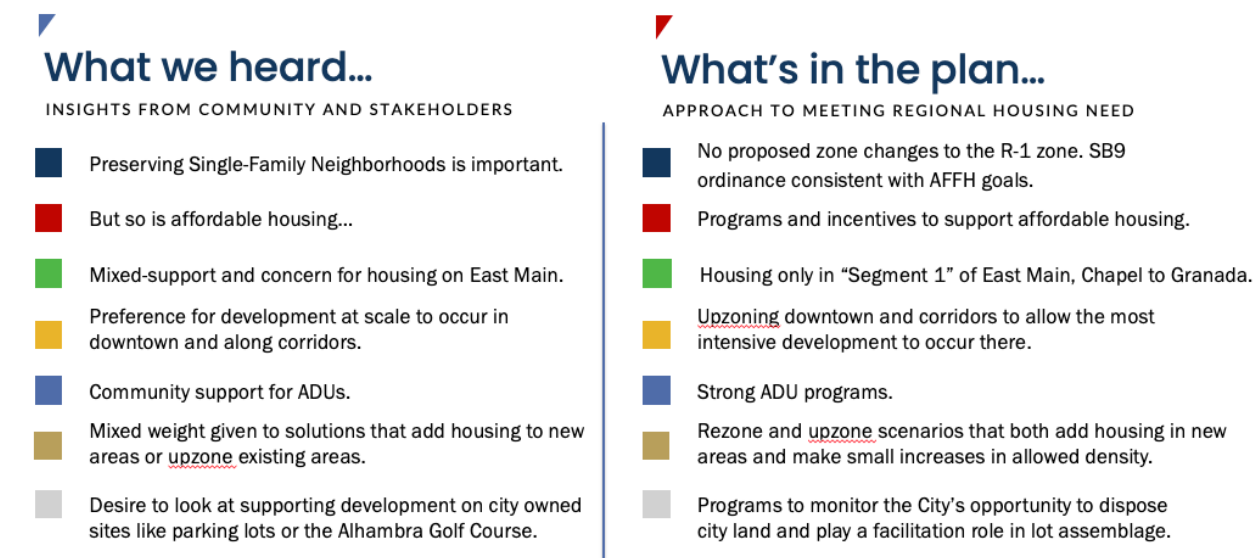
- Concerns that development projects that are allowed and appropriate are being halted.
- Residents expressed concerns over scale and density, specifically that large projects threatened the character of the community and could block territorial and mountain views. This echoed a call for targeted historic preservation.
- Enthusiasm for the City to develop a plan to reflect a mixture of housing types, affordability, and diversity of residents as reflective of the region. This paralleled with survey results that supported a broad range of housing types. Middle housing types and mid-rise housing showed the strongest support. There was a general aversion to high-rise development.
- Residents expressed a desire to locate new capacity broadly across the city. Valley Boulevard was often referenced as an underutilized asset for potential housing. Other areas identified for upzoning/rezoning included Garfield Avenue, East Main Street, and the Industrial Zones in west Alhambra.
- Residents showed strong support for policies to support Accessory Dwelling Units (ADUs). This was seen as the best alternative to promote additional capacity in existing low-density areas.
- Residents and commissioners both expressed various concerns over the potential impacts of SB9 and SB10 on the R-1 zone.
- Commenters expressed some concerns about the impacts of increased population on city services, specifically systemwide water capacity and traffic.
- Support to leverage new legislation making it easier to consider housing development and capacity on church properties.
- Questions of the appropriateness to consider broad rent stabilization and just cause eviction protections as a program.
- Recommendations that the city explore the viability of an affordable housing overlay zone in targeted parts of the city.
- Concerns over broad redevelopment impacts on displacement.
- Finding in survey results that housing discrimination is still broadly present in Alhambra, and many residents that experience or witnessed housing discrimination do not know how to access resources and support.
- Concerns that infill development that does not require additional parking will result into overflow parking on existing city streets in neighborhoods.
- Support for the city to continue to look at its land assets as a resource to deliver sites for housing.
- Support for a mix of rezoning and upzoning strategies across the city to create capacity necessary to accommodate regional housing need.
- General support for the city's existing inclusionary housing program, but mixed concerns over the appropriateness of set asides, calibration of in-lieu fees, and need for offsetting incentives.
- Recommendations to explore a more comprehensive range of funding sources linked to development.

- Recommendations that the city include a full mid-cycle Housing Element review to measure the effectiveness of programs and policies.

Integration of Comments into The Housing Element

Comments received during the public outreach process were used to refine the city’s understanding of housing needs, potential for housing problems, and to formulate and refine programs in the Housing Element. Key linkages were organized and communicated back to the public at a public workshop prior to the release of the Public Review Draft (see figure 1). Comments received during the public review period were collected through the review period. The city organized these comments into a matrix representing key themes and relevant portions of the Housing Element. The city held a work session with its consultant team to determine actions and revisions where appropriate. General comments that were more questions and clarifications were responded to individually. Public review draft revisions were made prior to submitting an review draft to HCD. A summary of key linkages is included below.

Figure 1. Summary of Community Input and Housing Plan Linkage
 Source: Alhambra Community Workshop #2



- Program 19 includes rezoning and upzoning strategies that considered preferences for broad distribution throughout the city. Every zone with the exception of the R-1 zone saw a change in density or housing allowance.
- A compromise between contrasting positions on East Main. The Housing Element includes rezoning a portion of East Main from Chapel to Granada at densities suitable for lower income housing. Housing was not allowed on properties east of Granada. Based on the parcellation of this segment and the character of existing buildings, this was determined the most appropriate segment for an “Old Town Alhambra” district.
- Program 26 includes a comprehensive ADU program designed to remove barriers to ADU development, provided pre-approved plans, and incentives for ADU production.
- Program 5 includes actions to monitor the effectiveness of the City’s inclusionary housing policy and adjust policies if ineffective.
- Program 40 directs the city to conduct a full mid-cycle review.

- Program 23 directs the city to implement adaptive reuse standards to assist in the conversion of underutilized commercial and industrial buildings for housing.
- Programs for the city to play an active role in site assembly and disposition of city owned land. The city will specifically look at the Alhambra Golf Course when its existing operating lease nears expiration.
- Programs to prevent displacement through unit replacement.
- Inclusion in programs to identify new affordable housing funding sources strategies linked to development (i.e. linkage fees, transfer tax).
- A program to study the feasibility of development under proposed densities and development standards and the potential impacts of SB9 and SB10 on housing production.
- A commitment to study the feasibility and appropriateness of an affordable housing overlay zone.
- A community education program to maintain an on-going dialogue with the community on housing issue.

Additional data points and clarifications were considered throughout the Housing Element based on comments and feedback from the community, Planning Commission, and City Council.

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Public Review and Comment

Throughout the Housing Element Update process, the City posted presentations and draft materials as they were available. This includes formal public review as required by state law. The city received feedback from many residents and interested parties. Key themes are organized below:

Key Themes

- Consideration of workforce policies that benefit local workers and the local area.
- The role of the Villages project in meeting RHNA targets.
- The risk of units in the IPD zone not being approved by City Council
- The role of tenant protection and education programs in the Housing Plan
- The prioritization of rezoning throughout the city, specifically the EMC zone
- Consideration of applying an affordable housing overlay zone
- Planning for housing in high-resource areas. Specifically affordable housing
- The role of public land in meeting affordable housing production
- The need for monitoring and implementation programs
- The role of inclusionary zoning in meeting affordable housing needs
- The need to remove barriers and streamline approvals
- Commitment to a mid-cycle review
- Promotion of place-based strategies to target investment in historically under invested areas

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- The need for a full and robust Affirmatively Furthering Fair Housing (AFFH) analysis
- Need for clarification of SB9 applicability
- The role of increasing maximum densities and amending development standards to facilitate denser development forms.
- Concerns over housing impacts on East Main Corridor
- The need to balance housing needs with historic character and existing development scale in many neighborhoods. Including higher density housing in single-family areas and high-rise development in commercial areas.
- Preference for the use of Specific Plans to guide neighborhood development in some areas.
- Resources to promote ADU production and simplification of the process with the City
- The need for a compliant impediments analysis
- Strategies to promote housing production in single-family areas and near transit
- Early feedback included a desire for more opportunities for engagement
- Desire to explore housing opportunities on city-owned land, specifically the Alhambra Golf Course
- Identification of specific sites that might not be suitable for inclusion in the sites inventory due to potential or existing uses.

When considering public comment, it is important to balance often competing opinions with the policy objectives of the City and ultimately the objective of improving housing production in accordance with the City's Regional Housing Need. To incorporate feedback received during the public review process, the City held several work sessions and discussions with HCD to evaluate comments and determine changes that would be responsive as appropriate. Significant changes in response to public comment included:

- The addition of a local hire program (Program 10) to encourage the use of local workers in subsidized affordable housing projects.
- Exploration of the feasibility of including the Alhambra Golf Course in the sites inventory in the context of existing lease agreements.
- Including a commitment to create a new affordable housing overlay zone (Program 29)
- Amending the assumptions of how the Villages Project is contributing to RHNA progress.
- The addition of programs (Program 32 and Program 33) to establish a target for housing production in existing high-resource R1 areas through SB9.
- A program (Program 22) to prioritize affordable housing production on public land.
- The inclusion of mid-cycle and periodic review processes in multiple programs
- An inclusionary housing program (Program 5) and commitment to ongoing monitoring of the effectiveness of this program.
- The addition of place-based strategies to direct investment in lower and moderate resource areas and parks that are utilized by protected populations (Program 34-38).
- Commitment to create a new Specific Plan for Valley Boulevard.

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- A rezoning and upzoning strategy that increases allowed densities in all zones that currently allow housing and allows housing in most areas that do not currently allow housing.
- The addition of five town hall meetings concentrated on each council district to expand opportunities for community engagement and input.
- Removal of sites that were identified as not suitable for inclusion in the sites inventory.
- Reduction in the reliance on ADUs to meet RHNA targets.

Summary Reconciliation of RHNA Allocation and Capacity

The table below summarizes Alhambra, RHNA allocation by income category and capacity identified by type. Alhambra’s adequate sites inventory has capacity for 87,642~~000~~ units.

Table 2: Site Capacity by Source and Income Level. RHNA Surplus/Shortfall

Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above-Mod. Income	
Proposed Projects	94	55	99	907	1,155
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	141	267	14	178	600
New Sites	1,543	831	954	2,243	5,571
Total Sites	1,830	1,333	1,192	3,645	8,000
2021-2029 RHNA	1,774	1,036	1,079	2,936	6,825
Surplus/Shortfall	56	297	113	709	1,175

^A Includes capacity from increases in allowed density on existing sites

Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above Mod. Income	
Proposed Projects	94	106	33	693	926
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	113	214	11	142	480
New Sites	1,543	831	951	2,237	5,562
Total Sites	1,802	1,331	1,120	3,389	7,642
2021-2029 RHNA	1,774	1,021	1,079	2,936	6,810
Surplus/Shortfall	28	295	41	453	802

^A Includes capacity from increases in allowed density on existing sites

Chapter 2: Housing Needs Assessment

This Housing Needs Assessment (HNA) is a required section of the Alhambra Updated Housing Element. This section of the Housing Element included data on the characteristics of the city's population, economy, households, housing challenges, special needs housing, and housing stock. Each of these components is presented in a regional context, and, where relevant, in the context of other adjacent communities. This assessment serves as the basis for identifying the appropriate goals, policies, and programs for Alhambra to implement during the 2021-2029 Housing Element cycle.

Data in this analysis are derived from a variety of sources. Where appropriate, the HNA leverages the data package produced by SCAG and pre-certified by HCD. However, additional analysis was required to build a more complete picture of housing needs in Alhambra. Additional data sources are cited throughout the document and include data from the U.S. Census Bureau's American Community Survey (ACS), the U.S. Department of Housing and Urban Development (HUD), data from the City of Alhambra, and third-party data sources.

Population Characteristics

A community's population characteristics affect the amount and type of housing needed. Factors such as population growth, age, income, and employment trends influence the type of housing needed and households' ability to afford housing. This section evaluates the various population characteristics that affect Alhambra's housing needs.

Population Growth

According to the California Department of Finance, the population in Alhambra has steadily increased over time. In 2000, Alhambra had a population of 85,757. Unlike the SCAG region, the Great Recession had an impact on Alhambra's population, reducing its population to 83,089 in 2010, while population in the rest of the region grew. Since then population in Alhambra has steadily increased to 86,792 in 2020. Over the 2000 to 2020 period, Alhambra had an annual growth rate of 0.1%, a much lower rate compared to 0.7% for the region.

Figure 2. Population Growth, Alhambra and SAG Region, 2000-2020

Source: SCAG Analysis of California Department of Finance E-5 Population and Housing Units Estimates, Pre-certified Local Housing Data

Jurisdiction	2000	2010	2020	2000-2020 Change		Annual Growth Rate
				Number	Percent	
Alhambra	85,757	83,089	86,792	1,035	1.2%	0.1%
SCAG	16,516,703	18,051,534	19,021,787	2,505,084	15%	0.7%
Alhambra share of SCAG Region	0.52%	0.46%	0.46%			

Population Forecast

While population growth in Alhambra is expected to accelerate over the next 15 years, it is expected to remain well below the regional average. SCAG's regional forecast estimates that

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Alhambra will add 5,400 residents over the next 15 years, an annual average increase of 0.4%. The SCAG region is expected to grow twice that rate, at 0.8%, between 2020 and 2035.

Regional growth forecasting is completed by SCAG for the purposes of Regional Transportation Planning (RTP). The Connect SoCal RTP forecast was adopted in September 2020. The population projection covers the period from 2016 to 2045. Over this period, the City of Alhambra is expected to add 4,600 new residents, growing at an average annual rate of 0.18 percent. This rate is far lower than the regional forecast rate of 0.62 percent in the SCAG region. Among other San Gabriel Valley cities, Alhambra is projected by SCAG to have the lowest average annual growth rate (AAGR) in the region, trailing Glendale (0.22%), Monterey Park (0.22%), Pasadena (0.33%), San Gabriel (0.41%), and El Monte (0.64%).

Figure 3. Population Forecast, City of Alhambra and SCAG Region, 2016-2045

Source: SCAG Connect SoCal RTP Growth Forecast (2020)

Jurisdiction	2016	2045	2016-2045 Change	
			Number	Percent
Alhambra	86,600	91,200	4,600	0.18%
SCAG	18,832,000	22,504,000	3,672,000	0.62%

Age Characteristics

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The age characteristics of a community indicate current needs and future trends for housing. Because different age groups have very different housing needs, housing demand correlates to the age of residents. For example, young adult households may choose to occupy apartments, condominiums, and small single-family homes because of affordability, location, and household size/presence of children. Middle-aged adults may prefer larger homes in which to raise families, while seniors may prefer smaller units that have lower costs, less maintenance, and are more proximate to services.

Figure 4 and Figure 5 show the age characteristics of Alhambra residents in 2018. Alhambra's median age is 41.8 in 2018. Compared to the SCAG region, Alhambra's residents tend to be older, with a larger population proportion being between the age of 20 to 64 years old. In 2018, Alhambra has a larger population proportion of younger residents (those age 19 years and under) than seniors (those 65 years and older). However, Alhambra's senior population (those 65 years and older) is larger than the SCAG region's share. This may translate into greater need for senior housing or multi-generational housing solutions like accessory dwelling units.

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Figure 4. Age Distribution Totals, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Total	Alhambra		SCAG	
	Number	Percent	Number	Percent
Median Age	41.8	-	-	-
19 and Under	16,153	19%	4,903,838	26%
20 to 65	54,499	64%	11,457,825	61%
65 and Older	14,322	17%	2,447,598	13%

Figure 5. Age Distribution, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Age Group	Alhambra		SCAG	
	Number	Percent	Number	Percent
Under 5	4,306	5%	1,193,126	6%
5 to 9	3,804	4%	1,193,271	6%
10 to 14	4,019	5%	1,244,937	7%
15 to 19	4,024	5%	1,272,504	7%
20 to 24	5,806	7%	1,370,418	7%
25 to 29	7,423	9%	1,487,672	8%
30 to 34	6,461	8%	1,361,873	7%
35 to 39	5,863	7%	1,267,296	7%
40 to 44	5,748	7%	1,241,074	7%
45 to 49	5,883	7%	1,274,771	7%
50 to 54	6,295	7%	1,257,723	7%
55 to 59	6,230	7%	1,182,327	6%
60 to 64	4,790	6%	1,014,671	5%
65 and older	14,322	17%	2,447,598	13%

Race and Ethnic Composition

Cultural preferences and needs for housing vary by racial and ethnic type. Alhambra remains a minority majority community where over 90% of the population is non-white. Alhambra has strong Asian and Hispanic community composition. The nature and extent of a community's housing needs are, to a large extent, determined by the racial/ethnic composition of its

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population. The size and type of housing preferred, and the neighborhood desired, often vary by a person or household's racial or ethnic background. Research has shown that some cultures (e.g. Hispanic and Asian) tend to maintain extended families within a single household.¹ This can lead to overcrowding or an increased demand for larger housing units.

Figure 6 shows that, according to the Census, more than half of Alhambra's population identified as non-Hispanic Asian in 2019. This is 3.5 times the Los Angeles County average. An additional 31% of the population identifies as Hispanic or Latino of any race. The foreign-born population fell slightly over the last five years from 42,310 residents in 2013, to 41,872 in 2018.

Figure 6. Population by Race and Ethnicity, City of Alhambra and SCAG Region, 2019

Source: American Community Survey 2019 1-year estimates

Race/ Ethnicity	Alhambra		SCAG	
	Number	Percent	Number	Percent
Hispanic/ Latino of any race	26,298	31%	8,905,824	47%
Non-Hispanic White	7,110	8%	5,681,360	30%
Non-Hispanic Black/African American	2,247	3%	1,168,071	6%
Non-Hispanic American Indian	383	0%	51,703	0%
Non-Hispanic Asian	45,165	54%	2,512,336	13%
Non-Hispanic Hawaiian/ Pacific islander	-	0%	47,749	0%
Non-Hispanic Other	959	1%	58,749	0%
Non-Hispanic Two or More Races	1,570	2%	466,859	2%
Total	83,732	100%	18,892,651	100%

Areas of Minority Concentration

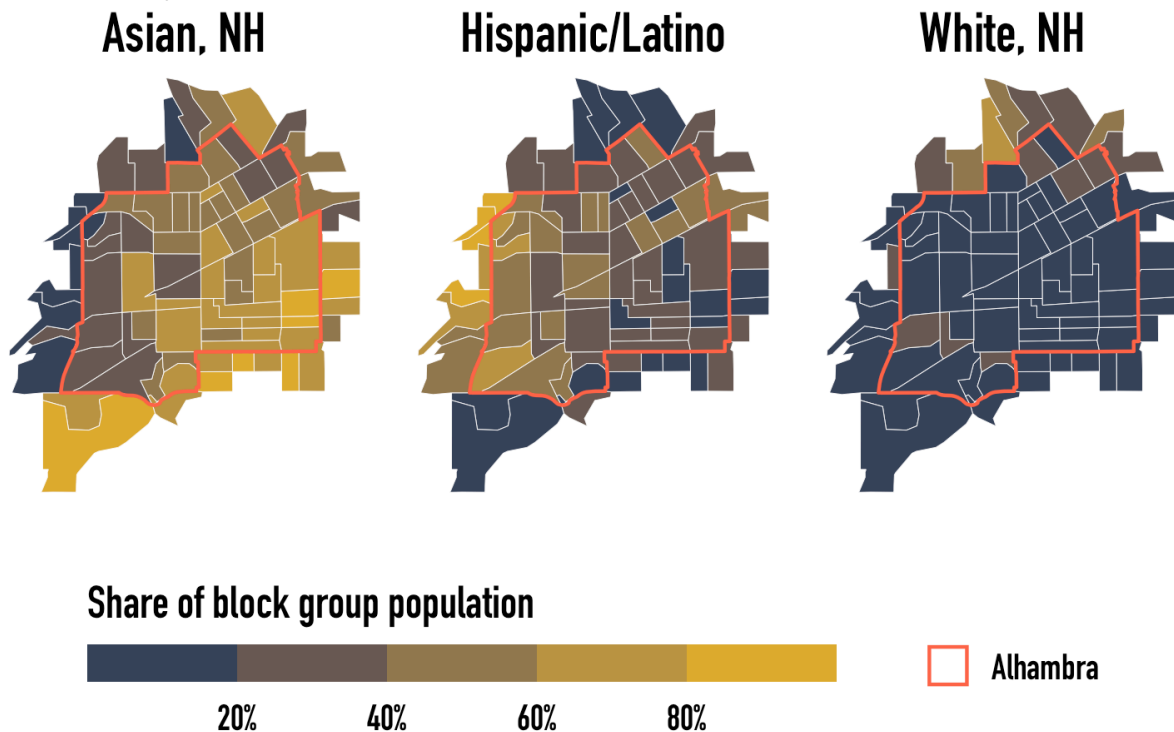
A minority concentration is defined as Census block group where the proportion of non-White residents is higher than the proportion of White residents. Non-White Asians, however, comprise the majority racial/ethnic group in Alhambra and are more distributed throughout the city compared to other racial/ethnic groups. Figure 7 shows that there are still some concentrations of Asian non-white residents, more specifically near the southeast corner of Alhambra. Concentrations of Hispanic/Latino residents can be found in the western portion of the city. No concentration of White or Black/African American residents exists in the city.

¹ Pew Research Center. *Second-Generation Americans: A Portrait of the Adult Children of Immigrants*, February 7, 2013, Appendix 8, <http://www.pewsocialtrends.org/2013/02/07/appendix-1-detailed-demographic-tables/>. National Association of Hispanic Real Estate Professionals. *2017 State of Hispanic Homeownership Report*, 2017.

Figure 7. Concentrations of Asian, Hispanic/ Latino, and White Population Groups, 2018

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

Note: NH = Non-Hispanic



Economic Characteristics

Employment by Industry

Labor and employment characteristics have a direct impact upon current and future housing needs within Alhambra. Incomes associated with different jobs, as well as the number of workers in a household, determine the type and size of housing a household can afford. In some cases, the types of jobs themselves can affect housing needs and demand (such as in communities with military installations, college campuses, and large amounts of seasonal agriculture). Employment growth typically leads to strong housing demand, while the reverse is true when employment contracts.

According to the Census, a total of 41,917 Alhambra residents were employed during the 2014-2018 period. As shown in Figure 8, most of Alhambra residents were employed in three industries: the Educational Services and Health Care and Social Assistance industry category; the Professional, Scientific, and Management, and Administrative, and Waste Management Services industry category; and the Arts, Entertainment, and Recreation, and Accommodation and Food Services industry category. Generally, managerial/professional positions earn higher incomes than other occupation categories. In 2018, the Information and Public Administration industries had the highest average wage of over \$60,000 annually.

Figure 8 uses a location quotient to quantify and compare concentrations of industries in a particular area and is useful to understanding an area's economic strengths and weaknesses. A location quotient typically compares an area's concentration to a larger region, in this case, to the SCAG region. A location quotient greater than 1.0 indicates an area has a higher concentration of a specialized industry. Alhambra has a location quotient exceeding 1.0 in four industries: Public

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Administration, Educational Services and Health Care and Social Assistance; Finance, Insurance, Real Estate, and Rental and Leasing; and Other Services, Except Public Administration. These industries also offer some of the highest paying jobs within Alhambra.

Figure 8. Employment by Industry, City of Alhambra, 2018

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

Note: Location quotient compares Alhambra's employment concentration relative to the SCAG region.

Industry	Number	Percent	Location Quotient	Average Wage
Agriculture, Forestry, Fishing and Hunting, and Mining	110	0%	0.28	\$22,500
Construction	1,768	4%	0.67	\$41,935
Manufacturing	3,521	8%	0.85	\$44,436
Wholesale Trade	1,395	3%	1.00	\$39,591
Retail Trade	3,892	9%	0.84	\$35,041
Transportation, Warehousing, and Utilities	2,364	6%	0.98	\$52,856
Information	1,207	3%	0.89	\$62,656
Finance and Insurance, and Real Estate, and Rental and Leasing	2,951	7%	1.11	\$50,488
Professional, Scientific, and Management, and Administrative, and Waste Management Services	5,123	12%	0.98	\$59,853
Educational Services and Health Care and Social Assistance	9,975	24%	1.16	\$51,048
Arts, Entertainment, and Recreation, and Accommodation and Food Services	5,110	12%	1.11	\$27,476
Other Services, Except Public Administration	2,582	6%	1.09	\$29,452
Public Administration	1,919	5%	1.26	\$61,975
Total Employment	41,917	100%	-	

Employment by Occupation

By understanding the industries in which the residents of Alhambra work, it is also possible to analyze the types of jobs they hold. The most prevalent occupational category in Alhambra is Management, in which 16,387 (39% of total) employees work. The second-most prevalent type of work is in Sales, which employs 10,815 (26% of total) in Alhambra.

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Figure 9. Employment by Occupation, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

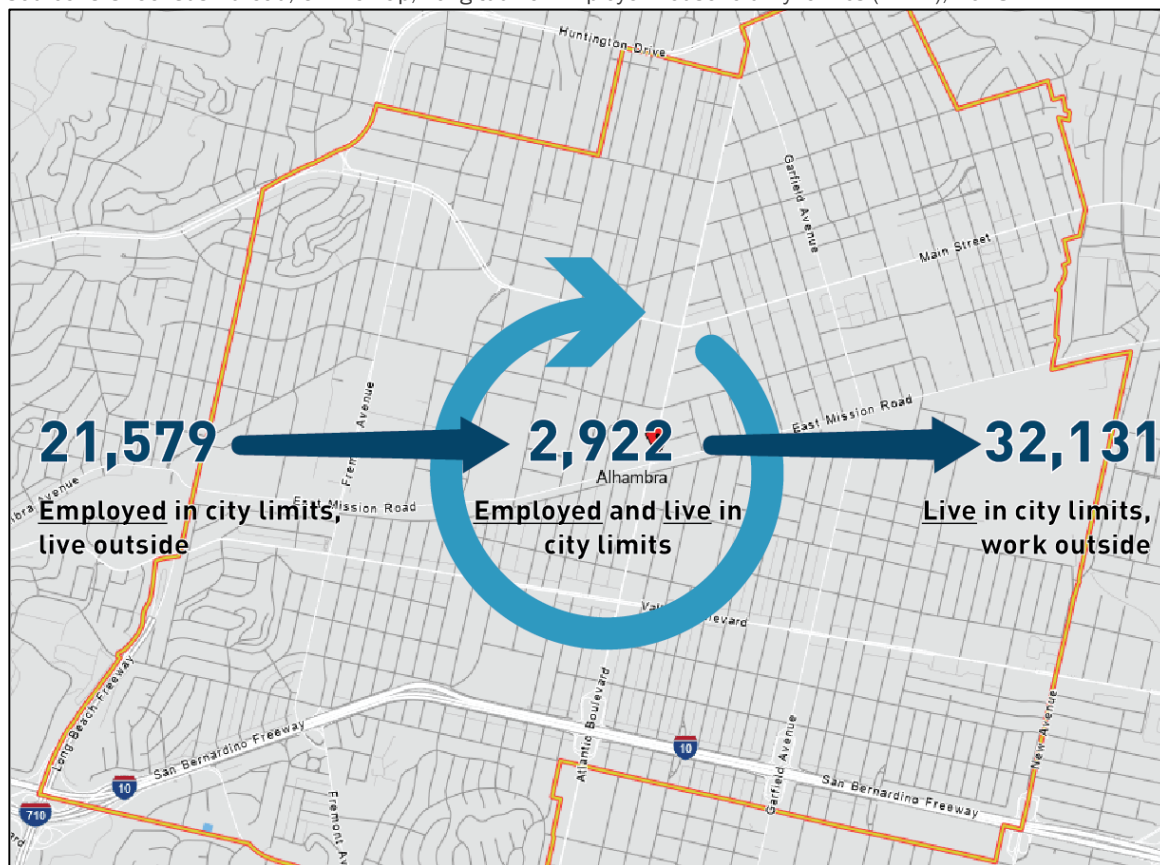
Occupation	Alhambra		
	Number	Percent	Location Quotient
Management, Business, Science, and Arts	16,387	39%	1.08
Service	7,862	19%	1.00
Sales and Office	10,815	26%	1.13
Natural Resources, Construction, and Maintenance	2,394	6%	0.69
Production, Transportation, and Material Moving	4,459	11%	0.77

Commute Patterns

Alhambra has a jobs-housing imbalance. Only about 12% of Alhambra residents (2,922) work and live in the city. This imbalance of jobs to housing impacts quality of life including how far Alhambra residents have to travel for work, increasing transportation costs, and reducing individual productivity. In general, a good balance of jobs to housing would occur where the jobs available in a community match the labor force skills, and where housing is available at prices, sizes, and locations suited to workers who wish to live in the area.

Figure 10. Job Inflow and Outflow, City of Alhambra, 2018

Source: U.S. Census Bureau, OnTheMap, Longitudinal Employer-Household Dynamics (LEHD), 2018



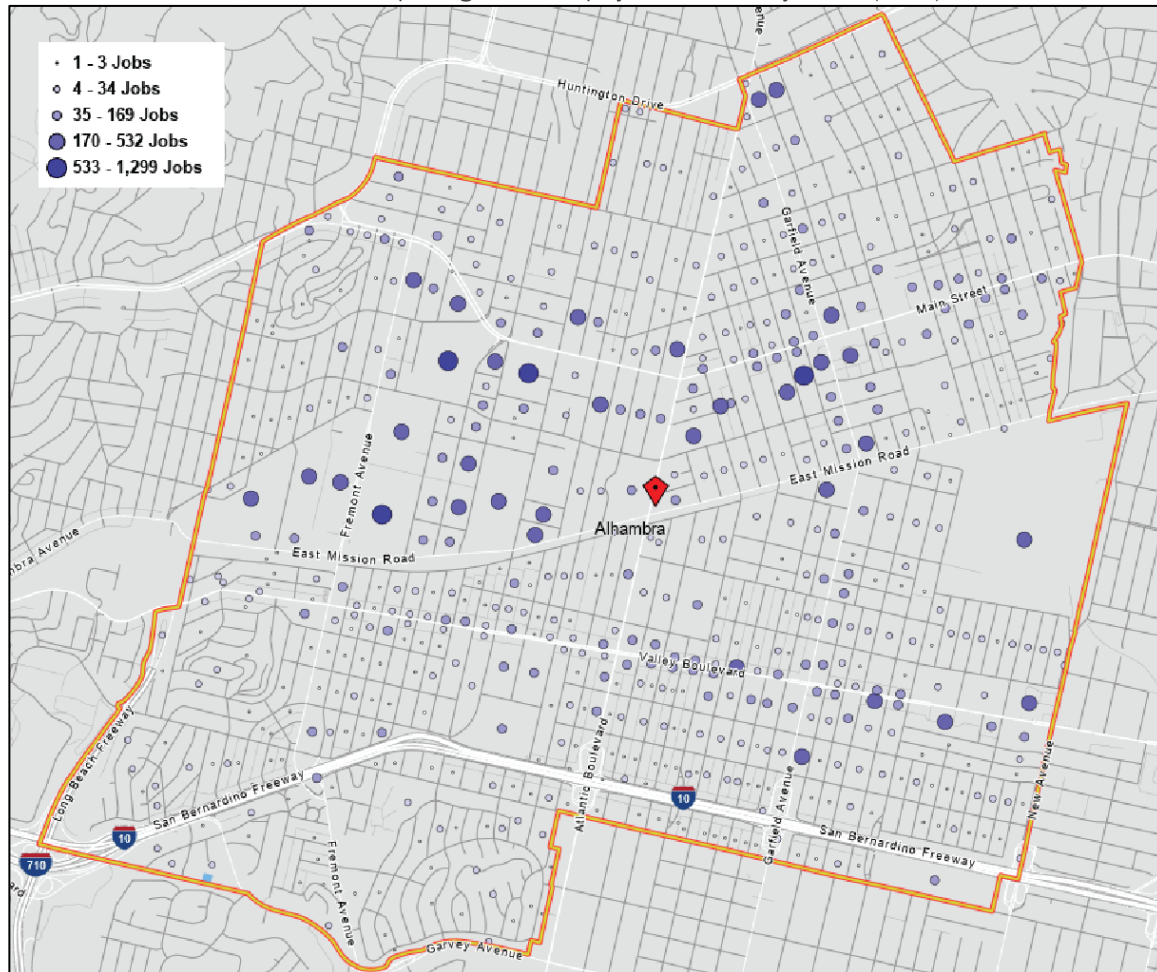
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As of 2018, there were an estimated 24,501 full- or part-time jobs in Alhambra. Of these, the most common jobs were in the following industries: Health Care and Social Assistance (20%), Retail (19%), and Accommodations and Food Services (16%). As shown in Figure 10, the vast majority (88%) of jobs in Alhambra are filled by someone who lives outside of the city. Additionally, the majority of residents living in Alhambra work outside the city.

Figure 11 shows the concentration of employment in Alhambra. Jobs are concentrated in the industrial/manufacturing zone, central business district, and along major arterials like Valley Boulevard and Main Street.

Figure 11. Employment Density, City of Alhambra, 2018

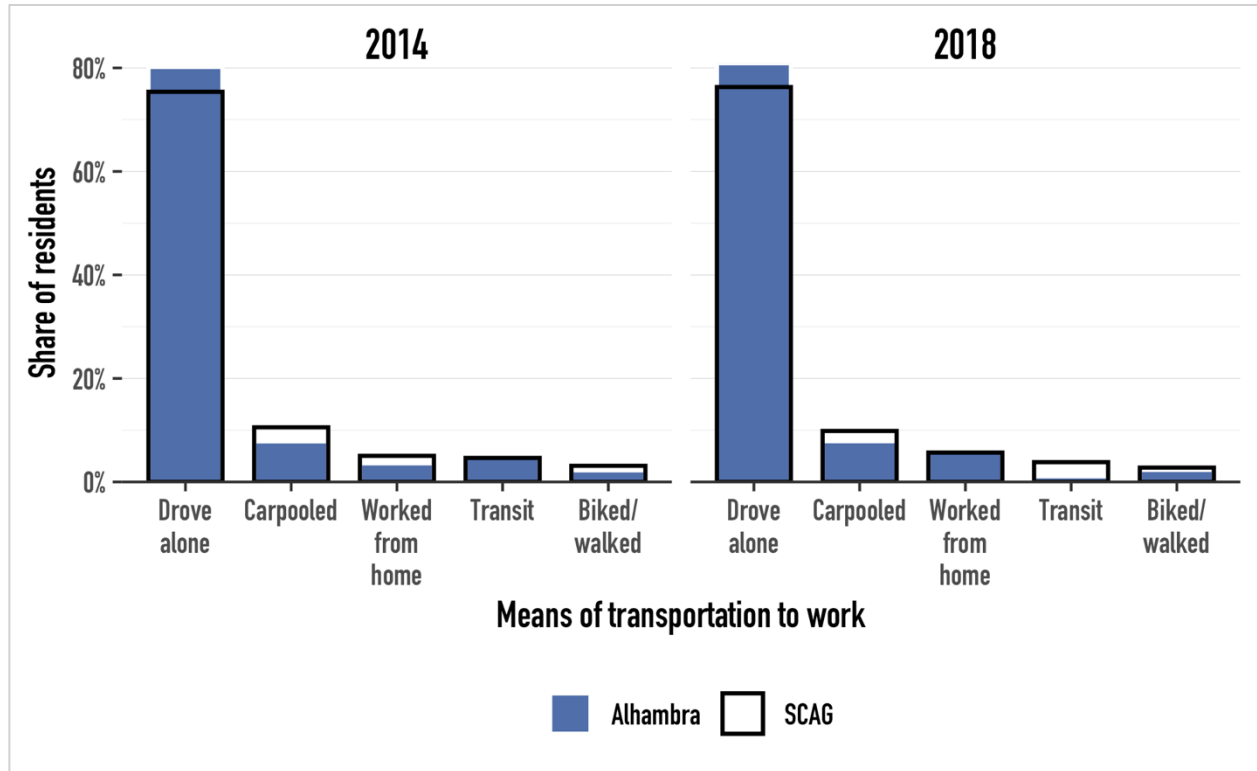
Source: U.S. Census Bureau, OnTheMap, Longitudinal Employer-Household Dynamics (LEHD), 2018



Means of Transportation to Work

The City of Alhambra has a high share of its population located in regionally-designated “High Quality Transit Areas.” Because this is one of the criteria for SCAG’s regional housing needs allocation (RHNA), it impacts Alhambra’s share of future housing needs in the region. Figure 12 shows that in 2018, about 81% of Alhambra’s residents drove alone to work, about five percent higher than the region-wide average. Approximately 8% of Alhambra residents carpooled, two percent biked or walked, and one percent used public transportation. Approximately 6% of Alhambra residents worked from home. Compared to the SCAG region, Alhambra residents use alternative modes of transportation such as carpool, transit, bike, and walking far less to get to work.

Figure 12. Means of Transportation to Work, City of Alhambra and SCAG Region, 2014 and 2018
 Source: American Community Survey 2010-2014 and 2014-2018 5-year estimates



Household Characteristics

The characteristics of a community’s households impact the type of housing needed in that community. Household type, income levels, the presence of special needs populations, and other household characteristics are all factors that affect the housing needs of a community. This section discusses the household characteristics affecting the housing needs of Alhambra residents.

Household Type and Size

A household is defined by the U.S. Census Bureau as all persons who occupy a housing unit, which may include families, single persons, and unrelated persons sharing a housing unit (such as roommates). Persons residing in group quarters such as dormitories or retirement homes are not considered households. The characteristics of a community’s households serve as important indicators of the type and size of housing needed in the city. For instance, single-person households often occupy smaller apartment units or condominiums, such as studios, one-bedroom units, or accessory dwelling units (ADUs). Married couples often prefer larger single-family homes, particularly if they have children. This underscores the need to provide a diversity of housing opportunities to provide households of different ages and types the opportunity to live in Alhambra.

Figure 13 shows the type of households in Alhambra. In 2018, there were 29,427 households in Alhambra. Alhambra continues to be a stable, family-oriented community, with 69% of all households identifying themselves as families. Average household size has remained stable over time at 2.86 persons. Over the 2010 and 2018 period, the number of families has decreased slightly, while the number non-family households have increased. Non-family households are

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generally characterized as single households or households with more than one person living together (often roommates) and unrelated to each other.

Figure 13. Household Type and Size, City of Alhambra, 2010 and 2018

Source: American Community Survey 2014-2018 5-year estimates, Decennial Census 2010

Household Types	2010		2018		Change (2010 to 2018)	
	Number	Percent	Number	Percent	Number	Percent
Families	20,774	72%	20,416	69%	-358	-2%
With Children	8,414	29%	7,429	25%	-985	-12%
With no Children	12,360	43%	12,987	44%	627	5%
Non-Families	8,030	28%	9,011	31%	981	12%
Singles	6,457	22%	6,912	23%	455	7%
Other	1,573	5%	2,099	7%	526	33%
Total Households	28,804	100%	29,427	100%	623	2%
Average Household Size	2.85	-	2.86	-	-	-

Multigenerational Households

Nationally, a growing family typology is the multigenerational household.² Estimates from the Pew Research Center suggest this market segment grew by 21.6 million households between 2000 and 2016.³ The same research found Asian and Hispanic/Latino households to be 35% to 45% more likely than average to be multigenerational. In Alhambra, the combined Asian and Hispanic/Latino share of the population is 25 percentage points higher than the SCAG average.

To approximate multigenerational households in Alhambra, we evaluated two metrics from the American Community Survey:

- The share of households with at least one grandparent and grandchild (5.2%).⁴
- The share of the population in households with non-spouse, non-child relatives (13.4%).⁵

The factors influencing growth in multigenerational households are social, cultural, economic, and demographic. The primary drivers include:

² Defined by the Pew Research Center as households that include at least two adult generations, or grandparents and grandchildren younger than 25.

³ Pew Research Center (2018). Multigenerational Household Analysis. Retrieved from: <https://www.pewresearch.org/fact-tank/2018/04/05/a-record-64-million-americans-live-in-multigenerational-households/>

⁴ Source: U.S. Census Bureau, 2015–2019 ACS 5-year estimate, Table S1002.

⁵ Source: U.S. Census Bureau, 2015–2019 ACS 5-year estimate, Table DP02.

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- **Slower Household Formation:** Young people are delaying marriage and continuing to live with supportive parents well into their 20s. This is driven in part by preference but also out of economic necessity due to rising housing costs and/or underemployment.
- **Immigration:** As mentioned above, Asian and Hispanic/Latino households have a higher likelihood of living in multigenerational households. Some of this is cultural, but economic factors also contribute.
- **Ability of Kin to Support:** In many markets, the Baby Boomers are more financially stable than previous generations and have a greater ability to support aging parents in addition to their own children. Further, an increasing number of Americans suffer from chronic illness and/or disabilities and need caregiving—much of which is provided by family members.
- **Economic Conditions:** Housing costs are increasing at a rate well above incomes. Economically-challenged households, or those on fixed-incomes, are forming multi-generational households out of necessity.

Households by Tenure

Household tenure is an important component of housing needs, as it helps to determine whether future housing should be built as ownership units or rental units. In the 2012-2016 period, only about 40% of all households in the city owned their homes, while 60% were renters. This is far below the national average of roughly 63.7% homeownership in 2016, and also below Los Angeles County's homeownership rate of about 48.4% in 2016. In the U.S., homeownership remains one of the primary ways that households are able to build equity and generate wealth. However, for many households, the high costs of housing can be a barrier to becoming homeowners.

Household Income

The ability of a household to acquire adequate housing is related to household income, whether earned or from other sources. Household income is oftentimes the crucial factor in evaluating the size and type of housing available for any given household. Household income can vary greatly across many demographic factors including race, gender, and household type. While higher-income households have more discretionary income to spend on housing, low- and moderate-income households often face limited choices in the housing they can afford.

In 2018, the median household income in Alhambra was \$57,117, lower than the Los Angeles County median of \$64,251. Figure 14 shows that, overall, the income distribution in Alhambra closely mirrors that of Los Angeles County. Compared to the County, Alhambra has more households that make less than \$49,999 annually.

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Figure 14. Household Income Distribution, City of Alhambra and Los Angeles County, 2018

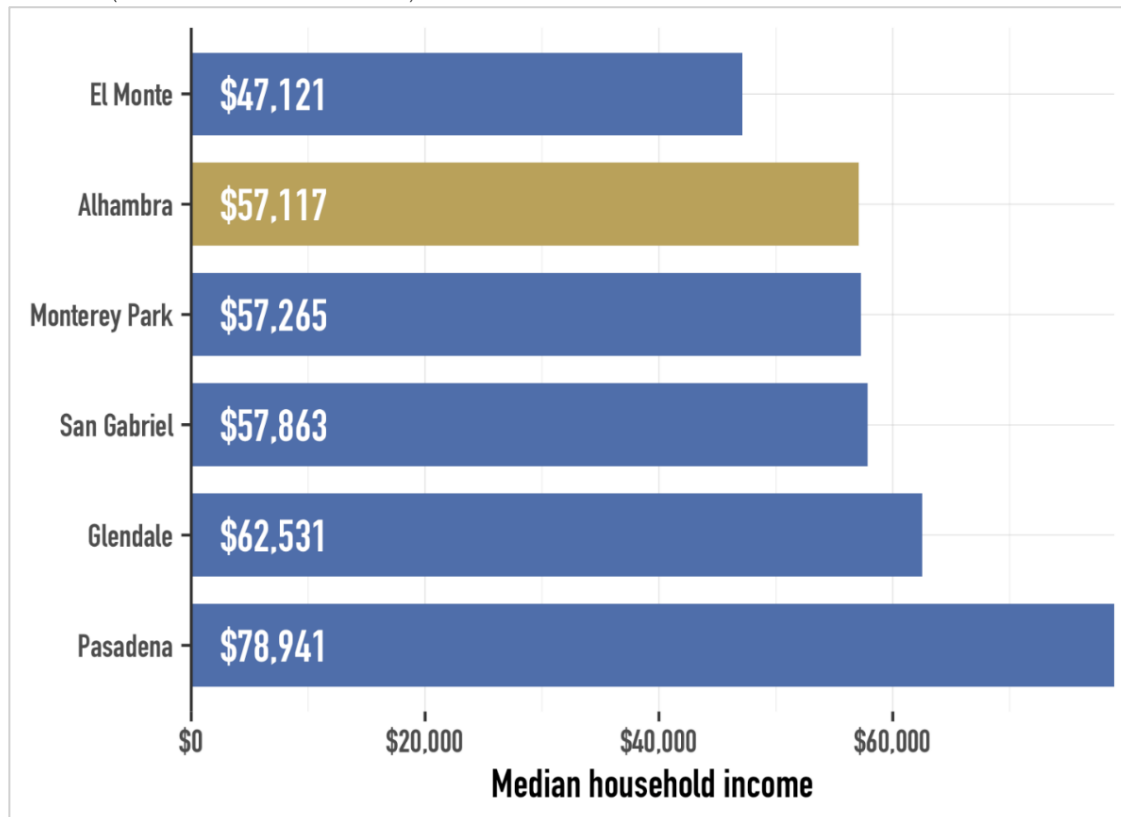
Source: American Community Survey 2014-2018 5-year estimates

Household Income	Income Distribution	
	Alhambra	Los Angeles County
Less than \$25,000	23%	20%
\$25,000 to \$49,999	21%	20%
\$50,000 to \$74,999	16%	16%
\$75,000 to \$99,999	11%	12%
\$100,000 to \$149,999	17%	15%
\$150,000 or more	12%	17%
Median	\$57,117	\$64,251

Figure 15 below shows the median household income of several nearby cities compared to Alhambra’s median household income for 2018. The median household income in Alhambra is in-line with neighboring cities—slightly higher than El Monte, in-line with Monterey Park and San Gabriel, and lower than Glendale, Pasadena, and the SCAG region as a whole (\$67,329).

Figure 15. Median Household Incomes in Peer Cities, 2014-2018.

Source: American Community Survey 2014-2018 5-year estimates, American Community Survey PUMS 2014-2018 5-year estimates (for the SCAG median income)



Area Median Income

To facilitate the analysis of income distribution among communities, each year the U.S. Department of Housing and Urban Development (HUD) calculates affordability and income limits for metro areas and counties across the country, based on Census data. These data are calculated as a percentage of the Area Median Income (AMI) and then adjusted for household size. California HCD further groups these households into the categories shown in Figure 16 below.

The AMI shown here comes directly from HCD and HUD and differs from the median household incomes discussed in Figure 14 and Figure 15. The differences include the year analyzed, the geography analyzed, and the household type analyzed.

- Median household income (in Figure 14 and Figure 15) is calculated using Census data, the most recent of which is 2018. It is calculated for each city specifically, and is calculated as the median of all households (of all types and sizes).
- Area median income (in Figure 16) is calculated by HUD each year; the most recent data comes from 2020. It is calculated for Los Angeles County as one geography, and is calculated for family households (where all household members are related). The standard 100% AMI for LA County is based on a family of four. HUD and HCD calculate percentages of this median, and also make adjustments based on different family sizes (not shown).

Figure 16. HCD Income Category, Description, and Limit, 2020
Source: California Department of Housing and Community Development (HCD)

AMI Income Category	Description	Income Limit (2020)
Los Angeles County—100% Area Median Income (AMI)		\$77,300
Extremely Low-Income	Gross family income equal to 30% or less of AMI	Less than \$23,190
Very Low-Income	Gross family income between 30 and 50% of AMI	\$23,190 to \$38,650
Low-Income	Gross family income between 50 and 80% of AMI	\$38,650 to \$61,840
Moderate-Income	Gross family income between 80 and 120% of AMI	\$61,840 to \$92,760
Above Moderate-Income	Gross family income over 120% of AMI	Greater than \$92,760

Combined, the extremely low, very low, and low-income groups are referred to as “lower income.”

The Census ACS does not collect information on the number of households belonging to each of the income categories described above. However, the Comprehensive Housing Affordability Strategy (CHAS) dataset, which is developed by the U.S. Census Bureau for HUD, does provide this information. This dataset provides detailed information on housing needs by income level for different types of households in Alhambra, as well as information relating to common problems relating to the condition of the housing stock (detailed in the next section).

Figure 17 shows the distribution of Alhambra households by AMI in 2016. In 2016, the majority of Alhambra households earned low-incomes, while 45% of Alhambra households earned moderate or above-moderate incomes. Like most communities across the country, renter

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households in Alhambra have lower incomes than do homeowners. This is caused by a number of factors, largely relating to the ability to save up for a down-payment and get approved for a mortgage—two prerequisites for homeownership. But the high costs of housing (both rental housing and homeownership housing) in Southern California are also a big factor in renters’ inability to make the switch.

Figure 17. Income Distribution by Tenure, 2012-2016

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

Note: This figure uses the same underlying data categories as in Figure 16, but the years analyzed differ.

AMI Income Category	Total Households		Owner Households		Renter Households	
	Number	Distribution	Number	Distribution	Number	Distribution
Extremely Low-Income (30% or less)	6,135	21%	1,590	14%	4,545	26%
Very Low-Income (31% to 50%)	4,540	16%	1,200	10%	3,340	19%
Low-Income (51% to 80%)	5,430	19%	1,900	16%	3,530	20%
Moderate and Above Moderate (over 80%)	13,070	45%	7,080	60%	5,990	35%
Total	29,175	100%	11,770	100%	17,405	100%

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Housing Problems

The CHAS dataset, developed by the Census for HUD, provides detailed information on housing needs by income level for different types of households in Alhambra, as well as information relating to common problems relating to the condition of a city’s housing stock. Housing problems considered by CHAS include:

- Units with physical defects (lacking complete kitchen or bathroom).
- Overcrowded conditions (housing units with more than one person per room).
- Housing cost burden, including utilities, exceeding 30% of gross income; or
- Severe housing cost burden, including utilities, exceeding 50% of gross income.

The latest CHAS data are based on 2013-2017 ACS data, as shown in

Figure 18. The types of problems vary according to household income, type, and tenure. Some key findings include:

- Renter households experience a higher rate of housing problems, 60% compared to 37% of owner households that experienced housing problems.
- Of all households who earned less than 80% of AMI, renters are more likely to experience at least one housing problem (53%) as compared to owner households (24%).
- Overall, 51% of all households in Alhambra reported at least one housing problem.

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Figure 18. Renter Households with Housing Problems, City of Alhambra

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

AMI Income Category	Renter Households with No Housing Problems		Renter Households with At Least One Housing Problem		Renter Total
	Number	Percent	Number	Percent	
Extremely Low-Income (30% or less)	415	2%	3,675	21%	4,545*
Very Low-Income (31% to 50%)	130	1%	3,210	18%	3,340
Low-Income (51% to 80%)	1,195	7%	2,335	13%	3,530
Moderate and Above Moderate (over 80%)	4,680	27%	1,305	7%	5,985
Renter Totals	6,420	37%	10,530	60%	17,405*

Notes: * Total includes 455 households where cost burden data is unavailable, and the household has no other housing problems. HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group.

Figure 19. Owner Households with Housing Problems, City of Alhambra

Source: CHAS based on 2013-2017 American Community Survey 5-year estimates

AMI Income Category	Owner Households with No Housing Problems		Owner Households with at Least One Housing Problem		Total
	Number	Percent	Number	Percent	
Extremely Low-Income (30% or less)	215	2%	1,225	11%	1,590*
Very Low-Income (31% to 50%)	495	4%	700	6%	1,195
Low-Income (51% to 80%)	980	8%	920	8%	1,900
Moderate and Above Moderate (over 80%)	5,640	48%	1,440	12%	7,080
Owner Totals	7,335	62%	4,285	37%	11,770*

Notes: * Total includes 150 households where cost burden data is unavailable, and the household has no other housing problems. HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group.

Overcrowding

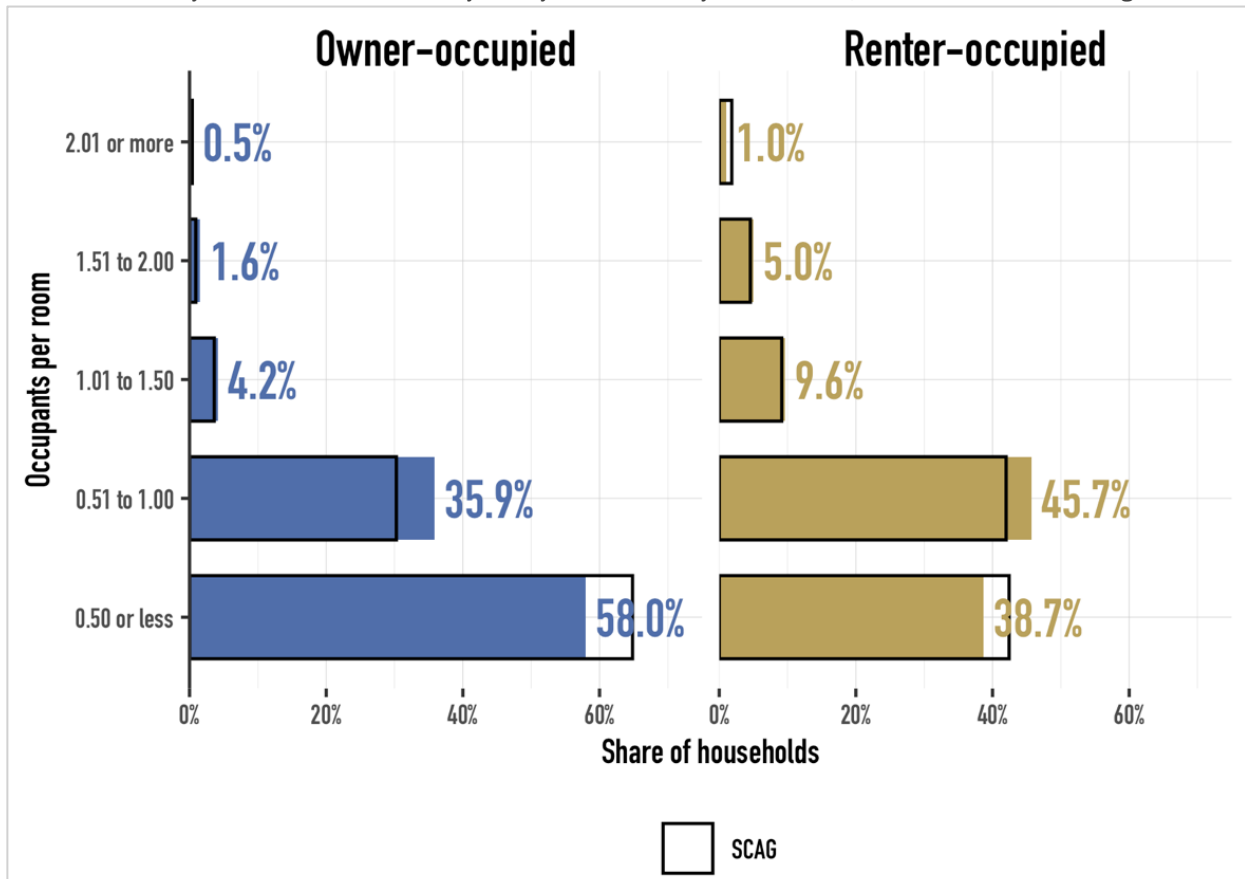
Overcrowding occurs when the relatively high cost of housing either forces a household to double-up with another household or live in a smaller housing unit in order to be able to afford food and other basic needs. An overcrowded household is defined by the Census as one with more than one person per room, excluding bathrooms, kitchens, hallways, and porches. Severely overcrowded households are households with more than 1.5 persons per room. Overcrowding can indicate that a community does not have an adequate supply of affordable housing, especially for larger families.

Figure 20 shows the prevalence of overcrowding in Alhambra by tenure. According to the Census, approximately 12% of all households in Alhambra were overcrowded (3,505 households). The

incidence of overcrowding was slightly higher in Alhambra than in the SCAG region (10%). Additionally, the incidence of overcrowding is higher for renter households (16%) than owner households (6%) in Alhambra.

Figure 20. Overcrowding by Tenure, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Cost Burden

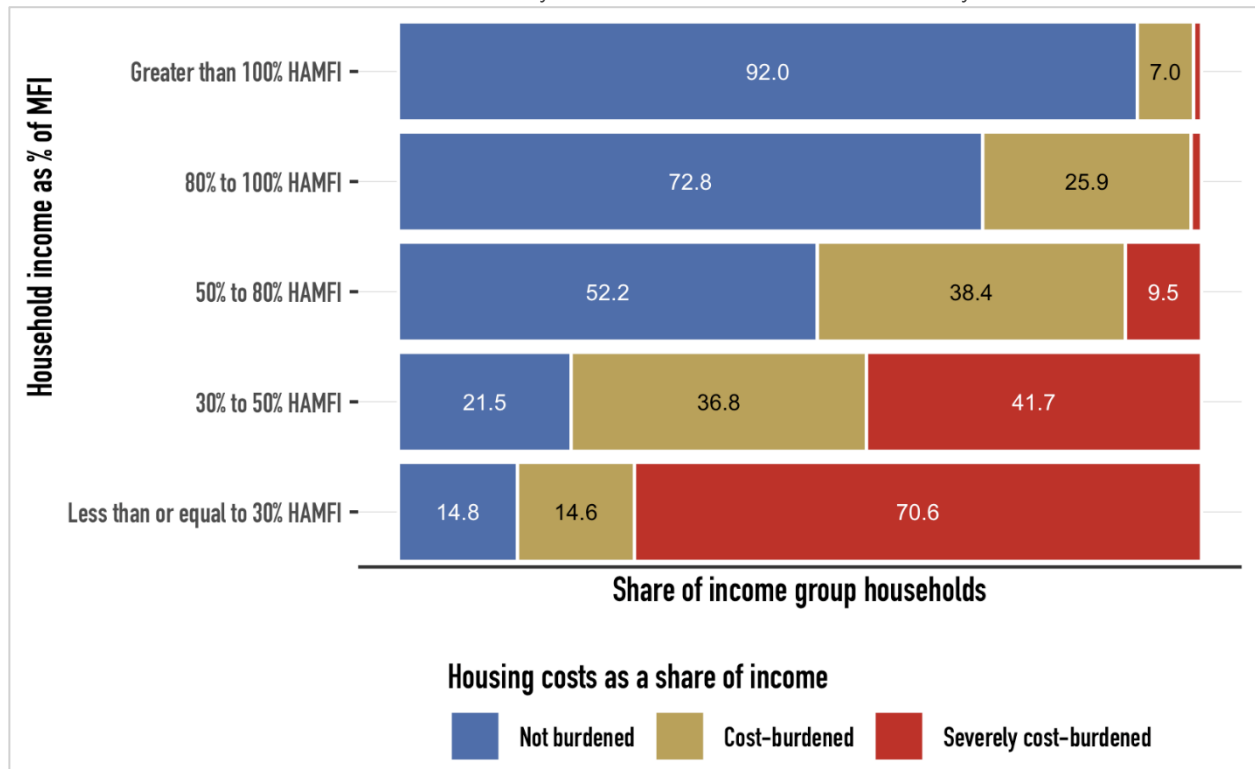
State and federal standards specify that households spending more than 30% of gross annual income on housing experience a housing cost burden. Housing cost burdens occur when housing costs increase faster than household income. When a household spends more than 30% of its income on housing costs, it has less disposable income for other necessities, including health care, food, and clothing. In the event of unexpected circumstances such as the loss of employment or serious health problems, lower-income households with a burdensome housing cost are more likely to become homeless or be forced to double-up with other households. Homeowners with a housing cost burden have the option of selling their homes and becoming renters. Renters, on the other hand, are vulnerable and subject to constant changes in the housing market.

Overall, housing cost burden in Alhambra was most prevalent among extremely low-income households (85%), while very low-income households also experienced a high rate of cost burden (79%).

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Figure 21. Cost Burden by Income, City of Alhambra

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data
 Note: HAMFI connotes Household Area Median Family Income and MFI connotes Median Family Income



While the previous figure breaks down cost burden by area-relative income, the 2018 American Community Survey also allows for the analysis of Alhambra's 17,921 renter households (for which income data are available) by spending on rent by income bracket (dollar amounts).⁶ As one might expect, the general trend is that low-income households spend a higher share of income on housing (e.g. over 50%) while high-income households are more likely to spend under 30% of income on housing.

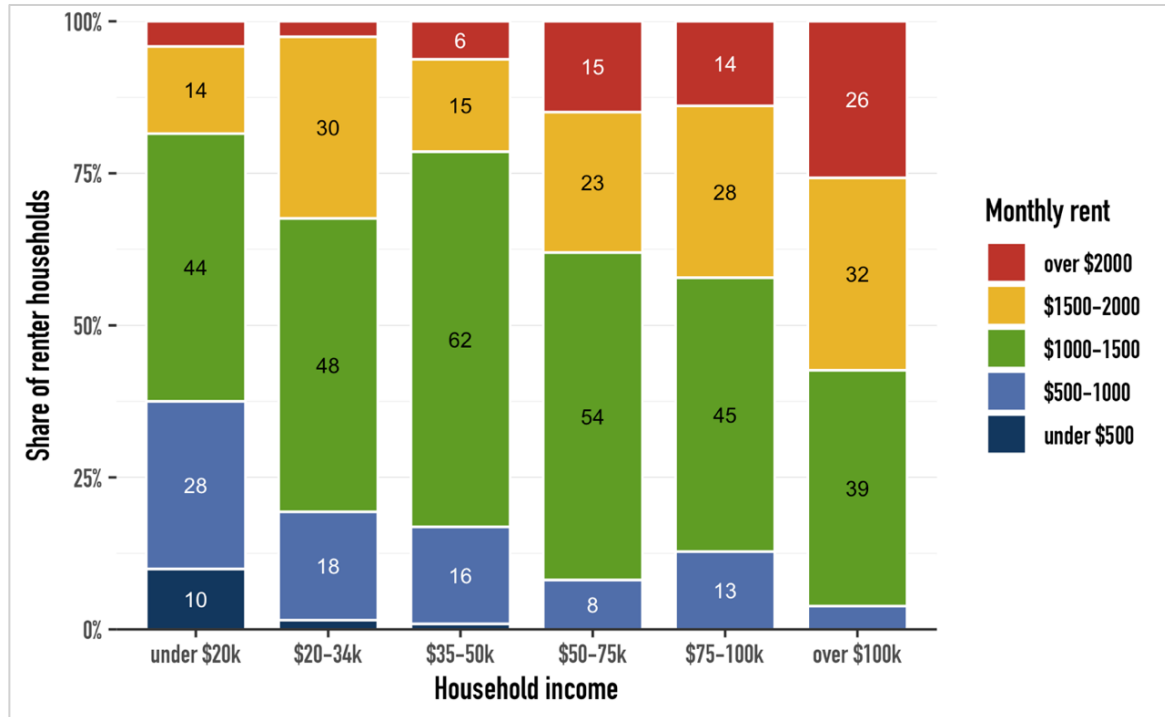
Cost burdening is a measure of housing instability and vulnerability to displacement. Policymakers typically focus on renters when assessing cost burdening. It can signal a lack of affordable housing in a region. It is less of a focus for homeowners, because a lender will assess a buyer's ability to pay for a mortgage before the household can buy a home, and because mortgage payments are typically fixed and do not fluctuate with the larger economy or housing market. While a homeowner's property taxes can go up with rising home values, they are typically a small share of overall housing costs. For these reasons, homeowners are not as vulnerable to price changes in the housing market as are renters.

⁶ This estimate of renter households differs from those shown in prior figures as it comes from 2018 American Community Survey data rather than the 2013-2017 CHAS dataset.

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Figure 22. Spending on Rent by Income, City of Alhambra, 2018

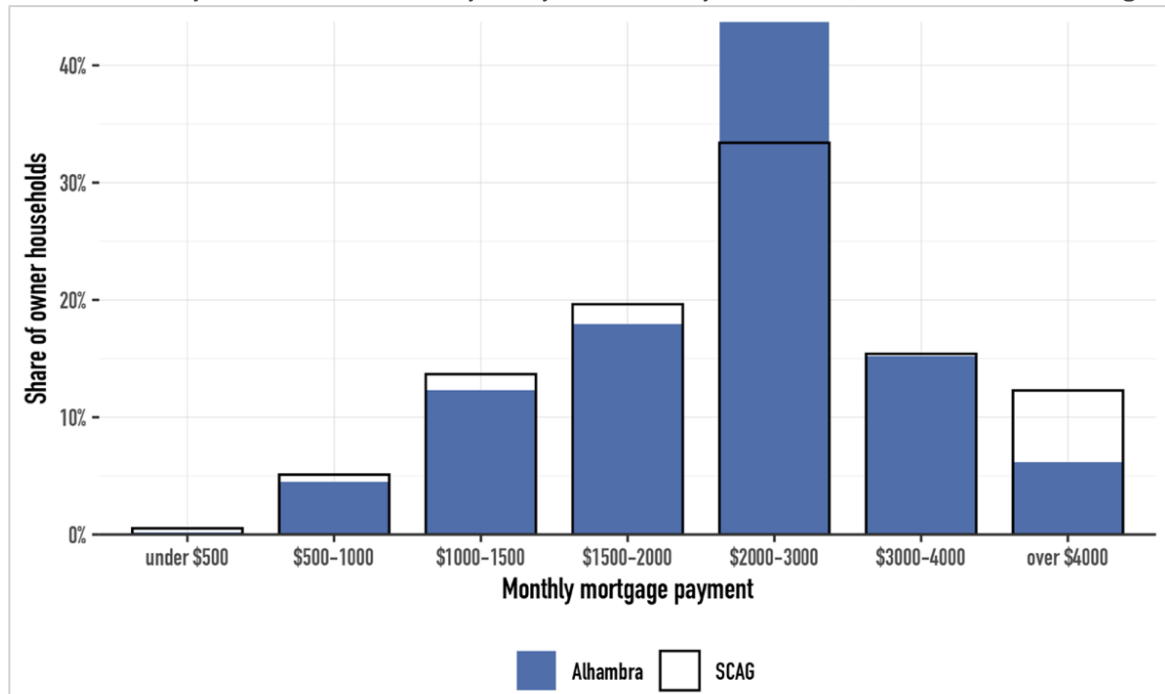
Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



In Alhambra, homeowner households make up 40% of Alhambra’s total households and 52% of the SCAG region. In both Alhambra and the SCAG region, the most commonly occurring mortgage payment in Alhambra is \$2,000-\$3,000/month. However, the SCAG region as a whole has a very high share of homeowners paying over \$4,000 per month on their mortgage payment. It is important to keep in mind that the mortgage payment is one part of total homeownership costs; other costs include taxes, insurance, and maintenance.

Figure 23. Monthly Owner Costs for Mortgage Holders, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



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Housing the extremely low-income population (below 30% of area median income) can be especially challenging. HUD's CHAS dataset provides a wealth of information on such households in Alhambra. Figure 24 provides a breakdown of extremely low-income households by race and ethnicity. Non-Hispanic Asian households⁷ account for the highest share of all extremely low-income households in Alhambra—61% of total—but they only account for 52% of all households in the city. This means they account for a disproportionately large share of households with extremely low incomes.

Figure 24. Extremely Low-Income Housing Needs, City of Alhambra, 2016

Source: SCAG Analysis of HUD CHAS, 2012-2016, Pre-Certified Local Housing Data

Demographic Indicator	Total Households		Households with Income 30% or Less	
	Number	Share	Number	Share
Non-Hispanic White	3,694	13%	714	11%
Non-Hispanic Black	594	2%	75	1%
All other Non-Hispanic races	15,248	52%	3,945	61%
Hispanic	9,620	33%	1,725	27%
Total	29,156	-	6,459	-
Renter Households	17,365	60%	4,865	75%
Owner Households	11,770	40%	1,595	25%
Total	29,135	-	6,460	-

Summary of Needs for Extremely Low-Income Households

State law requires that cities analyze the existing and projected housing needs for extremely low-income households (ELI). ELI households are those that earn 30 percent or less of area median income (AMI) adjusted for household size.

ELI households have a higher propensity to experience severe housing problems and have unique housing needs. Among the most common problems are cost burden and overcrowding. Both factors have an outmeasured impact on health, safety, and mobility.

ELI characteristics have been included in the preceding analysis; they are summarized here. In Alhambra, there are currently 6,135 ELI households in Alhambra. Over the next planning cycle Alhambra assumes 50 percent of VLI households (887 ELI households) will qualify as ELI households. Among all ELI households, 85.2 percent are cost burdened or severely cost burdened. An estimated 4,545 renter households (26 percent of all renters), and 1,590 owner households (14 percent of all owners) are ELI households.

⁷ In Figure 24, this group is shown as "all other Non-Hispanic races," but as shown in Figure 6, the vast majority of households in this race and ethnic group identify as Asian.

Figure 25. Extremely Low-Income Housing Need Summary, City of Alhambra

Source: SCAG Analysis of HUD CHAS, 2012-2016, Pre-Certified Local Housing Data

Existing ELI Households	6,135			
Projected ELI Households	887 (assumes 50% of VLI RHNA)			
	Renter	% of Renters	Owner	% of Owners
ELI Households	4,545	26%	1,590	14%
	Renter		Owner	
ELI with Any Housing Problem	3,675		1,225	
Elderly/Senior ELI Households	1,705		1,060	
% of ELI Households Cost Burdened	85.2%			

The city currently classifies single-room occupancy (SRO) housing as part of the definition of boardinghouses in the Alhambra Zoning Ordinance. Boardinghouses are permitted outright in the R-3 zoning district. This is insufficient to assist in meeting the needs of the portion of ELI households that could utilize SRO housing. The establishment of siting regulations and expanded allowance of SRO housing is a priority of the ongoing comprehensive zoning code update that will be adopted under Program 21 in this Housing Element.

Special Housing Needs

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Often some segments of the population have more difficulty finding decent, affordable housing due to differing needs for housing and specific circumstances. Special circumstances may be related to employment and income, family characteristics, disability, and household characteristics, among other factors. Consequently, certain residents in Alhambra may experience higher incidences of housing cost burden, overcrowding, or other housing problems. The special needs groups analyzed include:

- Elderly households
- People with disabilities
- People experiencing homelessness
- Single parents
- Large households
- People living in poverty
- Farm workers

Many of these groups overlap; for example, single parents may have large households, and many elderly people have a disability of some type. The majority of these special needs groups would be assisted by an increase in affordable housing, especially housing located near public transportation and services.

Figure 26. Special Needs Groups (2014-2018)

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

Special Needs Groups	Number of People or Households	Percent of Total Households or Population
Households with Seniors (includes at least one-person age 65 or over)	9,502	32%

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Senior Headed Households	6,995	24%
Seniors Living Alone	2,602	9%
Persons with Disabilities	15,892	19%
Large Households	2,936	10%
Single-Parent Household	2,001	7%
Female-Headed Households with Children	1,373	5%
Persons living in Poverty	2,305	8%
Farmworkers	93	0%
People Experiencing Homelessness	68	0%

The city’s 2020-2024 Consolidated Plan states that Alhambra has “extensive needs for supportive services, including housing, senior services, youth and childcare services, recreational activities, immigrant support services, health/medical care, counseling, employment, case management, transportation, and coordination and information/referral.”

Elderly

Many senior-headed households have special needs due to their relatively low incomes, disabilities or limitations, and dependency needs. Specifically, people aged 65 years and older often have four main concerns:

- **Housing:** Many seniors live alone and may have difficulty maintaining their homes.
- **Income:** People aged 65 and over are usually retired and living on a limited income.
- **Healthcare:** Seniors are more likely to have high healthcare costs.
- **Transportation:** Many of the elderly—especially those with disabilities—rely on public transportation.

Figure 27 shows that an estimated 14,322 persons were age 65 and older in Alhambra in 2018. This accounted for about 17% of the city’s total residents, higher than the percentage share in the SCAG region as a whole. Comparing Alhambra to nearby peer cities, Figure 27 shows that Monterey Park has the highest share of its population that are 65 years and older. Alhambra is second to Monterey Park in terms of having the highest share of elderly population amongst the peer cities.

Figure 27. Persons Age 65 Years and Older, City of Alhambra, Peer Cities, and SCAG Region, 2018
Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Jurisdiction	Population that is Age 65 Years and Older	Percent of Population Age 65 Years and Older
Alhambra	14,322	17%
El Monte	14,511	13%
Glendale	34,318	17%

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Monterey Park	12,892	21%
Pasadena	22,047	16%
San Gabriel	6,498	16%
SCAG	2,447,598	13%

While many in this cohort have the financial resources they need, many do not. Many elderly persons have limited incomes, such as small pensions, social security income benefits, or a few assets. This can make it difficult to find secure, stable, affordable housing in high cost areas. Figure 28 shows that of Alhambra's 6,995 elderly households, 40% earn less than 30% of the area median income, (compared to only 24% of elderly households in the SCAG region), and 57% earn less than 50% of the area median income (compared to 31% in the SCAG region).

Figure 28. Elderly Households by Income and Tenure, City of Alhambra

Source: HUD CHAS, 2012-2016

AMI Income Category	Owner Household	Renter Household	Total	Percent of Total Elderly Households
Extremely Low-Income (30% or less)	1,060	1,705	2,765	40%
Very Low-Income (31% to 50%)	605	585	1,190	17%
Low-Income (51% to 80%)	595	525	1,120	16%
Moderate and Above Moderate (over 80%)	1,400	520	1,920	27%
Total	3,660	3,335	6,995	100%

Note: HUD programs are available only to households with incomes at or below 80% AMI. Therefore, the CHAS data groups all households above that income threshold (both moderate and above moderate income) into one income group. HAMFI refers to HUD Area Median Family Income

Resources

The City of Alhambra's Parks and Recreation Department offers a Community Services Senior Division that provides services, recreation, and programs for the city's senior population (age 60+). The Joslyn Adult Recreation Center located in Alhambra is a designated Focal Point by the Los Angeles County Area Agency on Aging for the Southwest San Gabriel Valley Community Services Area. This recreational facility provides a centralized access point for people to find information and services, for themselves or their family members.

Importantly, this center also offers case management services focused on allowing Alhambra's senior population to live independently and safely for as long as possible. The center also offers food and nutrition programs including: group grocery runs, meal delivery programs, and a senior weekday lunch program. Referral services include the following:

- Referrals for medical, counseling, and mental health services;
- Referrals for free legal consultations related to estate planning, trusts, and wills;
- Referrals for in-home services, transportation, and nutrition; and
- Referrals for caregiver resources.

The 2020 Analysis of Impediments to Fair Housing report also highlights a free curb-to-curb transportation service available to Alhambra’s seniors, the Senior Ride Program. Transportation is available for any service within Alhambra city limits and for medical appointments up to two miles outside of the city. The city has a fleet of vehicles, expanded in 2018, for this program. Rides can be scheduled in advance, scheduled on repeat, and are available (but not guaranteed) in emergency situations. This program is available to non-senior disabled participants as well.

The 2020 Analysis of Impediments to Fair Housing report also lists several age-restricted housing developments in Alhambra that serve seniors. These include Burke Manor, the Plaza on Main, TELACU Las Palmas Manor, 15 N. Valencia, and Wysong Plaza. In addition, the city has 12 residential care facilities that provide housing and services for adults and the elderly (5 for elderly specifically) with capacity for up to 274 individuals ~~(described in the resources part of the next section, on page 32).~~

The 2020-2024 Consolidated Plan lists elderly households as a high priority population for conserving and improving existing affordable housing options, a high priority population for supporting affordable housing opportunities, and a high priority population for providing community and supportive services.

Persons with Disabilities

Physical and developmental disabilities may influence the ability to access traditionally-designed housing units and may limit a person’s ability to earn income. Physical and/or developmental disabilities may deprive a person from earning income, restrict mobility, or make self-care difficult. Thus, persons with disabilities often have special housing needs related to limited earning capacity, a lack of accessible and affordable housing, and higher health costs associated with a disability. Additionally, some residents may have disabilities that require living in a supportive or institutional setting.

The American Community Survey identifies six disability types: hearing disability, vision disability, cognitive disability, ambulatory disability, self-care disability, and independent living disability. The US Census and the ACS provide clarifying questions to determine persons with disabilities and differentiate disability types within the population. The ACS defines a disability as a person reporting one of the six disabilities identified by the following questions:

- **Hearing Disability:** Is this person deaf or does he/she have serious difficulty hearing?
- **Visual Disability:** Is this person blind or do they have serious difficulty seeing even when wearing glasses?
- **Cognitive Difficulty:** Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions?
- **Ambulatory Difficulty:** Does this person have serious difficulty walking or climbing stairs?
- **Self-Care Difficulty:** Because of a physical, mental, or emotional condition, does this person have serious difficulty concentrating, remembering, or making decisions? Does this person have serious difficulty walking or climbing stairs? Does this person have difficulty dressing or bathing?
- **Independent Living Difficulty:** Because of a physical, mental, or emotional condition, does this person have difficulty doing errands alone such as visiting a doctor’s office or shopping?

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According to the 2018 American Community Survey, an estimated 19% of Alhambra’s residents had a disability. The majority of persons with at least one disability were aged 65 years or older (67%); disabilities are less prevalent in persons under the age of 18 (3%). Among the different types of disabilities, ambulatory difficulties were the most prevalent, about 25% of all reported disabilities, followed by independent living difficulties (23%), and then cognitive difficulties (16%).

Disability data also provides valuable context for assessing current and future need for accessible housing units. Note that since some disability types are not recorded for children below a certain age, calculating disability as a percentage of total population may not be accurate. Ambulatory difficulties and independent living difficulties were most prevalent amongst residents 65 years and older.

Figure 29. Disabilities Tallied by Age and Type, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Disability Type	Age 5 to 17	Age 18 to 64	Age 65+	Total	Share of total
Hearing Difficulty	47	484	1,565	2,096	13%
Vision Difficulty	78	608	687	1,373	9%
Cognitive Difficulty	168	959	1,379	2,506	16%
Ambulatory Difficulty	53	1,136	2,859	4,048	25%
Self-Care Difficulty	71	605	1,459	2,135	13%
Independent Living Difficulty	NA	1,095	2,639	3,734	23%
Total	417	4,887	10,588	15,892	100%

Four factors—affordability, design, location, and discrimination—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.

- Most single-family homes are inaccessible to people with mobility and sensory limitations. Housing may not be adaptable to widened doorways and hallways, access ramps, larger bathrooms, lowered countertops, and other features necessary for accessibility.
- Incorporating “barrier-free design” in all new multi-family housing is especially important to provide the widest range of choices for the disabled.
- 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 design” housing, accessibility modifications, proximity to services and transit, and group living opportunities are important in serving this group.
- Housing advocacy groups report that people with disabilities are often the victims of discrimination in the home buying market. People with disabilities, whether they work or receive disability income, are often perceived to be a greater financial risk than persons without disabilities with identical income amounts.

The Housing Element must also discuss housing needs for people with developmental disabilities, which are federally defined to mean a severe, chronic disability of an individual that:

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- Is attributable to a mental or physical impairment or combination of mental and physical impairments;
- Is manifested before the individual attains age 18 (Note: State of California has a manifestation age of 18 years of age; Federal is 22 years);
- Is likely to continue indefinitely;
- Results in substantial functional limitations in three or more of the following areas of major life activity: a) self-care; b) receptive and expressive language; c) learning; d) mobility; e) self-direction; f) capacity for independent living; or g) economic self-sufficiency; and that
- Reflects the individual's need for a combination of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.

The California Department of Developmental Services provides data on developmental disabilities by age and type of residence. This data is collected at the ZIP-code level and joined to the jurisdiction level by SCAG. Figure 30 shows that in Alhambra, an estimated 663 residents had a developmental disability in 2019. Approximately 51% of individuals with a developmental disability were 17 years or younger, and 49% were 18 years and older. The majority of individuals with a developmental disability resided with a parent or guardian.

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Figure 30. Developmental Disabilities by Residence and Age, City of Alhambra, 2019

Source: CA DDS Consumer Count by CA ZIP, Age Group and Residence Type, June 2019

Developmental Disabilities	Number of Individuals
Total	663
By Residence	
Home of Parent or Family Guardian	591
Independent Supported Living	27
Community Care Facility	25
Intermediate Care Facility	0
Foster Family Home	10
Other	10
By Age	
0 to 17 Years	341
18 Years and Older	321

Notes:

1. Data available in 161/197 SCAG jurisdictions.
2. Totals may not match as counts below 11 individuals are unavailable and some entries were not matched to a ZIP code, necessitating approximation.

Resources

The City of Alhambra has several resources available to people with disabilities. According to the 2020-2024 Consolidated Plan and the 2020 Analysis of Impediments to Fair Housing report, the city has three types of residential care facilities that provide supportive services, as shown in Figure 31 below.

Figure 31. State Licensed Community Care Facilities, City of Alhambra, 2019

Source: 2020 Draft Analysis of Impediments to Fair Housing

Facility Type	Number of Facilities	Capacity
Adult Day Care	4	210
Adult Residential Facilities	7	30
Residential Care Facilities for the Elderly	5	244
Total	16	484

In addition to the supportive housing available through these 16 community care facilities, the City of Alhambra refers individuals with intellectual and developmental disabilities to an organization in Monterey Park called Mentally and Educationally Retarded Citizens, Inc. (MERCIC), which can house and provide programming for up to 50 people.

In addition to these community care facilities currently available, the Consolidated plan suggests that the city will explore the use of Community Development Block Grant (CDBG) funding to

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provide additional case management services, while also relying on existing partnerships with community-based providers.

While the Adult Residential Facilities and the Residential Care Facilities for the Elderly provide housing, these housing units are not “permanent supportive housing” and do not offer wrap-around services intended to stabilize individuals coming out of homelessness, or exiting institutions such as jails or mental health facilities. The city’s 2020-2024 Consolidated Plan shows that there are no permanent supportive housing units in the city.

Federal Law requires the City of Alhambra to provide “reasonable accommodation to rules, policies, practices, and procedures where such accommodation may be necessary to afford individuals with disabilities equal housing opportunities.” The city has procedures in place to process reasonable accommodations when requested. These procedures allow for flexibility (or waivers) in relation to land use, zoning, or building code regulations to ensure equal housing opportunities.

People Experiencing Homelessness

State law (Section 65583(a)(7)) mandates that Housing Elements address the special needs of homeless persons. “Homelessness” as defined by HUD describes an individual (not imprisoned or otherwise detained) who:

- Lacks a fixed, regular, and adequate nighttime residence; and
- Has a primary nighttime residence that is:
 - A supervised publicly- or privately-operated shelter designed to provide temporary living accommodations (including welfare, hotels, congregate shelters, and transitional housing for the mentally ill);
 - An institution that provides a temporary residence for individuals intended to be institutionalized; or
 - A public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

This definition does not include: persons living in substandard housing (unless it has been officially condemned), persons living in overcrowded housing (for example, doubled up with others), persons being discharged from mental health facilities (unless the person was homeless when entering and is considered to be homeless at discharge), or persons who may be at risk of homelessness (for example, people living temporarily with family or friends, youth recently released from foster care settings, parolees recently released from jails or prison, or households who are extremely low income and severely cost burdened).

HUD mandates that jurisdictions conduct a point-in-time (PIT) count on a single night in January each year to estimate the size of their population experiencing homelessness. In even-numbered years (e.g., 2018, 2020), the PIT only captures people experiencing sheltered homelessness, whereas unsheltered counts are done in odd-numbered years. The unsheltered counts are difficult and costly to do, often involving trained volunteers. Industry experts and homeless service providers often state that official PIT counts underestimate the true number of people experiencing homelessness in a given year. In Los Angeles County, the Los Angeles Homeless Services Agency (LAHSA) conducts the point-in-time counts.

The LAHSA point-in-time count conducted in 2019 shows that approximately 68 people experienced homelessness in Alhambra. Of these people experiencing homelessness, 53 (78%) were in unsheltered conditions. This is more than twice the number of people experiencing

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homelessness estimated during previous Housing Element Update (30 persons). When extrapolated to the full year, it was estimated that 85 people experienced homelessness in calendar year 2019. California is known to have a chronic issue with unsheltered homelessness, in large part due to its mild weather and high costs of housing.

Figure 32. Count of People Experiencing Homelessness, City of Alhambra, 2019

Source: SCAG Analysis of City and County Homelessness Point-in-Time Counts, Pre-certified Local Housing Data

Jurisdiction	Sheltered	Unsheltered	Total
Alhambra	15	53	68
El Monte	25	434	459
Glendale	96	147	243
Monterey Park	17	82	99
Pasadena	221	321	542
San Gabriel	0	28	28

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

Resources

The city's 2020-2024 Consolidated Plan lists zero permanent supportive housing units in Alhambra for people experiencing homelessness or exiting institutions (such as hospitals, jails, or mental health facilities). Permanent supportive housing units are low-barrier housing options for individuals and families with histories of chronic, long-term homelessness who need very low (or no cost) rents and wrap-around supportive services to remain stably housed (such as mental health services, addiction treatment services, employment support services, or others). In addition, the city has no transitional housing units which are intended to provide low-barrier housing and supportive services as individuals and families come off the streets or out of institutions and prepare to enter longer term housing. According to the 2020-2024 Consolidated Plan, Alhambra residents have access to 48 year-round emergency shelter beds for households with adults and children, 533 year-round beds for adult-only households, and 30 year-round beds for unaccompanied homeless youth.

Figure 33 lists the homeless services facilities and providers available to residents of Alhambra who are experiencing homelessness. While most homeless service facilities are located in Los Angeles and other parts of the metro area, the City of Alhambra has cooperative relationships with non-profit organizations to provide information, services, and assistance for people experiencing homelessness.

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Figure 33. Homeless Facilities and Service Providers Available to Alhambra Residents, 2020

Source: 2020-2024 City of Alhambra Consolidated Plan, City of Alhambra Staff

Facility Name	Location	Services Provided
New Image Project Fresh Start	Los Angeles	Shelter facility for clients with mental health issues; target population is single women or women with children
Midnight Mission	Los Angeles	Shelter facility for up to 500 men per night
Covenant House	Los Angeles	30 bed shelter facility for homeless youth
Emmanuel Baptist Rescue Mission	Los Angeles	Shelter facility for up to 33 men per night
Salvation Army Safe Harbor	Los Angeles	Drug and alcohol rehabilitation services
Higher Goals	Los Angeles	Drug and alcohol rehabilitation services
Union Station Homeless Services	Pasadena	Homelessness outreach and rapid re-housing
Housing Rights Center	Los Angeles	Housing information and counseling such as civil rights, fair housing issues, evictions
Allen House	Santa Fe Springs	Adult residential treatment shelter through LA CADA
Alice's House	Whittier	Residential treatment center through LA CADA
Casa De Corazon	East Los Angeles	Transitional housing through CHIRP Los Angeles
Meredith's House	Pasadena	Two shelter beds

In addition, the city has funded a Homeless Outreach Services program since 2017 that provides people experiencing homelessness with information and referrals to service agencies. The outreach program is administered by the Union Station Homeless Services center in Pasadena. The Union Station Homeless Services center also facilitates an emergency hotel and motel voucher program on behalf of the City of Alhambra. The city has also contracted with the Los Angeles Centers for Alcohol and Drug Abuse (LA CADA), which is a certified substance abuse and behavioral treatment provider offering critical services across the continuum of care (outpatient, intensive outpatient, and inpatient residential programs). LA CADA also contracts with other service providers and shelters in the region, opening up a larger network of resources.

Alhambra's Homeless and Mental Evaluation Team (HOME Team) partners with LA CADA to conduct homelessness outreach, provide housing, assist in rapid-rehousing programming, and provide case management services. Alhambra also uses grant funding from Los Angeles County Measure H and from the San Gabriel Valley Council of Governments to provide emergency shelter services when LA CADA facilities are unavailable or do not meet an individual's needs.

Lastly, Los Angeles County Departments provide additional services for people experiencing homelessness in the City of Alhambra. The Department of Health Services provides a range of physical and mental healthcare services and the County Regional Occupational Program offers services such as job training and career counseling. Low income Alhambra residents are also able to receive work readiness and skills training from the federal Workforce Investment Act (WIA) program administered through the County.

Single-Parent Households

Single parents with dependent children represent another important group with special housing needs. Single-parent households often require special consideration and assistance because they tend to have lower incomes and a greater need for daycare and related facilities. Figure 34 shows that in 2018, Alhambra had 2,001 single-parent households. Of these, the majority (69%) were female-headed households.

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Figure 34. Single-Parent Households, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Jurisdiction	Single Parent Household		Female-headed Household with Children	
	Number	Percent of total Households	Number	Percent of total Households
Alhambra	2,001	7%	1,373	5%

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) and affordable childcare options are recognized as needed resources for the City of Alhambra’s population of single-parent households. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to this population.

Large Households

Large households are defined as households with five or more members. Large households are identified as a group with special needs because of the limited availability of adequately sized, affordable housing units. Large households often have lower incomes and frequently live in overcrowded smaller dwelling units, which can result in accelerated unit deterioration. Figure 35 compares the number of large households in Alhambra to that in the SCAG region. In 2018, 10% of households in Alhambra consisted of five or more persons, compared to 15% in the SCAG region.

Figure 35. Large Households, City of Alhambra, SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Number of Persons in Household	Alhambra		SCAG Region	
	Number	Percent	Number	Percent
5 Persons	1,917	7%	510,037	8%
6 Persons	651	2%	232,374	4%
7 Persons or More	368	1%	185,003	3%
Total	2,936	10%	927,414	15%

Figure 36 shows that in Alhambra in the 2012-2016 time period, large renter households were more likely to have lower incomes than large owner households. However, a greater share of large owner households experienced cost burdening compared to renter households. One potential explanation for this could be that large owner households have more children present, whereas large renter households could have more adults present to assist in paying for housing costs and reducing the rate of cost burdening. More analysis is needed to uncover these trends.

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Figure 36. Large Households by Tenure and Income Level

Source: HUD CHAS, 2012-2016. HAMFI refers to HUD Area Median Family Income

Household by Income	Owner Households		Renter Households		Total Households
	Large Related (5 or More Persons)	Total Owners	Large Related (5 or More Persons)	Total Renters	
Household Income <= 30% AMI	30 (1.8%)	1,590	185 (4.0%)	4,545	6,135
Household Income >30% to <=50%	50 (4.1%)	1,200	295 (8.8%)	3,340	4,540
Households by Cost Burdening					
% Cost Burdened >30%	165 (9.5%)	1,740	315 (8.0%)	3,940	5,680
% Cost Burdened >50%	125 (6.2%)	2,014	220 (4.5%)	4,840	6,854

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra's population of larger households. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to this population, but these documents listed housing and community service resources that can benefit this population, in addition to others (like the city's Housing Rehabilitation Program).

The 2020-2024 Consolidated Plan lists large family households as a high priority population for conserving and improving existing affordable housing options, and a high priority population for supporting affordable housing opportunities.

People Living in Poverty

In 2018, 2,305 households (8% of the city's total households) were estimated to be living in poverty, defined as having an income under the Federal Poverty Line. Female-headed households with children are disproportionately affected by poverty. While female-headed households make up 27% of those in poverty, female-headed households with children make up the majority of female-headed households in poverty (about 55%). In 2018, there were an estimated 348 female-headed households with children living in poverty.

Figure 37. Households Living in Poverty, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Household Type	Number of Households	Share of Total Households
Total households below poverty level	2,305	8%
Female-headed households with children below poverty level	348	1%

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra's population living in poverty. Neither the 2020 Analysis of Impediments to Fair Housing report nor the 2020 CAPER

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listed resources available in the city that are specific to this population, but these documents listed housing and community service resources that can benefit this population, in addition to others (like the Housing Choice Voucher Program).

The 2020-2024 Consolidated Plan lists extremely low-income⁸ households as a high priority population for the following housing and service needs:

- Conserving and improving existing affordable housing options,
- Supporting affordable housing opportunities,
- Supporting code enforcement services,
- Promoting equal housing opportunities,
- Providing community and supportive services,
- Providing for planning and administration activities, and
- Providing community facilities and infrastructure.

In addition, the 2020-2024 Consolidated Plan's Strategic Plan includes an Anti-Poverty Strategy that focuses on encouraging business growth and development to create employment opportunities. Tenets of this strategy include:

- Assistance in locating and siting potential business tenants;
- Streamlining procedures for opening new businesses;
- Modest business and utility user fees;
- Marketing programs to attract and retain businesses, residents, and customers; and
- Low-cost public transit within the city.

The 2020 CAPER stated that in FY 2019-2020, no CDBG funds were expended on economic development activities, but that this strategic plan was still in place.

Farmworkers

Statewide, farmworker housing is of unique concern and of unique importance. While only a small share of SCAG region jurisdictions have farmworkers living in them, they are essential to the region's economy and food supply. Farmworkers are traditionally defined as persons whose primary incomes are earned through permanent or seasonal agricultural labor. Permanent farm laborers work in the fields, in processing plants, or support activities on a generally year-round basis. When workload increases during harvest periods, the labor force is supplemented by seasonal labor, often supplied by a labor contractor. For some crops, farms may employ migrant workers, defined as those whose travel distance to work prevents them from returning to their primary residence every evening.

Given the small number of persons employed in agriculture-related industries, the city can address the needs of the farm worker population through its overall affordable housing programs. Also, because Alhambra is an urban community in a metropolitan area, those persons identified as having agriculture jobs are most likely employed at plant nurseries and similar enterprises and

⁸ While households living in poverty have different income thresholds than households with extremely low incomes, the resources available would be similar.

thus are not anticipated to have the seasonal housing needs associated with crop-related farm worker jobs.

Figure 38. Farmworkers by Occupation, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Occupation	Alhambra	Share of Total Alhambra Workers	SCAG
Total Jobs: Farming, Fishing, and Forestry Occupation	93	0.22%	57,741
Full-time, Year-Round, Jobs: Farming, Fishing, and Forestry Occupation	23	0.05%	31,521

Figure 39. Employment in the Agricultural Industry, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Occupation	Alhambra	Share of Total Alhambra Workers	SCAG
Total in Farming, Agriculture, Forestry, Fishing, and Hunting	98	0.23%	73,778
Full-time, Year-Round in Agriculture, Forestry, Fishing, and Hunting	46	0.11%	44,979

Resources

Affordable housing options (such as regulated affordable housing units or rent assistance programs) are recognized as needed resources for the City of Alhambra’s population of farmworkers. The 2020 Analysis of Impediments to Fair Housing report, the 2020-2024 Consolidated Plan, and the 2020 CAPER all did not list resources available in the city that are specific to the farmworker population, but these documents listed housing and community service resources that can benefit this population.

Housing Stock Characteristics

A community’s housing stock is defined as the collection of all housing units located within the jurisdiction. The characteristics of the housing stock, including growth, tenure, vacancy rates, age, type, condition, and cost are important in determining the housing need for the community. This section details the housing stock characteristics of Alhambra, in an attempt to identify how well the current housing stock meets the needs of the current and future residents of the city.

Housing Unit Growth

Alhambra is a built-out city that has experienced only minimal growth in its housing stock over the past 20 years. According to the California Department of Finance, there are 31,915 housing units in Alhambra as of 2020. This represents a 6% growth in housing units since 2000. The city’s growth rate is comparable to that of El Monte, Monterey Park, and San Gabriel, while residential development was greater in Pasadena and Glendale.

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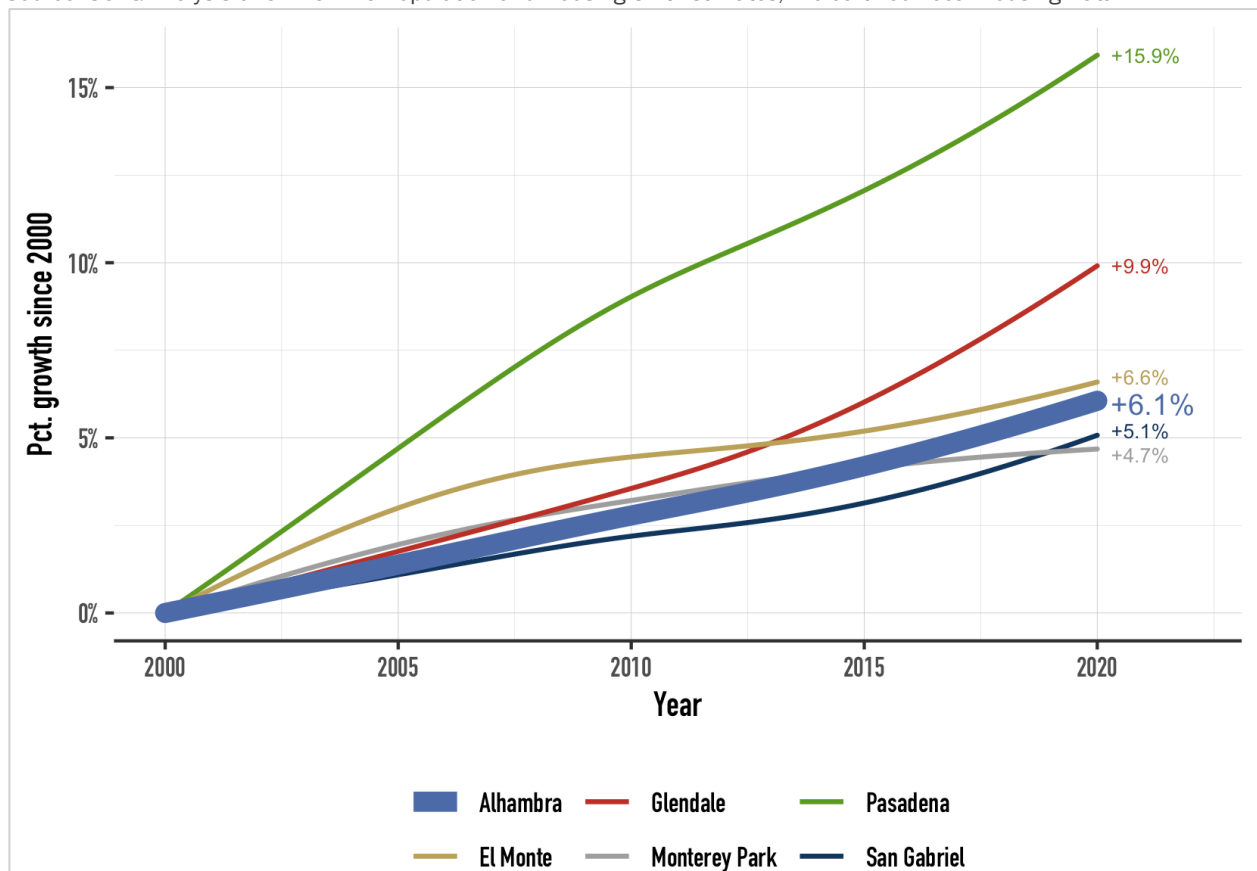
Figure 40. Housing Unit Growth, City of Alhambra and Peer Cities, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

Jurisdiction	2000	2020	Change 2000-2020	
	Number	Number	Number	Percent
Alhambra	30,045	31,865	1,820	6%
El Monte	27,758	29,588	1,830	7%
Glendale	73,713	81,019	7,306	10%
Monterey Park	20,209	21,155	946	5%
Pasadena	54,132	62,753	8,621	16%
San Gabriel	12,909	13,564	655	5%

Figure 41. Housing Unit Growth, City of Alhambra and Peer Cities, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data



Housing by Type and Tenure

Figure 42 shows that in 2020, the largest percentage of housing units in Alhambra was single-family detached (43%). Approximately 12% were single-family attached units, 12% were

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multifamily housing with two to four units, 33% were large multifamily housing with five or more units, and 0.1% were mobile home/manufactured housing.

Figure 42. Housing Type, City of Alhambra and SCAG Region, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

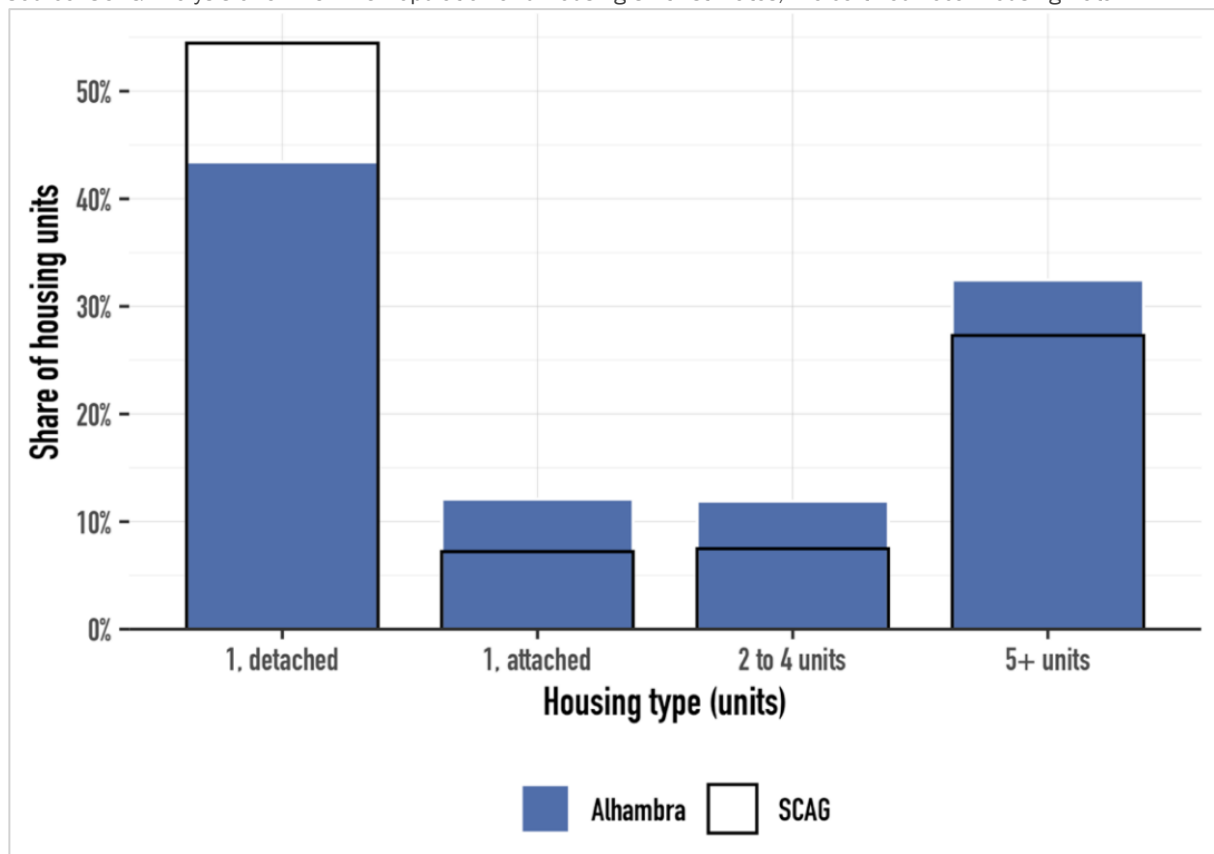


Figure 43 shows who lives in these different types of housing units in Alhambra. In 2020, the majority of renter households in Alhambra lived in large multifamily housing with five or more units (46%) and smaller multifamily with two to four units. In comparison, owner households in Alhambra live in single-family detached housing (73%), followed by single-family attached (12%), and large multifamily with 5 or more units (12%).

Figure 43. Housing Type by Tenure, City of Alhambra, 2020

Source: SCAG Analysis of CA DOF E-5 Population and Housing Unit Estimates, Pre-certified Local Housing Data

Housing Type	Owner-Occupied Housing Units		Renter-Occupied Housing Units	
	Number	Percent	Number	Percent
Single-Family Detached	8,412	73%	4,487	25%
Single-Family Attached	1,340	12%	1,902	11%
Multifamily (2-4 units)	389	3%	3,223	18%
Multifamily (5+ units)	1,323	12%	8,262	46%
Total	11,464	100%	17,874	100%

Housing Availability and Tenure

Housing tenure and vacancy rates are important indicators of the supply and cost of housing. Housing tenure refers to whether a unit is owned or rented. Tenure is an important market characteristic because it is directly related to housing types and turnover rates. The tenure distribution of a community's housing stock can be an indicator of several aspects of the housing market, including the affordability of units, household stability, and residential mobility among others.

In most communities, tenure distribution generally correlates with household income, composition, and age of the householder: older households, higher-income households, and larger households tend to own their homes at greater rates than do younger households, lower-income households, or smaller households.

In 2018, the majority of Alhambra households were renters (61%), while 39% of households owned their homes. In contrast, the majority of households in the SCAG region own their homes (52%), while 48% rent.

Figure 44. Housing Tenure, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Tenure Type	Alhambra		SCAG	
	Number	Percent	Number	Percent
Owner-Occupied	11,506	39%	3,150,310	52%
Renter-Occupied	17,921	61%	2,852,437	48%

Figure 45 shows tenure by household size in Alhambra. In 2018, owner-occupied units had a slightly higher average household size compared to renter-occupied units. Approximately 56% rental units were occupied by one- and two-person households compared to 51% of owner households. The average person per household in Alhambra was 2.86 in 2018, according to the Census.

Figure 45. Tenure by Household Size, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data

Size	Owner-Occupied Housing Units		Renter-Occupied Housing Units	
	Number	Percent	Number	Percent
1-Person	2,267	20%	4,645	26%
2-Person	3,539	31%	5,364	30%
3-Person	2,574	22%	3,696	21%
4+ Person	2,987	26%	3,987	22%
Total	11,506	100%	17,921	100%

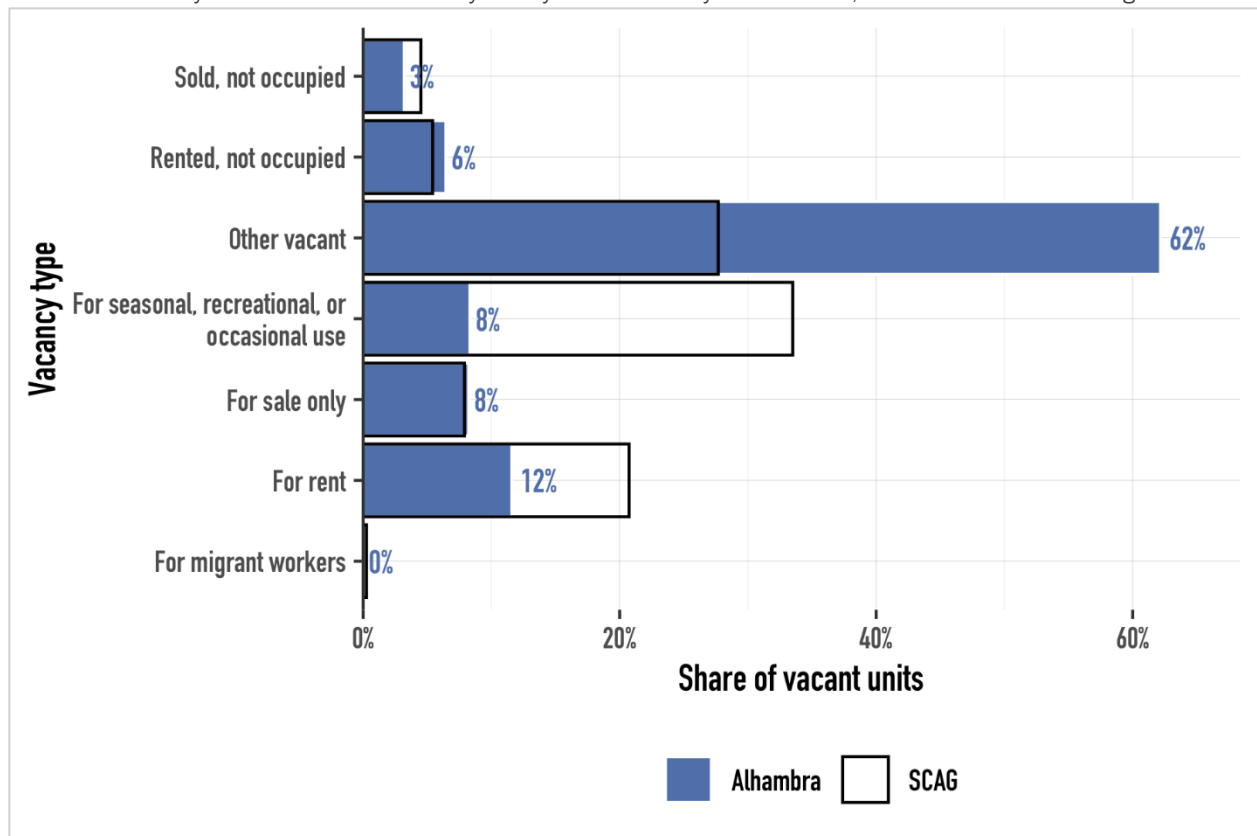
Housing Vacancy

Vacancy rates are an important housing indicator because they indicate the degree of choice available. High vacancy rates usually indicate low demand and/or high supply conditions in the housing market. Too high of a vacancy rate can be difficult for owners trying to sell or rent but may also indicate the presence of a substantial second home market. Low vacancy rates usually indicate high demand and/or low supply conditions in the housing market. Too low of a vacancy rate can force prices up, making it more difficult for low- and moderate-income households to find housing. Vacancy rates between 2% and 3% are usually considered healthy for single-family housing, and 5% to 6% for multi-family housing. However, vacancy rates are not the sole indicator of market conditions. They must be viewed in the context of all the characteristics of the local and regional market.

According to the 2014-2018 American Community Survey, the overall vacancy rate in Alhambra was 6.0%. However, about 62% of vacant units (almost 1,240 units) were vacant for an “other reason.” Seasonally-occupied vacation homes represent about 8% of all housing units in the city, compared to about 35% in the SCAG region. Vacant rental units represent 12% of all housing units in the city. Overall the vacancy rates reflected a relatively healthy housing market.

Figure 46. Vacancy Rates by Vacancy Type, City of Alhambra, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Housing Age and Condition

Housing age can be an important indicator of housing condition within a community. Like any other tangible asset, housing is subject to gradual physical or technological deterioration over time. If not properly and regularly maintained, housing can deteriorate and discourage reinvestment, depress neighboring property values, and eventually impact the quality of life in a

neighborhood. Many federal and state programs also use the age of housing as one factor in determining housing rehabilitation needs. Typically, housing over 30 years of age is more likely to have rehabilitation needs that may include new plumbing, roof repairs, foundation work, and other repairs.

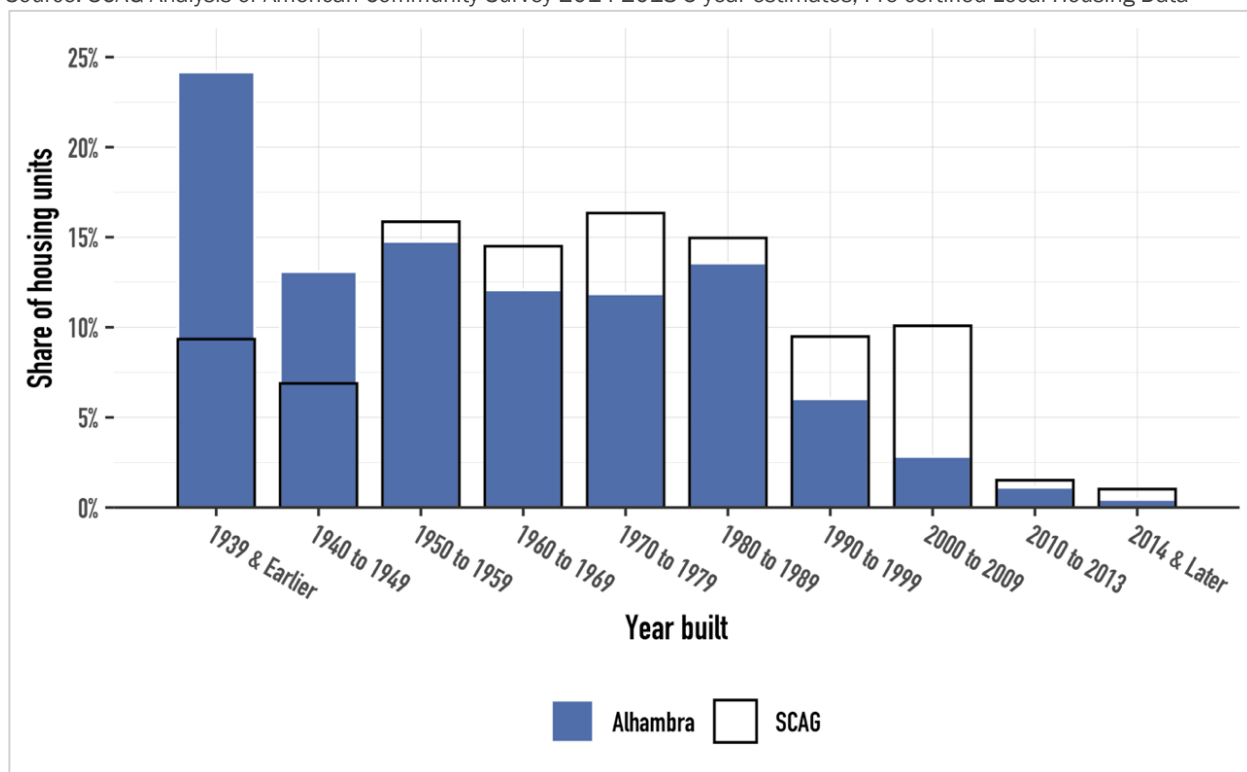
In Alhambra, approximately 76% of the housing stock may potentially require some improvements based on the age of the structure as shown in Figure 47. Approximately 52% of the housing stock in Alhambra is approaching 50 years of age or older, and is more likely to require major rehabilitation. The age of the city’s housing stock indicates a potential need for continued code enforcement, property maintenance, and housing rehabilitation programs to stem housing deterioration. Due to the fact that the majority of households in Alhambra earn low incomes, deferred maintenance could become an increasing issue.

The city allocates CDBG funds to the Code Enforcement program annually. During the 2019-2020 fiscal year, 913 code violations were investigated, of which 492 violations (53 percent) were in low- and moderate-income areas. Code enforcement staff made 506 referrals to the Housing Rehabilitation Program; all were for properties in low- and moderate-income areas.

Given the age of Alhambra’s housing stock, and that maintenance can be economically and physically difficult for some homeowners, the city offers an array of rehabilitation loans for low-income households to maintain their homes. To reach a broad range of participants in the program, flyers are distributed in three languages. City staff have emerging concerns about substandard housing among rental properties which are expected to be addressed in the 2021-2029 Housing Element.

Figure 47. Year Housing Built, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Pre-1940 Housing

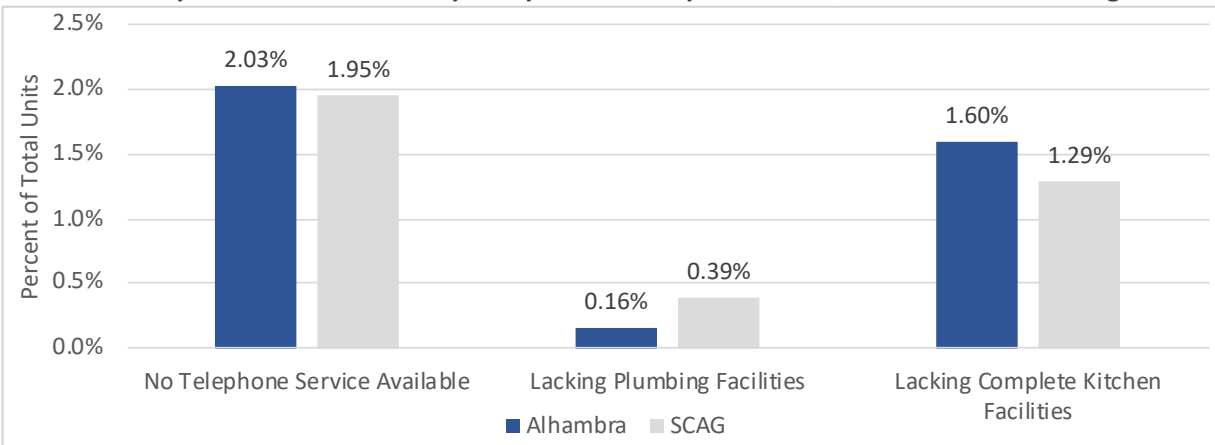
HUD may consider units substandard if they were built before 1940. Figure 47 shows that 7,589 housing units were built before 1940, approximately 24 percent of the total housing in Alhambra. Region wide, about nine percent of units were built before 1940.

Lacking Telephone Service, Plumbing, and Kitchen Facilities

A city can estimate the number of substandard housing units within its jurisdiction using a number of sources of information, such as the Census. The 2014-2018 American Community Survey reports that 597 housing units had no telephone service available, 47 housing units were lacking complete plumbing facilities, and 470 housing units were lacking complete kitchens.

Figure 48. Substandard Housing Conditions, City of Alhambra and SCAG Region, 2018

Source: SCAG Analysis of American Community Survey 2014-2018 5-year estimates, Pre-certified Local Housing Data



Estimate of Housing Units in Need of Rehabilitation

Complementing the ACS data on age and available facilities, an assessment of code enforcement activities can provide additional insight on the overall condition of the City’s housing stock. Over the five-year period ending in November 2021, Alhambra’s code enforcement division opened 7,342 cases, or 1,468 per year. Among those only 821 (11 percent) remain open and active. Most cases are for minor complaints unrelated to structural issues. Over time, housing units move into and out of various states of disrepair as a result of deferred maintenance, negligence, or the natural aging process. During the 2020-2021 fiscal year, the City received 125 confirmed complaints for violations with Health and Safety (H&S) issues. It also had proactive enforcement of 446 violations for a total of 571 serious H&S violations. This was up from 304 cases in 2019

Since code enforcement activity is primarily complaint-driven or reliant on proactive enforcement, it is difficult to make accurate assumptions about the overall condition of the City’s housing stock based upon this data because code enforcement is not likely capturing the full range of housing units in need of repair and rehabilitation. However, code enforcement spent 1,200 hours in the field in 2021, which was more than twice the time in 2020. Given that the city saw between 300 and 600 cases over the last two years cases across all structures, and that a portion of these will be non-residential and a portion will not actually require substantial renovations, it is reasonable to assume an upper bound of 600 units annually require some form of substantial rehabilitation. The Alhambra Code enforcement division confirmed this as a a reasonable estimate based on their observation of the data and field experience.

Figure 49. Code Enforcement, Health and Safety Issues in Buildings, City of Alhambra (FY 2019, 2020)

Source: City of Alhambra

Category	FY 2019-20	FY 2020-21
<u>Complaints</u>		
Total Confirmed Complaints, as Stand-alone H&S Issues in Buildings	<u>129</u>	<u>125</u>
Total Proactive Enforcement for Stand-alone H&S issues in Buildings	<u>175</u>	<u>446</u>
Total Confirmed and Proactive Complaints	<u>304</u>	<u>571</u>
<u>Example Cases</u>	<u>2020-2021</u>	
	<u>Total Violations by Type⁹</u>	
<u>Unsafe, substandard, or dangerous structure</u>	<u>189</u>	
<u>Unsanitary conditions</u>	<u>2</u>	
<u>Deteriorated exterior of building or structure</u>	<u>342</u>	
<u>Building or premises violation H&S</u>	<u>26</u>	

Housing Cost and Affordability DRAFT

Housing costs directly impact housing accessibility for all economic segments of the community. In general, if housing supply exceeds housing demand, housing costs will decrease. If housing demand exceeds housing supply, housing costs typically increase. In Alhambra, housing costs tend to be higher than in the SCAG region as a whole. The high cost can be attributed to a low supply of homes for sale and a high demand for housing. This section summarizes the cost and affordability of the housing stock to Alhambra residents.

Homeownership Market

According to a 2020 California Association of Realtors (CAR) report, the average home on the market in November 2020 in Los Angeles County had a median price of \$664,160, which was a 12% increase from November 2019. Based on a CAR First Time Buyer Housing Affordability Index, in the third quarter of 2020, the median value of a home in the Los Angeles Metropolitan Area was \$518,500 with monthly payments (including taxes and insurance) of \$2,560. This would require a qualifying income of at least \$76,800 annually.

In comparison, these costs are much higher in Alhambra than in the Los Angeles Metropolitan Area. According to November 2020 data from Zillow, the median cost of a single-family home in Alhambra was \$771,423, up 9% from \$710,556 in 2018.

According to data provided by SCAG, between 2000 and 2018, median home sales prices in Alhambra increased 229% while prices in the SCAG region increased 151%. Prices in Alhambra have fluctuated across the regional average: they were only 86.1% of the SCAG region median in 2003 and but reached a high of 137% of the SCAG median in 2009. Despite these dramatic price increases, median home sales prices in Alhambra have consistently remained lower than some peer cities, such as Pasadena, Glendale, and San Gabriel.

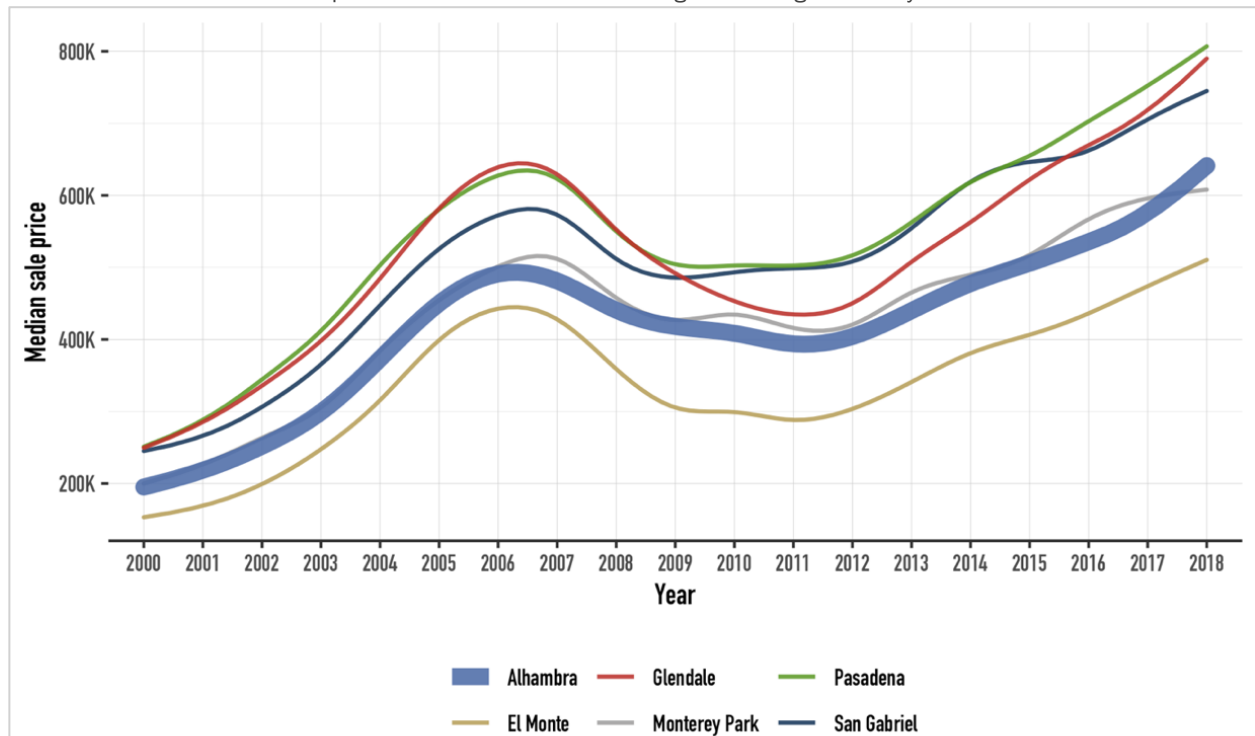
⁹ A case may have violations in multiple categories

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Figure 50. Median Home Sales Price, City of Alhambra and SCAG Region, 2000-2018

Source: SCAG Local Profiles, Core Logic/Data Quick, Pre-certified Local Housing Data

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



Rental Market

CoStar¹⁰ is one of many source providers of commercial real estate data and analytics for multifamily, retail, office, industrial, hospitality, and other real estate classes across the Country. CoStar provides insightful building-level information such as rent, vacancies, and other important information used for local market analyses. Figure 51 shows that in January 2021, the average monthly rents in Alhambra ranged from \$1,335 for a studio apartment to \$2,019 for a 3-bedroom apartment.

Figure 51. Multifamily Average Monthly Rent, City of Alhambra, 2021

Source: CoStar, January 2021.

Unit Type	Average Monthly Rent (January 2021)
Studio	\$1,335
1-bedroom	\$1,438
2-bedroom	\$1,737
3-bedroom	\$2,019

Housing Production

Figure 52 shows the number of housing permits issued per every 1,000 residents in Alhambra. Between 2000 to 2018, the number of housing permits Alhambra issued increased; the majority of these were for multifamily units. Permits per 1,000 Alhambra residents have been more stable

¹⁰ CoStar is a private, third-party, proprietary data provider commonly used in the real estate industry. Of its residential data, CoStar focuses on multifamily properties with four or more units. While CoStar is one of the best sources for multifamily data, it has gaps and limitations. Newer buildings and those that are professionally managed are more likely to have reliable information, while smaller, older buildings may have incomplete or missing data.

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in the 2000-2018 timeframe than in other neighboring cities. However, the permitting process for one large property can skew these data.

Figure 52. Housing Units Permitted Per 1,000 Residents, City of Alhambra and SCAG Region, 2000 to 2018

Source: SCAG Analysis of Core Logic/Data Quick, Pre-certified Local Housing Data

Note: Additional detail available in SCAG 2019 Local Profiles.

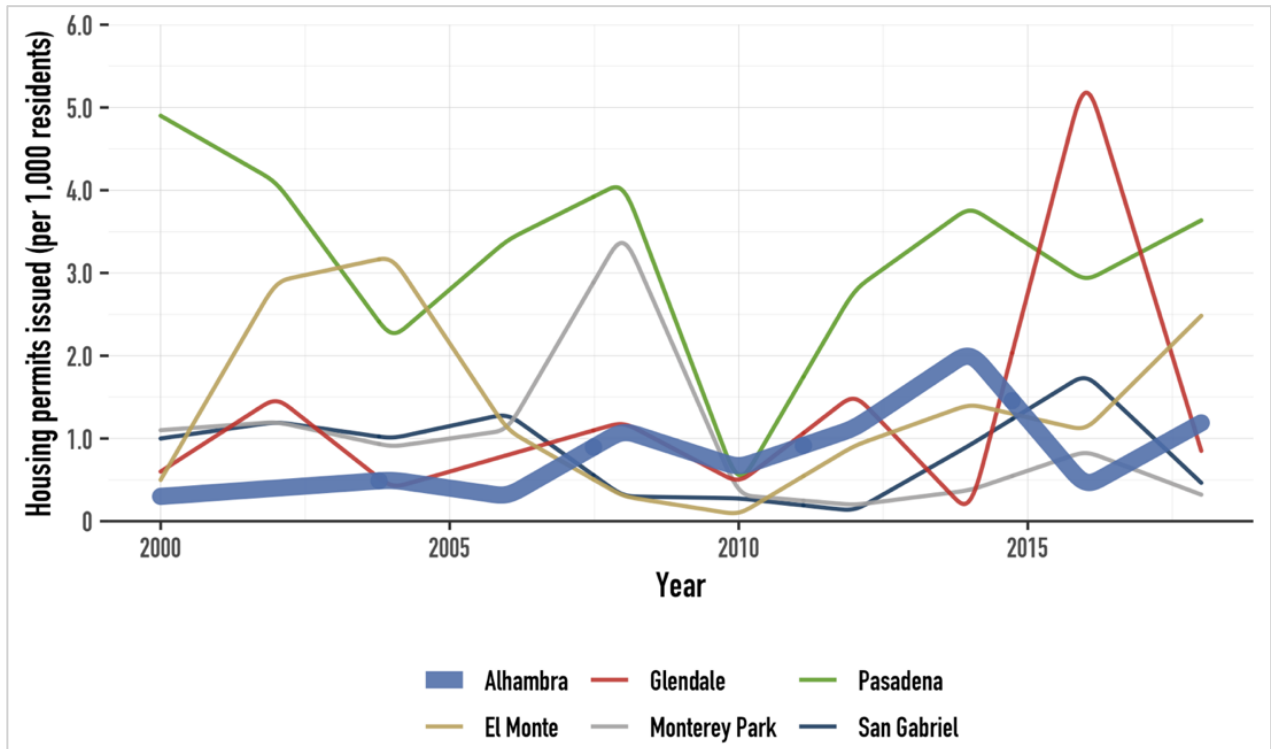
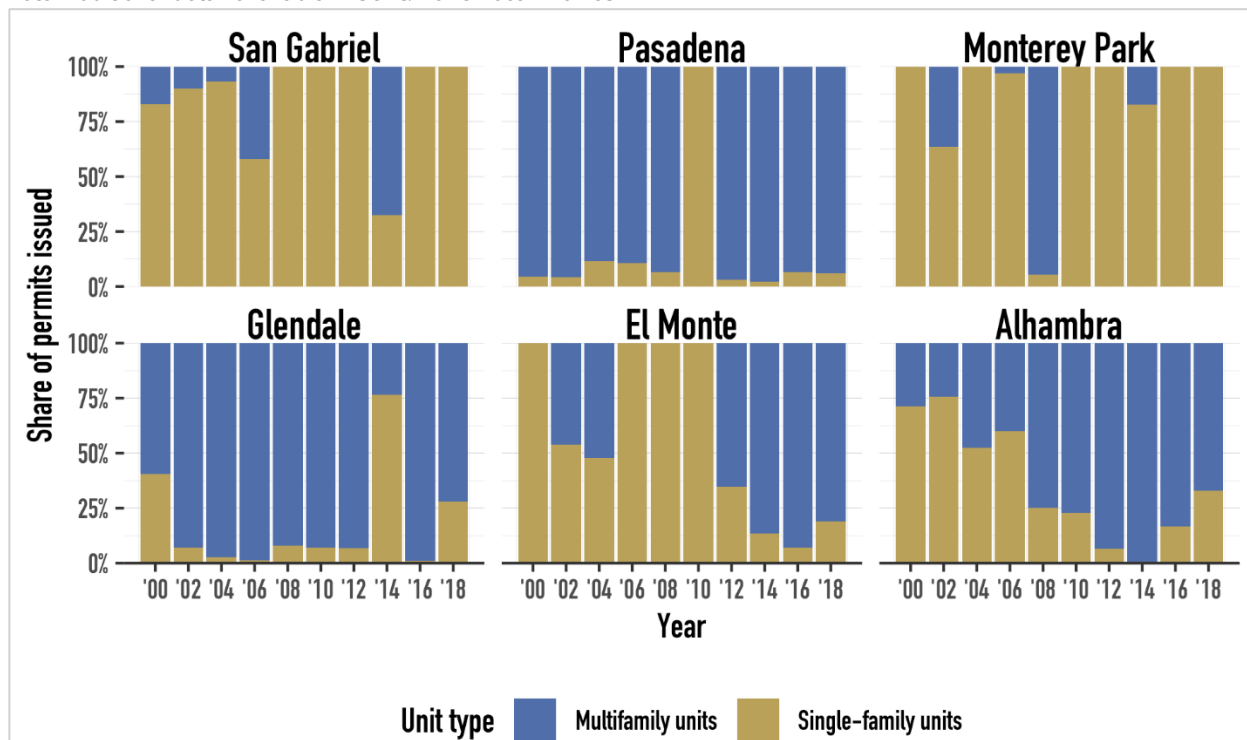


Figure 53 below shows the share of housing permits issued in Alhambra and peer cities using data provided by SCAG. Beginning at the Great Recession and the years after, the majority of housing permits have been issued for multifamily units. Similarly, Pasadena, Glendale, and El Monte have also issued the majority of their housing permits for multifamily units.

Figure 53. Share of Housing Permits Issued, City of Alhambra and Peer Cities, 2000 to 2018

Source: SCAG Analysis of Core Logic/Data Quick, Pre-certified Local Housing Data

Note: Additional detail available in SCAG 2019 Local Profiles.



Affordable Rental Housing Stock

An important component of any community’s housing inventory is the stock of housing that is affordable to households earning lower incomes. This housing can be regulated or unregulated, and is most often rental housing.

Unregulated affordable housing is affordable to lower-income households by virtue of its location, age, condition, or amenities. Typically, unregulated affordable housing units are older, smaller, and/or lower-quality, with fewer amenities, older appliances, or older appearances. Often, these properties have some deferred maintenance or capital needs. Because there is not enough regulated affordable housing across the country, unregulated affordable housing is an important part of the housing stock in a community. But because it is unregulated, the rents charged at the properties can change suddenly and can be influenced by the larger real estate market. In addition, these properties can sometimes have habitability issues ([see a discussion of common housing problems on page 21](#)) if they are not well maintained by the landlord.

Regulated affordable housing often has public funding that restricts the maximum incomes of the tenants, or restricts the rents that can be charged to ensure that the housing is serving low-income households. This housing is sometimes referred to as government-assisted housing, referencing the public funds at the property. These restrictions vary by the type of funding and the affordability level at the property, and typically have a limited duration—the property is affordable for a specified period of time.

This section outlines the stock of regulated affordable housing in Alhambra and those units that are at risk of losing their restrictions and “converting” to market rate. This is an important issue for cities and local governments to monitor, as units that convert to market rate can include big rent increases for tenants—putting them at risk of housing instability, homelessness, or

displacement—and can cause a permanent loss to the community’s inventory of regulated affordable housing.

Assisted Housing at Risk of Conversion

State law requires the city to identify, analyze, and propose programs to preserve existing multifamily rental units that are restricted to low-income households and that will become unrestricted and possibly be lost as low-income housing (i.e., “units at risk” or “at-risk units”). State law requires the following:

1. An estimate of the number of units at risk of conversion within ten years of the Housing Element deadline,
2. An analysis of the costs of preserving and/or replacing the units at risk and a comparison of these costs,
3. An analysis of the organizational and financial resources available for preserving and/or replacing the units “at risk,” and
4. Programs for preserving the at-risk units.

The following discussion satisfies the first three requirements of State law listed above pertaining to the potential conversion of assisted housing units into market-rate housing between ~~the 2021–2029 planning period~~ through October 15, 2031. Program 3 in the Housing Action Plan describes a program for preserving these at-risk units.

According to data provided by the California Housing Partnership, SCAG (using the HCD preapproved data), and the City of Alhambra, there ~~are~~ were six properties in Alhambra in 2020 providing 366 affordable housing units. Over the next ~~ten~~ eight years (~~2021–2029~~), three properties that provide 215 affordable units have expiring affordability restrictions: 11 units at ~~(non-elderly)~~ 17. S. Olive Ave., 110 units ~~(elderly)~~ at Plaza on Main, and 94 units ~~(elderly)~~ at Wysong Plaza. ~~city staff report that there are other affordable ownership units in the community built in the last 20 years with unknown covenant expirations that could be at risk over the planning period.~~ An example of this is the Alhambra Regency project at 500 West Main Street, which has 16 owner-occupied affordable units. No additional covenants are expected to expire within the next ten years.

Figure 54. Assisted Rental Housing in Alhambra

Source: 2013–2021 Alhambra Housing Element; [California Housing Partnership, 2021 Information from City of Alhambra](#)

Project Name	Tenant Type	Low Income Units/Cons. Type	LIHTC	Funding Source	Affordability End Date	Risk Level
Wysong Village Apartments 111 N Chapel Ave	Elderly	94 (rehab)	4%	HUD 202 Section 8	2029	At risk
Telacu Las Palmas 89 S Chapel Ave	Elderly	67 (unknown)	No	HUD 202 Section 8	2049 2021	Not at risk
Burke Manor 15 N 3rd St.	Elderly	74 (unknown)	No	HUD 202 Section 8	2034 2025	Not at risk
Plaza on Main	17 S. Olive Ave.	Low Income 11 (unknown)	No	HOME and Set-Aside	2027	At risk
	15 N. Valencia St.	Elderly 11 (unknown)	No	HOME and Set-Aside	2063	Not at risk
	333 W Main	Elderly 110 (new)	4%	HOME and Set-Aside	2027	At risk

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Total		366				
At Risk of Conversion		215				

According to the California Housing Partnership, Both Wysong Village and 333 W Main were funded with 4% LIHTC. Wysong is also funded with PCAC/202 funds, 333 W Main also has funding from HOME. While these projects are technically eligible to convert to market rate housing over the next ten years, these projects are owned by non-profits and are not likely to convert to market rate, as these organizations' mission is to provide affordable housing.

Cost Analysis

Preservation. Project-based rental assistance programs can achieve preservation of at-risk units. Most of the units at risk in Alhambra are senior units. Senior households tend to have smaller household sizes and lower incomes. Subsidies for these households can be very high. In LA County a two-person VLI household has an affordable rent of around \$960. The average market rate rent for a one-bedroom unit in Alhambra is \$2,580 per month¹¹. The difference between market rents and affordable rents for these units is \$1,620 per month. This would result in an annual rent subsidy of \$19,440 per unit and a total preservation subsidy of \$4.1 million per year.

New Construction/Replacement. New construction of a new property or properties with the same number of units and similar quality and amenities would vary greatly depending on the location within the city, density, construction type, unit sizes, and a number of other factors. The cost to construct a new unit in the region ranges from \$470,000 to \$580,000. Initial estimates for Related's proposal for the Chapel affordable housing project is over \$600,000 per unit. Replacing 215 at-risk units with new construction would cost anywhere from \$101 to \$129 million dollars. Due to the high cost of land and construction in Alhambra, preservation of units through rent subsidies and other mechanisms is far lower than through construction.

Resources

The financial resources section in Chapter 4 documents a range of partners and funding sources that could be leveraged to support affordable housing preservation in the unlikely event that existing owners seek to allow covenants to expire. The city is actively engaged with both Related California and American Family Housing/Core on affordable housing projects. The city has previously worked with National Preservation Partners, and Habitat for Humanity. TELACU is another non-profit community development corporation that is active in developing and rehabbing affordable housing in the San Gabriel Valley.

Federal, State, and local financial resources could include (see Chapter 4 for details in these programs):

- Alhambra's Housing Asset Fund (RDA carryover)
- HOME
- LACDA administered Housing Choice Voucher Program

¹¹ CoStar. Properties in Alhambra with 25 or more units, built since 1980 (2Q21)

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- CoC
- Inclusionary Housing Trust Fund (from In-lieu fees)

In addition to these resources, Program 13 and Program 14 implements actions to strengthen Alhambra's affordable housing finding and administrative capacity.

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Chapter 3: Constraints Analysis

This section outlines the Opportunities and Constraints Analysis, which is a required component of the housing element update. HCD requires the following:

“The housing element must identify and analyze potential and actual governmental constraints to the maintenance, improvement, or development of housing for all income levels, including housing for people with disabilities. The analysis should identify the specific standards and processes of these constraints and evaluate their impact on the supply and affordability of housing. The analysis should determine whether local, regulatory standards pose an actual constraint and must also demonstrate local efforts to remove constraints that hinder a jurisdiction from meeting its housing needs.”

This section builds on the Opportunities and Constraints Analysis in the 2013-2021 Housing Element, as well as prior work conducted by the City of Alhambra. Importantly, it provides an update to address progress to leverage opportunities and remove constraints over the prior planning cycle.

Nongovernmental Constraints

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Housing development relies on inputs set by numerous interrelated markets and players, from the cost and availability of land to the cost of labor and materials to the price of rents. Each input to development is its own market with supply and demand factors constantly in flux. These nongovernmental factors impact housing market dynamics in Alhambra and the region and may pose barriers to housing production and affordability. To a large degree, the city has limited-to-no control over these constraints. However, through its housing programs, the city can take steps to mitigate the effects of these constraints.

Land Availability

Natural limits on land—like slopes, wetlands or floodplains, or forested areas—constrain the areas that are available for housing development. Artificial limits on land—like zoning, protected areas, and public policies—are subject to governmental input and oversight and are discussed in the subsection on Governmental Constraints beginning on page [6758](#).

On a given parcel of land, landowners and property developers evaluate a site for the economically highest and best use allowed, be that office, residential, commercial, or vacant land, depending on the parcel's unique characteristics.

The City of Alhambra is a built-out, landlocked community. The City of Alhambra currently has less than 5.5 acres of vacant land zoned for residential uses in the community. This will limit the city's ability to accommodate future housing need for redevelopment and reuse. This condition is not uncommon, with many communities in the San Gabriel Valley experiencing a similar situation. Land scarcity is a direct cause of high land costs and contributes to lack of housing production.

Constraints Summary:

Alhambra is a built-out community with only five acres vacant residentially-zoned land in the city. Nearly all of residential development in the future will have to come through infill, redevelopment, and residential recycle.

What can the City of Alhambra do?

There are only a few tools that the city can use to increase the amount of land available for development, and these types of changes may come at the expense of other public goals (such as economic development, open space, or fiscal benefits) or invite public pushback:

- Change the zoning on non-residential parcels that are ripe for development or redevelopment.
- Sell or donate publicly-owned buildable land for development.
- Convert open space to residential uses. These conversions should be limited only to open space areas suited for development that are not planned for park, conservation, or recreational uses.

Among these options, changes to non-residential zoning is the most likely path to increasing Alhambra's residential land supply.

Relevant Housing Action Plan Programs: Program 8, Program [1518](#), Program [1619](#), Program [1922](#), Program [2023](#), Program [2421](#), Program [2522](#).

Market Feasibility

When land is available for development, the type of development that is ultimately built is dependent on zoning and regulations (discussed in the Governmental Constraints on Development section) and the feasibility/profitability from different development options.

Market feasibility is a robust process that assesses the demand for development—comparing the expected revenues against the investment costs for the desired and allowed types of development. Each development project has the potential to generate revenue from rents, leases, sales, parking, retail, and numerous other end uses. However, development projects are also costly and risky to build—most often requiring debt or equity (with return on investment requirements), raw materials, labor, fees and taxes, and other costs.

Development feasibility is assessed during a project's due diligence process, where the developer compares sources of capital (and their required returns) against the uses of capital (development costs) and the developer's own required return threshold for taking on the risk. If a development project is not feasible, it will not be built. A number of factors influence development feasibility, including (but not limited to):

- Development costs (land, labor, raw materials);
- Government costs (including taxes, permits, fees, and the time it takes to process);
- Interest rates (including return thresholds);
- Zoning and regulations governing what is allowed to be built; and

- Local market rents or sales prices, as well as prices of retail or commercial spaces, parking spaces, storage spaces, etc. that are influenced by the demand in an area.

Development will only happen when a developer anticipates meeting or exceeding their costs. Just like capital, development is mobile and not compulsory; developers can look to other locations, other segments of the market, or other financial opportunities for investment.

Development risk is important because it can affect the type of development that gets built, the design and look of the project, and the developers' willingness to pursue. Changes to any of the largest factors influencing development—market rents, sales prices, interest rates, zoning, taxes, fees, and overall demand for the development project—are all beyond the developer's control but can quickly make a project infeasible or unprofitable.

Development Costs

Development costs are a function of demand. The demand for parking is one of the most notable factors of development costs because parking spaces take up a significant portion of the parcel. Stacking parking stalls in private or shared garage structures would save space on the parcel for other uses, but it costs much more than parking directly on land. Demand for additional amenities, common spaces (e.g., lobbies, private parks), and aesthetic features of a property also add to the total costs.

Development costs are also a function of government policy, such as building codes, requirements for construction material, design standards (e.g., setbacks, maximum lot coverage, minimum lot size, maximum residential density), and affordable housing requirements adopted by communities. These are discussed in the section on Governmental Constraints beginning on page [6758](#).

Real estate feasibility is a complex function that reconciles achievable pricing or income from a finished product, rates of return necessary to attract capital investments, and the costs of development. Governments have little-to-no control over most factors that influence market feasibility. This section summarizes market factors that influence housing feasibility and production.

Land Costs

The price of land is typically among the largest components of housing development costs. Costs are determined by both demand for space and the supply of developable land, which is influenced by topography, environmental issues (floodplains, seismic hazards, etc.), zoning, existing developments, and the presence of infrastructure, among other factors. A parcel of vacant land can be less costly than a parcel with an existing use, since the existing may have intrinsic value, and will need to be demolished and assessed for hazardous materials, among other steps.

Different uses of land—building office, industrial, retail/commercial, or residential—are able to pay different amounts for land, so competition for land is influenced by the demand for all of these different uses. What ultimately gets built is dependent on zoning and regulations (discussed in the Governmental Constraints on Development section), and the feasibility/profitability from different development potentials (discussed above).

Many cities in Southern California suffer from the dual forces of high land demand and limited land supply, a recipe for high prices. According to data from CoStar¹², in the first quarter of 2021 when this draft was written, Alhambra did not have a single active listing for any vacant residentially zoned parcel or a nonvacant residentially zoned parcel marketed as a redevelopment site. Over the last five years, CoStar reported 12 properties sold for land. Most of these properties were redevelopment sites. Most of these sites were between 0.25 and 0.75 acres in size. The average sale price was \$3.8 million per acre. Example recent sales in Alhambra include the Midwick Collection site (8.8 acres; \$3.1 million per acre), 1428 S Marengo Avenue (8.0 acres; \$4.06 million per acre), 747 Stoneman Avenue (0.44 acres; \$5.89 million per acre), and 107 S Chapel (0.23 acres, \$2.78 million per acre).

The added costs of redevelopment are particularly burdensome for affordable housing development, which cannot achieve market rents necessary to offset increased development costs. The land costs remain the same whether the housing is rent-restricted to be more affordable for low- to moderate-income households or whether the housing is market-rate.

Cost of Labor and Materials

Labor costs are another large factor in determining the overall cost of development and are set by the supply of workers and the demand for labor. Examples of labor costs include the wages of construction workers, architects, engineers, designers, developers, financiers, and investors.

Materials costs for housing development include the price of raw materials (like wood, concrete, steel, etc.) as well as lease rates of construction equipment (cranes, cement mixers, hauling). These factors influence the overall cost of development and thus the price or rents that need to be charged. Fluctuations in material costs can add cost and uncertainty to development projects.

According to Engineering News Record's Construction Cost Index, overall construction costs in the Los Angeles area increased 20% from November 2010 to November 2020. This index includes both a labor component (200 hours of common labor) and a materials component (25 cwt of fabricated standard structural steel).¹³

While construction costs for material and labor are large portion of development costs, these input costs are often determined at a regional level. We do not find any evidence of these inputs being higher in Alhambra compared to other cities in the region.

Labor Cost Impacts of Subsidized Housing

When more than \$1,000 of public funds are included in a project, California law requires prevailing wages to be paid.¹⁴ If federal funds are included in a project, Davis-Bacon wage requirements may apply. The development of regulated affordable housing is an interesting example where public funds are used to advance public goals, but one policy goal—paying prevailing wages—has the potential effect of limiting the output of the other policy goal—affordable housing—since development costs are increased from higher wages, and fewer housing units can be built with the same total amount of funding. In effect, a portion of the public subsidy goes toward

¹² CoStar is a private, third-party, proprietary real estate data provider, commonly used for market analysis in the real estate industry. Of its residential data, CoStar focuses on multifamily properties with four or more units, and industry trends. While CoStar is one of the best available sources of multifamily rent and vacancy data overall, the data has gaps and limitations that make it less reliable in areas with few existing buildings. Newer buildings and those that are professionally managed are more likely to have reliable rent and vacancy information, while smaller, older buildings may have incomplete data or be missing from the system entirely.

¹³ <https://www.enr.com/economics>

¹⁴ https://www.dir.ca.gov/OPRL/FAQ_PrevalingWage.html#q15

subsidizing prevailing wages. Prevailing wage policies have their own trade-offs and benefits, but the economics are clear that they can place an additional cost burden on affordable housing development.

Other Costs

In addition to land, labor, and material costs, the costs of development include the time and moneys required to interact with the government (taxes and permitting processes and fees). These are discussed in the Governmental Constraints on Development section.

Constraints Summary:

Marginally higher costs require marginally higher prices for housing to remain feasible. Where income growth does not keep pace with price increases, communities are increasingly cost burdened. High land costs are clearly impacting the cost of housing in Alhambra. The lack of vacant land also means that development in Alhambra is increasingly redevelopment, which is inherently more costly. While construction and land costs are high in Alhambra, there is nothing to indicate that local costs are disconnected from regional trends.

What can the City of Alhambra do?

Communities on the urban periphery have the ability to add land through annexation when land supply becomes a constraint. Alhambra is surrounded by built-out urban communities and does not have this option. Alhambra has the ability to influence the cost function in a number of ways. It can purchase land and sell or lease it at a discount price, donate publicly-owned land, reduce parking requirements, streamline processes, or adjust its fee structure to offset overall costs. It can also take measures to influence the income function by allowing more housing to be built on a given site (height and density bonus). While these actions are clearly “governmental” factors, they represent actions that offset nongovernmental factors the city has limited control over.

Relevant Housing Action Plan Programs: Program [130](#), Program [152](#), Program [163](#), Program [174](#), Program [2017](#), Program [263](#), Program [274](#), Program [285](#).

Timing and Density

A variety of factors can constrain the timing between project approvals and requests for building permits. This can be a product of a developers ability to get financing, shifts in market conditions, the sophistication of the developer in its ability to respond to corrections. In Alhambra a project has one year from planning approval to obtain a building permit or the planning approval expires. A one-year extension may be requested. After the Planning Commission approves a project, the decision is not final until a 10-day appeal period lapses and no appeals are filed. After the 10-days lapse and no appeal are filed, staff is ready to accept the plan check application. The actual time interval between approval and submittal of a plan check application is usually not as swift as 10 days and can be highly variable from applicant to applicant. The time interval is to a large extent based upon factors beyond the City’s control such as how long it takes the applicant’s design team to have drawings ready. However, the data from 2013-2021 suggests that the time interval tended to be 4-6 months for smaller projects and 1 year for larger jobs. Over the last planning cycle only 4% of projects expired without a plan check application being submitted within one year.

Among projects receiving planning approval since 2013, most projects are requesting densities at or near maximum allowed density. Because the cost of land is high in Alhambra, developments rarely go below 75 percent of max density. Where it does, it has most commonly been a small project that allows three or four units but built at two or three. Since 2018 only two projects have requested densities below 75 percent or max density. The sites inventory methodology assumes a maximum achievable density of 70 percent of maximum allowed density to reflect this trend.

Figure 55. Approved projects by Percent of Max Density Requested

Source: City of Alhambra

	Above 100%	At 100%	75% to 99%	Below 75%	Total
<u>2013-2017</u>	0	12	7	4	23
<u>2018-2021</u>	3	16	7	2	28

Zoning Code requirements is one of the man reasons projects are submitted below maximum density. AMC Section 23.20050(C) states that in the case of multiple dwelling on property, the number of units shall be determined by counting the number of kitchens, or the number of bedrooms divided by two. The number of bedrooms divided by two is key because a project built to maximum density must limit the number of bedrooms to an average of 2 bedrooms/unit, and a developer wanting more than an average of 2 bedrooms/unit (such as 3-bedroom units) would need to reduce the number of units. The Zoning Code update will remove this bedroom tie-in to density to remove this barrier.

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Availability of Financing

The availability of financing for housing is influenced by greater economic forces, like interest rates, credit markets, and other macroeconomic effects that are dictated by national polices and federal programs.

New Housing Development

The vast majority of new housing development is financed through borrowed money. This capital is necessary to pay for the costs of development and the lenders’ expected return on investment influences development feasibility, including defining the type of property that is built, the needed revenues (which affects the rents or prices that need to be charged), and the design and amenities that are offered. When real estate development cannot meet the return requirements, return-seeking capital will flow to other sectors such as stocks and bonds.

The availability of financing for new housing development is largely dependent on macroeconomic factors like interest rates and the availability of credit (how easy it is to get a loan). Better profitability or investment return opportunities in other types of development (such as office, commercial, industrial) can also influence the availability of financing for new housing development.

Homeownership

The majority of homeowners also borrow funds to purchase or renovate a home via a mortgage. Low interest rates on mortgages increase the amount that a potential buyer can borrow. When low interest rates and strong demand for buying a new home are met with a low supply of homes, for-sale prices will rise.

Under the federal Home Mortgage Disclosure Act (HMDA), lending institutions are required to disclose information on the disposition of loan applications and the income, gender, and race of loan applicants. The availability of financing for a home greatly affects a person’s ability to purchase a home or invest in repairs and improvements.

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Figure 56. Home Purchase and Improvement Loan Applications in Alhambra in 2017.

Loan Type	Total Applications	Percent Approved	Percent Denied	Percent Other
Conventional Purchase	565	82.1%	4.8%	13.1%
Government-Backed Purchase	28	75.0%	7.1%	17.9%
Refinance	1,084	67.3%	14.0%	18.6%
Home Improvement	151	67.5%	19.9%	12.6%
TOTAL	1,828	72.0%	11.5%	16.4%

Source: ECONorthwest analysis of Home Mortgage Disclosure Act Data, 2017

Notes: Percent approved includes loans originated, loans purchased by the institution, and loans approved but not accepted by the applicant. Percent other includes loans withdrawn or closed for incompleteness.

In 2017, a total of 1,828 applicants sought a home loan, either conventional or government-backed, to purchase homes, refinance, or do home improvements in Alhambra. The majority (59%) of all loan applications were for refinancing existing mortgages while about a third were for new purchases (either conventional or government-backed) and about 8% were for home improvement loans. Would-be buyers in Alhambra have high loan approval rates, with 82% of the conventional purchase applications and 75% of government-backed applications approved.

The data in Figure 56 suggest that loan denial rates in Alhambra are low and in line with typical benchmarks. This would indicate that home loans are accessible to local residents and should not be considered a constraint to access housing.

Loans for refinancing and home improvements have lower approval ratings, at roughly two-thirds of loans approved. Comprehensive data is not available on the reason for denials, but factors could include insufficient income or lack of home equity. These rates also remain in line with regional averages and should not be considered a constraint.

Foreclosures

Foreclosure occurs when households fall behind on one or more scheduled mortgage payments. The foreclosure process can be halted if the homeowner is able to bring their mortgage payments current. If payments cannot be resumed or the debt cannot be resolved, the lender can legally use the foreclosure process to repossess (take over) the home. If the home is worth less than the total amount owed on the mortgage loan, a deficiency judgment could be pursued. The homeowner would lose their home and would also owe the home lender an additional amount.

High rates of foreclosures can have an adverse impact on housing markets because they have a depressing effect on home values. According to RealtyTrac, the regional foreclosure rate in Los Angeles County was 0.01 percent in 2020. In the City of Alhambra only one out of every 15,479 homes are in foreclosure.

Constraints Summary:

Rates of financing approvals in Alhambra are in line with typical benchmarks across all loan types. Rapid price escalation over the last 10 years has driven foreclosure rates to historic lows, having no impact on the local housing market. The availability of financing and functionality of financial markets are not a constraint of housing.

What can the City of Alhambra do?

While local governments like Alhambra have little control over the financing industry or macroeconomic forces that affect the availability of credit, they can institute local programs and policies to help reduce the cost of developing or purchasing a home. Typically, these types

of financing benefits are offered to achieve some public goal, like increasing the homeownership rate (particularly for low-income homebuyers) or by developing regulated affordable housing. Examples include:

- Programs offering loans with generous or flexible terms can help to reduce the borrowing costs associated with buying or developing a home. These include: below-market interest rates, deferred interest payments, soft loans (for developments, loan payments and/or interest payments are cash-flow dependent), or government-insured loans (which transfer the borrowing risk from the bank to the government, in the event of non-payment), among others.
- Grants, or funds that are not expected to be repaid. These programs include down payment assistance for homeowners or grants to finance a development project the government wants to see built.
- Purchasing foreclosed or auctioned properties to sell at below-market rates.

Relevant Housing Action Plan Programs: Program 1, Program 141, Program 3128.

Community Influence on New Housing Development

It is common for community members to want to influence the types, sizes, and quantities of new housing development in their neighborhoods. This often occurs through public comment and testimony at public government meetings, but can also materialize in other ways. Numerous regulations and processes that govern and oversee new development are designed with public goals in mind, such as ensuring life and safety standards, ensuring environmental sustainability, or improving walkways or rights-of-way. However, these processes can be weaponized against new development, creating opportunities for community members to object to most new development.

Economically speaking, homeowners who have seen equity grow with their home values have a financial motive to prevent any new development from occurring that might reduce their home values.¹⁵ However, many homeowners have wide-ranging perspectives on what might actually influence their home values. In addition, financial motives are not the only factor that influences community opposition to new housing development; a few examples of the wide array of concerns about development include the following:

- Concerns about market-rate development's effects on **housing affordability** may lead to opposition of new market-rate housing development, or to new office development.
- Concerns about the built form's effects on **the environment**—such as traffic, air quality, open spaces, sunlight permeability, noise, etc.—may lead to opposition of all types of development.
- Concerns about development form (size, density, height, etc.) and its effects **on quality of life** (congestion, sunlight permeability, noise, population density) may lead to opposition of higher density development in favor of single-family homes.

¹⁵ Paavo Monkkonen & Michael Manville (2019): Opposition to development or opposition to developers? Experimental evidence on attitudes toward new housing, Journal of Urban Affairs, DOI: 10.1080/07352166.2019.1623684

Constraints Summary:

Some segments of the community are active opponents to development. Common concerns include traffic congestion, overcrowded schools, and strain on utility and emergency service infrastructure. In recent years, the public is increasingly concerned with ensuring that development is affordable to Alhambra residents. In Alhambra, all new residential construction except for single-family construction on an R-1 zoned lot must be approved by the Planning Commission. This serves as an extra delay for even small development projects that meet all codes and standards. Combined, these factors have resulted in a greater number of hearings, longer approval timelines for residential approvals, and added costs, resulting in a likely constraint on housing production.

What can the City of Alhambra do?

The best approach to mitigate community opposition to housing production is through outreach efforts. The city should consider new programs that educate the public on the tradeoffs of production and affordability, provide information on state law impacting housing approvals, and build community support for housing development at all income levels in the City.

Moreover, California State law promotes a variety of permitting/environmental review streamlining measures to help accelerate affordable housing development. AB1485 (2019) clarifies and expands SB 35 (adopted in 2017) by requiring local jurisdictions to approve more housing projects (up to 120% AMI) through a ministerial approval process within certain timeframes, and removed the Conditional Use Authorization requirement (or similar discretionary entitlements) which are granted by local Planning Commissions. Essentially this updated law builds on existing environmental streamlining laws by reducing barriers for developing low- to moderate-income housing.

The role of the Planning Commission in approving nearly all residential development in the city is addressed in more detail in the section below on Governmental Constraints. However, this approval structure gives an abnormal and out-measured influence of community opposition over housing production. The city should reconsider the type and scale of developments that are subject to Planning Commission approval.

Relevant Housing Action Plan Programs: Program [2118](#), Program [285](#), Program [296](#).

Governmental Constraints

This section describes the constraints on housing development that come from the government, with a particular focus on the City of Alhambra. Numerous other governmental influences on development come from state and federal policies, but the City of Alhambra can do little to affect these policies or how they impact development. Where local programs or policies can influence the effects imposed by state or federal policies, they are listed.

At the same time that the Housing Element is being updated, a parallel effort is underway to update the city's Comprehensive Zoning Code, which will be one tool to help to implement the Land Use decisions suggested in the Housing Element. The zoning code update began with an initial zoning code audit which identified inconsistencies, complexities, and overall aspects of the zoning code that could act as a constraint on development. These findings were summarized in the *Code Analysis Memo* (2020) by Miller Planning Associates. Where relevant, these findings help

inform the constraints analysis of the Housing Element with respect to land use controls and development standards. Key findings of the City's zoning code audit include:

- General complexity in the code that could be simplified
- Unclear presentation of allowed uses, definitions, and rules of measurement
- Insufficient form and design-related standards
- Potentially onerous parking requirements that may limit development to maximum densities
- An outdated approach to land use regulation
- Overreliance on discretionary review
- Unclear and inconsistent review and approval procedures

Land Use Controls

Land use controls dictate what can be built and where, as well as other considerations like allowed use, height, density, open space, and design, among others. This section lists four categories of land use control plans: the city's General Plan Land Use Element, Specific Plans in effect in the city, overlay districts, and the city's general development standards. These plans have direct impacts on the availability and affordability of housing in the city.

General Plan Land Use Element

The City of Alhambra's General Plan (including the Land Use Element) was updated in August 2019. Recalibrating the plan periodically helps ensure that it continues to be comprehensive, internally consistent, and takes a long-term perspective. The Alhambra General Plan is referred to as Vision 2040—A Community Mosaic, and this vision articulates Alhambra's values and priorities, resources, and future needs of residents. A range of policies and implementation actions outline how to achieve this vision. The vision focuses on promoting stable residential neighborhoods; improved commercial corridors including a mixture of retail, office, entertainment, and lodging meeting the needs of residents while also attracting visitors; industrial and commercial districts meeting local demand, creating good jobs, and taking advantage of the close proximity to downtown Los Angeles; and the establishment of a beautiful community with enhanced streetscapes, parks, and gateways. This plan provides guidance on how to direct local development and accommodate housing growth and provides a "constitution" for local land use decisions to address community issues and support the city's vision.

The Land Use and Community Design Chapter encompasses the Land Use Element and includes eight goals and an overall purpose to manage the use of land to enable growth and re/development to occur in an orderly fashion, sensitive to opportunities, and adhering to constraints imposed by the city's infrastructure and environmental and social resources. The General Plan's Land Use section discusses the preservation of residential neighborhoods, while emphasizing mixed-use and commercial opportunities along commercial corridors and nodes. This chapter supports efforts to enhance the community identity and appearance and retain traditional character in the downtown area.

The city's zoning regulations offer more detail on how to carry out the General Plan policies by providing direction on the types of land uses allowed in different zones across the city, as well as detail regarding development density, scale, and form. Two-thirds of the acreage in Alhambra is designed for residential uses of varying densities (Low Density Residential or R-1, Medium Density Residential or R-2, and High Density Residential or R-3 Zones), but among these zones, the

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largest amount of land is dedicated to the R-1 zone and the least amount is designated as the R-2 zone. Although Alhambra is the second-largest city in terms of land in the San Gabriel Valley, the area is largely already built out. Overall, the southern part of the city consists of lower-intensity development with low- to medium-density residential uses. The northern part has more high-density residential uses, especially in the areas nearby commercial uses.

Key development opportunities identified in the General Plan are summarized below.

- Adoption of design guidelines for the preservation of historic neighborhoods/districts.
- A vision for a mixed-use entertainment district on the eastern end of Valley Boulevard. The Valley Boulevard corridor has the potential to support activity nodes where economic or social resources/activities will be concentrated for the benefit of the community.
- A transition of the Garfield Corridor into a medical office corridor with high-quality job opportunities for the community. The Garfield Corridor currently has a mix of older multifamily housing and newer office developments. The new vision could phase out the older stock of multifamily residential units in this area of the city.
- The Industrial Corridor, located in the western part of the city, has a large concentration of industrial and commercial uses. The General Plan envisions media and high-tech industries moving into the area. The plan encourages regional commercial development along Fremont Avenue and more mixed-use developments in this section of the city.

Alhambra's land uses with allowed residential use are summarized in Figure 57 below.

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Figure 57. Description of the City of Alhambra Residential Land Use Designations and their Associated Development Standards and Allowed Uses

Source: Alhambra General Plan, 2019

Land Use Designation	Zone	Allowed Uses	Maximum Height Allowed
Low-Density Residential	R-1	<ul style="list-style-type: none"> Single-family housing units (1-5 units per acre) 	<ul style="list-style-type: none"> 2 stories, 25 feet; 15 feet for accessory structures
Medium-Density Residential	R-2	<ul style="list-style-type: none"> Single-family detached units, duplexes, triplexes, and fourplexes (6-12 units per acre) 	<ul style="list-style-type: none"> 2 stories, 25 feet; 15 feet for accessory structures
High-Density Residential	R-3	<ul style="list-style-type: none"> Multifamily housing types, including garden style units and town houses (13-24 units per acre); densities up to 30 units per acre are allowed on larger sites; densities up to 43 units an acre allowed on large sites in the Central Business District. 	<ul style="list-style-type: none"> 3 stories, 35 feet; 15 feet for accessory structures.
General Commercial	CPD	<ul style="list-style-type: none"> Mostly commercial and office uses allowed or conditionally allowed. Conditional: Residential uses, when proposed in conjunction with commercial uses. 	<ul style="list-style-type: none"> 5 stories, 55 feet; 3 stories, 40 feet if adjacent to a residential zone or use.
Central Business District	CBD	<ul style="list-style-type: none"> All commercial uses except for fortunetelling businesses, computer game and internet access centers, and office uses on the first floor of buildings with frontage on Main Street; higher residential density on larger lots. This area provides a multi-purpose residential and commercial district that meets the service needs of surrounding neighborhoods. 	<ul style="list-style-type: none"> 5 stories
Office Professional	PO	<ul style="list-style-type: none"> Professional, financial, administrative, medical, and general business office use; urban residential (15-75 units per acre) with minimum lot size 	<ul style="list-style-type: none"> 5 stories, 55 feet; 3 stories, 40 feet if adjacent to a residential zone or use

Maximum densities permitted in the high-density R-3 zone vary according to location or parcel size. For example, property with frontage only on Curtis or Electric Lanes have a maximum of 12 units per acre, while properties larger than 20,000 square feet can be developed at up to 30 units per acre. Maximum density is extended to 43 units per acre on sites greater than 20,000 square feet that are located in the Central Business District.¹⁶

¹⁶ Defined as the area bounded by Atlantic Boulevard, Commonwealth Avenue, Chapel Avenue, and Woodward Avenue.

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Residential uses (multi- and single-family) are also conditionally permitted in the Commercial Planned Development (CPD) and Central Business District (CBD) zones. In the CPD zone, residential uses must be proposed in conjunction with commercial uses. Such residential uses are subject to the development regulations associated with the R-3 zone. The Valley Boulevard Specific Plan provides for up to 43 units per acre, allowing both single-family and multifamily developments.

The Community Identity and Urban Fabric section of the plan describes the Residential Neighborhoods and the importance of retaining the unique housing architecture in Alhambra, a town referred to as the “City of Homes” with a rich array of historical development reflective of different time periods. For example, early 1900s development included Craftsman, Foursquare, Mediterranean, Spanish Colonial Revival, and Victorian architectural styles, while 1920-30s development sprinkled throughout Alhambra consisted mostly of Craftsman, Tudor Revival, and Spanish Colonial Revival architectural styles.

Figure 58. Map of General Plan Land Uses in Alhambra

Source: Alhambra General Plan

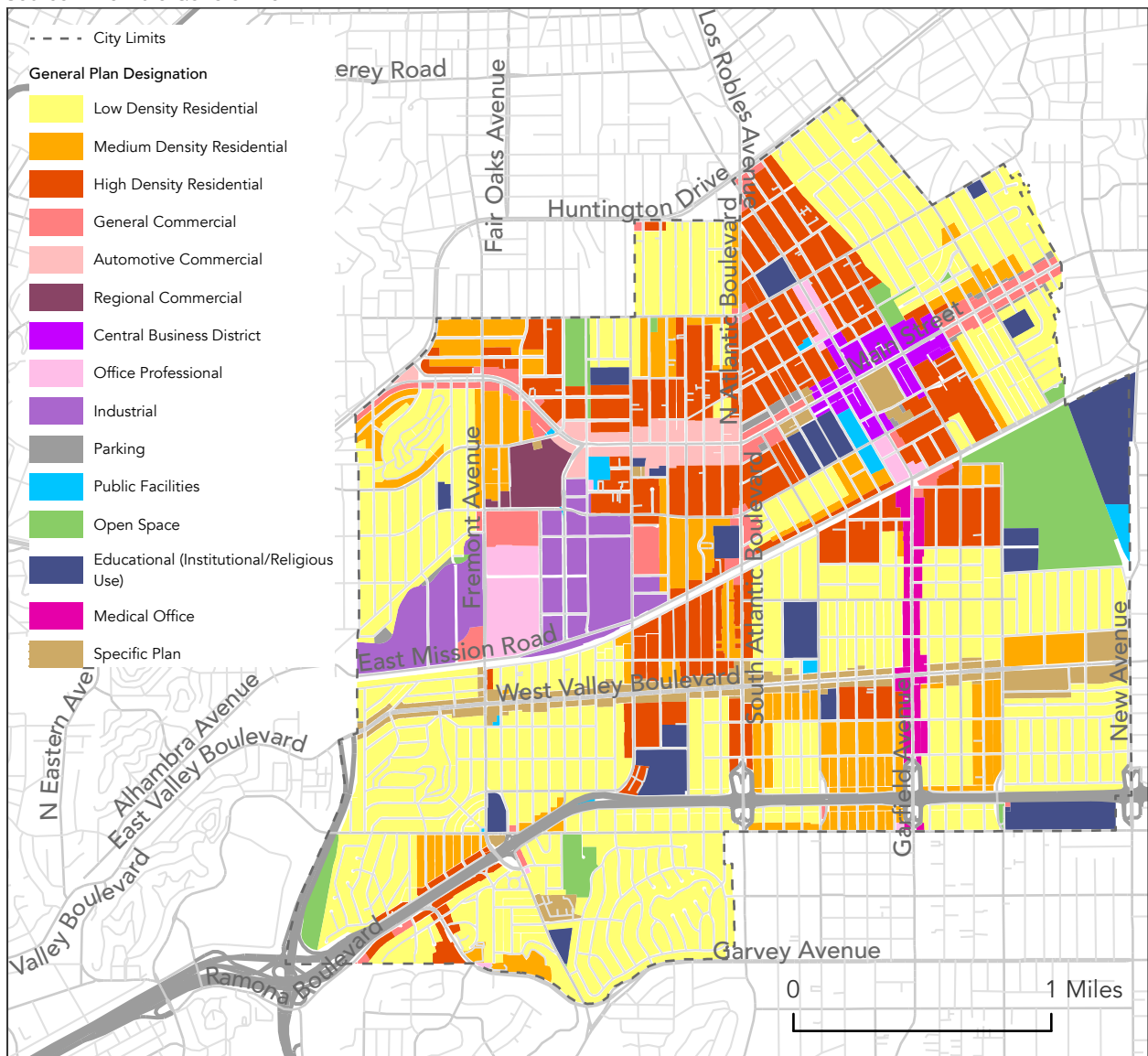
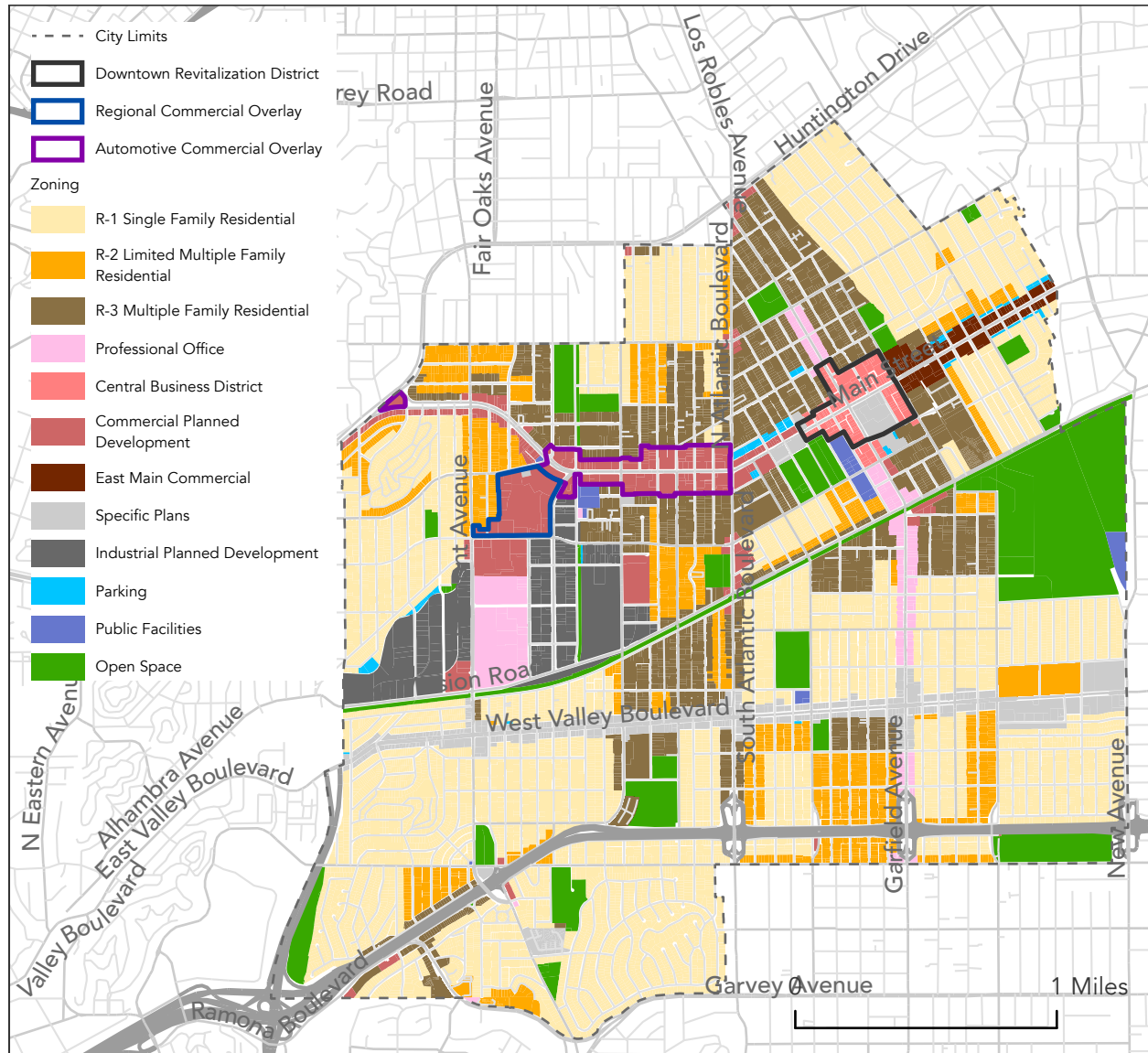


Figure 59. Map of Alhambra Zoning, Overlay Districts, and Specific Plans

Source: Alhambra General Plan



New guidelines for siting lower income RHNA require that sites have an allowable density of at least 30 units per acre and be between .5 and 10 acres in size. This is because affordable housing typically requires higher densities and larger sites to be financially viable. Based on the city’s zoning ordinance, only sites within the R-3, CPD, CBD, and RSP¹⁷ that are greater than 0.5 acre¹⁸ and not within 50 feet of a lower density zone can accommodate this type of density. Under existing zoning, all parcels not meeting these criteria would not be considered suitable to accommodate lower-income housing need without significant parcel aggregation.

Specific Plans

The City of Alhambra has adopted a master plan and several specific plans that provide for further variety in residential types and locations. Specific Plans are a land use planning tool that set

¹⁷ In the Valley Boulevard Specific Plan.

¹⁸ Minimum lot size for residential uses in RSP is 40,000 square feet

planning policies for a specific area within a community. It creates a nexus of place-specific policies to the General Plan. The City of Alhambra has adopted 10 Specific Plans dating back to 1990.

Alhambra's Specific Plans as described in the General Plan include (in alphabetical order):

2300 Poplar Specific Plan (SP-5) was approved in 2011. SP-5 allows a 0.66-acre, vacant site to be transformed into a commercial, mixed-use development consisting of 104,000 square feet of self-storage and 4,300 square feet of leasable commercial space. The self-storage component consists of interior-accessible, climate-controlled self-storage units. In addition, when constructed the complex will contain open and covered parking spaces on the ground floor of the building.

2400 Fremont (SP-9) (Midwick Collection) was approved in 2015. It allows a project of up to 70 residential units, including 28 town homes and 37 new, single-family homes. It retains five existing homes that have been rehabilitated.

2500 West Hellman Avenue (SP-7) was approved in 2012, covering approximately 1.25 acres of land. It transformed three older, functionally obsolete retail/commercial structures and a former gasoline service station site into a 135,000 square-foot self-storage development with a customer leasing-office and an option to provide an on-site residence for the management.

Acacia and Marengo (SP-8) was approved in 2012. It transformed an underutilized site into a planned residential community with 18 attached, three-story town homes.

Alhambra 5th and Main Specific Plan (SP-3) (Main Street Collection) was adopted in 2006. SP-3 transformed the site from an institutional use (previously the Alhambra Public Library) into a planned, mixed-use development with 86 for-sale condominium units, 8,200 square feet of leasable commercial/office space, and a parking garage.

Alhambra Gateway Walk (SP-10) was approved in 2003. It transformed 2.69 acres of blighted, vacant land into a planned residential community with 129 high-end condominiums.

Alhambra Pacific Plaza (SP-6) was approved in 2011. This project replaced an existing low-density, full-service grocery store located at 300 West Main Street, between 3rd and 4th streets. It revitalized the property with a higher-density development that includes 120 condominium units with ground floor retail/grocery and restaurant uses.

Alhambra Place (SP-2) was originally approved in 2006 and amended in 2014. It covers the 11-acre block located at the juncture of Garfield Avenue and Main Street. SP-2 consists of a planned, mixed-use development with 260 luxury apartments and 140,000 square feet of commercial, restaurant, and retail space. It also has a parking structure with subterranean and ground-level parking for visitors and upper-level, secured parking for residents.

Casita de Zen (SP-4) was approved in 2010. It transformed this area along the north side of Main Street into a planned mixed-use development with 94 for-sale condominium units and 5,000 square feet of leasable commercial space. The complex also contains at-grade and subterranean parking.

Downtown Specific Plan Overlay was adopted in 2005, pursuant to the West Main Street Corridor Master Plan. This plan is aimed at providing a pedestrian-friendly downtown that offers residents dining, shopping, entertainment, employment, and other amenities within short walking distance. The West Main Street Corridor Master Plan identified for principal opportunity sites. As of 2020 three of these sites have been fully redeveloped.

Valley Boulevard Corridor Specific Plan (SP-1) was adopted in 1990. The Valley Boulevard corridor consists of 130 acres along 3.1 miles of Valley Boulevard. SP-1 was designed to guide reuse and new development along the corridor, and provides guidelines to ease traffic congestion, enhance the corridor’s physical appearance, and ensure that new development is sensitive to adjacent land use.

Figure 60. Map of Alhambra Specific Plans

Source: Alhambra General Plan



The two large-scale plan areas with remaining residential capacity are the Valley Boulevard Corridor Specific Plan and sites within the Downtown Specific Plan Overlay.

Housing capacity within Specific Plan areas are considered opportunities to meet the city’s RHNA allocation. Most of Alhambra’s Specific Plans are for site or project-specific areas that have already been developed. Specific Plans appear to have been an effective tool in facilitating development. Capacity remains in the Valley Boulevard Specific Plan and the Downtown Specific Plan Overlay will have the greatest impact on the Housing Element. The Specific Plans can also help guide redevelopment of existing areas, and redevelopment, done in a way to minimize or mitigate

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displacement, can offer opportunities for providing more residential housing needed by the community. However, the VBSP was adopted in 1990, and many of the standards in the plan are antiquated. Large site requirements and height limits may be preclusive to development. Moreover, among the 130 acres in the VBSP, only 12.5 acres have an RSP designation that allows for housing.

Overlay Districts

The current zoning code has three overlay districts: The Downtown Revitalization Overlay District, the Automobile Commercial Overlay District, and the Regional Commercial Overlay District. Mixed-use developments, including housing, are conditionally permitted consistent with R3 in the Downtown Revitalization Overlay District and the Automobile Commercial Overlay District areas, so these overlays are not prohibitive to housing development. However, the Regional Commercial Overlay District—which is comprised mostly of the Costco and Target Sites—has a minimum size requirement of five acres which would be prohibitive to most housing development. This condition could potentially prohibit infill development on the site. However, this property is a productive commercial use with surface parking consistent with standard parking ratios for similar development. Land within the Regional Commercial Overlay should not be considered a market-supported candidate for redevelopment over the planning period.

Development Standards

The city regulates the type, location, density, and scale of residential development primarily through the Zoning Ordinance (Title 23 of the Municipal Code).

In addition to the Valley Boulevard Specific Plan, residential uses are allowed and encouraged to locate in the R-1, R-2, and R-3 Zones, and are allowed conditionally in the CBD, CPD, and to a lesser extent the PO¹⁹ Zones.

¹⁹ Residential development in the PO zone requires a 30-acre minimum lot size.

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Figure 61. Development Standards in Residential Zones

Source: Alhambra, California Code of Ordinances, last updated in 12-9-19

R-1 Zone	
Maximum density	1-5 units per acre
Maximum building height	2 stories, 25 feet; 15 feet for accessory structures
Maximum floor area ratio	0.35 - Lot area less than 10,000 square feet 0.325 - Lot area between 10,000 and 19,999 square feet 0.30 - Lot area 20,000 square feet and over
Minimum front yard	25 feet for structures up to 20 feet in height. If street has right-of-way of less than 60 feet, 55 feet from centerline of street for structure up to 20 feet in height. For structures over 20 feet in height, an additional 5 feet of front yard or a 40° angle from the front property line, whichever is greater, shall be provided for that portion of the structure above 20 feet.
Minimum rear yard	Main Buildings: 20% of lot depth, up to 15 feet Accessory Structures: 3 feet
Minimum side yard	Main Buildings: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor 10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet
Maximum lot coverage	50% if all buildings on the property are one story, 40% if any buildings or portion thereof contain more than one story; accessory buildings may not occupy more than 40% of the required rear yard area
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three
Minimum habitable space for each dwelling occupant	150 square feet
Minimum distance between buildings	6 feet

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R-2 Zone	
Maximum density	6-12 units per acre
Maximum building height	2 stories, 25 feet; 15 feet for accessory structures
Maximum floor area ratio	0.35
Minimum front yard	Average of the front setbacks of the two adjacent properties, with a minimum of 20 feet. Minimum of 50 feet from centerline of street if street has right-of-way less than 60 feet.
Minimum rear yard	Main buildings: 10 feet Accessory structures: 3 feet
Minimum side yard	Main Building: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor 10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet
Maximum lot coverage	45%; accessory buildings may not occupy more than 40% of the required rear yard area
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three
Minimum habitable space for each dwelling occupant	150 square feet
Minimum distance between buildings	6 feet if only one or neither building is used for residential purposes. 10 feet if both buildings are used for residential purposes.

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R-3 Zone	
Maximum density	13-24 units per acre (higher densities, up to 43 units per acre, are allowed on larger lots)
Maximum building height	<p>3 stories, 35 feet for high density residential in General Plan, except that 6 stories, 75 feet shall be permitted in the area bounded by the centerline of the following streets: Woodward Avenue on the north, Chapel Avenue on the east, Commonwealth Avenue on the south and Atlantic Boulevard on the west. 6 stories shall also be permitted on properties designated as high density residential, located on a major arterial street and within 1300 feet of an existing or proposed freeway interchange as depicted on the General Plan land use map.</p> <p>For that portion of a property which is within a 50 foot radius (less street or alley right-of-way) of properties zoned R-1 or R-2 the height limit shall not exceed the maximum height of the applicable adjacent zone.</p> <p>The prior building height restriction notwithstanding, for those properties which are across a street from R-1 or R-2 zones, the building height shall be not higher than the height allowed by a 50 degree angle measured from the front property line.</p>
Maximum floor area ratio	<p>0.60 for all living area (excluding non-living areas and garages), for lots up to 19,999 square feet</p> <p>0.70 for all living area (excluding non-living areas and garages), for lots 20,000 square feet and larger</p>
Maximum building length	95 feet
Minimum front yard	Average of the front setbacks of the two adjacent properties, up to a maximum of 30 feet, with a minimum of 20 feet. Minimum of 50 feet from centerline of street if it has right-of-way less than 60 feet. For properties which have their front yards on Curtis or Electric Lanes, 15 feet.
Minimum rear yard	<p>Main Buildings: 10 feet. For properties which have rear yards on Curtis or Electric Lanes, 15 feet.</p> <p>Accessory Structures: 3 feet. For properties which have rear yards on Curtis or Electric Lanes, 15 feet.</p>
Minimum side yard	<p>Main Buildings: 5 feet for each interior side yard, increased by 1 foot for each story or partial story above the first floor</p> <p>10 feet for street side of a corner lot, or 40 feet from centerline of street where lot sides upon street having a right-of-way of less than 60 feet. For properties on Curtis and Electric Lanes, 10 feet.</p> <p>For a reversed corner lot, a side yard equaling the required front yard setback of the first lot to its rear.</p> <p>Accessory Structures: 3 feet, except that for a corner lot, the street side setback shall be 10 feet</p> <p>For a reversed corner lot, the street side setback shall be at least the required front yard setback for the key lot</p> <p>A garage with the automobile entrance facing a street shall be set back 20 feet from the street side property line, or 50 feet from the centerline of the street if it has right-of-way of less than 60 feet</p>

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Minimum distance between buildings	6 feet if only one or neither building is used for residential purposes. 10 feet if both buildings are used for residential purposes.	
Maximum lot coverage	55% for all structures	
Minimum dwelling unit size	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 800 square feet Three-bedroom unit: 1,100 square feet More than three bedrooms: 1,100 square feet plus 150 square feet for each additional bedroom over three	
Minimum habitable space for each dwelling occupant	150 square feet	
For land use conversions from low or medium density residential development (less than 18 units per acre) or any other use other than high density residential to high density residential development (18 units or more per acre) along streets classified as Major Arterials in the General Plan, the following additional development standards shall also apply:	Minimum Lot Area: 12,000 Sq. ft. Minimum Street Frontage: 75 ft.	

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Central Business District Zone, Commercial Planned Development Zone (if different for CPD)²⁰

Maximum density	Consistent with the regulations of the R-3 zone	
Maximum building height	10 stories, 115 feet ^{1, 2}	
Maximum floor area ratio	Lot area less than 10,000 sf: 1.0 (0.75) Lot area between 10,000 and 19,999 sf: 1.5 (1.0) Lot area between 20,000 sf and one acre: 2.0 (1.25) Lot area larger than one acre: 3.0 (2.0)	
Maximum building length	Not listed	
Front yard	Not listed	
Rear yard	Not listed ^{3,4}	
Side yard	Not listed ³	
Minimum distance between buildings	6 feet	
Maximum lot coverage	Not listed	
Minimum dwelling unit size	Not listed, consistent with R-3	
Minimum habitable space for each dwelling occupant	Not listed, consistent with R-3	

²⁰ Residential uses in these zones are required to be built in conjunction with commercial uses (mixed-use).

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Office Professional (PO Zone)	
Maximum density	Not listed, N/A
Maximum building height	5 stories, 55 feet (if adjacent to a residential zone or use, 3 stories, 40 feet) 1, 2
Maximum floor area ratio	Lot area less than 19,999 sf: 0.45 Lot area between 20,000 and 39,999 sf: 0.6 Lot area between 40,000 and 59,999 sf: 1.0 Lot area 60,000 sf and over: 1.5 Urban residential uses if included on a site with a minimum size of 30 acres: 3.28
Maximum building length	Not listed
Front yard	20 feet for buildings up to two stories or 26 feet in height. 25 feet for buildings higher than 26 feet. Projections to within 10 feet of the front property line may be permitted for up to 25% of the front building length. The front yard shall be maintained in landscaping. Urban residential uses if included on a site with a minimum size of 30 acres: 10 feet from back of curb.
Rear yard	10 feet for the first story up to 14 feet in height, 30 feet for the second story up to 26 feet in height and 40 feet thereafter. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Side yard	5 feet for the first 30 feet from the front property line. 10 feet if adjacent to a residential zone or public right-of-way. Urban residential uses if included on a site with a minimum size of 30 acres: 0 feet.
Minimum distance between buildings	6 feet or 3 feet for urban residential uses if included on a site with a minimum size of 30 acres
Maximum lot coverage	75% (for urban residential uses included on a site with a minimum size of 30 acres)
Minimum dwelling unit size for urban residential uses included on a site with a minimum size of 30 acres	Efficiency unit: 400 square feet One-bedroom unit: 500 square feet Two-bedroom unit: 860 square feet Three-bedroom unit: 920 square feet
Minimum habitable space for each dwelling occupant	Not listed

¹ Where a rear lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (MC 23.42.040(D))

² Where an interior side lot line of an office, commercial or industrial zoned lot abuts a residential zone, no building or other facility constructed on such lot shall exceed the maximum height prescribed for the abutting residential zone. (AMC 23.42.040(E))

³ Wherever a rear lot line or an interior side lot line of a parcel which does not generally require a rear or side yard abuts any portion of a residential zone, there shall be provided on the lot, along that portion of the lot line, a yard with a minimum width equal to the side yard which would be required on the lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(A))

⁴ Wherever the rear lot line of a parcel which does not generally require a rear yard abuts the rear lot line of a residential zone, there shall be provided on the former lot, along the abutting portion of its rear lot line, a rear yard with a minimum depth equal to that which would be required on the former lot if it were located in the abutting residential zone, or ten feet, whichever is greater. (AMC 23.42.050(B))

Open Space

To improve the living environment of residential neighborhoods, communities typically require housing to have a certain amount of open space, such as yards, common space, and landscaping. In Alhambra, open space is reflected in setbacks and lot coverage requirements for single-family developments, and minimum required open space areas for multi-family developments. For single-family homes, buildings must be in compliance with the lot coverage standard for the

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respective zone (for example, the R-1 zone maximum lot coverage is 50 percent of the lot if all the buildings on the property are one story and 40 percent if any buildings (or part of a building) include more than one story while the R-3 zone maximum lot coverage is 55% for all structures). Most of this open space is located within the required front and back yards.

The R-2 and R-3 zones require developments to provide common open space for residents. Units with two or more bedrooms must provide 400 square feet of common open space; those with fewer than two bedrooms are required to provide 300 square feet of common open space. All areas designed for use as common open space must have a minimum dimension of 15 feet. In addition, recreational amenities are required on all projects of four or more units. The amenities include one or more of the following: swimming pool, spa, recreation room with ping-pong table and lounge furniture or billiard table, children's play equipment, barbecue and picnic table, tennis court, shuffleboard, weight room or sauna. Only one of the listed amenities is required. These amenities serve to provide a high-quality of life for residents, providing a space for children to play, and rapport to develop among neighbors. Developers may opt to include a less expensive recreational amenity in the project, such as a gazebo or barbeque area. The cost impact to an affordable housing development would be minimal. Developments that are directly accessible to a public park may be granted up to a 50-percent reduction in the common open space requirement.

Private open space (indoor or outdoor) is devoted to the recreation and leisure use. The Zoning Ordinance does not require the provision of private open space and will reduce the common open space requirements proportionally when private open space is provided, up to a maximum reduction of 50 percent. Alhambra's open space standards mirror those of similar nearby communities and are not considered a constraint to development. Alhambra's open space standards are, in general, slightly less than those of nearby Monterey Park and Baldwin Park.

Second Units (ADUs)

California Assembly Bill 68 (AB 68) builds upon recently-adopted state laws to provide more flexibility as to where and how ADUs can be created. AB 68 also places additional restrictions on local governments from adopting ordinances that would hinder the creation of ADUs. A summary of recent changes to the city's ADU ordinances is below.

Expansion of Ministerial Approval. AB 68 requires ministerial approval, rather than a discretionary approval process, for most ADU types. Under new state law, local agencies are required to ministerially approve at least one ADU and one Junior ADU (JADU) per lot.

Removal of Owner-Occupancy Requirement. New State law eliminates the requirement for owner occupancy of either the primary dwelling or the ADU. The bill requires that ADUs be used for rental terms of at least 30 days by requiring the local government mandate 30-day minimum rentals for ADUs.

Prohibition on Local ADU Laws. To further remove barriers in the creation of ADUs, AB 68 prohibits local governments from enacting ADU ordinances that would do one the following:

- Impose requirements on lot coverage or minimum lot size.
- Allow more than 60 days to ministerially approve an ADU or JADU permit if there is an existing dwelling on the lot.
- Require replacement parking when a garage, carport or covered parking structure is demolished to create an ADU or is converted to an ADU.

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- Require a setback for ADUs within existing structures, and new ADUs located in the same location and footprint as existing structures, and no more than a four-foot side and rear yard setback.
- Set a minimum ADU size that does not allow an ADU of at least 800 square feet and 16 feet in height.

The City of Alhambra allows all ADUs and JADUs in all of its residential zones including single-family and multifamily zones and mixed-use zones. All residential lots can have one ADU and one JADU. Multiple ADUs may be allowed within the portions of multifamily structures that are not used as livable space. Local agencies must allow at least one of these types of ADUs and up to 25 percent of the existing multifamily structures. Also, up to two detached ADUs are allowed on a lot with existing multifamily dwellings that are subject to height limits of 16 feet and 4-foot rear and side yard setbacks. All ADUs are required to have a living/sleeping area, a kitchen or kitchenette, and a bathroom including a shower or bathtub. ADUs are no longer subject to lot coverage or floor area ratio regulations.

An ADU is an attached or detached residential dwelling unit which provides complete independent living facilities for one or more persons, and includes permanent provisions for living, sleeping, eating, cooking, and sanitation on the same parcel where an existing single-family or multifamily is located.

Figure 62. ADU Development Standards

	Detached	Attached	Multifamily
Maximum Height	25 ft (or 2 stories)	25 ft (or 2 stories)	16 ft.
Size	Not to exceed 1,200 sq. ft.	Cannot exceed 50% of the main dwelling unit	Up to 25% of the existing multifamily dwelling unit if it's a conversion ADU
Design	ADU shall match the architectural design of the existing or proposed main dwelling	ADU shall match the architectural design of the existing or proposed main dwelling	N/A
Setbacks*	4 ft. from side and rear yard; 6 ft. from the existing main dwelling	4 ft. from side and rear yard; 6 ft. from the existing main dwelling	4 ft. from side and rear yard
Parking**	1 parking space if not within a one-half mile of public transit station or bus stop.	1 parking space if not within a one-half mile of public transit station or bus stop.	1 parking space if not within a one-half mile of public transit station or bus stop.

City of Alhambra ADU development Standards

Note: * Existing accessory structures and single-family homes that are converted into ADUs are exempt from meeting the required setbacks; however, any expansion shall meet the 4 ft. side and rear yard setbacks.

** In multifamily zones, for accessory structures or a portion of the existing residence that is converted into an ADU, no additional parking is required. An ADU cannot have direct access to a garage if the proposed or existing garage has less than three spaces.

A JADU is a small living unit created within an existing main dwelling. The JADU must have the same living provisions required in an ADU; however, a bathroom is not required. If a bathroom is not provided, the JADU shall have direct access into the main dwelling unit. If a JADU requires expansion, the expansion shall not exceed 150 square feet.

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Figure 63. Junior ADU Development Standards

	JADU
Size	Not to exceed 500 sq. ft
Setbacks	4 ft. from side and rear yard
Parking*	Parking is not required

City of Alhambra ADU development Standards

Note: * An ADU cannot have direct access to a garage if the proposed or existing garage has less than three spaces.

Parking Requirements

Parking is one of the most influential factors relating to the cost and density of new housing development. It has a large impact on development feasibility because it competes for site area with residential uses, thereby limiting the value that can be generated from more rental units. More rental units not only generate more rent revenue but also reduce per-unit fixed costs, such as land. Moreover, parking tends to add costs without generating its own source of revenue.

City parking standards for residential developments are tailored to the vehicle ownership patterns associated with different residential uses. The Zoning Ordinance requires parking based on the number of units on the property. Parking requirements for residential uses are listed in Figure 64.

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Figure 64. City of Alhambra Zoning Code Parking Standards

Source: Alhambra, California Code of Ordinances, last updated in 12-9-19

Zone	Dwelling Type	Off Street Parking Standards ^A
R-1	Single-family dwellings	2 covered parking spaces per unit; plus 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit
R-2	Single-family dwellings and apartment units	2 covered parking spaces per unit; plus 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit; a two-car garage shall be required for front units and at least one garage space shall be required for rear units.
R-3	Single-family dwellings, apartment units, and residential condominiums	2 covered spaces within an enclosed garage for each unit; plus 1 additional uncovered space for each 500 sf in excess of 1,000 sf per unit;
	Senior citizen unit	1 covered space for each unit
	Guest parking	A minimum of one guest parking space is required for three units. Additional units will require additional guest spaces based on the following ratios: 1 space (covered or uncovered) for each 5 units on local residential streets; 1 space for each 4 units on collector streets; 1 space for each 3 units on arterial streets.
	Residential hotels, boarding houses, and similar uses	1 covered space for each sleeping room or 1 for each 100 sf. of sleeping area, where sleeping rooms do not exist.
	Sanitariums, Rest Homes	1 space for each 3 beds. Minimum of 3 spaces per establishment.
R-1, R-2, R-3 Zones	Accessory Dwelling Units	1 open or enclosed parking space per bedroom. For purposes of this section, a studio unit shall count as having one bedroom. No parking is required for an ADU in any of the following instances: (1) The ADU is located within one-half mile of a public transit stop or station. (2) The ADU is located on a parcel that has been designated on a local, state, or national register of historic places or districts. (3) The ADU is an integrated ADU. (4) When on-street parking permits are required, but not offered to the occupant of the ADU. (5) When there is a car share vehicle operation parking hub or station located within one block of the ADU.

^A California's Parking Statute enacted in 2015 (AB 744), limits parking requirements for development containing affordable housing and located near transit. No more than 0.5 parking spaces per bedroom can be required if the development includes 11% very low-income units or 20% low income units and is within one-half mile of a transit stop. TOD rental housing affordable to lower income households or senior housing development with sufficient transit access cannot be required to provide more than 0.5 parking spaces per unit. Special needs affordable rentals within one-half mile of transit cannot be required to provide more than 0.3 parking spaces per unit.

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The city's parking standards are generally comparable, but slightly more restrictive than peer communities including San Gabriel, Monterey Park, Baldwin Park, and South Pasadena.

Figure 65. Comparative Parking Standards for Peer Communities

Source: ECONorthwest review of local codes (2021)

Jurisdiction	Single Family	Multi Family	Guest	Senior
San Gabriel	2 spaces (covered)	2 garage spaces per unit.	1 space per 3 dwelling units	0.75 spaces per unit.
South Pasadena	2 spaces (covered)	1-bed unit: 1 space per unit. 2+bed unit: 2 garage spaces.	1 space per 2 dwelling units	0.5 spaces per unit. 1 additional space per 4 units.
Monterey Park	2 spaces (covered)	4 or fewer bedrooms: 2 garage spaces per unit. 5 or more bedrooms: 3 garage spaces per unit. ^c	3 or fewer bedrooms: 1 space per 2 dwelling units. 4 or more bedrooms: 1 space per 1 dwelling unit.	Unknown
Baldwin Park	2 spaces (covered)A	1 carport space per dwelling unit plus one other space per dwelling unit.	1 space per 3 dwelling units	1 space per dwelling unit.
Alhambra	2 spaces (covered)B	2 covered parking spaces per unit plus additional spaces for larger units. ^d	1 space per 3 dwelling units. Additional units will require additional guest spaces based on the following ratios: 1 space (covered or uncovered) for each 5 units on local residential streets; 1 space for each 4 units on collector streets; 1 space for each 3 units on arterial streets.	1 space per dwelling unit.

A 1 additional space required for 5 bedrooms or more

B 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit

C 1 additional open parking space required for each bedroom above 5.

D 1 additional uncovered space for each 750 sf in excess of 2,000 sf per unit in R-2, Plus 1 additional uncovered space per for each 500 sf in excess of 1,000 sf per unit in R-3.

The city offers applicants the ability to request reductions in the parking requirement if different uses can prove they have different time-of-day demands for parking facilities. However, the city does not have a track record of applying this adjustment to residential uses.

The Planning Commission can reduce parking requirements for projects utilizing the flexible development standards allowed in Section 23.20.080 of the Alhambra Municipal Code in areas zoned CBD or R-3 and where the permitted height is 75 feet, including any of the following:

- Spaces may not be required to be enclosed,
- One-third of the spaces may be compact size,
- The number required for one-bedroom units may be reduced by up to 25 percent, and
- The number required for efficiency units may be reduced by up to 33 percent.

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The Planning Commission may reduce the number of parking spaces required for senior citizen housing by up to 50%, or 75% for low- and moderate-income senior citizen housing based upon findings that the proposed development is located in proximity to commercial activities and services and is adequately served by public transportation systems.

The Planning Commission may permit up to one-half of the required parking spaces to be uncovered for dwelling units provided exclusively for low- and moderate-income and senior citizen households.

The Planning Commission may count city-owned public parking facilities within 400 feet of a use (excluding residential parking), measured from the use's nearest public access to such parking, in waiving all or part of the parking requirements if the sum of the required parking for such facilities is less than the existing parking provided.

Flexibility in Development Standards

Section 23.20.080 of the Alhambra Municipal Code states that the special objectives of the flexible development standards in the R-3 zone are to:

- (1) Promote higher-quality multifamily residential development by providing a more flexible approach to development standards;
- (2) Encourage innovative design and efficient use of land which might otherwise be stifled by standard, rigid development standards;
- (3) Encourage the consolidation of parcels;
- (4) Permit developments to be judged on individual merits and overall impacts on the site and the neighborhood.

Flexibility is offered for standards set out in the R-3 Zone (Chapter 23-20), standards set out in the General Development Standards (Chapter 23-42), General Design Standards (Chapter 23-44), and General Parking Standards (Chapter 23-52-060). Developments must have a minimum net parcel area of 40,000 square feet to utilize the flexible development standards.

Flexible development standards are implemented through the planned residential development permit process and approved by the planning commission. The city's 2013-2021 Housing Element included policies and a program to continue to promote the use of flexible development standards in the R-3 zone.

SB330 State Override on Local Laws

Passed in 2019, SB330 makes numerous changes to the Permit Streamlining Act and the Housing Accountability Act. These rules limit the ordinances and policies that can be applied to housing developments. The law defines "housing development" as residential and mixed-use projects where two-thirds of the square footage is dedicated to residential units and transitional or supportive housing projects.

The legislation also establishes a new preliminary application process where a housing development is considered to have completed the preliminary application process by providing information with respect to site characteristics, project description, environmental concerns, and other factors. Housing developments will only be subject to standards in effect when it completes its preliminary application. Developers will have 180 days to submit a development application. It also makes additional streamlining amendments including reduced timeframes of housing development approval and creating a limit on the number of hearings allowed.

Consistency with Other Plans

The city's development standards are mostly consistent with the General Plan. We identified one exception where there is inconsistency in stated height limits in the CBD zone.

Constraints Summary:

General Code Usability:

The *Code Analysis Memo* (2020) by Miller Planning Associates found many issues in Alhambra's existing zoning code that contribute to a constraint on development. Factors identified include inconsistent organization, general complexity, inconsistencies in allowed uses, and lack of clear definitions and rules of measurement. **Taken together these issues add time, cost, and uncertainty for code users which can be a constraint on housing development.** [Program 21 will adopt the Comprehensive Zoning Code Update to remove this constraint.](#)

Density:

The City of Alhambra only allows residential densities greater than 30 units per acre on sites that are high-density residential (R-3, CBD, CPD, PO, and RSP), are greater than 20,000 square feet, and are not in proximity to a lower-density designation. Excluding recently developed Specific Plan areas (which are not likely to be redevelopable), these conditions apply to only 253 individual parcels totaling 295 acres of land. Most of this land is located on high-value commercial properties (i.e., Costco, Home Depot, Auto Commercial) or on sites that already have residential development, making redevelopment more challenging. High-density land is also concentrated in downtown. Because most land in Alhambra does not allow for densities greater than 30 units/acre, density is a likely constraint on affordable housing development. [The recent pattern has been for projects to be able to develop near maximum densities. However, Program 19 will implement the City's rezoning program that will increase allowed densities across most of the city. This will create a disconnect between existing development standards and density, resulting in a constraint on housing production and diversity of housing types.](#)

Specific Plans:

The city has developed various Specific Plans which has helped to clarify the complexities of the city's code. The city wants to try to eliminate this use of Specific Plans in the future by addressing the constraints and complexities of its zoning code. The only Specific Plan with meaningful land suitable for redevelopment is the VBSP. This plan was adopted in 1990 and many of its standards are antiquated ~~and may be limiting development potential.~~ For example, the plan has a 40,000 sq. ft. minimum lot size requirement for residential uses. Only three blocks with the RSP designation have ~~contiguous~~ contiguous parcels capable of meeting this threshold. [The Valley Boulevard Specific Plan has certainly constrained residential development by limiting the amount of land available for residential uses along an underutilized corridor with high transit access. Program 19 directs the city to replace the Valley Boulevard Specific Plan.](#)

Overlay Districts:

Housing is permitted in overlay districts consistent with the base zone. There is nothing inherent in the overlay districts that is prohibitive to housing development and they should not be considered a constraint on development.

Development Standards:

The city's development standards include minimum setbacks, height limits, maximum floor area ratios (FARs) and lot coverage and minimum size for dwelling units, open space, and minimum parking requirements. We found that collectively, the city's development standards will make it difficult to reach maximum allowed densities and place additional financial burden on development. Height limits, open space and parking requirements are the greatest constraint.

Height Limits. The city uses a graduated height limit where height defaults to a lower zone within 50 feet of a lower zone. For example, a high-density parcel adjacent to a low-density zone would have the area within 50 feet of the low-density zone limited to only two stories or 25 feet. This condition impacts a large share of high-density land in Alhambra. Combined with minimum unit sizes and FAR, height limits will prohibit development from reaching maximum densities in zones that will have increased density under the city's rezoning program.

Commercial Zones. With the exception of the PO zone, residential development in commercial zones requires residential to be developed in conjunction with a commercial use. This constrains the ability to reach maximum density in residential zones. Program 21 will remove this requirement and allow 100% residential uses in commercial zones.

Parking Requirements. Parking requirements are one of the primary factors influencing site utilization and financial feasibility. Parking is costly to build and consumes land that could otherwise be used for housing. When minimum parking requirements are too high, they can be a constraint on development by reducing redevelopment potential and limiting the redevelopment of irregular sites. While the city's parking standards are generally in line with peer cities, the region as a whole has been slow to adjust to changes in parking demand. The city's parking requirements are slightly higher than similar jurisdictions and covered parking (garages) are required for multifamily development. This space requirement and costs associated with structured (garage) parking could reduce the number of units feasible on a site, discourage smaller units, limiting housing choice, and result in higher priced units only being feasible, perpetuating lack of affordability. The zoning code provides options to reduce parking requirements for projects that meet certain criteria (addressed in section above), but these incentives are limited to the R-3 zone and require discretionary approval from the Planning Commission, therefore, existing standards should be considered a constraint for multifamily development. Programs 27 and 21 require the analysis and amendment of parking standards to remove as a constraint.

Inconsistency with the General Plan:

The maximum height limit in the Central Business District is listed at five stories in the Land Use Element of the General Plan, but the current code lists a limit of 10 stories and 115 feet. This is expected to be addressed in the next Zoning Code update.

Collective Assessment of Constraints:

Under proposed rezoning to densities ranging from 30 to 64 units per acre in high density residential areas and commercial zones, the combination of allowed uses, height limits, FAR, minimum unit size, and parking and open space requirements under existing land use controls will make developing near maximum densities both physically and financially infeasible. These factors will make only projects with the highest income potential (rent or sales price) feasible, impacting affordability and a diversity of housing choice.

What Can the City of Alhambra do?

The city has already recognized challenges and constraints in its land use controls and is in the process of completing a comprehensive zoning code update. Many of the issues identified in this section will be addressed through this process. The city is also in the process of evaluating whether there is a need for a new set of design guidelines providing direction on architectural themes and elements associated with new development and redevelopment of the East Main Corridor. Whether through these efforts or other programs (to be determined in the housing plan), potential constraints on development could be mitigated through:

- Improve the organization and usability of the zoning code
- Update ordinances to be consistent with state law
- Update the Valley Boulevard Specific Plan or replace with an appropriate zoning classification
- Amend development standards to allow for development to maximum densities
- Study the appropriateness minimum parking requirements and make reductions where possible.
- Expand the use of parking reductions and/or waivers
- Address inconsistencies with the General Plan.

Relevant Housing Action Plan Programs: Program 5, Program 6, Program [912](#), Program [152](#), Program [163](#), Program [185](#), Program [196](#), Program [2118](#), Program [241](#), Program [263](#), Program [296](#), Program [3929](#), Program [3400](#).

Residential Planned Development

The Residential Planned Development (RPD) Permit is the name of the entitlement application involving residential development projects (this should not be conflated with Planned Unit Developments). The RPD permitting process is required for nearly all residential projects and this process largely requires review and approval by the city's Planning Commission. Design review is embedded in the RPD permitting process and this can add extra time and additional costs for applicants.

The only exceptions for full RPD permitting are residential development projects within the 1) R-2 and R-3 zones including one-story additions of less than 50% of existing floor area (these development requests would be processed by Zoning Clearance); or 2) R-1 zone including new single-family residential development with second-story additions of any size, and one-story additions of more than 50% of the total residential building (requires a RPD Permit but the RPD Permit is processed administratively); and 3) R-1 zone with one-story additions of less than 50% of the total residential building area (processed by Zoning Clearance).

Constraints Summary:

Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. Through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development.

Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.

What can the City of Alhambra do?

To mitigate this constraint, the City should reconsider which developments are subject to Planning Commission approval. The city has started down this path. In early 2020, the city began implementing RPD requirements of the Code to allow administrative review of permit applications in the R-1 zone rather than a RPD permit process, subject to Design Review Board and Planning Commission discretionary review. This update is a step towards right-sizing the discretionary review with the scale of change in the built environment. Additional efforts to ameliorate development uncertainty and risk especially for projects small in scale should be considered as a way to better meet the community's housing needs. As a part of the city's comprehensive zoning code update, it will be exploring how the number of projects that require discretionary review can be reduced through new design standards and requirements in the Code.

Relevant Housing Action Plan Programs: Program [163](#), Program [296](#).

Density Bonus

The City of Alhambra offers housing density bonuses (Code Section 23.20.060) consistent with the state law outlined in California Government Code § 65915. This Code essentially helps expedite local residential development and promotes affordable housing. Eligible applicants are allocated a density bonus for projects providing at least ten percent of the total units as lower income households (defined as 80% AMI), or five percent of the total as very low-income households, or for a senior citizen housing development (defined by California Civ. Code § 51.3). The City of Alhambra Code Section 23.20.060 E provides detail on the calculation of the density bonus units and outlines the range of percentages allocated for different eligible projects. Generally, the greater the share of lower-income housing units, the greater the percentage of density bonuses. For example, a project with ten percent low-income units would gain a 20 percent density bonus allocation while a project with 20 percent low-income units would gain a 35 percent density bonus allocation.

Additional updates are expected for California Government Code § 65915 in response to AB 1763 approved by the Governor on October 9, 2019. The expected update generally allows housing development located within one-half mile of a major transit stop and meeting all housing affordability requirements to have a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. Essentially, housing projects with a minimum of 80 percent low-income units and up to 20-percent moderate-income units are eligible for a density bonus of up to 80 percent of the maximum allowed density or a density bonus with no limit if located within one-half mile of a major transit stop. Also, eligible applicants qualify for reduced parking requirements and a height increase of up to three stories or 33 feet when located within one-half mile of a major transit stop.

State law also now requires the replacement of affordable units in redevelopment projects and additional incentives for projects that are 100 percent affordable. While the City of Alhambra enforces the State Density Bonus requirements, its ordinance will require an update to be in compliance with State law.

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There has only been one project applicant (application filed on 2/12/2021) submitting a request to use density bonuses. This application is requesting bonus units for a project referred to as the Mariposa Affordable Housing site that will include 50 units, 100% affordable, and will utilize density bonuses provided under AB 1763. Since the site is within one-half mile of a major transit stop (Atlantic/Main) there is no maximum density applicable.

Constraints Summary:

The city's density bonus ordinance is not currently in compliance with State law. However, the city enforces the minimum requirements of current State law. Density bonuses are an opportunity to support affordable housing development, but the city has not seen any utilization of the density bonus in recent years. The density bonus itself is not a constraint on development, but there may be other factors in the city's development standards that are limiting the ability of developers to utilize density bonuses.

What can the City of Alhambra do?

There are two paths forward for the city to improve its density bonus program. The first will be to update the current ordinance to be compliant with state law and institute a process to identify and adopt conforming amendments in the future within a reasonable time frame. The second path is to explore how other market or regulatory factors interact with the density bonus to understand why it is not being utilized in the community.

Relevant Housing Action Plan Programs: Program [129](#), Program [152](#).

Inclusionary Housing Ordinance

The City of Alhambra adopted an Inclusionary Housing Ordinance in September 2020 that is applicable to five (5) or more units. City Council held the first reading of the proposed ordinance on September 14, 2020. The ordinance includes a maximum 15-percent affordability requirement at low- and moderate-income levels for all projects with seven or more units. Credit is given for including a larger number of units at progressively lower income levels. An in-lieu fee is also allowed with limitations.

1. Applicability and Exemptions: The Ordinance will apply to all new residential construction projects consisting of seven (7) or more units in a single-family or multifamily setting, unless exempt by state law. This threshold will apply to for-sale or rental units equally.

The units developed as Inclusionary must be dispersed throughout the Residential Development, and of a similar size, bedroom count, location, and generally comparable to the market rate units in terms of design, appearance, materials and finished quality. Units developed on site must be constructed concurrently with the market rate units.

2. Inclusionary unit requirement: For all applicable projects, the Ordinance will require a total of fifteen percent (15%) of all newly constructed dwelling units be offered for sale or for rent to low- and moderate-income households comprising of:

- 1) Nine percent (9%) of all required inclusionary units to be sold or rented to low-income households (80% of LA County area median income or AMI); and,
- 2) Six percent (6%) of all required inclusionary units to be sold or rented to moderate-income households (120% of LA County AMI).

Rental units must remain affordable in perpetuity; for-sale units must remain affordable for 45 years.

In calculating the required number of Inclusionary Units, fractional units of .75 or above will be rounded up to a whole unit if the Residential Development consists of ten (10) to twenty (20) units; fractional units of .50 or above will be rounded up to a whole unit if the Residential Development consists of twenty-one (21) or more units.

3. Incentives for greater affordability: The Ordinance will provide incentive credits when a required inclusionary unit is offered to a lesser income bracket than required.

- 1) If Very-Low-Income units are provided in lieu of required Low-Income units, a credit of 1.5 units to every 1 unit shall be provided.
- 2) If Very-Low-Income units are provided in lieu of required Moderate-Income units, a credit of 2 units to every 1 unit shall be provided.
- 3) If Low-Income units are provided in lieu of required Moderate-Income units, a credit of 1.5 units to every 1 unit shall be provided.

4. Alternative to providing Inclusionary Housing Units: The Ordinance will provide a series of three alternatives to requiring the inclusionary housing units being built. They are in-lieu fee, off-site units, and land donation.

In-lieu fee. Applies to developments of 5-20 units and is payable for all or some of the required units. The fee is based on a fee schedule established by resolution of the City Council.

Off-site units. A developer may satisfy the inclusionary requirement by providing affordable units, in whole or in part, by constructing or substantially rehabilitating the required number of units at a site different than the site of the Residential Development.

Land Donation. The Developer may satisfy the requirement of providing Inclusionary Units as part of the Residential Development, in whole or in part, by a conveyance of land to the city for the construction of the required Inclusionary Units.

5. Inclusionary Housing Trust Fund: The IHO will create an Inclusionary Housing Trust Fund to receive the in-lieu fees paid by developers, instead of creating affordable units and/or units sold to an above moderate-income purchaser, provided that the sale shall result in a recapture by the city or its designee of a financial interest in the unit equal to (1) the difference between the initial affordable sales price and the appraised value at the time of the initial sale, and (2) a twenty percent share of any appreciation.

This fund can be used for a Revolving Loan Program, housing vouchers, or similar programs, or for quarterly reporting on revenues and expenditures available.

Figure 66 presents a comparison of Inclusionary Housing Ordinances in the Region. Across most categories, Alhambra's structure is less restrictive. Alhambra has a higher exempt threshold (7 units), lower fees, offers credits, and has generally lower affordability thresholds.

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Figure 66. Comparison of Inclusionary Housing Ordinances in the Region

Source: ECONorthwest

	Alhambra	South Pasadena ^A	Pasadena	West Hollywood	Santa Monica
Standard Set Aside	15%	15%	20%	20%	25% - 40%
Applicable Project Size	7+ units	4+ units	All	2+ units	4+ units
Set-aside Structure (Rent)	<i>Same for rent and sale</i> 9% @ LI or below 6% at MI or below Credits for higher percentages at lower income levels.	10% @ LI or below 6% @ MI or below Credits for higher percentages at lower income levels.	5% @ VLI or below 5% @ LI or below 10% @ MI or below	<i>Same for rent and sale</i> 2-10 units: 1 unit @ MI or below 11-20 units: 20% @ MI or below 21-40 units: 20% @ MI or below, 30% if units are small. 41+ units: 20% @ MI or below,	4-15 units: 20% @ LI or below 10% @ VLI or below, or 5% @ ELI. 16+ units: 25% @ LI or below 15% @ VLI or below, or 10% @ ELI or below.
Set-aside Structure (Sale)	at lower income levels.	15% @ MI or below.	20% @MI or below	20% of total floor area if units are small.	4-15 units: 20% @ MI or below 16+ units: 25% @ MI or below
In-Lieu Fee	Rent: \$0.89-\$14.30 Own: \$1.88-\$30.00	Rent: \$20.00-\$30.00 Own: \$30.00-\$40.00	Rent: \$1.19-\$33.76 Own: \$16.86-\$63.89	\$13.63-\$29.23	Rent: \$35.70 Own: \$41.70
Incentives and Bonuses	None	Density Bonus Reduced Fees Reduced Parking	Density Bonus Reduced Fees	Density Bonus Reduced Parking	Density Bonus Reduced Fees

ELI = Extremely Low Income

VLI = Very Low Income

LI= Low Income

MI = Moderate Income

A South Pasadena IHO adopted May 2021

Constraints Summary:

Because the City of Alhambra's IHO is relatively new, there is not information on the potential impacts on actual development feasibility. However, IHO policies have been effective in delivering affordable housing in the region. While Alhambra's IHO does not offer associated incentives, its structure is less restrictive than existing or proposed IHOs in the region.

What can the City of Alhambra do?

The city should be actively monitoring its IHO through development applications and conversations with developers. It should be prepared to make amendments that respond to changes in market conditions or evidence that the current structure is misaligned with the market.

Relevant Housing Action Plan Programs: Program 5.

Growth Controls and Local Ordinances

The City of Alhambra has the following housing-related Local Ordinances that can affect housing development. These local ordinances have been discussed in their respective places in this document.

- Short-Term Rentals: The City of Alhambra is in the process of considering a short-term rental ordinance. Short-term rentals are units that are rented by visitors to the community and are typically defined as properties that are rented for a period of less than 30 days. Online platforms that have made it easier to promote and book peer-to-peer rentals have resulted in a proliferation of short-term rental units in Southern California. Short-term rentals have yet to have meaningful impacts on Alhambra's housing market. For example, in 2021 we found only 300 units listed publicly in the city²¹, representing less than one percent of the local housing stock. The City of Alhambra is committed to limiting the impacts of short-term rentals on the supply of housing for community residents, and the adoption of a short-term rental ordinance will limit future market disruption.
- Transitional Housing: See page [9999.101](#)
- Supportive Housing: See page [102-9999](#).
- Mobile Homes and Manufactured Housing: See page [9595.97](#)
- Single-Room Occupancy Housing (SRO): See page [100100.102](#)
- Accessory Dwelling Units: The city's Accessory Dwelling Unit ordinance, Chapter 23.57, was nullified by the changes to State ADU laws on January 1, 2020. The city is presently applying the State ADU laws in processing ADU applications. The city has a draft ADU ordinance already approved by the Planning Commission that needs to be adopted by the City Council that brings its ADU policies in line with state requirements. This adoption process was delayed by the COVID-19 crisis. See page [9595.97](#)
- Emergency Shelters: See page [9696.98](#)
- Reasonable Accommodations: See page [101101.103](#)
- Inclusionary Housing: See page [8888.91](#)

²¹ Airbnb search, February 1, 2021.

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- **Historic Preservation:** Since 2017, the city has been working to establish a historic preservation program for the purpose of preserving the cultural identity of Alhambra as a diverse residential and commercial city with distinct single-family neighborhoods. This program is still in process, including determinations for eligibility criteria, resource inventory, and review process. Historic preservation programs are good at protecting cultural identity and the architectural consistency and integrity of the community and can be value-enhancing programs. However, preservation programs may also limit redevelopment potential. If too comprehensive, a historic preservation program in Alhambra may emerge as a constraint on housing production.

Constraints Summary:

Potential constraints for each ordinance summarized above are discussed in their respective referenced sections. Several ordinances (emergency shelters, ADUs) require updates to be consistent with State Law, but the city currently defaults to enforce State requirements. Generally, the city's adopted ordinances serve to facilitate housing development, and are not a constraint.

What can the City of Alhambra do?

The city should continue to monitor how its policies and ordinances impact development feasibility and production. It should maintain relationships with local developers, organizations, and non-profits to continually inform its processes.

Relevant Housing Action Plan Programs: Program 5, Program 8, Program [263](#).

Providing for a Variety of Housing

State law requires jurisdictions to provide the opportunity for development of a variety of housing types including single-family housing, multifamily housing, mobile and manufactured homes, and accessory dwelling units. These housing types are either permitted or conditionally permitted in Alhambra by zone, as defined in the Alhambra Zoning Ordinance. The law further defines a variety of housing to meet the needs for specific demographic groups including senior housing, residential care facilities, emergency shelters, transitional housing, supportive housing, farmworker housing, and single-room occupancies. These housing types are also either permitted or conditionally permitted by zone in the Alhambra Zoning Ordinance, though some types, such as transitional or supportive housing, depend on the form of the development as they can vary.

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Figure 67. Permitted Residential Uses by Zone

Source: City of Alhambra Planning Department

Residential Use	R-1	R-2	R-3	PO	CPD	CBD	RC	Valley SP	IPD
Single-Family Dwelling	P	P	P	*	C(1)	C(1)	C(1)	P	*
Multifamily	*	P (no condos)	P	C(2)	C(3)	C(3)	C(3)	P	*
Mobile Homes and Manufactured Housing	P	P	P	*	C(3)	C(3)	C(3)	P	*
ADUs	P	P	P	*	P	P	P	P	*
Senior Housing	Could be permitted as a group home or residential care facility 6 or less	Could be permitted as a group home or residential care facility 6 or less	P, C	*	C(3)	C(3)	C(3)	C	*
Residential Care Facilities	P	P	P	*	C(3)	C(3)	C(3)	C(3)	*
Emergency Shelters	*	*	*	*	*	*	*	P	P
Transitional Housing	P	P	P	*	C(3)	C(3)	C(3)	P	*
Supportive Housing	P	P	P		C(3)	C(3)	C(3)	P	
Farmworker Housing	*	*	*	*	*	*	*	*	*
Single-Room Occupancy	*	*	P	*	*	*	*	*	*

P = Permitted Use

C = Conditional Use

A = Accessory Use

* = Not permitted

(1) N conjunction with, and accessory to, a permitted or conditionally permitted use.

(2) Urban Residential uses permitted on a site with a minimum of 30 acres and with a density ranging from 15 to 75 units per acre.

(3) When proposed in conjunction with commercial uses.

Multifamily Housing

According to the California Department of Finance's (DOF) Population and Housing Unit Estimates, approximately 12% of Alhambra's total housing units in 2020 were structures with two to four units and 33% were larger multifamily housing with five or more units. Multifamily housing is permitted outright in Alhambra in the R-2 and R-3 zones and in the Valley Boulevard Corridor Specific Plan, and permitted with a conditional use in PO, CBD, CPD, and RC zones.

Maximum allowed densities for multifamily housing range from 12 units per acre in the R-2 zone to 43 units per acre in areas of R-3 and other zones including CPD, CBD PO, and Valley Boulevard Corridor Specific Plan.

Mobile Homes and Manufactured Housing

In 2020, less than one percent (0.1%) of Alhambra's total housing units were mobile homes or manufactured housing. The city's Zoning Ordinance includes mobile homes in the definition of single-family dwelling as: *"a building containing one dwelling unit constructed entirely on-site, or a unit constructed and/or assembled off-site, including mobile homes manufactured and certified under the National Mobile Home Construction and Safety Standards Act of 1974 and located on a permanent foundation system approved by the Building Department."*

Thus, mobile or manufactured homes are permitted where single-family dwellings are also permitted. In Alhambra, these housing types are allowed outright in R-1, R-2, and R-3 zones and in the Valley Boulevard Corridor Specific Plan, and are conditionally allowed in CPD, CBD, and RC zones. The Alhambra Zoning Ordinance meets all legal requirements for mobile and manufactured housing types.

In addition, the city has a Mobile Homes and Manufactured Housing Ordinance, which describes this housing allowance as follows:

Individual mobile homes installed on a permanent foundation are treated as single-family dwellings. They are permitted by right in the R-1, R-2, R-3 and residential areas of the Valley Boulevard Corridor Specific Plan).

Second Units (ADUs)

Chapter 23.57 of the Alhambra Zoning Ordinance includes development standards for accessory dwelling units (ADUs). Initially adopted in 2005, the code was amended and replaced in December 2017 to meet new state requirements. ADUs, or second units, are permitted outright on lots 6,500 square feet or greater with an existing or proposed single-family dwelling in the R-1, R-2, and R-3 zones.

ADUs must also meet the design and development standards of the underlying zone. In R-1, the lot with the ADU must abut property with a zone other than R-1 and no shared boundary with the Open Space zone. ADUs are permitted through a ministerial review process under a zoning clearance permit. Recent legislation since 2017 make amendments to ADU standards. For example, applicants for an ADU in Alhambra must be owner-occupants of the existing unit on the lot. New legislation will require the city to remove this requirement. The city currently enforces the minimum state requirement but will need to update its ADU ordinance to be in compliance with State law.

Senior Housing

The Alhambra Zoning Ordinance allows development of multifamily senior housing in zones that allow multifamily development. Senior housing developments are also subject to additional density bonuses and additional use allowances based on the zoning district. For example, senior housing developments that include housing for lower-income households have a density bonus of 20%. Additionally, in the R-3 zone, additional uses may be allowed as part senior housing planned developments including specific commercial or retail services.

Reductions in parking spaces for senior citizen units also apply in certain zones. For example, in the R-3 zone, 2 covered spaces per unit are required for non-senior housing, and 1 covered space per unit for a senior citizen unit. In other zones with a proposed senior housing development, Planning Commission may reduce the number of required spaces by 50% or up to 75% for income-restricted housing (low- and moderate-income).

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Residential Care Facilities

The Alhambra Zoning Ordinance defines residential care facilities as “any family home or group care facility for 24-hour non-medical care of persons in need of personal services, supervision or assistance essential for sustaining the activities of daily living or for the protection of the individuals, excluding jails and other detention facilities.” Residential care facilities serving six or fewer people are allowed outright in all residential zones in Alhambra, consistent with State regulations. Larger residential care facilities are conditionally allowed in R-3, PO, CPD, and CBD zones and the Valley Boulevard Corridor Specific Plan. The process to obtain a conditional use permit for a residential care facility follows the same standards as other similar uses, and the average processing time is approximately three months.

Figure 68. Summary of Approvals for Group Homes

Source: City of Alhambra

Small residential care facilities of 6 or less:	
Permitted by right	R-1, R-2, R-3 zones.
Conditionally permitted	PO, CPD, CBD, VSP zones.
Larger residential care facilities of 7 or more:	
Permitted by right	Not permitted by right in any zones.
Conditionally permitted	R-3, PO, CPD, CBD, VSP
Rest homes:	
Permitted by right	Not permitted by right in any zones.
Conditionally permitted	R-3, PO, CPD, CBD, VSP

The Zoning Code should be amended to allow large family care homes by right where multi-family is allowed by right instead of requiring a Conditional Use Permit or not being allowed.

Emergency Shelters

The Alhambra Zoning Ordinance defines an emergency shelter as “housing with minimal supportive services for homeless persons that is limited to occupancy of six months or less by a homeless person. No individual or household may be denied emergency shelter because of an inability to pay.” Chapter 23.86 of the Zoning Code defines the regulations for permitting and development of emergency shelters in the city.

As noted in the previous housing element, Alhambra updated the Emergency Shelter code to comply with SB 2 in 2008, which required changes to the permitting process and allowing emergency shelters outright in at least one zoning district. Alhambra allows emergency shelters outright in the Valley Boulevard Corridor Specific Plan (VSP) and the Industrial Planned Development (IPD) zoning districts.

“AMC Section 23.86.040(B): Emergency shelters are allowed by right in the VSP (Valley Boulevard Corridor Specific Plan) zone and the IPD (Industrial Planned Development) zone, provided they meet the minimum property development standards of the zone in which then are located.”

These parcels are located along transportation corridors and therefore have access to services. Emergency shelters are not permitted in all parts of the VSP or IPD zone. The following location requirements apply and have the effect of limiting shelters to only one remote area for each of the zones.

“AMC Section 23.86.040(C)(1): Shall be permitted in the VSP zone only when located in the area bounded by Vega Street to the west and New Avenue to the east.

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"AMC Section 23.86.040(C)(2): Shall be permitted in the IPD zone only when located in the area bounded by Orange Street to the north, Mission Road to the south, Raymond Avenue to the east, and Palm Avenue to the west."

"AMC Section 23.86.040(C)(3): There shall be no other emergency shelters within 300 feet of the subject property, nor shall the proposed emergency shelter be located within 1,000 feet from any residential care facility, public park or public school (not including trade or technology schools), as measured from property line to property line."

"AMC Section 23.86.040(C)(4): Shall be located within one-quarter mile of a designated public transportation stop."

~~They are subject to specific locational requirements within these zoning districts, defined in Chapter 23.86 as:~~

- ~~▪ Permitted in the VSP zone only when located in the area bounded by Vega Street to the west and New Avenue to the east.~~
- ~~▪ Permitted in the IPD zone only when located in the area bounded by Orange Street to the north, Mission Road to the south, Raymond Avenue to the east, and Palm Avenue to the west.~~
- ~~▪ No other emergency shelters within 300 feet of the subject property, nor shall the proposed emergency shelter be located within 1,000 feet from any residential care facility, public park, or public school (not including trade or technology schools), as measured from property line to property line.~~
- ~~▪ Located within one-quarter mile of a designated public transportation stop.~~

Other development standards for emergency shelters in Alhambra include:

- Maximum stay. No person(s) shall stay within an emergency shelter for more than six months from the date of their acceptance into the emergency shelter. In addition, no person(s) shall be re-admitted to the same emergency shelter within five calendar days of being discharged.
- Maximum number of beds. No more than 12 beds shall be provided on the entire property where the emergency shelter is to be located. Beds shall be provided for men and women in separate and secured areas. No such separation shall be required when beds are located in a bedroom intended for a single family.
- Maximum density. The maximum resident density shall be one resident per 150 square feet, up to a maximum of 12 residents.
- Waiting area. If the intake of clients occurs on site, there shall be provided an on-site client intake and waiting area in a location not adjacent to the public right-of-way, that is fully screened from public view, and provides consideration for weather events including shade and rain cover. The intake and waiting area shall be suitably sized to prevent queuing in the public right-of-way or within any parking lot but shall occupy a maximum area of 400 square feet.
- Operating hours. Each emergency shelter shall establish and maintain set hours of operation for client intake and discharge. These hours shall be clearly displayed at the entrance to the emergency shelter at all times. In the event an emergency shelter client is socially disruptive, a threat to the safety of others, or in violation of the emergency

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shelter facility rules during non-business hours of operation, the emergency shelter management may proceed with discharging that client immediately.

- On-site personnel. On-site personnel shall be provided during all hours of operation when clients are present. A designated area for on-site personnel shall be located near the main entry to the facility for the purpose of controlling admittance into the facility and providing security.
- Client restrictions. The emergency shelter operator shall not intake any person as a client of the emergency shelter that the operator knows is wanted by the police or knows has been convicted of committing any violent offense.
- Personal storage. A private storage area or closet shall be provided with each on-site bed. At no time shall any client of an emergency shelter be allowed to keep on-site any alcoholic beverages or store any type of illegal substances, illegal drugs, and/or weapons of any kind.
- Personal space. A minimum of 30 square feet of personal space shall be allocated for each client bed.
- Restroom and shower facilities. A communal restroom facility with at least two toilets, one shower, and one sink shall be provided for every 12 clients residing at an emergency shelter.
- Common space. Interior and/or exterior common space for the on-site clients to congregate shall be provided on the property at a ratio of not less than 15 square feet per occupant or a minimum overall area of four hundred square feet, whichever is greater.
- Telephones. Each emergency shelter shall provide telephone(s) for the use of the on-site clients.
- Food service areas. The emergency shelter operator shall be responsible for ensuring that any food service or on-site meal preparation areas comply with all applicable requirements of the city and the Los Angeles County Health Department.
- Laundry facilities. The emergency shelter shall provide laundry facilities adequate for the number of clients.
- Outdoor storage. Any provision of on-site outdoor storage shall be fully screened from all public rights-of-way and on-site parking lots.
- Parking. Off-street parking shall be provided at the ratio of one on-site parking space for every five beds, one space for each bedroom intended for families, plus one additional space per staff member. No client shall sleep or live within a motor vehicle on the property of an emergency shelter at any time.
- Refuse. There shall be provided a refuse storage area that is completely enclosed with masonry walls not less than five feet high with a solid-gated opening and that is large enough to accommodate a standard sized trash bin adequate for the parcel. The refuse enclosure shall be accessible to refuse collection vehicles.

In addition, the city has a standalone Emergency Shelter Ordinance that was passed in 2011, and emergency shelters are allowed by right in the VSP and IPD zone, pursuant to geographical limitations within the zone. However, it was identified in the city's 2020 Analysis of Impediments,

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that the current ordinance includes requirements that are not permissible under state law²², including:

- “Emergency shelters must not be located within 1,000 feet of any residential care facility, public park or public school.
- Emergency shelters must be located within one-quarter mile of a designated public transit stop.
- AB 139 (Emergency and Transitional Housing)—parking for shelter staff only; definition of sufficient capacity
- AB 101 (Low Barrier Navigation Center)—housing for homeless or at-risk homeless while waiting to transition to permanent housing”

The city will need to revise its Emergency Shelter Ordinance to be in compliance with State law.

In the VSP and IPD zoning districts where emergency shelters are allowed, there are 27 total parcels that cover about 28 acres. Of these parcels, those zoned VSP are occupied by old, small shopping centers with retail and restaurant uses, as well as parking lots. The parcels zoned IPD have existing industrial uses and parking lots. In these areas, three of the structures are vacant, with a total of 10,080 vacant square feet. These vacant and underutilized properties would accommodate emergency shelter need.

[Transitional and Supportive Housing](#)

Transitional Housing

Transitional housing is defined as buildings configured as rental housing developments but operated under program requirements that call for the termination of assistance and recirculation of the assisted unit to another eligible program recipient at some predetermined future point in time, which shall be no less than six months (California Health and Safety Code Section 50675.2[h]). State law requires local jurisdictions to address the provisions for transitional housing.

Pursuant to State law, transitional housing constitutes a residential use and therefore local governments cannot treat it differently from other types of residential uses (e.g., requiring a use permit when other residential uses of similar function do not require a use permit). Transitional housing provides additional housing options for people with disabilities, a protected class of the population.

The city has a Transitional Housing Ordinance in place, which describes transitional housing allowances as follows:

Small transitional housing serving six (6) or fewer people is considered a standard residential use and is permitted in all zones where residential uses are permitted (R-1, R-2, R-3 and residential areas within the Valley Boulevard Corridor Specific Plan). Transitional housing for seven (7) or more people that is operated as a residential care facility is conditionally permitted in the R-3 zone. If operated as a boardinghouse, it is permitted by right in the R-3 zone.

²² City of Alhambra. 2020 Draft Analysis of Impediments, Page 68. April 2020.

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The city's Zoning Ordinance permits, conditionally permits, or prohibits transitional housing in the same manner as other residential dwellings of the same type in the same zone, consistent with State law.

Supportive Housing

Supportive housing is defined as housing with no limit on length of stay that is occupied by a target population and that is linked to onsite or offsite services that assist the supportive housing resident in retaining the housing, improving his or her health status, and maximizing his or her ability to live and, when possible, work in the community (California Health and Safety Code 50675.14 [b]). Target population means persons, including persons with disabilities, and families who are "homeless," as that term is defined by Section 11302 of Title 42 of the United States Code, or who are "homeless youth," as that term is defined by paragraph (2) of subdivision (e) of Section 11139.3 of the Government Code.

The city's Zoning Ordinance permits, conditionally permits, or prohibits supportive housing in the same manner as other residential dwellings of the same type in the same zone. The city also has a Supportive Housing Ordinance in place, which describes transitional housing allowances as follows:

A supportive housing development in the form of a residential care facility serving six (6) or fewer persons is treated as a residential use. Facilities serving more than 6 persons are conditionally permitted in the R-3 zone.

However, recent changes to State law under AB139 would require supportive housing to be permitted by right in all zones where multifamily and mixed uses are permitted. [Program 8 will direct the city to amend the zoning code to allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units in all zoning districts where multifamily and mixed-use development is permitted consistent with AB2162 changes to California Government Code Section 65583.](#)

~~The city will revise its ordinance and provisions for supportive housing to comply with State law.~~

Farmworker Housing

The Housing Needs Assessment shows that about 93 workers in Alhambra were employed in farming, fishing, and forestry occupations in the 2014–2018 period. This is about 0.2% of workers in Alhambra. Alhambra is an urban community in a metropolitan area, and those persons identified as having agriculture jobs are most likely employed at plant nurseries and similar enterprises and thus are not anticipated to have the seasonal housing needs associated with crop-related farm worker jobs.

Further, as Alhambra is an urban community, the city does not have any land designated for agricultural use. However, the city must still meet California Employee Housing Act requirements for housing with six or fewer employees to be allowed as a residential use. Alhambra updated the definition for employee housing in the Zoning Ordinance in 2014 to comply with this state law.

Single-Room Occupancy Housing

Single-room occupancy (SRO) housing is considered part of the definition of boardinghouses in the Alhambra Zoning Ordinance, "a building having space for not more than ten boarders and one kitchen facility for common usage, other than a hotel, motel or dormitory." Boardinghouses are permitted outright in the R-3 zoning district.

Housing for People with Disabilities

State law 65583(a)(4) and 65583(c)(3) require local governments to assess and address constraints for housing needs for people with disabilities. This includes removing barriers where possible to “provide reasonable accommodations for housing designed for, intended for occupancy by, or with supportive services for, persons with disabilities.” Part of the analysis of governmental constraints includes evaluating the jurisdiction’s definition of a family as well as zoning and building code controls.

Definition of a Family

The City of Alhambra’s definition of a family is “one or more individuals occupying a dwelling unit and living as a single household unit.” This definition meets the requirements for a broadened definition required by state law and meets fair housing law, as it does not discriminate against people with disabilities.

Zoning and Land Use Controls

Alhambra’s Zoning Ordinance allows residential care facilities serving six or fewer people in all zoning districts that allow residential uses. This is compliant with State law and meets zoning requirements for accommodations for people with disabilities. Other housing types, such as residential care facilities serving more than six people, are subject to conditional use permits in the R-3 zone, and boardinghouses are allowed outright in R-3.

Review of Building Code

The purpose of this code is to establish the minimum requirements to safeguard the public health, safety and general welfare through structural strength, means of egress facilities, stability, sanitation, adequate light and ventilation, energy conservation, and safety to life and property from fire and other hazards attributed to the built environment and to provide safety to firefighters and emergency responders during emergency operations. Consistent with this purpose, the provisions of this Code are intended and always have been intended to confer a benefit on the community as a whole and are not intended to establish a duty of care toward any particular person.

The city Building Services Division is responsible for enforcing the California Building Code and provisions of the Americans with Disabilities Act that regulate building accommodations for persons with disabilities. Section 20.21.010 of Alhambra’s Code states that in the event any differences in requirements exist between the accessibility requirements of Alhambra’s code and the accessibility requirements of the California Code of Regulations, then the California Code of Regulations shall govern.

Review of Permit and Review Procedures

Most residential projects in Alhambra require design review and approval by the Planning Commission. This process and its potential constraints are addressed in detail on [in the section on “Development Review and Permitting Process” below, Page 95](#). The hearing process is the same for housing structures that accommodate people with disabilities as other residential projects.

Review of Reasonable Accommodations

The City of Alhambra has a reasonable accommodations ordinance that was passed in 2013. Its role is to provide individuals with disabilities reasonable accommodation in the application of the city’s rules, policies, practices, and procedures, as necessary to ensure equal access to housing. Section 25.59.020 of the Alhambra Municipal Code describes the process for reasonable accommodations application and approval:

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- In order to make specific housing available to an individual with a disability, a disabled person or representative may request reasonable accommodation relating to the application of various land use, zoning, or building laws, rules, policies, practices, and/or procedures of the city.
- A request for reasonable accommodations must describe how the property will be used by the disabled individual and a specific reason the reasonable accommodation is necessary to make particular housing available to the disabled individual(s).
- A reasonable accommodation application requires a ten-day written notice to all adjacent property owners within a 100-foot radius of the subject property so that their input may be received
- The Community Development Director has the authority to act on any application for a reasonable accommodation.
- There is no original application or filing fee charged. However, for appeals, an administrative appeal filing fee is charged.

Over the planning period the city has approved three reasonable accommodations requests.

Constraints Summary:

The city's code allows for a range of housing types as required by State law and does not unduly constrain or prohibit a variety of housing types. The city enforces minimum State regulations where its current ordinances require updates. The city has adopted the 2020 Los Angeles County Building Code as amended, which is based on the California Uniform Building, Plumbing, Mechanical, and Electrical Codes. Enforcement of building code standards does not constrain the production or improvement of housing in Alhambra but instead serves to maintain the condition of the city's neighborhoods. Further, the California Building Code is adopted by many cities throughout Southern California and does not, in general, pose a constraint to residential development. The city adopted an administrative procedure for processing requests for reasonable accommodation in 2013, pursuant to State and Federal fair housing laws.

What can the City of Alhambra do?

The city adequately meets its obligation to provide for a variety of housing types and opportunities for housing for persons with disabilities. It will update its ADU, emergency shelter, and transitional housing ordinances to be compliance with State law.

The city may also explore strengthening its design standards to be more accommodative for persons with disabilities. Universal design standards are features in a home that encourage equitable use and visitability for individuals, particularly people living with disabilities and older adults. Features include, but are not limited to: step-less entrances, one-story living, wide doorways, wide hallways, extra floor space, lever door handles, rocker light switches, etc.

In Assembly Bill 2787, the California Department of Housing and Community Development created a Universal Design Model Ordinance for local governments to voluntarily adopt. The model ordinance offers definitions for key terms, options for building code standards, and options for exemptions and enforcement. The city could review this ordinance, meet with those knowledgeable about the building code and building living spaces for those with disabilities, and may amend the Building Code accordingly during the triannual code adoption process.

Relevant Housing Action Plan Programs: Program 2, Program 8, Program 263.

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Fees and Exactions²³

The City of Alhambra charges a range of fees for planning and development services, including permit fees for residential construction. These fees are allowed under State law and are necessary to maintain public services and facilities in the community. However, fees place an additional cost on development and can be a constraint if abnormally high.

Development fees in the city vary by development type and location throughout the city. A summary of the city's fee structure is included here. **The city posts its fee schedule online on its website consistent with government code 65940.1.**

Figure 69. Planning and Development Fees, Alhambra

Source: City of Alhambra, 2020

Permit Fee Type	Cost	Note	Neighboring Jurisdictions ²⁴
Planned Development			
Single-family residential	\$1,051.50		\$790 - \$1,340
Multifamily residential	\$1,633.75	Plus \$108.25 for each additional unit	\$1,580 - \$2,840
Design review			\$300 - \$8,280
Single-family	\$480.00		
Multifamily	\$ 960.00		
Window changeouts, Front	\$195.00		
Public Works/Engineering	\$446*		\$400 - 800
Conditional Use Permit			
Base Fee	\$1,500.00		\$1,070 - \$4,560
Planning Variance			
First variance	\$1,023.50		\$1,070 - \$6,800
Each additional variance	\$218		
First modification	\$212.50		
Each additional modification	\$26.75		
General Plan Amendment	\$1,138.50		\$2,940 - \$17,390
Specific Plan Amendment	\$1,600.00		NA - \$6,540
Zone Change	\$1,099.75		\$6,220 - \$18,230
Subdivisions			
Tentative tract/Parcel map	\$485.00	1st 4 units + \$108.25 for each add. unit	\$2,540–\$5,200
Lot line adjustment	\$1,012.75		\$500 - \$4,800
Second Unit Review (ADUs)	\$400		No fee - \$307
Zoning Clearance	\$400		NA - \$370

²³ Fees reported in this Housing Element update reflect fees current of 2021. Current fees should be verified through the city's fee schedule available online or through the finance department.

²⁴ Neighboring jurisdictions surveyed include EL Monte, Pasadena, Glendale, Monterey Park, and San Gabriel.

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The only impact fees for residential development collected by the City of Alhambra are a New Construction Tax, a Water Connection Fee, and a Public Arts Fee. All other fees are paid as ongoing services fees. The Alhambra School District also collects an impact fee.

Figure 70. Impact Fees, Alhambra

Source: City of Alhambra, 2020

Impact Fee Type	Cost per Unit
New Construction	\$2,000
Public Arts	0.005% of total building valuation excluding land value, off-site improvements, interior improvements, parking facilities and public facilities
Water System Access Fee/Connection	\$2,282
LA County Sanitation	No data—Set but LA County Sanitation Dist. Single-Family: \$1,630 - \$1,687 Condo: \$1,222.50 - \$1,265.25 Multifamily: \$978 - \$1,012.20
Alhambra USD School	Residential: \$4.39 per sq. ft. Commercial \$0.61 per sq. ft. No data—Set by AUSD
Sewer Connection	NoneVaries

Note: The Public Works/Engineering fee is collected by the Planning Division on behalf of the Public Works Dept. at time of entitlement submittal. The \$446 fee is deposited in PW's account.

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The typical ~~impact development~~ fees for single-family, duplex, and multifamily, ~~and mixed-use~~ residential projects in Alhambra are listed in Figure 71. ~~These do not include impact fees for arts, county sanitation, in lieu fee option for inclusionary housing, or school districts. Fees are generally consistent across development types. The per unit fees for multifamily development is lower than for single-family.~~

Figure 71. Example Development Fee Schedule

Housing Type	Example Size	New Construction Tax	Public Art Fee	Water System Access Fee	School Impact Fee	Per-unit Fee
Single-family	2,000	\$2,000	\$0	\$2,282	\$7,580	\$11,862
Duplex	2,500	\$4,000	\$0	\$2,282	\$9,475	\$7,879
Multifamily (10 units)	10,000	\$20,000	\$9,000	\$2,282	\$37,900	\$6,918

Constraints Summary:

The City of Alhambra's Planning and Development fees are within regional ranges among peer communities such as Monterey Park, Pasadena, San Gabriel, and El Monte. Impact Fees are lower than typical in Alhambra because the City's shas a higher reliance on service charges than impact fees. Further, fees on a per-unit basis are ~~relatively consistent across land use typologies and are~~ not disproportionately high as a percentage of cost. The city has a consolidated list of its fees clearly posted online. While fees can be a constraint on development when disproportionately high, Alhambra's fees ~~and exactions are typical and are lower than typical and~~ not a constraint on development.

What can the City of Alhambra do?

The City of Alhambra is in the process of updating and recalibrating its fee structure. Fees are being recalibrated based on cost recovery. When estimates are completed, the city should conduct a peer analysis to ensure that its fees remain within regional ranges.

The city currently does not utilize its fee program as an opportunity to incentivize development. Jurisdictions in California are increasingly using fee deferrals or waivers for projects that meet targeted affordability thresholds to help offset the costs of affordable housing. The city can explore the marginal impact a fee incentive program would have on development.

Relevant Housing Action Plan Programs: Program [141](#), Program [174](#), Program [274](#), Program [296](#).

Development Review and Permitting Processes

Applicable Permits for Residential

The Residential Planned Development (RPD) Permit is the name of the main City of Alhambra entitlement application for residential construction projects. This permitting process is required for nearly all residential projects.

Prior to submittal of a residential development application to the Planning Division, the developer may request a review conducted by staff to ensure that proposed project will meet all development standards with the City of Alhambra's Zoning Ordinance. The city offers pre-application meetings which can be booked online.²⁵ Pre-application meetings providing preliminary review are optional and require a fee priced at approximately \$162.75 individually for the first and second review and at approximately \$48.50 for subsequent reviews.²⁶ A few of the major items required for the RPD Permit application are a site plan (full set of architectural plans), photos of elevations, radius map, and land use findings. The radius map listing property owners within 300 feet of a proposed land use application (Planned Development, Conditional Use Permit, etc.) is required due to California state law.²⁷

The city is working to advance a "One-Stop" Streamline Permit Processes and has launched a new customer service portal. City staff worked with developers, contractors, and property owners to help streamline the process and develop guides to help applicants navigate the process. The city also provides a citizen's access portal that allows applicants to track permits, inspections, planning applications, etc.

If understandable, predictable, and accessible, the process of permitting residential development can help provide housing needed for a community. Many cities, including Alhambra, are working to help make their permitting process more straightforward to help the city attract desirable growth and this is typically an ongoing process.

By-Right Development

A land use permitted "by right" is a type of development that is allowed to be built without a conditional use permitting process. [The constraints analysis](#) previously denoted the specific residential uses by zone which are permitted ("P") in the table. These uses tend to be the targeted

²⁵ City of Alhambra, retrieved February 2021, <https://www.cityofalhambra.org/resources/planning-zoning>

²⁶ City of Alhambra, retrieved February 2021, <https://www.cityofalhambra.org/resources/planning-zoning-permits>

²⁷ City of Alhambra, Planning Application Requirements Handout, retrieved February 2021: <https://drive.google.com/file/d/1WwaxL82oMZrPOu6xa-cWmK93V81p-0RV/view>

uses that the city is encouraging to be built in the respective zone and they tend to already exist in the area and complement the existing land use pattern.

Conditional Use

A Conditional Use Permit (CUP) is required for proposed land uses which are conditionally allowed in the city. [The constraints analysis](#) previously denoted the specific residential uses which are currently categorized as “conditional” in the table.

Conditional uses are those uses which have a special impact or uniqueness requiring specific consideration as to their potential impacts on surrounding properties. At the time of application, a review of the location, design, configuration and impact of the proposed use is conducted by staff to compare the proposed use to established standards. This review determines whether the proposed use should be permitted by weighing the public need for and the benefit to be derived from the use against the impact that it may cause. A CUP is an entitlement application that requires a public hearing and the adoption of specific findings. Similar to a RPD permit, the Planning Commission must make a set of findings that generally determines that the proposed land use is compatible with the area’s existing character, is in compliance with existing and future uses, compatible with surrounding land uses and the physical conditions, and has sufficient services for the community. In addition, they must find that the proposed use would not be detrimental to the public interest, health, safety, convenience or welfare.

The requirements are the same for all uses requiring a CUP. Residential uses requiring a CUP include large (more than six persons) community care facilities, fraternities and sororities, and rest homes, as well as mixed-use developments in the CPD and CBD zones. A CUP is subject to public hearing before the Planning Commission. The city’s CUP review process is in place to provide city decision makers with more information on uses that have a special impact or uniqueness and that require specific consideration as to their potential impacts on surrounding properties.

A few of the major items required for the CUP Permit application are a site plan (full set of architectural plans), photos of elevations, radius map, and land use findings. The radius map listing property owners and occupants within 300 feet of a proposed land use application (Planned Development, Conditional Use Permit, Design Review if the project is new construction, or an addition to an existing structure, or if there are exterior alterations, etc.) is required due to California state law.²⁸ The total processing time for a CUP is approximately three and one-half months. While both a Conditional Use Permit and a Planned Development Permit are required for developments in the CBD, concurrent processing is available to facilitate the review process.

The CUP process is a common requirement for cities and has been necessary to help facilitate the development of uses that may have unique development requirements. However, CUPs should be reserved for uses that pose potential or significant land use compatibility issues and warrant Planning Commission review and approval and land uses conditionally allowed should be reviewed periodically, to ensure development patterns are achieving the intended outcomes.

Residential Development Permit

The Residential Planned Development (RPD) Permit is the name of the City of Alhambra entitlement application involving residential construction projects. This RPD permitting process is required for nearly all residential projects; however, the level of review with the city’s Planning Commission varies by the scale of development. Developers of residential uses and structures

²⁸ City of Alhambra, Planning Application Requirements Handout, retrieved February 2021:

<https://drive.google.com/file/d/1WwaxL82oMZrPOu6xa-cWmK93V81p-0RV/view>

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within R-1, R-2, and R-3 zones, including all two-story, second story, or multi-story additions, must obtain a planned development permit and in some cases, this will require public noticing. A planned development permit is also required for any new buildings in the CPD, CBD, and PO zones.

The planned development permit procedure is intended to ensure compliance with the provisions and development standards in the Zoning Code, and to limit the impacts associated with the new use. The Planning Commission must make a set of findings to approve the project which help ensure the project is in compliance with Zoning Code and General Plan, compatible with surrounding land uses and the physical conditions, and has sufficient services for the community. This process does not change the permitted uses or densities on the property. A typical Planned Development Permit must be approved by the Planning Commission. Three months is the typical time between an application being deemed complete and the Planning Commission hearing. Generally, the total processing time for a planned development permit is approximately three and one-half months and is The Planned Development Permit can be processed concurrently with other applications. In addition to the requirements of the planned development permit, all improvements within the downtown revitalization district must undergo design review if the project involves new construction, or an addition to an existing structure, or if there are exterior alterations.

Findings Examples

To demonstrate the RPD process and the potential challenges the procedure presents, we highlight two recent project examples.

PROJECT 1: 234 Marguerita Ave & 234 S Curtis Ave
Project Description: Proposed 11-unit condo project in an R-3 zone. Project replacing six existing units to be demolished. Project is in the R-3 zone with a maximum allowed density of 30 units/ac.
Filing Date: 8/23/2019 Approval Date: 8/3/2020
Project Summary: This Residential Planned Development Permit met all objective zoning code requirements and was even proposed under max density. The project was placed on the Planning Commission agenda four times, although, no discussions were held on the first two meetings due to rare circumstances relating to public noticing and technical issues. The third meeting of July 16, 2020 was a special meeting. Because of two other items needing to be discussed first, the PC did not get to this item until 11:14 PM. At 1:00 AM, the Commissioners still had not begun Commissioner deliberations, so the item was continued to a fourth meeting of August 3, 2020. In preparation of the August 3rd meeting, staff requested the the Commissioners to each give prepare a list of their concerns to have consensus items discussed/addressed at the Aug 3 meeting. Consensus items included concerns around: <ul style="list-style-type: none">▪ Occupancy. Questions about the number of occupants being displaced by the development and the tenure status of the existing units.▪ Ownership. Questions over the identify of the owner/LLC developing the property.▪ Property Conditions. Concerns regarding the current conditions of the existing structures and ongoing code enforcement of the new development.▪ Relocation Assistance. Concerns over the existing landlord/owners plans for relocation assistance for tenants at the existing units being demolished.▪ Other factors. General questions including if the existing units would qualify under historic preservation, inclusionary housing requirements, and statements about the actual number of meetings for the permit given the unusual circumstances of the first two meetings.

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Outcome:

The application was approved with the following vote: 6-Ayes; 1-Noes; 1-Abstain; 2-Recused. The approval came roughly two months after the first meeting.

PROJECT 2 510 N. 3rd Street

Project Description:

Proposed four unit apartment project in a three-story structure. The project is located in the R-3 zone with a maximum allowed density of 24 units/ac.

Filing Date: 8/16/2018

Planning Commission Denial Date: 1/7/2019

Ultimate Approval Date: 5/16/2020

Project Summary:

The project had two planning commission meetings, the first on December 3, 2018, roughly four months after application filing. The second meeting was held 1/7/2019 where the application was denied by the planning commission. Concerns and findings from the Planning Commission included:

- **Height.** Findings that the proposed three-story height was incompatible with the neighboring one-story residence to the north. Both properties are zoned R-3 with a three-story maximum height.
- **Shade and shadow.** Recommendation that a shade and shadow study would be needed to evaluate the impact on the residence to the north. The city does not have shade and shadow standards.
- **Architectural Style.** Findings that the proposed architectural style was incompatible with the existing development on the street.

Three members of the public also spoke against the project, highlighting similar concerns over height, shadow, architectural character, and parking impacts.

The project was denied by the Planning Commission and appealed to the City Council. A summary of City Council Meetings include:

- **March 25, 2019.** Council expressed concerns similar to the Planning Commission. The item was continued to April 22, 2022.
- **April 22, 2019:** Appellant requested continuance to May 13, 2019
- **May 13, 2019:** Council again expressed concerns similar to the Planning Commission. The item was again continued to May 28, 2019.
- **May 28, 2019:** After public comment and discussion, the City Council continued the item to July 8, 2019, and asked the appellant to conduct three meetings with neighbors to address issues of height, design, and privacy.
- **July 8, 2019:** The appellant requested continuance to September 9, 2019, as he needed more time to complete the neighbor meetings.
- **July 31, 2019:** After several meetings with neighbors the appellant decided to withdraw the appeal after unsuccessful negotiations on height limit.

Project Outcome:

The initial RPD was denied on 1/7/2019 by the Planning Commission by a vote of 2-Ayes; 5-Noes; 2 absences. A revised resubmitted 5-unit project was ultimately approved on 5/16/2020 administratively under SB35.

Prevalence of One-year Extensions

Approved Planned Development Permits are valid for one year and the applicant must obtain the building permit within that one year or the approval expires. This creates a short time period to obtain permits, a condition that is challenging for complex projects. The city does offer a one-year extension for \$400 that requires Planning Commission approval. Over the 2014-2020 period 30 projects had to rely on an extension. This condition certainly places additional time, cost, and uncertainty on applications.

RPD Summary:

Details of the Residential Planned Development on lists the currently available exceptions to the RPD process including the recent 2020 updates which have allowed an administrative review of permit applications in the R-1 zone rather than a full RPD permit process, subject to Planning Commission discretionary review. Among the most important factors in a city's administrative code, from the perspective of the development community, is certainty. Reducing the number of actions and decisionmakers involved in making planning approvals, while maintaining opportunities for public input, is desirable. The project examples and findings summarized above demonstrate that through the RPD permit, the City of Alhambra relies heavily on discretionary review of residential projects. This adds additional time, cost, and uncertainty to development that can be a constraint on development.

Overreliance on discretionary review and failure to apply objective standards are also inconsistent with recent changes to the Permit Streamlining Act and the Housing Accountability Act.

Design Review

The Design Review Board reviews the design of each new or altered improvement in the downtown revitalization district for which a building permit, license, certificate, or other approval is required. The Board also reviews the design of all new residential development, and commercial and industrial buildings and uniform sign plans for multi-tenant buildings throughout the city.

Within 30 days after the architectural plan is filed with the Community Development Department, the Design Review Board must consider the architectural plan and approve, disapprove, or conditionally approve the plan. When the architectural plan is approved or conditionally approved, the Design Review Board issues a certificate of design approval with attached conditions.

Residential design standards are clearly outlined in Section 23.44 of the city's Zoning Code. Design review approval is based on adherence to the general design standards listed in Chapter 23.44.030 of the Zoning Ordinance. In addition, Sections 23.44.040 and 23.44.050 address specific design standards for residential and commercial developments. General design standards are tailored to encourage quality development that is compatible with surrounding uses. For example, the design guidelines require that storage is screened and that lighting is deflected away from adjacent properties. In addition, the guidelines require that the proposed design is compatible with existing development in the area in terms of scale, height, bulk, materials, cohesiveness, colors, roof pitch, roof eaves and the preservation of privacy. Residential design standards are tailored to encourage compatibility of finishes and styles, continued maintenance of the property, appropriate massing so as to provide harmony with surrounding land uses, and to minimize such things as razor wire, metal roofs, outdoor storage. These standards are objective and not overly restrictive and are unlikely to have a significant impact on the affordability of a housing development.

The city provides pamphlets at the Community Development Counter that outline the process, submittal requirements, and a fee schedule. Overall, the Design Review process takes approximately two weeks.

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Figure 72. Processing Procedures and Approximate Timelines by Residential Development Type

Source: City of Alhambra

Residential Type	Approving Body/Entity	Public Hearing Required?	Estimated Processing Times	Appealing Body (if applicable)
Single-Family	Staff only for R-1 zones, RPD Permit required for R-2 and R-3 zones	Some cases require Design Review Board approval	Approximately 1 month from time of complete application	Planning Commission
Multifamily	Planning Commission	Planning Commission and Design Review Board approval required	Approximately 3 months from time of complete application	City Council
Mixed-Use	Planning Commission	Planning Commission, Design Review Board approval required, City Council may be required on some applications	Approximately 6 months from time of complete application	City Council
ADU	Staff	None	Approximately 1 month from time of complete application	Planning Commission

Processing Timelines

Processing time to obtain a development permit is an often-overlooked burden on housing development. If abnormally long, processing can be a considerable constraint on housing production. This is especially the case for affordable housing development, where developers are utilizing multiple capital stacks with often limited timeframes. Processing times can vary broadly depending on the completeness of applications and the responsiveness of both developers and staff. Approval times can be lengthened considerably for complicated project that require general plan amendments and projects that are not exempt from CEQA. Communities with strong opposition to development can often use these processes to further prohibit development.

The city strives to employ a “One-Stop” streamlined permit process. Step-by-step guides were developed to help contractors and homeowners through the process. For large-scale projects, city staff conducts pre-development coordination meetings with project proponents and all city departments that play a role in the construction process to help ensure a smooth-running project.

Figure 73 summarizes development review requirements for various types of applications. The city provided a list of project applications from 2016-2019. This list included 94 projects with a calculated time period from application to approval. The average time of approval across all projects was 6 months²⁹.

²⁹ Data was not provided on the number of units, complexity, or ultimate development outcome.

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Figure 73. Development Review Requirements

Source: City of Alhambra (2020)

Application	Typical Timeline (months)	Staff	Planning Commission	City Council
General Plan Amendment	5 mos.	R	R	D
Rezone (adjustment to zoning map)	varies	R	R	D
Zoning Ordinance Amendment	varies	R	R	D
Parcel Map (subdivision with less than 5 parcels)	3 mos.	R	D	A
Tentative Tract Map	3 mos.	R	D	A
Condominium Conversion	varies	R	D	A
Conditional Use Permit	3 mos.	R	D	A
Variance	3 mos.	R	D	A
Site Plan Review	1 mo.	D	A	A
Planned Development Permit	2-3 mos.	R	D	A
Recommendation (R)		Reviews the proposed project and submits a recommendation		
Decision (D)		A decision to approve, approve with conditions, or deny is made and will stand unless appealed within 10 calendar days.		
Appeal (A)		A decision made by the Planning Commission may be appealed, a public hearing will be set with the City Council.		

Constraints Summary:

A recent study from the Turner Center found that shortening permitting and approval timelines can mitigate costs associated with uncertainties and delays³⁰. Another study in the Seattle region found that just cutting permitting times in half can lower development costs and/or supportable rent/sales levels, improving affordability³¹. These themes have been present in local developer comments as well.

The city works to process permits concurrently and typical timelines for approval reported by the city are not considered overly constraining on development. The city's review processes are generally typical, with a few exceptions. First, requiring full Planning Commission approval for all variances can add to approval times. An initial variance can often be approved administratively. Second, as previously evaluated, on Page 78, the city's Residential Planned Development (RPD) permit has the potential adds uncertainty, time, and discretionary approval that is a constraint on development.

The city's zoning code audit found Alhambra's development review processes to be burdensome and over reliant on discretionary review. Subjective findings could lead to a protracted review process or denial of a project based on interpretation. Additional costs and uncertainty can negatively impact developer interest in the community, limiting affordable and market-rate housing production and perpetuate under-supply and lack of affordability.

What can the City of Alhambra do?

³⁰ Turner Center from Housing Innovation. "The Hard Costs of Construction" Recent Trends in Labor and Materials Costs for Apartment Buildings in California". March 2020

³¹ 2019 Seattle Affordable Middle Income Housing Advisory Council Final Report (pg. 59), see <https://durkan.seattle.gov/wp-content/uploads/sites/9/2020/01/AMIHAC-Final-Report-2020-01-22-.pdf>

Many cities, including Alhambra, are working to help make their permitting process more straightforward to help the city attract desirable growth. The City of Alhambra can take steps to increase development certainty and reduce risk to encourage development. This is largely done by limiting changes to the development process (e.g., reducing overly subjective design review requirements, clear messaging from elected or review bodies, outlining permitting steps), or by limiting changes to the costs of development (e.g., permit costs, taxes, fees).

Periodic reviews of the permitting process requirements, particularly for targeted development crucial to meeting the community's needs, can be a useful exercise for identifying possible areas of improvement. These process reviews could incorporate input from local housing and affordable housing developers and nonprofits. Lastly, many jurisdictions are working to move as much of the permitting process to online as possible, to promote "paperless" submittals, where it reasonably is effective. At the end of 2020, the city launched a new customer service portal called the Tyler Systems/Energov permitting system to implement permitting process efficiencies and to deliver better and faster assistance to the public. Citizens can pay bills, track permits, get zoning information, submit planning applications, and do more, in one centralized online location.

Portal link: <https://alhambraca-energovpub.tylerhost.net/Apps/SelfService#/home>.

Relevant Housing Action Plan Programs: Program 130, Program 163, Program 174, Program 2017, Program 274, Program 296.

Building Codes and Enforcement

Alhambra adopted the amended Chapters 2 through 35, 66, 67, 96, 98, 99 and Appendices I) and J) of the Los Angeles County, Title 26, Building Code in December 2019. This is now referred to as the Alhambra Building Code as Chapter 20.03 of the city's Building and Construction Ordinance. Modifications to the building code included changes to language in grading fees, compliance with Zoning Code processes, and completion of work requirements.

Alhambra also updated its fire code (Chapter 19.02 of the city's Fire Ordinance) in 2019, adopting the 2019 California Fire Code. Updates included refinements to requirements for additional address information, fire sprinklers, access to fire equipment in buildings, and minimum fire flows for R-3 and R-4 buildings and townhouses.

As noted in the previous housing element, the city adopted the Uniform Housing Code (1988) in 2010 and it has not been updated or amended.

Constraints Summary:

Enforcement of building code standards does not constrain the production or improvement of housing in Alhambra but instead serves to maintain the condition of the city's neighborhoods. Further, the California Building Code is adopted by many cities throughout Southern California and does not, in general, pose a constraint to residential development.

What can the City of Alhambra do?

The city continues to link code enforcement to its Housing Rehabilitation Program. During the 2019-2020 fiscal year code enforcement staff made 533 referrals to the Housing Rehabilitation Program for assistance.

Relevant Housing Action Plan Programs: Program 2.

On and Off-Site Improvements

Site improvements are a necessary component of the development process. Improvements can include the laying of sewer, water, and streets for use by a community when that infrastructure is lacking, and these improvements make the development feasible. Due to the built-out nature of the city, the residential areas in Alhambra are already well-served with infrastructure. Site improvement requirements for infill or redevelopment will vary depending on the existing condition of each project. Typically, requirements include the undergrounding of utilities, provision of a fire sprinkler system, ensuring the existence of one fire hydrant within 250 feet from the property line, dedication of streets and alleys, and smoke detectors. The street and alley dedications can be a significant constraint especially if it reduces the available density for a development project since density and FAR are all calculated using “net” lot area minus any dedications. Developers are required to purchase and have the city install water service pipe and meter and may be responsible for upgrading sewer laterals or installing backflow prevention devices. Portions of curbs, gutters, sidewalks, and driveways may be required to be replaced, depending on their condition.

Constraints Summary:

The City of Alhambra is a largely built-out community. The majority of future housing development will come through redevelopment of underutilized parcels. Required infrastructure improvements have not been reported as excessive by the development community and are not considered a burden or constraint on development.

What can the City of Alhambra do?

The city can continue to monitor the impact of its requirements on development projects to ensure that requirements are scaled to the impact of the project. It can also ensure that fees are calibrated to cost of service. The city should consider adding Code updates associated with the street and alley dedication requirements to remove unintended barriers to needed housing development.

Relevant Housing Action Plan Programs: Program [2017](#), Program [296](#).

Environmental and Infrastructure Constraints

Environmental and infrastructure constraints can hamper development of sufficient housing for all economic segments. The following section discusses potential environmental and infrastructure constraints to residential development in Alhambra.

Environmental

Alhambra is an urbanized city in a large metropolitan area. No rare or endangered plant and animal species are known or suspected to exist.³² The city’s topography is generally level, with no significant hillside areas, and soil erosion is not an issue. No active seismic faults are known or suspected to traverse the city, and Alhambra is not included in any special seismic study zones identified by the State. In the event of significant seismic activity in Southern California, ground shaking has the potential for substantial damage. The city maintains an up-to-date Emergency

³² City of Alhambra General Plan, 1986.

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Service Plan. City officials and staff responsible for implementing the plan have attended training classes and emergency simulation exercises.

To assist jurisdictions in addressing potential environmental constraints, SCAG developed the Housing Element Parcel Tool (HELPR). This tool includes a comprehensive list of environmental constraints including:

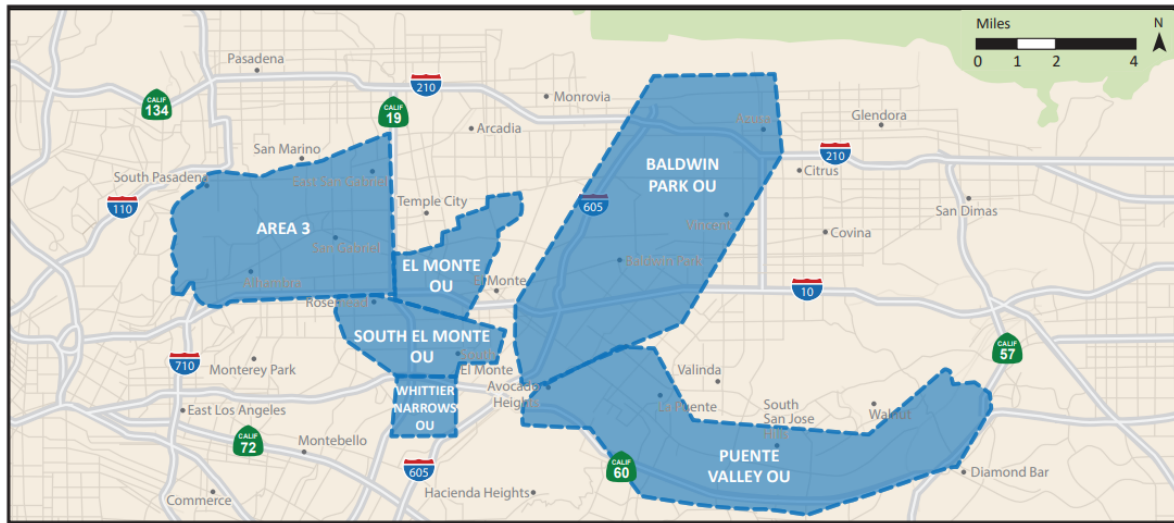
- Fire hazard areas
- 3ft. sea-level rise inundation area
- FEMA 100-year flood plain area
- Alquist-Priolo earthquake fault zone
- Liquefaction susceptibility zones
- Landslide hazard zones
- California protected areas
- River or wetland areas
- Wildlife habitat zones
- 6ft. sea-level rise inundation areas
- Locations with rare plants and animals
- NCPP/HCP reserve areas

Alhambra is generally void of constraints in nearly all these areas. There are a few pockets considered in landslide hazard zones. There is also a section straddling the San Pascual Wash from Huntington Drive to the Alhambra Golf Course that is considered inside an active river/wetland area. However, this is a controlled waterway and impacts on actual parcels are likely limited. This constraint impacts only a handful of sites in the sites inventory. Sites with potential environmental constraints are noted in the detailed inventory appendix and electronic inventory database.

Soils and Groundwater Contamination. Most of Alhambra that lies north of Interstate 10 is located within a portion of the San Gabriel Valley Superfund Fund Site – Area 3. Area 3 covers 19 square miles of contaminated ground water and is one of 8 Operable Units identified by U.S. EPA for the San Gabriel Valley Superfund Sites and is known as the San Gabriel Valley Area 3 Superfund Site.

Figure 74. San Gabriel Valley Superfund Sites

Source: City of Alhambra



San Gabriel Valley Superfund sites (boundaries are approximate)

Discovery of contamination in water purveyor production wells led the U.S. EPA to designate Area 3 as a National Priorities List (NPL) site in 1984. Volatile organic compounds (VOCs) have been detected in production wells and safeguards are in place to ensure acceptable drinking water quality. Area 3 groundwater is contaminated with VOCs (most commonly tetrachloroethene [PCE] and trichloroethene [TCE]), perchlorate, and nitrate at concentrations exceeding state and federal water quality standards. The EPA is expected to finish groundwater investigation by 2021 and will then develop next steps for potential action.

Several areas of the city are experiencing groundwater contamination. Similar to contamination the underlying soils in the Villages east of Fremont Avenue area were also found to be contaminated. The combination of the groundwater and soils contaminations and the magnitude of groundwork required for the Villages development caused the Villages to propose significant and costly soils and vapor mitigation measures. As this was a large project that was heavily capitalized, it was able to absorb the fiscal impact of those mitigations, however, other projects within the city, if faced with similar currently unidentifiable issues, may not be able to overcome these constraints.

Infrastructure

The infrastructure of critical importance to the maintenance and development of new housing includes water facilities, sewerage facilities, streets, and sidewalks. The water supply for the city comes from two sources: groundwater from wells in the Main Basin, and through direct delivery of treated imported water from the Metropolitan Water District of Southern California (MWD). According to the 2005 Alhambra Urban Water Management Plan, through groundwater management, conservation programs, well maintenance, and capital improvement programs, the city has been able to minimize its reliance on imported water.

The Sewer and Storm Drain Section of the Utilities Department maintains and operates the sanitary sewer collection system, which consists of 1,000 storm drains/catch basins, 2,800 manholes, seven lift stations with main sewer lines ranging in size from four inches to 36 inches. Approximately 99 percent of the system is composed of vitrified clay pipe, with less than one percent being cast iron pipe and reinforced concrete pipe. The sewer system is maintained consistently with the use of high-pressure jetting to clean sewer lines.

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The city has completed a number of infrastructure improvements on local roads and streets, including the widening, reconstruction, and repaving of a number of main streets. The provision and maintenance of infrastructure in a community enhances not only the character of the neighborhoods, but also serves as an incentive to homeowners to routinely maintain the condition of their homes. In the alternative, when public improvements are left to deteriorate or are overextended in use, the neighborhoods in which they are located become neglected and show signs of deterioration.

Very little undeveloped residential land remains in the city. Future housing growth will occur on existing infill sites or will be integrated with commercial uses. All necessary infrastructure to meet housing development pursuant to the RHNA is already in place.

Water System Capacity. The city has nine active wells located within the Main Basin including Wells No. 7, No. 8, No. 9, No. 11, No. 12, No. 14, No. 15, Longden 1, and Longden 2. The city of Alhambra's distribution system includes six reservoir locations, five booster pump stations, one interconnection with MWD (designated USG-5), and an interconnection with San Gabriel County Water District. The city's total water demands (including potable and recycled water) over the past 10 years have ranged from 8,840 AFY to 11,199 AFY, with an average of 9,998 AFY. The city currently measures its water use through meter data and billing records. The city updated its 2020 Urban Water Management Plan in June 2021. It analyzes the projected water demand in five-year increments over the next 25 years. Projected water demands for lower income households are included in these projected water demands. The analysis found that the city will be able to provide sufficient water supplies to meet the projected water demands of its customers, including during a five consecutive drought period. Therefore, the city should have adequate systemwide capacity to meet its regional housing need.

Sewer System Capacity. Wastewater generated in the city is treated by the Sanitation District of Los Angeles County (LACSD). Wastewater generated in the city is treated at one or more of the following: Most wastewater is treated at the Whittier Narrows Reclamation Plant (WRP) located near the City of South El Monte, which has a capacity of 15 million gallons per day (mgd) and currently produces an average recycled water flow of 9.9 mgd; the Los Coyotes WRP located in the City of Cerritos, which has a capacity of 37.5 mgd and currently produces an average recycled water flow of 23.1 mgd. These plants are capable of treating the potential increase in wastewater associated with Alhambra's regional housing needs.

The city updated its Sewer System Management Plan in 2019 which identified projects and funding required to maintain safe operations of the system. In 2018 the city approved a sewer rate increase to assist in funding the Capital Improvement Plan.

Statutory Requirements. Government Code §65589.7 requires each public agency or private entity providing water or sewer services to grant a priority for the provision of these services to proposed developments that include lower income housing units. The City has not denied, applied conditions, or reduced the amount of sewer service for a development that includes housing affordable to lower-income households consistent with state law. The City will adopt written policies and procedures that grant a priority for sewer hook-ups and service to developments that include affordable housing for lower-income households.

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

Transparency Requirements

The city is complaint with transparency requirements for posting all zoning, development standards and fees on the City’s website.

Code Availability. The entire Alhambra Municipal Code, including Title 23 (“Zoning”) is accessible from the City’s website³³.

Development Standards. Development Standards contained Title 23 of the Alhambra Municipal Code are accessible on the City’s website. The City also has specific pages on the City’s website devoted to the following:

- Accessory Dwelling Units
- Residential Development Standards
- SB35 Affordable Housing Streamlining Act Information
- Master Fees and Services Charges Schedule

In addition, the Planning Division’s page on the City’s website contains information on “Zoning Permits, Licenses, and Applications” that provides a direct link to an itemized list of all Planning entitlement fees.

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³³ <https://codelibrary.amlegal.com/codes/alhambra/latest/overview>

Chapter 4: Housing Resources

The magnitude of housing need in most communities, especially affordable housing need, is often large relative to the resources available. Providing for an adequate supply of housing across all income levels is challenging and requires a balance of resources across the physical, social, and financial realm. To inform the city's Housing Plan, this section of the Housing Element provides an overview of the resources available to the city.

Land and Market Support

The City of Alhambra has 5.5 acres of vacant residential land available for development with the capacity to accommodate up to 59 units. Market conditions in Alhambra are characterized by escalating rent and home prices and low vacancies and inventory—characteristics that are generally supportive of redevelopment. The site's inventory in Chapter 7 details redevelopment potential in Alhambra. Through this process the city identified realistic market-supportive redevelopment capacity of 5,571 units.

Administrative Resources

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Providing solutions that meet the housing needs of the city's residents requires an ecosystem of governmental, non-profit, and private partners that offer resources and expertise.

The City of Alhambra Community Development Department

The Community Development Department is responsible for assisting business owners, citizens, and developers through the city's review and approval process; developing a comprehensive, long-range plan for development and improvement of land use; and promoting quality development and rehabilitation of existing structures. The department includes five divisions: Planning, Economic Development, Housing, Building, and Code Enforcement. The overarching role of the Department is to administer the city's land use and zoning regulations and ensure the city is in compliance with State and Local regulations, administer the building and land use permitting services, support the rehabilitation and creation of affordable housing, and support the business community.

Alhambra HCDA Citizen Advisory Committee

The City has established the HCDA Citizen Advisory Committee to make recommendations to City Council regarding the use of HUD funds and the administration of the CDBG and HOME programs. The HCDA is a 10-person council of community members.

Non-profit Developers and Community Development Organizations

Alhambra works with a variety of non-profit developers and community development organization partners collaboratively to facilitate the production of affordable housing in the city.

- TELACU is a non-profit community development corporation that provides affordable home-ownership opportunities for families, and apartment rentals for low-income senior citizens and the disabled. Since its establishment in 1968, TELACU has developed thousands of such units in communities throughout Southern California. In Alhambra,

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TELACU developed a 66-unit very low-income housing unit for seniors (the head of the household must be 62 years-old and the household income must not exceed 50% of the HUD annual income limits).

- Habitat for Humanity is a non-profit Christian organization dedicated to building affordable housing and rehabilitating damaged homes for lower-income families. Habitat builds and repairs homes for families with the help of volunteer and homeowner/partner families. Habitat homes are sold to partner families at no profit with affordable no-interest loans. Volunteers, churches, businesses, and other groups provide most of the labor to build the homes. Land for new homes is usually donated by government agencies or individuals.
- The city has also worked with the National Preservation Partners to develop an affordable housing project on the city-owned Howard Street property – a property purchased with CDBG funds and developed by National Preservation Partners with HOME and Redevelopment Housing Set-Aside funds from the city.
- The city contracts with the Housing Rights Center to provide fair housing services in the community.
- The city is also undertaking a Disposition and Development Agreement to build 50 one-to two-bedroom permanent supportive and low-income rental housing on a currently city-owned parking lot at 2nd and Main Street with American Family Housing/National Core.
- The city also negotiating a second agreement with Related California to develop 44 units on a 0.32-acre city-owned parking lot on N Chapel Avenue.

Homeless Services

Alhambra has a very small homeless population. The city recognizes that many agencies in the County provide services to homeless persons in the San Gabriel Valley. The city's strategy is to focus resources on the at-risk homeless, specifically the elderly and frail elderly with limited resources.

The city has cooperative relationships with non-profit organizations, such as the Union Station Homeless Services (USHS), Housing Rights Center (HRC), the Los Angeles Homeless Services Authority (LAHSA), and the Greater Pasadena Housing and Homeless Network to provide services and housing for homeless persons.

Since 2017, the city has been funding a Homeless Outreach Services program. The program connects homeless agencies that provide emergency shelter, provide supportive services, and/or help transition them to permanent housing. The USHS in Pasadena administers the program and provides outreach, shelter, rapid-rehousing, case management, and supportive services for homeless persons from Alhambra. The city's efforts include an emergency hotel/motel voucher program, which is facilitated by USHS. The city is currently requesting proposals for a new contract to provide homeless support services and case management, including shelter assistance.

Financial Resources and Incentives

Financial Resources

California Redevelopment Agencies (RDAs) were created with the state's passing of the Community Redevelopment Act in 1945. In February 2012, the approximately 400 RDAs were officially dissolved as part of the 2011 Budget Act. Although the documented shortcomings of

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these agencies were plenty—particularly in the last few years leading up to their dissolution—, they played a key role in aiding affordable housing development across the state, in addition to renovating rundown urban areas, cleaning up and rehabilitating contaminated land, and redeveloping areas for commercial retail, which resulted in the creation of new jobs and increases in private investments.

According to a white paper from the U.S. Department of Housing and Urban Development (HUD), during the fiscal year period of 2001 to 2008, RDAs created approximately 63,000 affordable housing units, 44 percent of which were affordable to those earning 50% of MFI or lower. Statewide, the removal of these agencies expected to result “in a statewide average annual loss of 4,500 to 6,500 new affordable units through the foreseeable future after all enforceable obligations have been met.”

A key benefit RDAs provided to local communities, beyond the creation of new affordable housing units, was assisting developers in filling fund gaps in Low-Income Housing Tax Credit (LIHTC) developments. In California’s 2011 funding round, it was estimated that “62 percent of all 9% LIHTC awards also had RDA financing.” Hence, the dissolution of RDAs has and will continue to impact developers insofar that access to this bridge in funding is gone.

In place of the RDAs’ absence, local governments have alternatives to encourage redevelopment and affordable housing; however, these options are narrower in scope and often require a 2/3 majority vote to become reality. Some of these options include: Infrastructure Financing Districts, Community Facilities Districts, Assessment Districts and Business Improvement Districts, Statutory Development Agreements, Federal New Market Tax Credit Programs, or Community Controlled Nonprofit Economic Development Corporations.

Additionally, California’s cap-and-trade program, which is set-up to reduce carbon emissions and generate revenue for the state via auctions of pollution permits, is being used to fund affordable, or “sustainable”, housing projects for residents. In particular, these projects are required to be constructed near transit lines so as to provide residents ease of access to public commuting. As of 2015, about \$122 million was allocated to 28 sustainable housing projects in the state. Some cities that received funding include Los Angeles, San Diego, Riverside (a veteran’s village), and Long Beach, among many others across the state.

The following programs exist to continue to fund housing and affordable housing developments, but they do not backfill the gap left by the dissolution of RDA programs in 2012.

[Alhambra Housing Asset Fund](#)

The City of Alhambra maintains a Housing Asset Fund that includes funds remaining from the former RDA. The city uses these monies to fund affordable housing development. The city plans to use Asset Fund monies for both the Mariposa project and the Chapel Lot project.

[Community Development Block Grant \(CDBG\)](#)

Through the federal CDBG program, the HUD provides funds to local governments to fund a wide range of community development activities for low-income persons. The CDBG program provides formula funding to larger cities and counties, while smaller cities (fewer than 50,000 population) receive its allocation from the county or competes for funding that is administered by the state. Given Alhambra’s population, it is entitled to receive CDBG funds directly from HUD. The city anticipates receiving a CDBG allocation of approximately \$1,014,111 for the 2020-21 Proposed Budget. CDBG allocations fluctuate annually; however, the city conservatively estimates an average of \$1,000,000 annually.

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The CDBG program is flexible in that the funds can be used for a range of activities. In the past, the city has used CDBG funds for eligible housing activities including acquisition and/or disposition of real estate, housing rehabilitation, and code enforcement efforts.

HOME Investment Partnerships (HOME)

The city receives an annual entitlement of funds from HUD under the HOME program. HOME funds can be used for activities that promote affordable rental housing and homeownership for construction, reconstruction, moderate or substantial rehabilitation, and first-time homebuyer assistance. In recent years, Alhambra has contributed HOME funds to help lower-income homeowners with rehabilitation and to provide first-time homebuyers with down payment assistance. The city anticipates receiving a HOME allocation of approximately \$631,003 for the 2020-21 proposed budget. Similar to the CDBG funding, the HOME allocations fluctuate annually. The city conservatively assumes an average of \$700,000 per year.

Housing Choice Voucher Program

The Los Angeles County Development Authority (LACDA) administers the local Section 8 Housing Choice Voucher Rental Assistance Program for Alhambra residents, providing rental assistance payments to owners of private market-rate units on behalf of low-income tenants. Typically, the voucher pays for the difference between the Fair Market Rent for the unit and 30 percent of the voucher recipient's household income.

Continuum of Care (CoC)

Grants for development of a continuum of housing options and support services to assist homeless persons in the transition from homelessness are available from HUD. These grants are awarded to the Los Angeles Continuum of Care to be distributed to nonprofit homeless agencies (such as the Greater Pasadena Housing and Homeless Network and LAHSA), in order to implement a broad range of activities that benefit homeless persons.

Housing Opportunity for Persons with AIDS (HOPWA)

The HOPWA program provides funding for the housing and related support-service needs of low-income persons living with human immunodeficiency virus (HIV) and acquired immunodeficiency syndrome (AIDS). The City of Los Angeles receives HOPWA funding on behalf of Los Angeles County, as the largest jurisdiction in the County.

Low Income Housing Tax Credits

Tax credits are available to individuals and corporations that invest in low-income rental housing. Usually, the tax credits are sold to corporations with a high tax liability and the proceeds from the sale are used to create the housing.

California Permanent Local Housing Allocation (PLHA)

SB2 created a permanent funding source through a \$75 real estate recording fee. Over the initial PLHA five-year period, Alhambra is estimated to receive nearly \$2.8 million in PLHA funds. The city's planned disposition of these funds is to ~~fund the San Gabriel Valley Regional Housing Trust, contribute to two 100% affordable projects being developed on city-owned sites, and explore additional affordable housing development on other city-owned sites.~~ fund the Homeless Supportive Services/Case Management Program.

San Gabriel Valley Regional Housing Trust (SGVRHT)

Alhambra is a member city of the SGVRHT. Alhambra initially contributed \$116,400 of its PLHA funds to the trust. The trust was established in February 2020 as a JPA to fund the planning and construction of affordable and homeless housing. In 2020 the trust successfully received a \$1,000,000 match from the California Local Housing Trust Fund (LHTF) program. The SGVRHT

maintains a pipeline of projects seeking funding. Both the Mariposa and Chapel projects are in the regional pipeline. The Mariposa project has received a loan from the trust-.

[Inclusionary Housing Trust Fund](#)

In 2020 the city approved an Inclusionary Housing Ordinance that includes an option for developers to pay an in-lieu fee as an alternative to providing mixed-income development. A fee calibration study was completed in Winter 2020. In-lieu fees collected will be eligible to support affordable development in the future.

[Other State and Federal Programs Available to the City of Alhambra](#)

The State of California has many other programs and funding sources the city and its residents can draw from to fund housing programs and access in Alhambra. A sampling of these programs include:

- Multifamily Housing Program (MHP)
- Affordable Housing and Sustainable Communities Program (AHSC)
- Calhome
- California Emergency Solutions and Housing (CESH)
- Infill Infrastructure Grant Program (IIG)
- Local Early Action Planning (LEAP) Grants
- Affordable Housing Partnership Program (AHPP)
- California Homebuyer's Down Payment Assistance Program (CHDAP)
- California Tax Credit Allocation Committee (CTCAC): Low-Income Housing Tax Credits (LIHTCs)
- California Tax Credit Allocation Committee (CTCAC): Historic Rehabilitation Tax Credits (HRTCs)
- California Debt Limit Allocation Committee (CDLAC): Various Programs

[Development Incentive Programs](#)

For both market-rate and affordable housing developments, government actors can offer a variety of non-market financial resources in the form of development incentives to encourage more housing development. Often these programs are aimed at encouraging the types of housing the market is not delivering, or housing that helps meet public goals.

Financial incentives often lower the cost of development (such as fee waivers or expedited permitting processes) or lower the cost of operations (tax exemptions). Regulatory incentives adjust site allowances and requirements (such as building higher or providing less parking) to increase developable space or reduce costs, thereby creating value. These incentives help increase development feasibility to shape market responses.

[Flexible Development Standards](#)

Section § 23.20.080 of Alhambra's zoning code allows for flexible development standards in the R-3 zone to promote high quality multiple-family residential developments, to encourage innovative design and efficient use of land which might otherwise be constricted by rigid development standards, to encourage consolidation of parcels, and permit developments to be evaluated on individual merits. The flexible development standards provide for variation from

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three of the provisions required by the R-3 zone (Section 23.20), three provisions required by the property development standards (Section 23.42), and three provisions required by the design standards (Section 23.42). Flexible development standards are available to lots of 40,000 square feet and larger. This is due to economies of scale. The city has used this tool threshold size to encourage consolidation of small lots to achieve large-size projects that can offer amenities, efficient site planning, and cost reductions in senior and affordable housing projects in conjunction with density bonuses.

Density Bonus Program

The City of Alhambra offers housing density bonuses (Code Section 23.20.060) consistent with the state law outlined in California Government Code § 65915. Eligible applicants are allocated a density bonus for projects providing at least ten percent of the total units as lower-income households (defined as 80% AMI), or five percent of the total as very low-income households, or for a senior citizen housing development (defined by California Civ. Code § 51.3).

AB1763 Density Bonus

AB 1763 generally allows housing development located within one-half mile of a major transit stop and meeting all housing affordability requirements to receive a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. The city's Mariposa project is using this bonus. As a part of the Housing Element Update, the city is planning to adopt an ordinance that extends the AB1763 bonus throughout the entire Downtown Revitalization District.

Inclusionary Housing Ordinance

In July 2020, the City Council of Alhambra approved the resolution to amend its zoning code to include a new inclusionary housing ordinance that outlines inclusionary unit requirements, incentives for greater affordability of units, and in-lieu fee for alternatives to the inclusionary unit requirement. The ordinance was adopted in September 2020. A detailed overview of the city's IHO is included in Chapter 3 of the Housing Element. At the most fundamental level, inclusionary policies reduce the economic value of a development site by driving part of its use to a below-market purpose. Therefore, inclusionary policies only work when the market can deliver market-rate housing and/or the loss in net-operating-income (NOI) is offset by value-enhancing incentives.³⁴ If poorly designed and executed, inclusionary policies may be a constraint to housing production. When structured appropriately and in supportable market conditions, an IHO can have meaningful impacts on the delivery of affordable housing units. The city's policy is too new to have observable direct impacts. However, the Constraints Analysis of the Housing Element did not find the city's IHO to be overly restrictive compared to peer cities that have had positive affordable housing development outcomes from their IHOs. Further, the Housing Element includes a program to monitor the IHOs impact on development in the community and make a mid-cycle adjustment in the event that it is found to be inhibiting development.

Opportunities for Energy Conservation

The City of Alhambra has taken action on energy conservation through policies in its building code, general plan, and utility partnerships. The city integrates the most current California Energy Code (California Code of Regulations Title 24, Part 6) and California Green Building Standards Code (California Code of Regulations Title 24, Part 11).

³⁴ In rare instances rents are sufficiently high to cross-subsidize affordable housing without offsets.

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Alhambra's municipal code has a guideline for solar energy design with the intent of maximizing passive heating and cooling opportunities for residential developments. It is also intended to protect possible solar energy systems from shading. The code requires subdivisions to "maximize the number of future buildings which will receive sun-light sufficient for using solar energy systems."³⁵ Additionally, the code requires a balance between sunlight and shade to "receive cooling benefits from both prevailing summer breezes and existing shading vegetation."

Alhambra's General Plan has a policy that encourages and language that requires green building construction. Policy R-5C from the plan "encourage the use of green building technology for building retrofit and pursue LEED-certification for new development." This policy comes after this statement on new developments, "New development projects are required to incorporate green building standards, which promote environmentally responsible and resource-efficient design through siting, construction, operation, maintenance, renovation, and de-construction."

This plan is using contradictory language while supporting the construction of green buildings because it both "encourages" and "requires" it. If the plan cleans this up, then the proper direction can clear up confusion for developers.

The City of Alhambra has a partnership with utility programs, like Southern California Gas Company (SoCal Gas) and Southern California Edison (SCE), to promote efficient energy use and assist lower-income customers. These partnerships are in direct alignment with the examples provided by the California Department of Housing and Community Development (HCD). Broadly these programs are looking to provide rebate programs for installing energy-efficient appliances, and public education about ideas to conserve energy. SoCal Gas offers installation of energy-saving home improvements at no cost to low-income households. SCE also offers free energy-saving appliances to low-income households.

Opportunities for the City of Alhambra to build on what they already have to include combining general plan policies with permitting and updating its energy plan.

The General Plans policy and recommendation on green building construction could be combined with three of California HCD's recommendations.³⁶ By combining these three recommendations, Alhambra can achieve a win for green building construction, while reducing cost of construction by speeding up their permitting process:

1. "Streamline and expedite the approval process for housing built using green building standards and specific energy standards."
2. "Adopt policies and incentives to promote energy-efficient retrofits prior to resale of homes."
3. "Target local funds, and Community Development Block Grants, to assist affordable housing developers incorporate energy-efficient designs and features."

Also, Alhambra could include "cool roofs" in its development code or encourage it through a rebate program as recommended by the U.S. Department of Energy. Cool roofs are designed to reflect more sunlight by choosing more reflective paint colors or materials. These roofs would reduce need for air conditioning, thereby lowering peak electricity demand.

³⁵ https://codelibrary.amlegal.com/codes/alhambra/latest/alhambra_ca/0-0-0-109642

³⁶ <https://www.hcd.ca.gov/community-development/building-blocks/site-inventory-analysis/opportunities-for-energy-conservation.shtml>

Alhambra has facilitated mixed-use, compact development for decades in the Central Business District and throughout the city. Mixed-used development encourage walking due to more compact development patterns and housing development that is in close proximity to services and retail businesses. To the extent that the city is able, mixed-use zoning should be expanded so that all residents have the option to walk to fulfill weekly errands, rather than drive.

In 2012, the city published its Energy Action Plan (EAP) along with the 27 other cities that are part of the San Gabriel Valley Council of Governments. The purpose of this plan is to establish a long-term vision and commitment to achieve energy efficiency in the city, for both the community and the government operations. This plan was created with a 2020 target goal of reducing greenhouse gas emissions. The State of California now has a 2030 target and a carbon neutral goal for 2045.

Affirmatively Furthering Fair Housing Analysis

AB686 requires that all Housing Elements due after January 1, 2021, must contain an Assessment of Fair Housing. California defines affirmatively furthering fair housing as:

"Meaningful actions, in addition to combating discrimination, that overcome patterns of segregation and foster inclusive communities free from barriers that restrict access to opportunity based on protected characteristics. Specifically, affirmatively furthering fair housing means taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity, and fostering and maintaining compliance with civil rights and fair housing laws. The duty to affirmatively further fair housing extends to all of a public agency's activities and programs relating to housing and community development"³⁷

The City of Alhambra updated and adopted a local Analysis of Impediments (AI) to fair housing choice in 2020. This document identifies fair housing needs and issues in the city and recommends solutions to mitigate or remove impediments. As an entitlement city for CDBG funding, the city also completed an update to its FY 2020-2024 Consolidated Plan in August 2020. Collectively, these analyses include considerable baseline information, outreach, and recommendations to serve and a foundation for additional research.

Summary of [Housing Element Outreach](#)

Chapter 1 includes a comprehensive reporting of community outreach and engagement that was conducted as a part of the Housing Element. Outreach was designed to both disseminate and gather information from the community. A summary of this outreach, specific to AFFH includes:

1. Initial scoping with the City of Alhambra to develop a comprehensive list of groups to directly send project information and invite to participate in the project. This initial effort identified 82 organizations including community organizations (i.e., Housing Rights Center, East LA Women's Center, Grassroots Alhambra), Culturally specific groups (i.e., Alhambra Latino Association, Asian American Association of Alhambra), faith-based groups, real estate and business groups (i.e., AbundantLA, Alhambra Downtown Association), and special housing needs groups.

³⁷ Gov. Code, § 8899.50, subd. (a)(1).

2. Project updates and announcements across a broad spectrum of resources to maximize exposure. This included the city’s social media platform, articles in the city’s newsletter, the city’s Parks and Recreation Leisure Guide that reaches 31,000 households in print, announcements on the library and school district social media accounts, and articles in the Around Alhambra Newsletter.
3. A public workshop was held at the beginning of the project that included a live interactive survey. The survey included questions and requests for insights specific to AFFH issues. Announcements for the workshop were translated into Spanish and Traditional Chinese. The Survey was also translated and posted to the project webpage for community members who could not attend the workshop to participate. This initial workshop was conducted virtually due to the COVID-19 pandemic. The project team offered “office hours” to discuss with community members who could not participate by computer, though none were requested.
4. To ensure comprehensive outreach throughout the entire community, each City Councilmember held a virtual town hall with the project team to discuss housing issues in each district.
5. In addition to the Housing Element outreach, the city updated its Analysis of Impediments in April 2020 and its Consolidated Plan in August 2020. Both efforts included significant outreach that included public study sessions, public meetings with the Housing and Development Advisory Committee, and a joint educational workshop with community members.

Figure 75: Word Cloud from [Chat Box Dialogue in Public Workshop #1](#)



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In addition to the outreach efforts listed above, the organized an effort to reach input for specific groups and organizations. The city developed a contact list representing a range of business associations, non-profit organizations, community organizations, faith-based institutions, housing advocacy groups, and other neighborhood and social groups. This list included:

Exhibit 76: List of Organizations Receiving Direct Contact

<u>Category</u>	<u>Organization Name</u>
<u>Business associations</u>	<u>Alhambra Downtown Association</u>
<u>Business associations</u>	<u>Chamber of Commerce</u>
<u>Business associations</u>	<u>San Gabriel Valley Economic Partnership</u>
<u>Community Organizations</u>	<u>Knights of Columbus #2431</u>
<u>Community Organizations</u>	<u>Maravilla Foundation</u>
<u>Community Organizations</u>	<u>People for People WSGVCC</u>
<u>Community Organizations</u>	<u>Door of Hope</u>
<u>Community Organizations</u>	<u>Women's Center for Creative Works</u>
<u>Community Organizations</u>	<u>Elizabeth House</u>
<u>Community Organizations</u>	<u>Alhambra Women's club</u>
<u>Community Organizations</u>	<u>LA Works</u>
<u>Community Organizations</u>	<u>Green Menu</u>
<u>Community Organizations</u>	<u>Housing Rights Center</u>
<u>Community Organizations</u>	<u>Grassroots Alhambra</u>
<u>Community Organizations</u>	<u>San Gabriel Valley Oversight Group</u>
<u>Culturally Specific Organizations</u>	<u>Alhambra Latino Association</u>
<u>Culturally Specific Organizations</u>	<u>Mexican American Opportunity Foundation</u>
<u>Culturally Specific Organizations</u>	<u>Asian American Economic Development Enterprise</u>
<u>Culturally Specific Organizations</u>	<u>Asian Business Association</u>
<u>Culturally Specific Organizations</u>	<u>Chinatown Service Center</u>
<u>Culturally Specific Organizations</u>	<u>Taiwanese American Professionals LA</u>
<u>Culturally Specific Organizations</u>	<u>Hai-Ninh Community Association</u>
<u>Culturally Specific Organizations</u>	<u>Eng Family Benevolent Association</u>
<u>Faith based institutions/Churches</u>	<u>Alhambra SDA Church The Grace Place</u>
<u>Faith based institutions/Churches</u>	<u>Bethany Church of Alhambra</u>
<u>Faith based institutions/Churches</u>	<u>Chinese Bible Missions Church</u>
<u>Faith based institutions/Churches</u>	<u>Emmaus Lutheran Church & School</u>
<u>Faith based institutions/Churches</u>	<u>First Baptist Church</u>
<u>Faith based institutions/Churches</u>	<u>First United Methodist Church</u>
<u>Faith based institutions/Churches</u>	<u>Mandarin Baptist Church of Los Angeles</u>
<u>Faith based institutions/Churches</u>	<u>Sage Granada Park United Methodist Church</u>
<u>Faith based institutions/Churches</u>	<u>Saint Therese Church</u>
<u>Faith based institutions/Churches</u>	<u>San Gabriel Mission</u>
<u>Faith based institutions/Churches</u>	<u>Gateway Community Church</u>
<u>Faith based institutions/Churches</u>	<u>Pasadena Hindu Temple</u>
<u>Faith based institutions/Churches</u>	<u>Temple Beth David</u>
<u>Faith based institutions/Churches</u>	<u>Jewish Federation of the Greater San Gabriel and Pomona Valleys</u>
<u>Historical/Preservation</u>	<u>Alhambra Historical Society</u>
<u>Historical/Preservation</u>	<u>Alhambra Preservation Group</u>
<u>Homeowners/Apartment/Tenant/RE associations</u>	<u>Foothill Apartment Association</u>
<u>Homeowners/Apartment/Tenant/RE associations</u>	<u>West San Gabriel Valley Realtors</u>
<u>Homeowners/Apartment/Tenant/RE associations</u>	<u>Housing Rights Center</u>

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Homeowners/Apartment/Tenant/RE associations	City Ventures
Homeowners/Apartment/Tenant/RE associations	YIMBY Law
Homeowners/Apartment/Tenant/RE associations	Abundant Housing LA
Homeowners/Apartment/Tenant/RE associations	Making Housing Happen
Homeowners/Apartment/Tenant/RE associations	HCDA Citizen Advisory Committee
Housing Developers/Owners	National Builders Control
Housing Developers/Owners	Intracopr Homes
Housing Developers/Owners	Pacific Plaza Premier Development Group
Housing Developers/Owners	Hillcrest Development / Charles Dunn
Housing Developers/Owners	Shea Properties
Housing Developers/Owners	southern California Multihousing Group
Housing Developers/Owners	Dynasty Builders Inc
Housing Developers/Owners	City Ventures Llc
Housing Developers/Owners	Foundation For Affordable Housing/Embrace Foundation
Housing Developers/Owners	National Church Residences of Southern California
Housing Developers/Owners	Telacu Housing-Alhambra, Inc.
Housing Developers/Owners	Wysong Village Apartments Limited Partnership
Housing Developers/Owners	The Villages at Alhambra
Housing Developers/Owners	Alhambra Community Association Management
Housing Developers/Owners	Habitat for Humanity SGV
Housing Developers/Owners	AOF /Golden State Community Development Corp
Housing Developers/Owners	East LA Community Corporation (ELACC)
Large employers	Cal State University Los Angeles
Publications	WaChow Media
Publications	Pasadena Star News
Special Needs Housing	Esperanza Services
Special Needs Housing	Home of Angels
Special Needs Housing	Choices Community Housing Options

These organizations represent constituents that could be impacted by fair housing issues, including Hispanic and Asian American populations, women’s organizations, and organizations supporting special needs populations. These groups received direct notification via email of project announcements, public meeting notifications, and notifications of workshops and surveys. Public meeting announcements and survey materials were translated into Spanish and Traditional Chinese.

Elemento de Vivienda de Alhambra

FORO DE LA COMUNIDAD

Miércoles 17 de febrero de 2021 de 6:00 p.m. a 7:30 p.m.

Únase a este foro virtual de la comunidad para aprender más sobre este proyecto y conocer las formas de participar.



Los temas del foro incluyen:

- El Proyecto de Actualización del Elemento de Vivienda incluyendo el proceso, fechas clave y los requisitos estatales importantes.
- El número de la Asignación Regional de Necesidades de Vivienda (RHNA) de Alhambra.
- Cómo el RHNA afecta a las viviendas en la ciudad y sus alrededores.
- El actual parque inmobiliario y las tendencias del mercado inmobiliario.
- Formas de participar y dar su opinión.



Servicios de traducción disponibles:

Las solicitudes de los servicios de traducción se pueden hacer en el momento de registrarse para el evento o por correo electrónico a HousingElement@CityofAlhambra.org. Las solicitudes deben realizarse antes de las 8:00 a.m. del jueves 11 de febrero de 2021. Los materiales traducidos de la encuesta también estarán disponibles en la página web del proyecto después de la reunión en www.alhambrahousingelement.com.



City of
Alhambra

Es necesario registrarse para asistir a este evento.
Para registrarse visite:
www.alhambrahousingelement.com/get-involved.

阿罕布拉市住房比例分配 (Housing Element)

社區論壇

2021年2月17日 (星期三) 下午6:00-7:30

請參加本次虛擬社區論壇，瞭解更多有關本專案的詳情，並瞭解參與的方法。



論壇主題將包括:

- 住房比例分配更新專案 (Housing Element Update Project), 包括程序、重要日期及重要州政府要求。
- 阿罕布拉市地區租房需求分配 (RHNA) 數字。
- RHNA 如何影響本市及周圍地區的住房。
- 阿罕布拉市目前的住房存量和住房市場發展趨勢。
- 參與和提出意見的方法。



可提供翻譯服務:

在登記參加活動時可提出翻譯服務請求，或請發電子郵件至 HousingElement@CityofAlhambra.org。翻譯服務請求必須在2021年2月11日 (星期四) 上午8時之前提出。會議結束後，將在以下專案網站刊載翻譯的調查問卷資料: www.alhambrahousingelement.com。



City of
Alhambra

參加本次活動需要登記。請在以下網站登記:
www.alhambrahousingelement.com/get-involved.

Information from these outreach efforts assisted the team in better understanding fair housing issues. Qualitative data from outreach efforts is important because reveals the lived experiences of residents beyond what is available in common datasets. However, outreach may not include a proportional cross-section of the population and findings are rarely statistically significant representations. Nonetheless, input from residents can be as important or more in revealing unique local challenges.

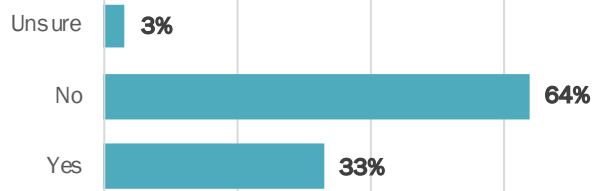
The most relevant information from the efforts outlined above is summarized under "local context" subsections and **are also summarized and consolidated below**. Combined with the data analysis, this information assisted in refining the city's fair housing objectives. For example, outreach revealed that housing discrimination remains a concern in Alhambra, and more importantly residents who experience it do not know where to get resources. This led the city to expand its information and outreach plan in its AFFH program. The city also learned that residents feel they have good access to public services, food, and health care, but feel that access to jobs and transit are more lacking. This led the city to prioritize lower income sites in proximity to transit corridors.

[Summary of Fair Housing Outreach Input](#)

[A survey was held in both a live community workshop and online posted to the project website. This survey asked residents a series of targeted questions relating to fair housing and the accessibility of resources in their neighborhoods.](#)

Have you ever experienced or witnessed housing discrimination in the City of Alhambra?

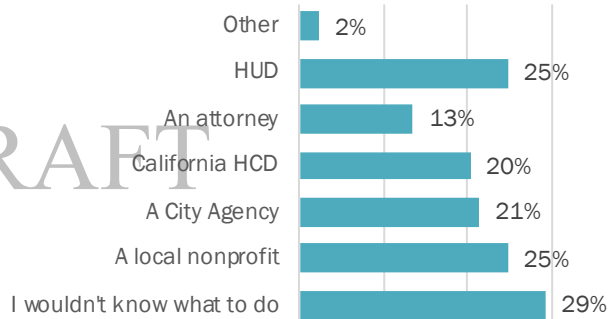
One-third of respondents have experienced or witnessed discrimination in Alhambra.



If you or someone you know experienced housing discrimination, where would you refer them to for assistance?

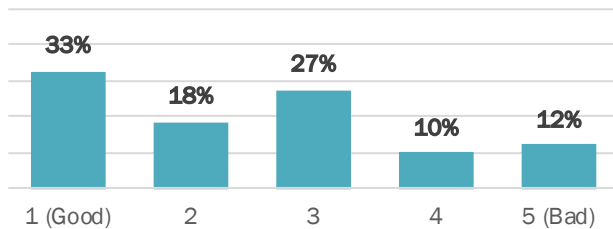
Nearly three in ten would not know what to do if faced with a housing discrimination issue.

Note: Respondents could select multiple answers



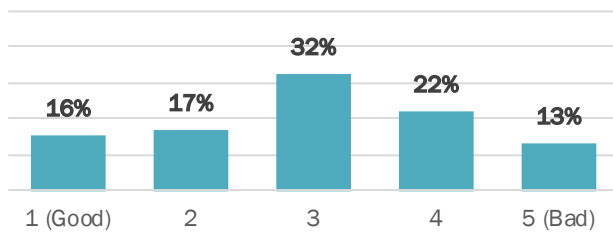
Is your home close to good schools?

Over half of respondents considered their home had access to above average quality schools.



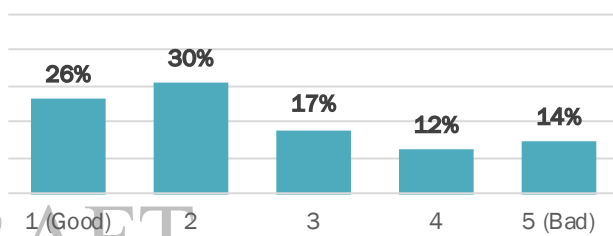
Is your home close to good jobs?

A full two-thirds of respondents noted their access to jobs was average or worse.



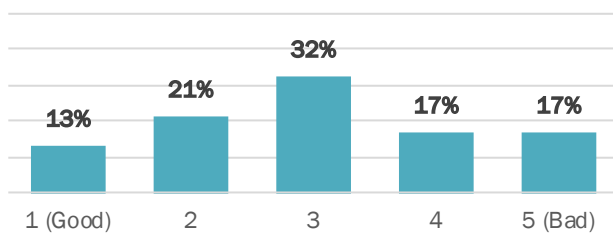
Is your home close to good parks and greenspace?

Fifty-six percent of respondents considered their home to have good or ok access to parks and greenspace



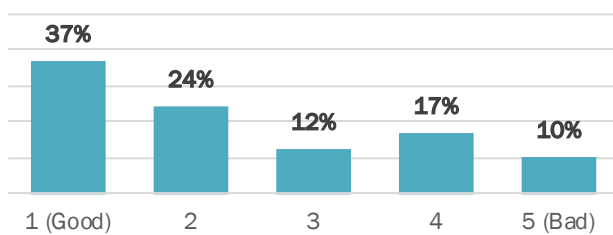
Is your home close to reliable and safe transit?

Only thirteen percent of respondents through their home had good access to reliable and safe transit.



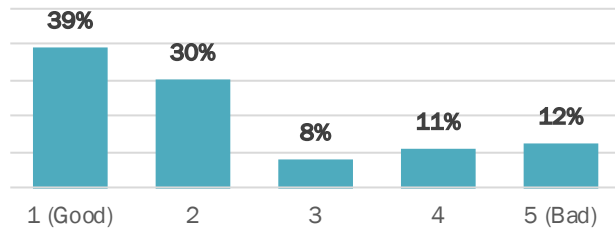
Is your home close to medical services (pharmacy, drugstore, health clinic, hospital)?

Roughly 73 percent of respondents thought their home had average or better access to medical services.



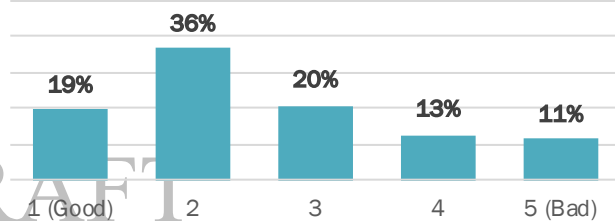
Is your home close to public services (library, post office, police/fire, City Hall, City services)?

Nearly 70 percent of respondents considered their home to have above average access to public services.



Are the streets and sidewalks in your neighborhood safe and well-kept?

Nearly one in four respondents considered the quality and safety of streets in their neighborhood to be below average.



Other Comments Received

In addition to survey responses, a summary of comments throughout the Housing Element Update process relating to fair housing issues include:

- What policies and measures can be implemented to protect tenants from rent increases and evictions in the housing element?
- How can we preserve existing low-income "naturally occurring" affordable housing in addition to production?
- Where does the community want to put the required housing capacity?
- Affordability [is most important]. I will have to move soon because rents keep getting higher and even 2-bedroom condo/townhomes are too expensive.
- Housing not as a commodity but a right
- [wWe need] easy access to public transportation for elderly who don't drive
- [wWe need] equitable, diverse, dynamic, growing but still independent and small-town feel
- [Alhambra needs to be] Inclusive, affordable, strong protection for tenants.
- [wWe need to] expedite ADU permits, allow ADU size that complements size of land not size of existing house. I would like to to increase pedestrian safety in Main Street, invigorate retail and family activities along East Main Street. General beautification of the area.

- [wWe have] a lack of housing for senior households
- [wWe need] Rent control, lack of permanent just cause eviction protections, informal evictions from lack of enforcement.
- [wWe have] Substandard, deteriorated, unsafe dwellings that need to be replaced.
- Lloans not available for middle income persons/households
- [wWe have] Inadequate Park/green space located near higher density housing
- Gentrification caused by so much new market rate development.
- [wWe need] support for unhoused populations, landlord harassment and eviction protections.
- We need a designated area for affordable housing just like other cities. We want to preserve East Main Corridor. Besides housing that's affordable cannot be placed there since the area is privately owned.
- How will Alhambra affirmatively further fair housing?
- We need to ensure that long-time residents aren't forced from the city by rising housing costs.
- Alhambra needs rent control.
- Education/outreach is key to making these successful (at least in Los Angeles Community Plans). 70% of attendees at the last Housing Element update were homeowners, but Alhambra is over 60% renters.

Assessmentassessment_of Fair Housing

The City of Alhambra’s Analysis of Impediments (2020) identifies many housing issues in the city and provides a foundation of information for inclusion in this section of the Housing Element. However, this section provides additional information derived from the unique resources in the region and local context from community outreach. Many fair housing factors and data are included in the Housing Needs Assessment (Chapter 2 of the Housing Element).

Fair Housing Data in the Housing Needs Assessment

The Housing Needs Assessment includes the following data related to fair housing factors in Alhambra:

- | | |
|---|---|
| ▪ Regional comparison of population by race and ethnicity | ▪ Regional Comparison of People Experiencing Homelessness |
| ▪ Areas of minority concentration | ▪ Homeless Facilities and Service Providers |
| ▪ Regional Comparison of HHs by Income | ▪ People living in poverty |
| ▪ Share of renter-occupied housing (tenure split) | ▪ Housing stock lacking telephone, plumbing, and kitchen facilities |
| ▪ Overcrowding | ▪ Assisted housing at risk of conversion |
| ▪ Cost Burden | |
| ▪ Special Housing Needs | |

Identification of Fair Housing Issues

Section VII of the AI, which includes Alhambra's Fair Housing Action Plan for the 2020 to 2024 planning period, provides a summary of fair housing issues that the city plans to address. These include:

Discrepancies in lending patterns by race and ethnicity. Between 2012 and 2017, the number of home loan applications decreased in Alhambra by about 3,300, with 2,061 applications in 2017. About 28% of applicants were White, while about 9% of Alhambra's population is White. Additionally, 1% of applicants were Black (2% of total city population), 16% of applicants were Hispanic (38% of total city population), and 41% of applicants were Asian (50% of total city population).

Wide range of approval rates by top lenders. Of the loan applications in Alhambra in 2017, approval rates ranged among top lenders. For example, Nationstar had an approval rating of 21%, while Shore Mortgage had an approval rating of 73%.

Subprime lending discrepancies by race and ethnicity. The frequency of spreads reported on loans in Alhambra in 2017 was 2.8%. Non-white households in Alhambra have a higher incidence of rate spread on average, ranging from 3.3% (Asian applicants) to 5.3% (Hispanic applicants), compared to White applicants (2.2%).

Discriminatory practices in the housing market. The Housing Rights Center (HRC) received 177 fair housing complaints over the 2014 to 2018 period, 40 of which were fair housing cases and 26 of the cases had substantial evidence. Additionally, the HRC reported inconsistencies in the types of clients they serve compared to the distribution of racial and ethnic groups in Alhambra. For example, Asian residents in Alhambra make up about 50% of the city's population, but the HRC reported that Asian residents accounted for 20% of their clients served to address fair housing issues.

Discriminatory language in real estate ads. The AI found "potentially discriminatory language, mostly encouraging family living" in a review of ads for units both for rent and for sale.

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Figure 775. Lending Patterns by Race/Ethnicity Summary of Opportunity Indicators, Alhambra
 Source: Table 26, City of Alhambra Analysis of Impediments (www.lendingpatterns.com, 2018)

	Approved		Denied		Withdrawn/ Incomplete	
	2012	2017	2012	2017	2012	2017
White						
Low (0-49% AMI)	55%	40%	32%	26%	9%	23%
Moderate (50-79% AMI)	56%	33%	18%	30%	14%	33%
Middle (80-119% AMI)	53%	55%	17%	10%	22%	28%
Upper (≥120% AMI)	63%	63%	12%	13%	13%	18%
Black						
Low (0-49% AMI)	67%	0%	0%	0%	33%	0%
Moderate (50-79% AMI)	0%	0%	100%	0%	0%	0%
Middle (80-119% AMI)	50%	100%	25%	0%	0%	0%
Upper (≥120% AMI)	47%	44%	6%	22%	24%	33%
Hispanic						
Low (0-49% AMI)	59%	43%	31%	29%	6%	24%
Moderate (50-79% AMI)	58%	32%	20%	36%	8%	28%
Middle (80-119% AMI)	51%	56%	21%	12%	20%	23%
Upper (≥120% AMI)	59%	62%	16%	14%	13%	20%
Asian						
Low (0-49% AMI)	65%	40%	16%	27%	15%	27%
Moderate (50-79% AMI)	57%	57%	16%	12%	8%	24%
Middle (80-119% AMI)	56%	63%	12%	11%	9%	16%
Upper (≥120% AMI)	63%	66%	9%	9%	9%	14%

Fair Housing Enforcement and Capacity

The city does not have any local fair housing laws. However, in March 2020 the Alhambra City Council adopted an emergency ordinance prohibiting COVID-19 related evictions. When this moratorium expired the city committed to enforcing LA County’s eviction moratorium. As outlined in Alhambra’s 2020 Analysis of Impediments to Fair Housing Choice (2020 AI), the city has committed to complying with applicable federal and State fair housing laws including the Fair Housing Act of 1968, the Fair Housing Amendments Act of 1988, and the Fair Housing Employment and Housing Act (FEHA). The city does not have any pending lawsuits, enforcement actions, judgements, settlements, or findings related to fair housing and civil rights.

The city contracts with the Housing Rights Center (HRC) to provide fair housing services in the community. The HRC is a non-profit, approved by HUD, that works with local government offices to ensure that Fair Housing Laws are upheld. In general, fair housing services include the investigation and resolution of housing discrimination complaints, discrimination auditing and testing, and education and outreach, including the dissemination of fair housing information such as written material, workshops, and seminars. Landlord/tenant counseling is another fair housing service that involves informing landlords and tenants of their rights and responsibilities under fair housing law and other consumer protection legislations as well as mediating disputes between tenants and landlords.

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Between FY 2014 and FY 2018, HRC provided fair housing services to an average of 29 clients per year (143 clients total). a majority (53 percent) of HRC clients from Alhambra were of “Other” races, followed by Whites (23 percent), Asians (20 percent), and Black/African Americans (four percent). The “Other” category most likely includes those who are of Hispanic origin.

In March, 2020, the COVID-19 pandemic was declared; subsequently, many of the HRC’s services shifted virtually. While the HRD statistics herein do not include 2019-2020 numbers, the need for housing services and support during the pandemic has been critical, given the uncertainty of economic resources and/or the ability for persons to maintain stable housing due to unemployment. Many eviction moratoriums, for example, were enacted, resulting in greater need for housing outreach and education by both the city and the HRC.

During the FY 2019-2020, HRC received 281 calls for general housing inquiries and 38 calls related to discrimination and fair housing inquiries. Among the fair housing inquiries 71 percent were related to disabilities or protected classifications.

During the FY 2019-2020, eight housing discrimination cases were opened, the majority were reconciled through counseling or withdrawn. A total of two cases were referred to litigation and went to small claims court.

Between 2013 and 2018, 12 cases were filed with the Department of Fair Employment and Housing (DFEH). Among these, one case was settled by enforcement and another by mediation. All other cases were dismissed, withdrawn, or were found to not have probable cause.

Local Context

Early in the development of this Housing Element, ECONorthwest and the City of Alhambra sought public input through a workshop and online survey. The workshop and online survey asked questions related to fair housing issues, including: “Have you ever experienced or witnessed housing discrimination?” and “If you or someone you know experienced housing discrimination, where would you refer them for assistance?”. Of the 94 survey respondents, 31 (33%) stated they had experienced or witnessed housing discrimination, 60 (64%) stated they did not experience or witness housing discrimination, and 3 (3%) stated they were unsure.

Of those who experienced or witnessed housing discrimination, 26 respondents stated they would not know where to seek assistance. Twenty-two respondents stated they would refer to a local nonprofit, while other respondents (at a lower response rate) stated they would refer to a city agency, HCD, an attorney, HUD, or other agencies. To better communicate available resources available for those facing housing discrimination, the City of Alhambra may consider reinforcing education about fair housing resources, and access to the HRC, to the public.

Relevant Factors and Data Available Related to Fair Housing Issues

In addition to findings stated in the AI and the Housing Needs Assessment, the city can draw from supplemental data and analysis to identify potential fair housing issues. These analyses include evaluations of segregation and integration, identifying racially or ethnically concentrated areas of poverty (or affluence), disparities in access to opportunity, and displacement risk. This section provides a summary of relevant analyses in Alhambra that further describe fair housing issues in the city.

Segregation and Integration Patterns and Trends

Trends in segregation and integration within a city can be closely linked to access to opportunities across racial and ethnic groups. Two analyses that help to identify patterns in segregation and integration are a dissimilarity index and an isolation index. The dissimilarity index requires a comparison group to determine another group's population distribution across Census tracts in Alhambra. The dissimilarity index for Alhambra is reported for racial and ethnic groups in comparison to the White alone population in the city. The isolation index also relies on distributions of groups of populations over a geographic area (Census tracts) but analyzes a population group's distribution across the city in relation to the group's total population in the city.

The results of the dissimilarity index and isolation index are shown in Figure 786. For the racial and ethnic groups (other than White alone) that have high shares of population in Alhambra, the dissimilarity indices for Black or African American alone, Asian alone, Some other race alone, and Hispanic or Latino (of any race) are in the moderate (30 to 60) or low range (0 to 30). For example, to achieve an even distribution of population for White alone and Black or African American alone groups, 40% of one group would need to move to a given Census Tract in Alhambra.

The isolation index scores across racial and ethnic groups in Alhambra are relatively low, as the total range is 0 to 100, and Alhambra ranges from 0.8 to 6.6. This shows that among each racial or ethnic group in Alhambra individually, the populations are relatively integrated in a given geographic area (i.e., Census tract).

Figure 7678. Dissimilarity Index and Isolation Index Scores by Race/Ethnicity, Alhambra

Source: American Community Survey, 2015-2019 5-year Estimates

Racial/Ethnic Group	Dissimilarity Index Score	Isolation Index Score
White alone	n/a	<u>1.93.8</u>
Black or African American alone	40	<u>1.15</u>
American Indian and Alaska Native alone	50	<u>0.68</u>
Asian alone	23	6.6
Native Hawaiian and Other Pacific Islander alone	81	<u>2.73.2</u>
Some other race alone	17	<u>1.63.6</u>
Two or more races	24	<u>0.81.1</u>
Hispanic or Latino (of any race)	11	<u>2.05.8</u>

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Figure 797. Dissimilarity Index and Isolation Index Scores by Race/Ethnicity, Alhambra
 Source: American Community Survey, 2015-2019 5-year Estimates

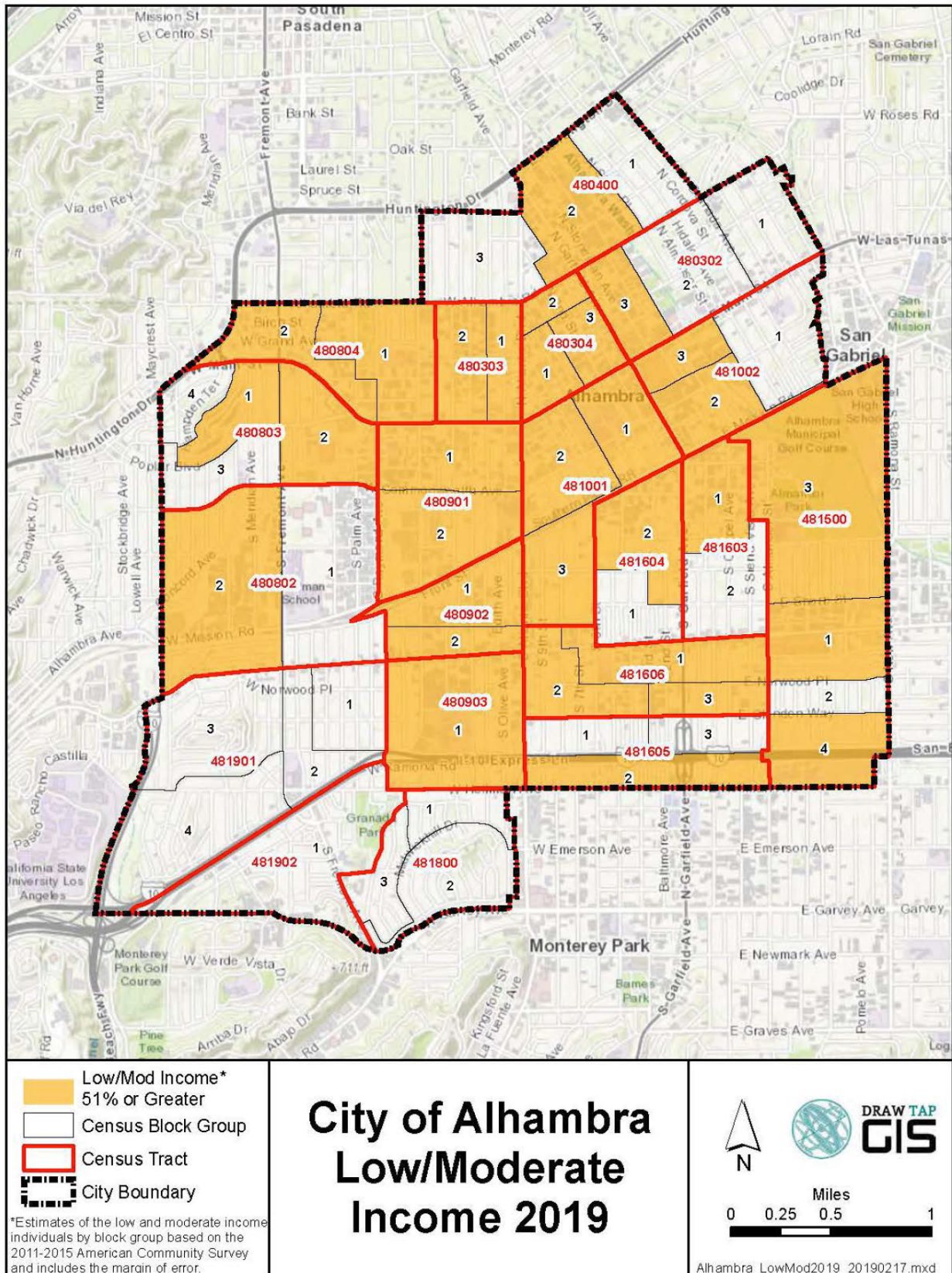
<u>(Alhambra, CA CDBG) Jurisdiction</u>				
<u>Racial/Ethnic Dissimilarity Index</u>	<u>1990 Trend</u>	<u>2000 Trend</u>	<u>2010 Trend</u>	<u>Current</u>
<u>Non-White/White</u>	<u>16.88</u>	<u>24.23</u>	<u>22.14</u>	<u>24.37</u>
<u>Black/White</u>	<u>16.47</u>	<u>31.00</u>	<u>24.60</u>	<u>30.81</u>
<u>Hispanic/White</u>	<u>18.13</u>	<u>22.92</u>	<u>20.94</u>	<u>23.71</u>
<u>Asian or Pacific Islander/White</u>	<u>17.22</u>	<u>27.69</u>	<u>27.29</u>	<u>30.48</u>
<u>(Los Angeles County, CA) Jurisdiction</u>				
<u>Racial/Ethnic Dissimilarity Index</u>	<u>1990 Trend</u>	<u>2000 Trend</u>	<u>2010 Trend</u>	<u>Current</u>
<u>Non-White/White</u>	<u>53.33</u>	<u>53.62</u>	<u>53.85</u>	<u>55.87</u>
<u>Black/White</u>	<u>68.29</u>	<u>63.51</u>	<u>60.24</u>	<u>64.21</u>
<u>Hispanic/White</u>	<u>62.81</u>	<u>64.99</u>	<u>64.38</u>	<u>65.12</u>
<u>Asian or Pacific Islander/White</u>	<u>41.58</u>	<u>48.57</u>	<u>49.62</u>	<u>52.79</u>
<u>(Los Angeles-Long Beach-Anaheim, CA) Region</u>				
<u>Racial/Ethnic Dissimilarity Index</u>	<u>1990 Trend</u>	<u>2000 Trend</u>	<u>2010 Trend</u>	<u>Current</u>
<u>Non-White/White</u>	<u>55.32</u>	<u>55.50</u>	<u>54.64</u>	<u>56.94</u>
<u>Black/White</u>	<u>72.75</u>	<u>68.12</u>	<u>65.22</u>	<u>68.85</u>
<u>Hispanic/White</u>	<u>60.12</u>	<u>62.44</u>	<u>62.15</u>	<u>63.49</u>
<u>Asian or Pacific Islander/White</u>	<u>43.46</u>	<u>46.02</u>	<u>45.77</u>	<u>49.78</u>

The general trend for racial and ethnic dissimilarity in the Los Angeles region has been growing at a slow pace since 1990. The city of Alhambra has seen a 44% increase in dissimilarity between its white and non-white population, being mostly driven by the Black and Asian/Pacific Islander communities. This trend demonstrates that racial and ethnic populations in the city have been moving to communities which represents their identity, whether by choice or institutional/de factor barriers to entry within other communities. However, dissimilarity in Alhambra remains well below regional levels.

The Alhambra AI provides a map showing the distribution of low and moderate-income (LMI) population in the city by block group, as of 2019. LMI areas are defined as Census tracts or block groups where 51 percent or more of the population is defined as LMI by HUD. The AI found that: "low- and moderate-income residents are generally dispersed across the middle of Alhambra with above-moderate income residents concentrated in block groups located in the southwest and northeast corners of the city".

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Figure 8078. Low- and Moderate-income Areas, Alhambra
 Source: Figure 3, City of Alhambra Analysis of Impediments (2020).



Racially or Ethnically Concentrated Areas of Poverty

To assist communities in identifying racially and ethnically concentrated areas of poverty (also known as R/ECAPs), HUD developed a definition that relies on a racial and ethnic concentration threshold, as well as a poverty test. The City of Alhambra does not have any Racially or Ethnically Concentrated Areas of Poverty (R/ECAP), as defined by HUD. According to HUD data, this has been a consistent condition since at least 1990. Regionally, there are few areas in the San Gabriel Valley designated as R/ECAP areas. R/ECAP areas most proximate to Alhambra are located in East Los Angeles and more broadly Downtown Los Angeles.

The TCAC/HCD opportunity maps use a location quotient to proximate racial segregation and poverty. This calculation is reported in the High Segregation and Poverty Category. The 2021 methodology and associated map does not show any areas of High Segregation and Poverty in Alhambra. However, in the 2020 methodology, Census Tract 4803.04 was listed as a High Segregation and Poverty Tract. This area encompasses most of west downtown and is bounded by North Atlantic Boulevard, West Alhambra Road, North Garfield Ave, and West Main Street. Its improvement in 2021 to a High Resource Area is indicative of improving conditions in Alhambra.

Persons with Disabilities

The City has been following the general regional trends of in and out-migrations of persons with different disabilities. There are a few subtle differences such as the city's increase of populations with a self-care disability and Los Angeles County's decrease of that population. Generally, rates of young people with disabilities remain low and in line with regional trends. However, Alhambra is exhibiting and increasing need relative to the region for households aged 65 and older across most disability categories.

Figure 8179: Population Distribution for Persons with Disabilities, Alhambra and LA County

Source: ACS 5-Year Tables 2010-2014, 2014-2018; Table S1810 – Characteristics of Disabilities

	Los Angeles County				Alhambra City			
	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total	Pop. 5-17 Years	Pop. 18-64 Years	Pop. 65+ Years and Over	% of Total
2010-2014								
With a Hearing Difficulty	8,549	79,263	148,563	14.9%	0	520	1,591	13.8%
With a Vision Difficulty	11,725	88,565	81,447	9.4%	37	577	754	7.4%
With a Cognitive Difficulty	44,345	188,713	132,619	17.3%	132	1,204	1,187	12.9%
With an Ambulatory Difficulty	10,898	228,883	287,559	29.8%	30	1,315	2,559	23.4%
With a Self-Care Disability	15,917	102,737	143,061	15.3%	51	593	1,209	11.4%
With an Independent Living Difficulty	N/A	175,035	233,900	23.6%	51	593	1,209	21.1%

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	<u>Los Angeles County</u>				<u>Alhambra City</u>			
<u>2014-2018</u>	<u>Pop. 5-17 Years</u>	<u>Pop. 18-64 Years</u>	<u>Pop. 65+ Years and Over</u>	<u>% of Total</u>	<u>Pop. 5-17 Years</u>	<u>Pop. 18-64 Years</u>	<u>Pop. 65+ Years and Over</u>	<u>% of Total</u>
<u>With a Hearing Difficulty</u>	<u>7,909</u>	<u>80,656</u>	<u>160,486</u>	<u>14.3%</u>	<u>47</u>	<u>484</u>	<u>1,565</u>	<u>12.7%</u>
<u>With a Vision Difficulty</u>	<u>11,253</u>	<u>95,338</u>	<u>87,968</u>	<u>9.1%</u>	<u>78</u>	<u>608</u>	<u>687</u>	<u>6.8%</u>
<u>With a Cognitive Difficulty</u>	<u>N/A</u>	<u>224,488</u>	<u>306,248</u>	<u>27.5%</u>	<u>N/A</u>	<u>959</u>	<u>1,379</u>	<u>11.6%</u>
<u>With an Ambulatory Difficulty</u>	<u>N/A</u>	<u>224,488</u>	<u>306,248</u>	<u>27.5%</u>	<u>N/A</u>	<u>1,136</u>	<u>2,859</u>	<u>22.6%</u>
<u>With a Self-Care Disability</u>	<u>N/A</u>	<u>100,542</u>	<u>150,046</u>	<u>13.3%</u>	<u>N/A</u>	<u>605</u>	<u>1,459</u>	<u>11.6%</u>
<u>With an Independent Living Difficulty</u>	<u>N/A</u>	<u>178,883</u>	<u>243,856</u>	<u>21.9%</u>	<u>N/A</u>	<u>1,095</u>	<u>2,639</u>	<u>21%</u>

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	<u>Los Angeles County – Change over Time</u>				<u>Alhambra City – Change over Time</u>			
<u>Changes between 2014-2018</u>	<u>Pop. 5-17 Years</u>	<u>Pop. 18-64 Years</u>	<u>Pop. 65+ Years and Over</u>	<u>% of Total</u>	<u>Pop. 5-17 Years</u>	<u>Pop. 18-64 Years</u>	<u>Pop. 65+ Years and Over</u>	<u>% of Total</u>
<u>With a Hearing Difficulty</u>	<u>-7.5%</u>	<u>1.8%</u>	<u>8%</u>	<u>-4%</u>	<u>4700%</u>	<u>-6.9%</u>	<u>1.6%</u>	<u>-8%</u>
<u>With a Vision Difficulty</u>	<u>-4%</u>	<u>7.6%</u>	<u>8%</u>	<u>3.2%</u>	<u>110.8%</u>	<u>5.4%</u>	<u>-8.9%</u>	<u>-8.1%</u>
<u>With a Cognitive Difficulty</u>	<u>N/A</u>	<u>4.7%</u>	<u>4.2%</u>	<u>-19.7%</u>	<u>N/A</u>	<u>-20.3%</u>	<u>16.2%</u>	<u>-10.1%</u>
<u>With an Ambulatory Difficulty</u>	<u>N/A</u>	<u>-1.9%</u>	<u>6.5%</u>	<u>-7.7%</u>	<u>N/A</u>	<u>13.6%</u>	<u>11.7%</u>	<u>-3.4%</u>
<u>With a Self-Care Disability</u>	<u>N/A</u>	<u>-2.1%</u>	<u>4.9%</u>	<u>-13.1%</u>	<u>N/A</u>	<u>2%</u>	<u>20.7%</u>	<u>1.8%</u>
<u>With an Independent Living Difficulty</u>	<u>N/A</u>	<u>2.2%</u>	<u>4.3%</u>	<u>-7.2%</u>	<u>N/A</u>	<u>-13.2%</u>	<u>14.1%</u>	<u>-0.5%</u>

Trends by Familial Status

Between the 2014 and 2018 census years, Alhambra has seen measurable decreases in households across many family types. The decrease in all households with children under the age of 18 has been consistent with regional levels. However, Alhambra has seen a decline in single-parent households and female headed households with children at twice the rate of the regional average. This is indicative of housing affordability and lack of diversity in housing options contributing to these household's inability to remain in the community.

Figure 820: Household Distribution by Familial Status

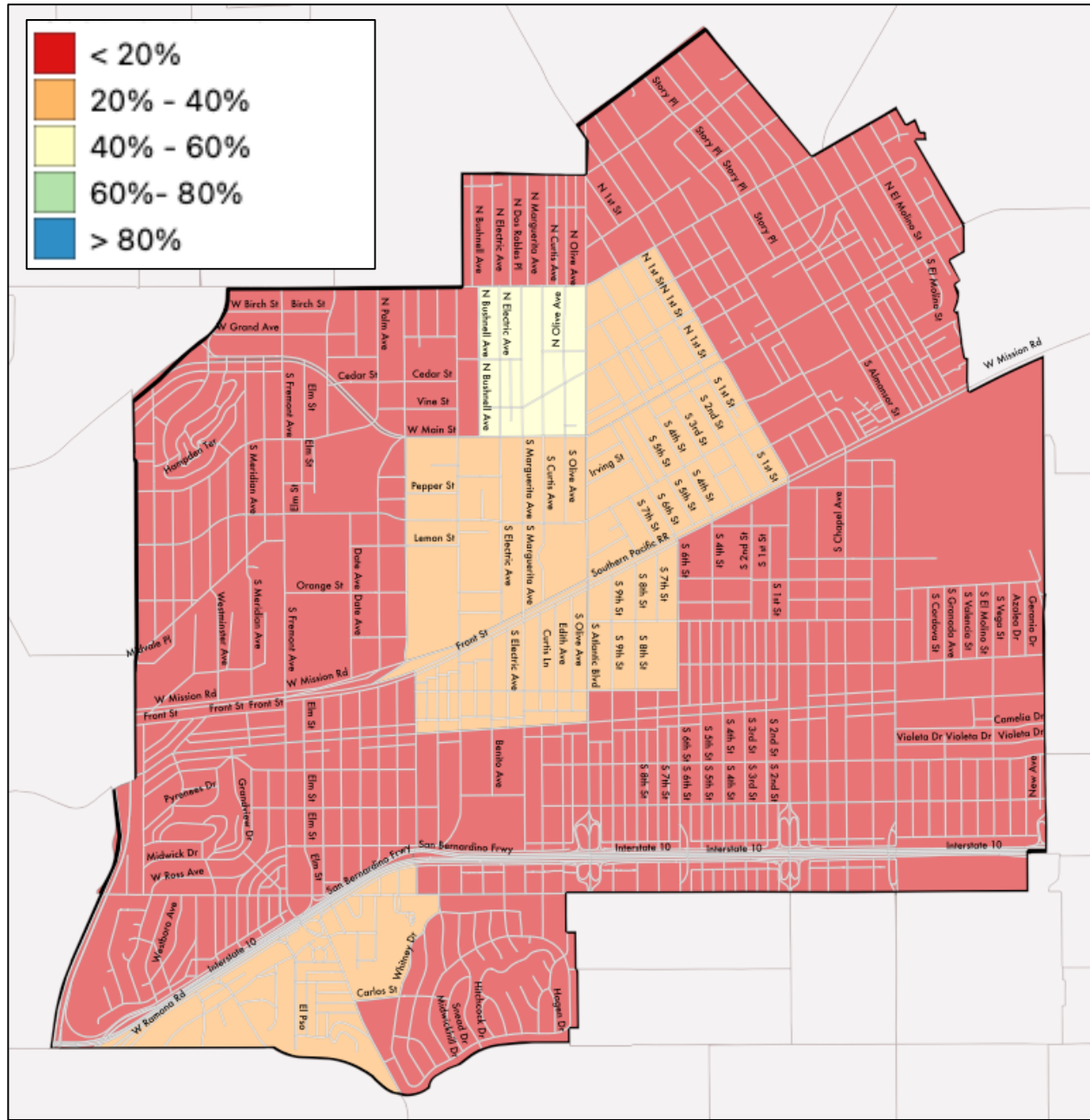
Source: ACS 5-Year Tables 2010-2014, 2014-2018; Table S1101 - Characteristics of Disabilities

Household Type	Jurisdiction	2014		2018		Percentage Change
		Households	Percentage	Households	Percentage	
Households w/ Children under 18	LA County	1,087,704	34%	937,890	28%	-14%
	Alhambra	8,414	29%	7,165	24%	-15%
Single-Parent Households	LA County	351,852	11%	297,954	9%	-15%
	Alhambra	2,562	9%	1,795	6%	-30%
Female Headed Households with Children	LA County	261,586	8%	211,592	6%	-19%
	Alhambra	2,053	7%	1,254	4%	-39%
All Households	LA County	3,217,889		3,316,795		3%
	Alhambra	28,804		29,771		3%

The concentration of female-headed households with children is generally centered in Central Alhambra near the downtown core. Areas in the northeast and southwest portion of the city that have a higher incidence of single-family homes have the lowest concentration of female-headed households.

Figure 834: Distribution of Female-Headed Households with Children

Source: HCD AFFH Data Viewer



Disparities to Access to Opportunity

Section II of the Alhambra AI provides information related to disparities to access to opportunity in the city. The assessment is based on HUD indices available for the city to report. Page 49 of the AI describes each index and explains the range of scores and how they related to measuring opportunity. In Alhambra, the AI found that after evaluating these indices, the Asian or Pacific Islander group has a higher exposure to poverty, compared to other racial or ethnic groups in

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the city. Hispanic or Latino populations in Alhambra had limited access to higher-performing schools and used public transit more than other groups. The Black, Non-Hispanic population in Alhambra had fewer opportunities to access employment in their neighborhoods.

Figure 842. Summary of Opportunity Indicators, Alhambra

Source: Table 23, City of Alhambra Analysis of Impediments

	Low Poverty Index	School Proficiency Index	Labor Market Index	Transit Index	Low Transportation Cost Index	Jobs Proximity Index	Environmental Health Index
Total Population							
White, Non-Hispanic	56.72	62.07	68.13	82.60	86.68	44.32	7.25
Black, Non-Hispanic	51.64	61.52	64.17	85.13	89.24	41.04	6.84
Hispanic	55.11	60.55	62.89	82.43	86.98	45.37	6.41
Asian or Pacific Islander, Non-Hispanic	50.00	64.47	61.73	83.33	87.64	45.63	6.40
Native American, Non-Hispanic	50.81	61.94	60.35	81.96	87.08	47.23	5.72
Population below federal poverty line							
White, Non-Hispanic	54.21	55.92	65.88	82.94	87.55	54.80	7.28
Black, Non-Hispanic	49.53	52.68	52.06	80.47	86.76	55.09	5.85
Hispanic	51.20	61.37	61.51	82.86	87.17	43.82	6.52
Asian or Pacific Islander, Non-Hispanic	46.05	63.26	61.69	85.51	89.98	45.45	6.35
Native American, Non-Hispanic	30.00	48.11	59.00	92.00	96.00	46.48	6.00

To further assist in the assessment of access to opportunity HCD compiled a series of datasets for jurisdictions to access for their area. This included a dataset developed with the California Tax Credit Allocation Committee (TCAC) that evaluates economic, educational, and health outcomes for low-income households. The dataset provides scores for each outcome metric, as well as a composite score. Figure 853 through Figure 886 show the TCAC opportunity areas for Alhambra.

The maps show that Alhambra generally has positive economic and educational outcomes throughout the city, and less positive environmental outcomes across the city. The composite score shows that areas in south and west areas of Alhambra have higher access to resources, and areas in the eastside of the city have moderate access to resources.

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Figure 853. TCAC Opportunity Areas, Environmental Score, 2021, Alhambra

Source: HCD AFFH Data Viewer; 2021, TCAC 2021

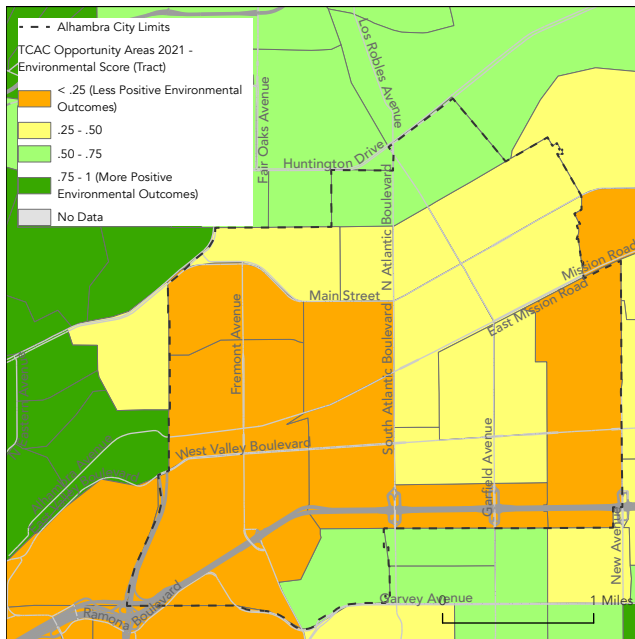


Figure 864. TCAC Opportunity Areas, Economic Score, 2021, Alhambra

Source: HCD AFFH Data Viewer; 2021, TCAC 2021

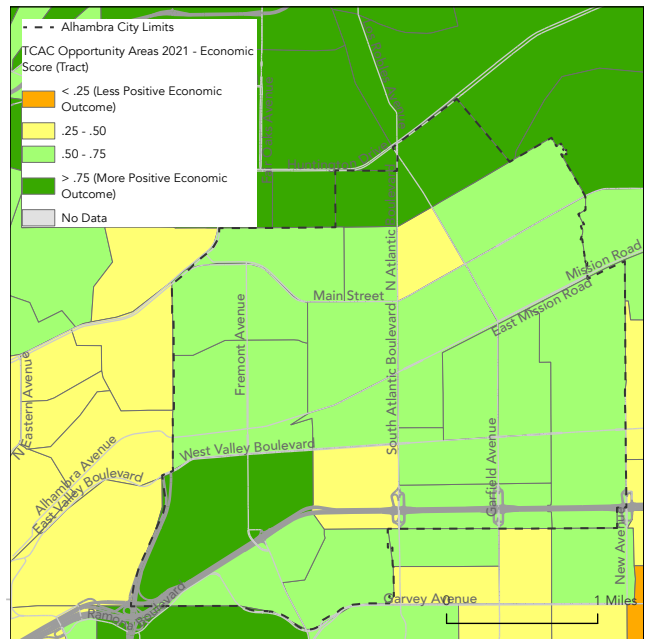


Figure 875. TCAC Opportunity Areas, Education Score, 2021, Alhambra

Source: HCD AFFH Data Viewer; 2021, TCAC 2021

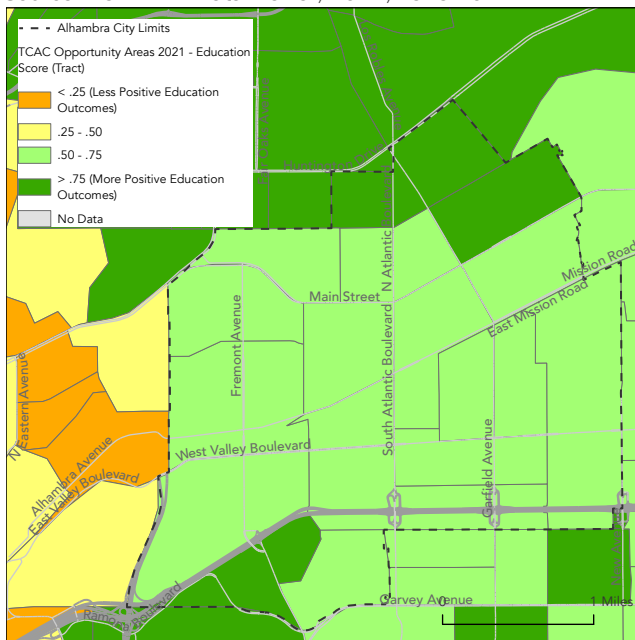
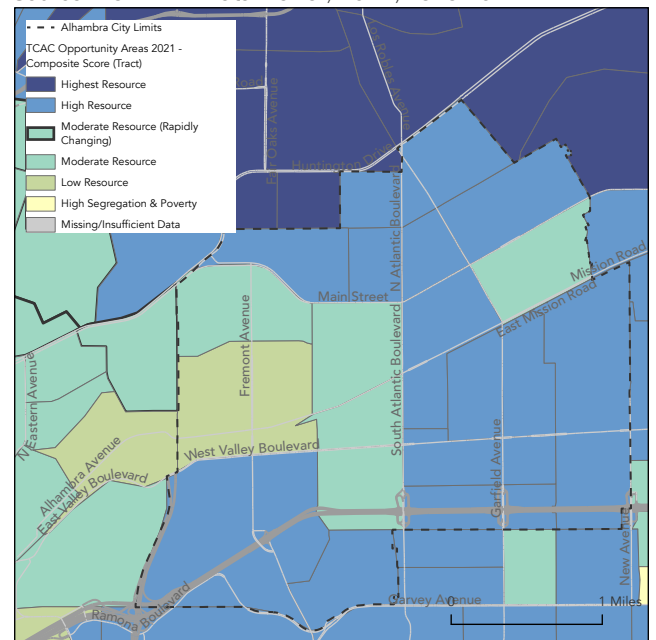


Figure 886. TCAC Opportunity Areas, Composite Score, 2021, Alhambra

Source: HCD AFFH Data Viewer; 2021, TCAC 2021



Local Context

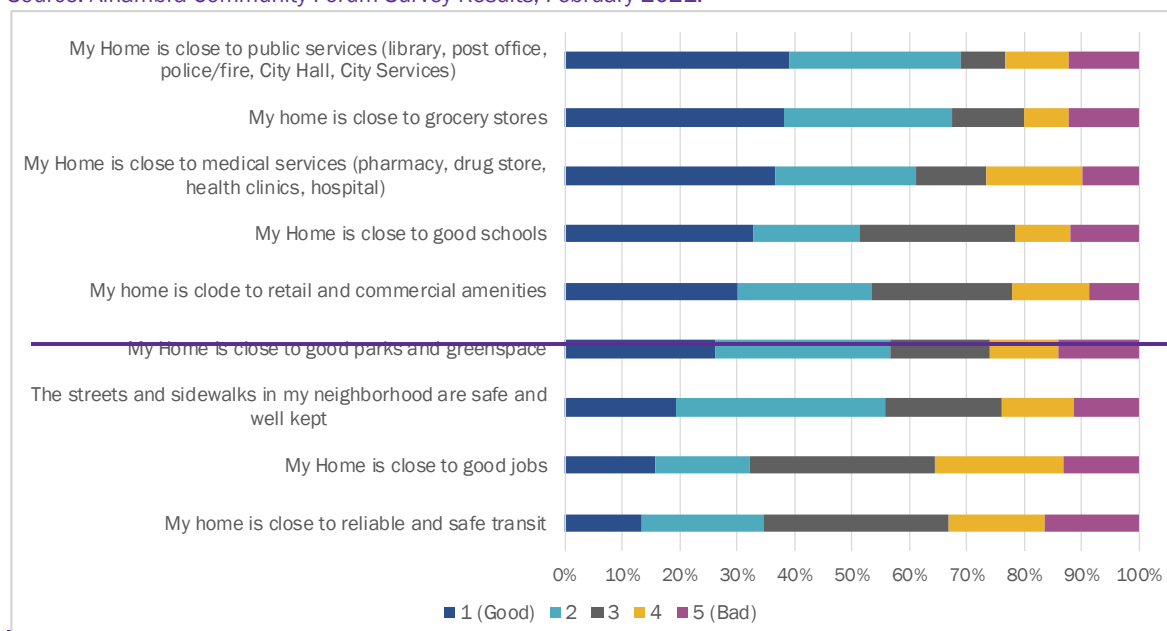
In addition to this analysis, community outreach conducted in the Housing Element workshop and online survey asked Alhambra residents questions about their access to resources and opportunities. While not a statistically significant survey, these findings supplement the Census data with a local context. These findings are included in Figure 87, and show that Alhambra residents who responded to the survey have the most access to public services, grocery stores,

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and medical services. Fewer residents who responded to the survey stated they have access to good schools, good jobs, and reliable and safe transit in their neighborhoods.

Figure 87. Access to Opportunity Community Forum Results, Alhambra

Source: Alhambra Community Forum Survey Results, February 2021.



Discussion of Disproportionate Housing Needs

The Housing Element provides an assessment of both existing and future affordable housing needs in Alhambra. The existing housing need for very-low and low-income households in Alhambra is described in Chapter 5, stating that 564 Alhambra residents were receiving Section 8 Housing Choice Vouchers as of November 2019.

The Regional Housing Need Allocation (RHNA) for Alhambra over the 2021 to 2019 planning period states a future growth need of 6,825 units. Of these 6,825 units, the RHNA states that 1,774 units (26%) must accommodate very low-income households and 1,036 units (15%) must accommodate low-income households. Chapter 7 and Appendix A show the results of the Site Inventory for the Housing Element that meets the requirements of the RHNA by each income level.

Housing Needs and Problems

Chapter 2 of the Housing Element includes the Housing Needs Assessment, which describes key demographic and economic trends as they relate to the Alhambra housing market and affordability of housing. Many of the data points presented in Chapter 2 provide insight into fair housing issues in the city, including cost burden, overcrowding, substandard housing, and homelessness. Key findings in Chapter 2 related housing problems were:

- Renter households experience a higher rate of housing problems, 60% compared to 37% of owner households that experienced housing problems.
- Of all households who earned less than 80% of AMI renters more likely to experience at least one housing problem (53%) as compared to owner households (24%)
- Overall, 51% of all households in Alhambra reported at least one housing problem

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Figure 89 shows the incidence of housing problems by tenure and race/ethnicity in Alhambra and Los Angeles County. In Alhambra, 36.6% of owner households and 61.1% of renter households experience at least one housing problem. These rates are both lower than the regional average. White owner households are least likely to have any housing problems. The differential is less severe for renter households where black households have the lowest rate of housing problems by a slight margin.

Figure 89: Presence of Housing Problems by Tenure and Race/Ethnicity

Source: HUD CHAS DATA (2014-2018 ACS)

Race/Ethnicity	City of Alhambra		Los Angeles County	
	Owner	Renter	Owner	Renter
White alone, non-Hispanic	29.5%	57.3%	31.9%	52.4%
Black or African-American alone, non-Hispanic	63.3%	56.7%	41.2%	62.8%
Asian alone, non-Hispanic	37.4%	64.0%	37.7%	56.0%
American Indian or Alaska Native alone, non-Hispanic	0%	75.0%	37.6%	59.1%
Pacific Islander alone, non-Hispanic	No Data	100%	42.3%	53.9%
Hispanic, any race	37.6%	58.4%	46.9%	70.2%
other (including multiple races, non-Hispanic)	63.0%	60.2%	36.5%	54.7%
Total/All	36.6%	61.1%	38.4%	61.7%

Cost Burden Households

The share of cost burden households in Alhambra mirrors general trends in Los Angeles County. Overall, housing cost burden in Alhambra and in the region is most prevalent among extremely low-income households (85%), while very low-income households also experienced a high rate of cost burden (79%). The distribution of renter households that are cost burdened are generally distributed throughout the city, with two nodes of elevated cost burdening east of downtown and near the I-10 freeway between Atlantic Boulevard and Almansor Street

Cost burdening among owner-occupied households is generally lower on average, with the northeast and southwest corners of the city experiencing the lowest levels. Two nodes, one east north of Valley Boulevard between S Garfield Avenue and S Almansor Street, and another north of W Main Street between N Atlantic Boulevard and N Bushnell Avenue have elevated concentrations of owner-occupied cost burden.

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Figure 9088: Distribution of Overpayment Renter Households

Source: HCD AFFH Data Viewer Data Set

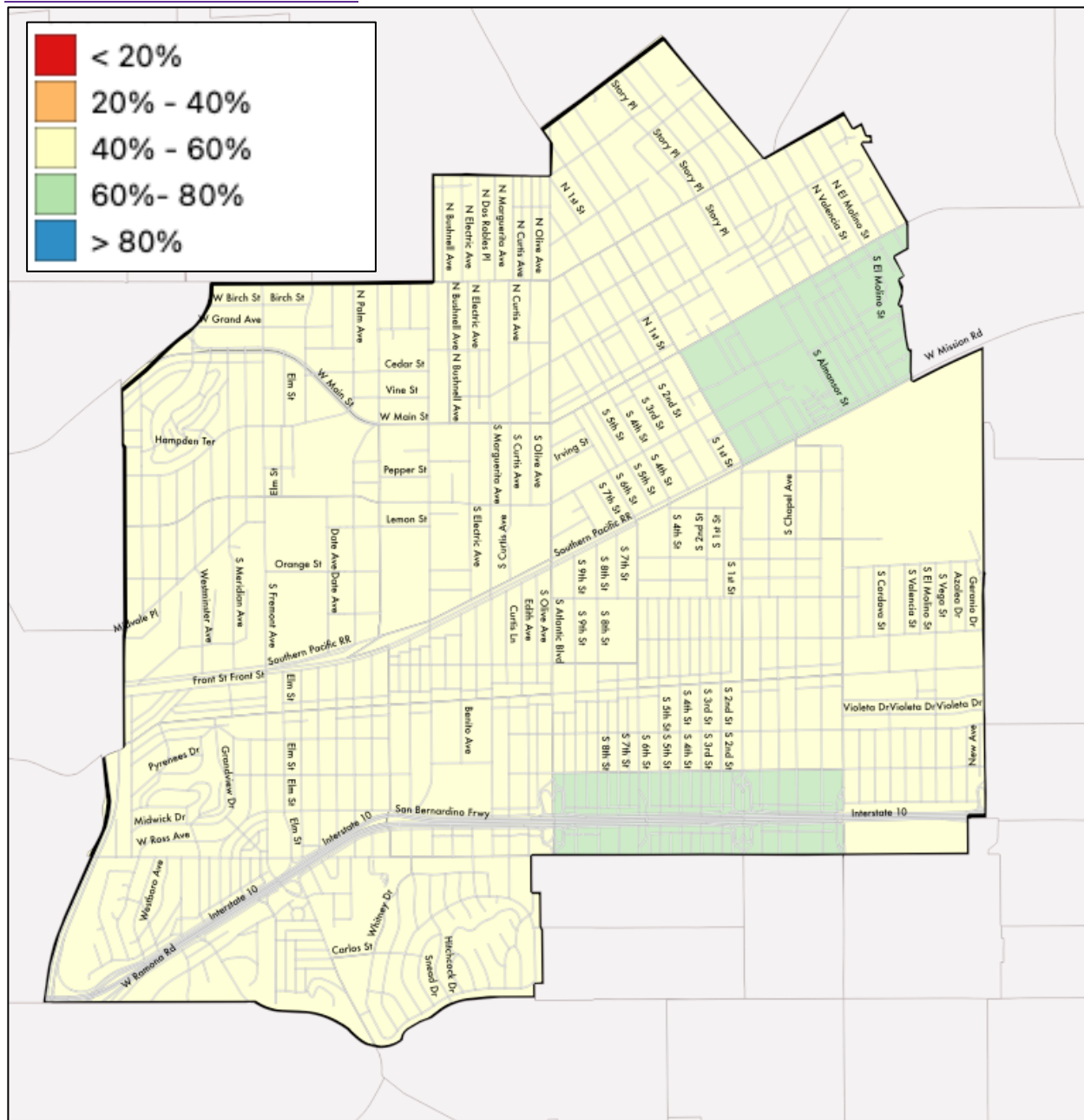


Figure 9189. Distribution of Overpayment Owner Households

Source: HCD AFFH Data Viewer

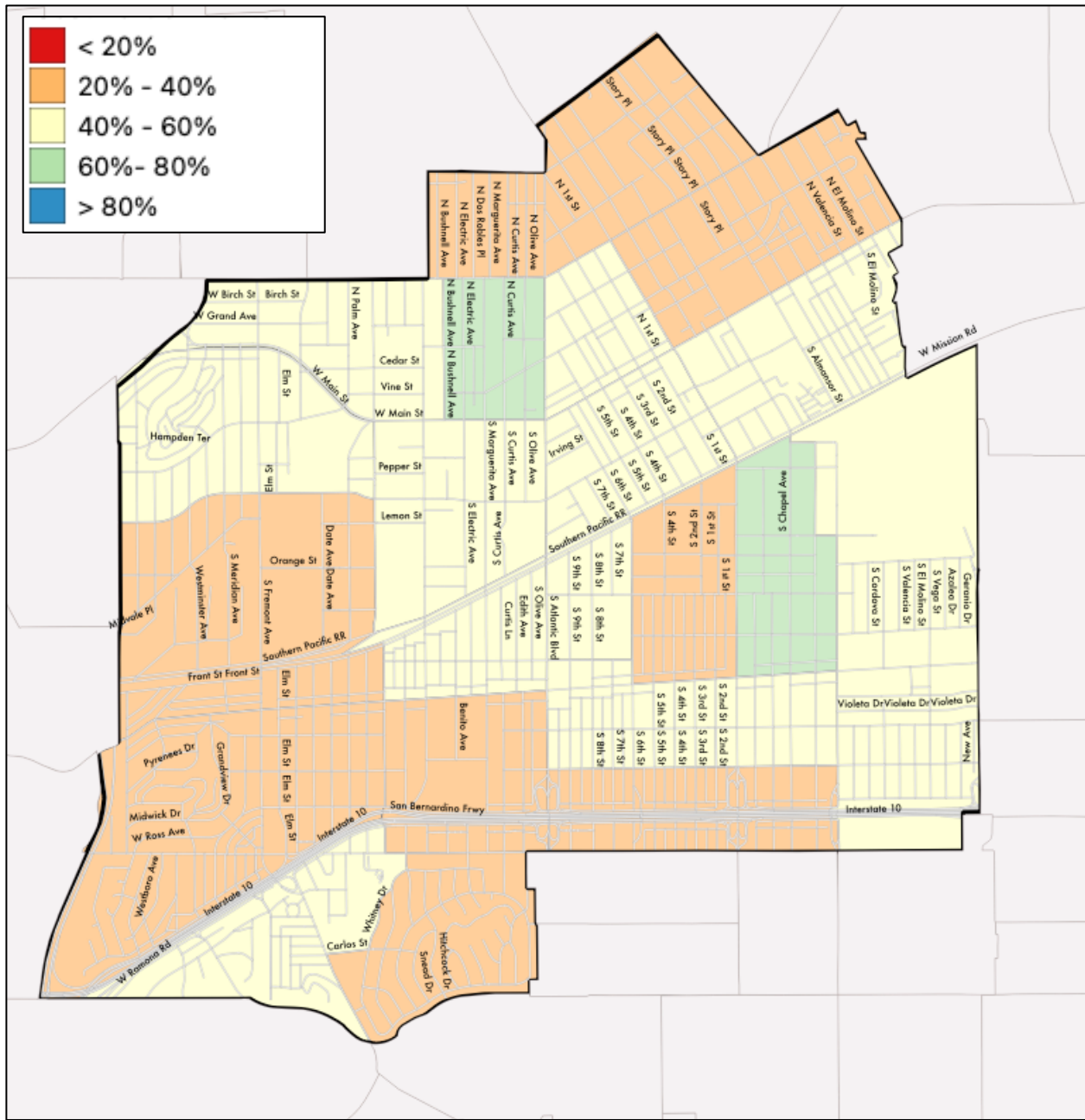


Figure 92 shows cost burdened data by race and tenure in Los Angeles County. Generally, renter households are more cost burdened than owner-occupied households. Among renter households, Hispanic and Black, non-Hispanic households have the most severely cost burden. This trend holds true for owner-occupied households as well.

Figure 93 shows the same data set for the city of Alhambra. Among owner-occupied households, the rate of cost burden is relatively close among White non-Hispanic (28.9%), Asian non-Hispanic (32%), and Hispanic households (34%). Cost burden among black households is over twice the rate of white households, although the sample size is small (110 households). Local renter

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households are also more commonly cost burdened across all racial categories. The variance among renters is much more narrow, with Hispanic renter households having a lower cost burden rate (45.7%) than their White (52.3%) or Asian (55.6%) counterparts.

Figure 92. Cost Burden by Tenure and Race/Ethnicity, Los Angeles County

Source: HUD CHAS Data (2014-2018 ACS)

Race/Ethnicity	Cost Burden (>30%)	Cost Burden (>50%)	Total Households
Owner-Occupied			
White alone, non-Hispanic	30.8%	14.6%	642,205
Black or African-American alone, non-Hispanic	39.8%	20.2%	104,535
Asian alone, non-Hispanic	33.9%	15.8%	259,930
American Indian or Alaska Native alone, non-Hispanic	36.0%	12.8%	3,310
Pacific Islander alone, non-Hispanic	33.8%	16.9%	2,275
Hispanic, any race	38.0%	16.7%	474,795
other (including multiple races, non-Hispanic)	34.4%	17.6%	27,575
Renter-Occupied			
White alone, non-Hispanic	49.2%	27.1%	543,280
Black or African-American alone, non-Hispanic	59.0%	34.4%	209,040
Asian alone, non-Hispanic	47.5%	25.5%	227,400
American Indian or Alaska Native alone, non-Hispanic	51.7%	30.7%	4,475
Pacific Islander alone, non-Hispanic	45.3%	20.4%	4,245
Hispanic, any race	57.2%	29.5%	759,185
other (including multiple races, non-Hispanic)	49.8%	27.0%	43,855

Figure 93. Cost Burden by Tenure and Race/Ethnicity, City of Alhambra

Source: HUD CHAS Data (2014-2018 ACS)

Race/Ethnicity	Cost Burden (>30%)	Cost Burden (>50%)	Total Households
Owner-Occupied			
White alone, non-Hispanic	28.9%	16.9%	1,750
Black or African-American alone, non-Hispanic	63.6%	63.6%	110
Asian alone, non-Hispanic	32.0%	16.0%	6,455
American Indian or Alaska Native alone, non-Hispanic	0.0%	0.0%	25
Pacific Islander alone, non-Hispanic	-	-	-
Hispanic, any race	34.0%	20.0%	3,100
other (including multiple races, non-Hispanic)	64.3%	50.0%	70
Renter-Occupied			
White alone, non-Hispanic	52.3%	26.0%	1,885

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<u>Black or African-American alone, non-Hispanic</u>	<u>56.3%</u>	<u>36.5%</u>	<u>480</u>
<u>Asian alone, non-Hispanic</u>	<u>55.6%</u>	<u>30.9%</u>	<u>8,575</u>
<u>American Indian or Alaska Native alone, non-Hispanic</u>	<u>23.5%</u>	<u>23.5%</u>	<u>85</u>
<u>Pacific Islander alone, non-Hispanic</u>	<u>96.0%</u>	<u>16.0%</u>	<u>25</u>
<u>Hispanic, any race</u>	<u>45.7%</u>	<u>23.6%</u>	<u>6,640</u>
<u>other (including multiple races, non-Hispanic)</u>	<u>34.8%</u>	<u>21.7%</u>	<u>230</u>

Overcrowded Households Across the Region

Severe overcrowding is defined as units with more than 1.5 persons per room. The dangers of overcrowding are exacerbated as public health risks, which have become more apparent during the pandemic. The County of Los Angeles has approximately 4.88% of its households facing this predicament, while the city of Alhambra has approximately 3.12% of households with severe overcrowding. The cities surrounding Alhambra, such as South Pasadena (1.25%), El Monte (2.03%), Pasadena (2.56%), San Gabriel (2.54%), and Los Angeles (5.86%)³⁸ share generally lower shares of households that are overcrowded, though the reasons behind this trend could be explained for many different reasons. For example, some cities may have older populations who may not need roommates aside from a partner, or the most likely determinant would be incomes among the renting populations. Once again, this indicator describes the importance of needing to provide affordable housing to renting populations to ensure that these groups can cohabitate safely to reduce public health dangers.

³⁸ CA HCD Data Viewer Data Tables, "Overcrowded Households Severe Tract", ACS 2014-2019

Figure 940. Distribution of Overcrowded Households

Source: HCD AFFH Data Viewer

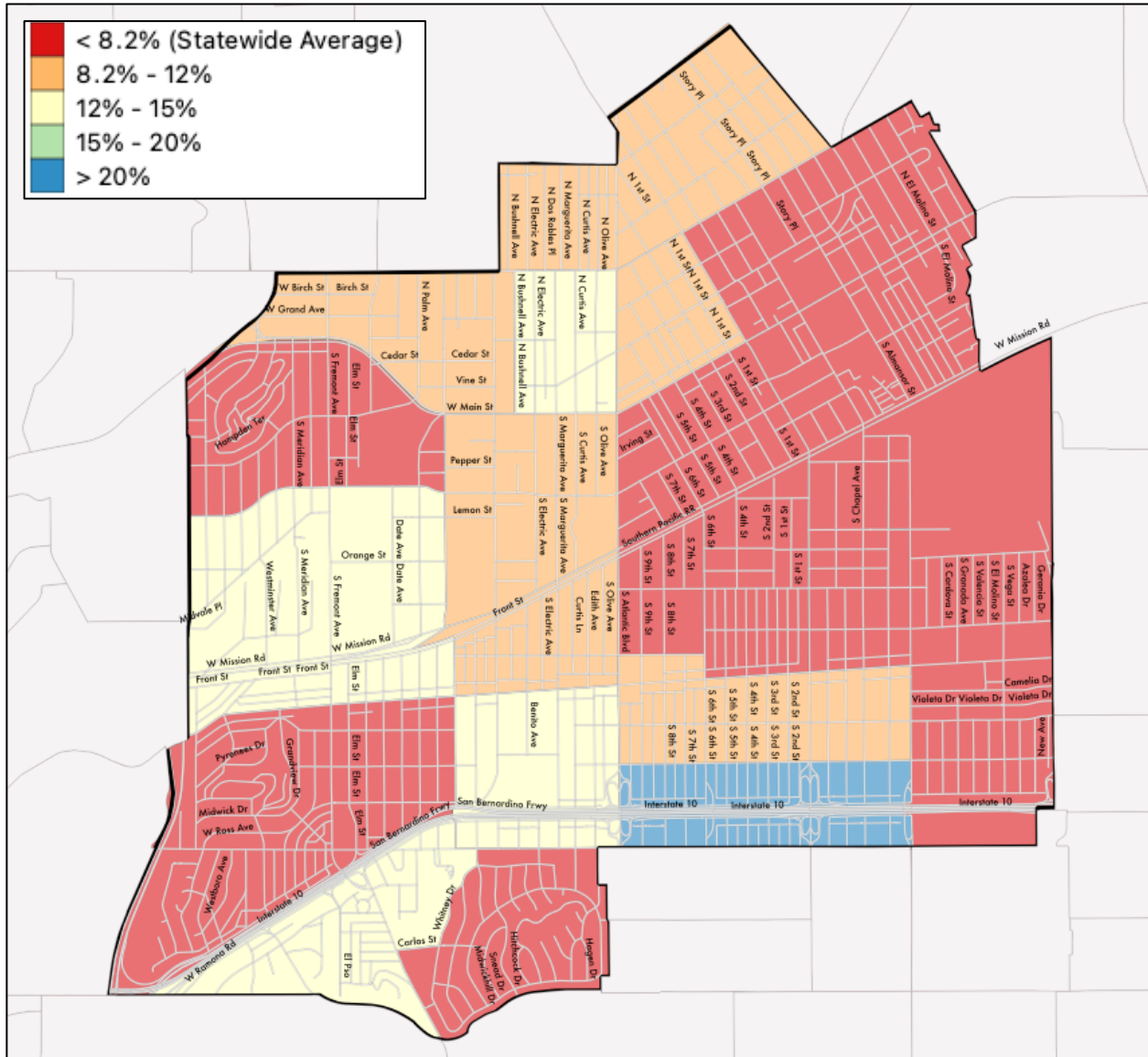


Figure 95 shows the concentration of overcrowded and severely overcrowded households in Alhambra and Los Angeles County by Tenure. It shows that the rate of overcrowding in Alhambra is slightly lower than the regional average for renter-occupied households but slightly higher for owner-occupied households. This is likely the result of a higher incidence of multi-generational households among homeowners.

Figure 95. Overcrowding by Tenure, Los Angeles County and City of Alhambra

Source: HUD CHAS Data (2014-2018 ACS)

	Overcrowded (>1 person per room)		Severely Overcrowded (>1.5 persons per room)		Total Households
	Households	Percent	Households	Percent	
City of Alhambra					
Owner-Occupied	690	6.0%	225	2.0%	11,505
Renter-Occupied	2,710	15.1%	1,010	5.6%	17,920
Los Angeles County					
Owner-Occupied	83,580	5.5%	22,195	1.5%	1,514,630
Renter-Occupied	285,920	16.0%	128,010	7.1%	1,791,480

Displacement Risk

One empirical measure of displacement risk is identifying the number of affordable units at risk of converting to market-rate housing. Chapter 2 of the Housing Element provides an estimate of the number of these units at risk of conversion. In Alhambra, of the 366 affordable housing units for lower-income households, about 215 low-income units are at risk of conversion. These units are located in three properties with affordability term end dates between 2021 and 2029. Additionally, city staff reports that there are other affordable ownership units in the community built in the last 20-years with unknown covenant expirations that could be at risk over the planning period.

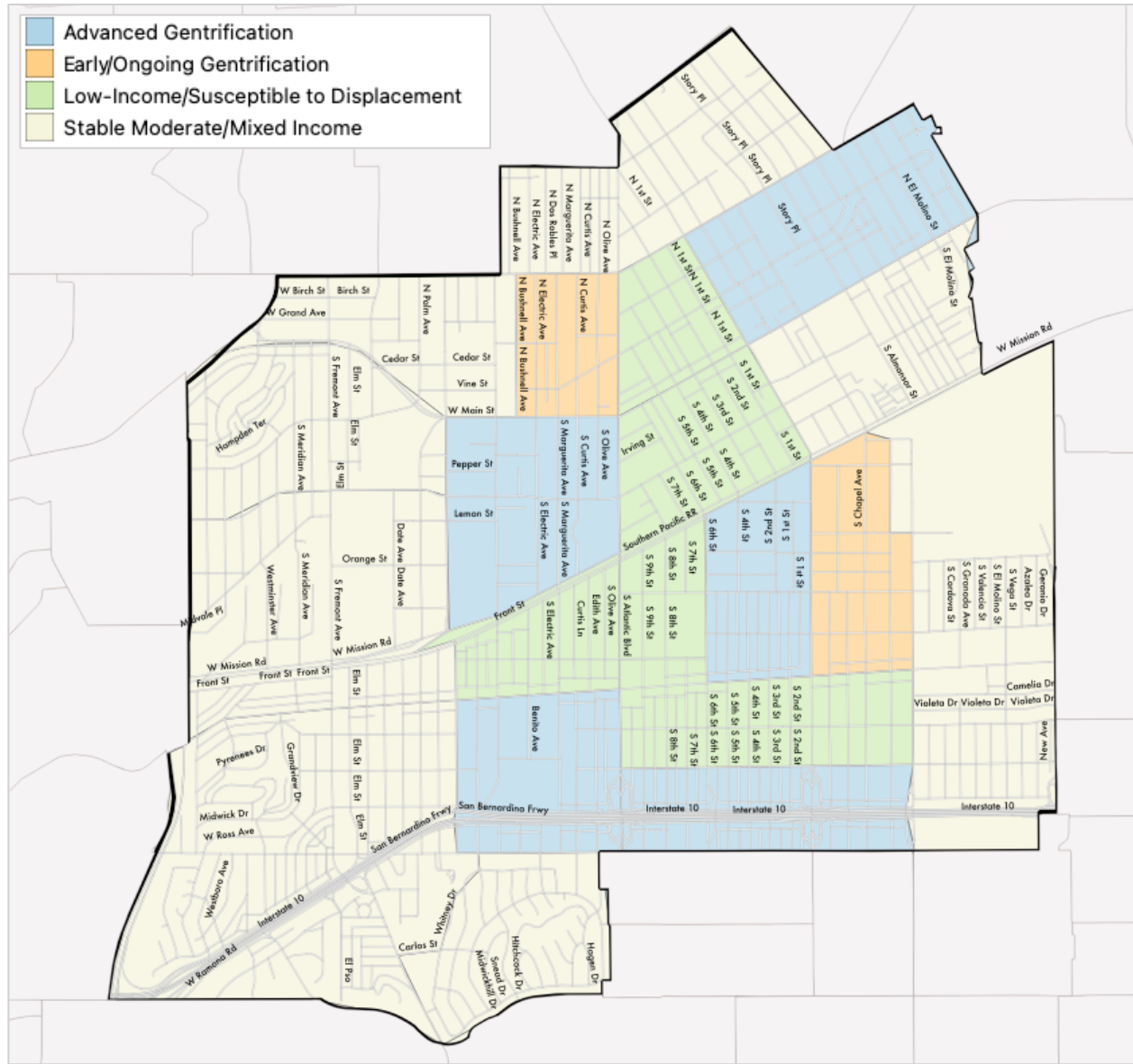
Other analyses of displacement risk can provide a more comprehensive evaluation of displacement risk using a range of criteria and aggregating various data sources. The Urban Displacement Project provides useful metrics for evaluating displacement risk in the Los Angeles region, including Census tracts in Alhambra.

Figure 96~~1~~ shows the results of the [Displacement Typology](#) for Census tracts in Alhambra. Many tracts in the city are stable/mixed incomes areas with moderate displacement risk. Other areas, in central and southern Alhambra are low-income areas that are susceptible to displacement, or are areas in at-risk, early/ongoing, or advanced stages of gentrification.

Figure 97~~2~~ shows the results of the renter vulnerability index in Alhambra, which accounts for measures affecting renter vulnerability to displacement, with considerations for accelerated vulnerability due to Covid-19. These factors include measures for cost burden, employment characteristics (e.g., service-sector jobs), and immigrant status. Most areas in Alhambra have an index value between 3 and 8, which indicates moderate to high vulnerability.

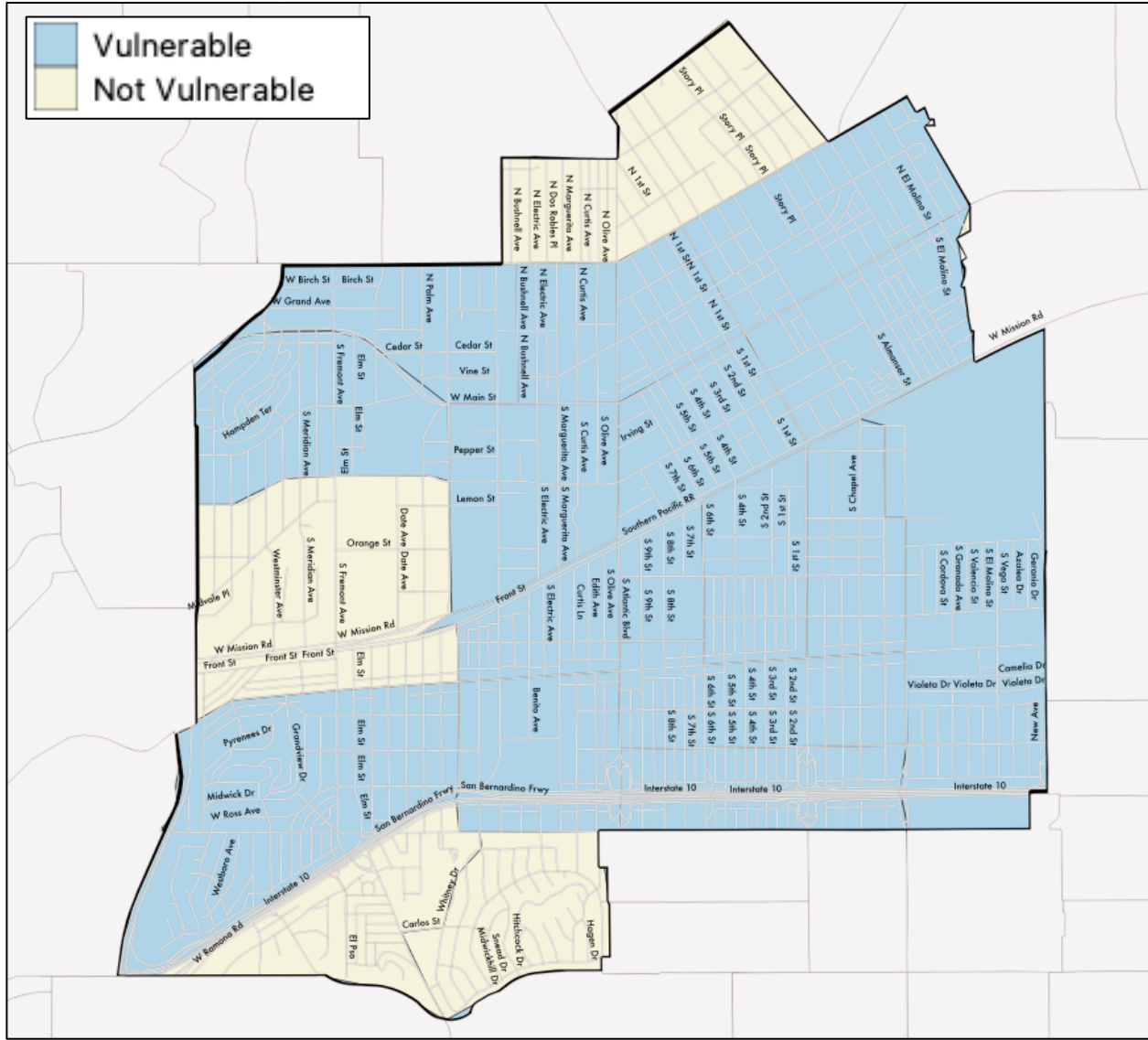
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Figure 961. Displacement Typology by Census Tract, Alhambra
 Source: Urban Displacement Project, 2021.



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Figure 972. Renter Vulnerability Index by Census Tract, Alhambra
Source: Urban Displacement Project, 2021.



Homelessness

Regional Trend

The Los Angeles Homeless Services Authority (LAHSA) conducts an annual Point-in-Time Count (PIT) of the homeless population. In 2020, LAHSA estimated that there were 66,436 people experiencing homelessness. The majority of the homeless population was unsheltered (72 percent). Both the homeless population and the share of the homeless population that is unsheltered has been trending higher over the last five years. Since 2015 the homeless population has increased by nearly 50 percent.

Figure 98: Sheltered and Unsheltered Homeless Population in Los Angeles County (2015-2020)
 Source: Los Angeles Homeless Services Authority (LAHSA), 2015-2020 LA County/LA Continuum of Care (CoC) Homeless Counts.

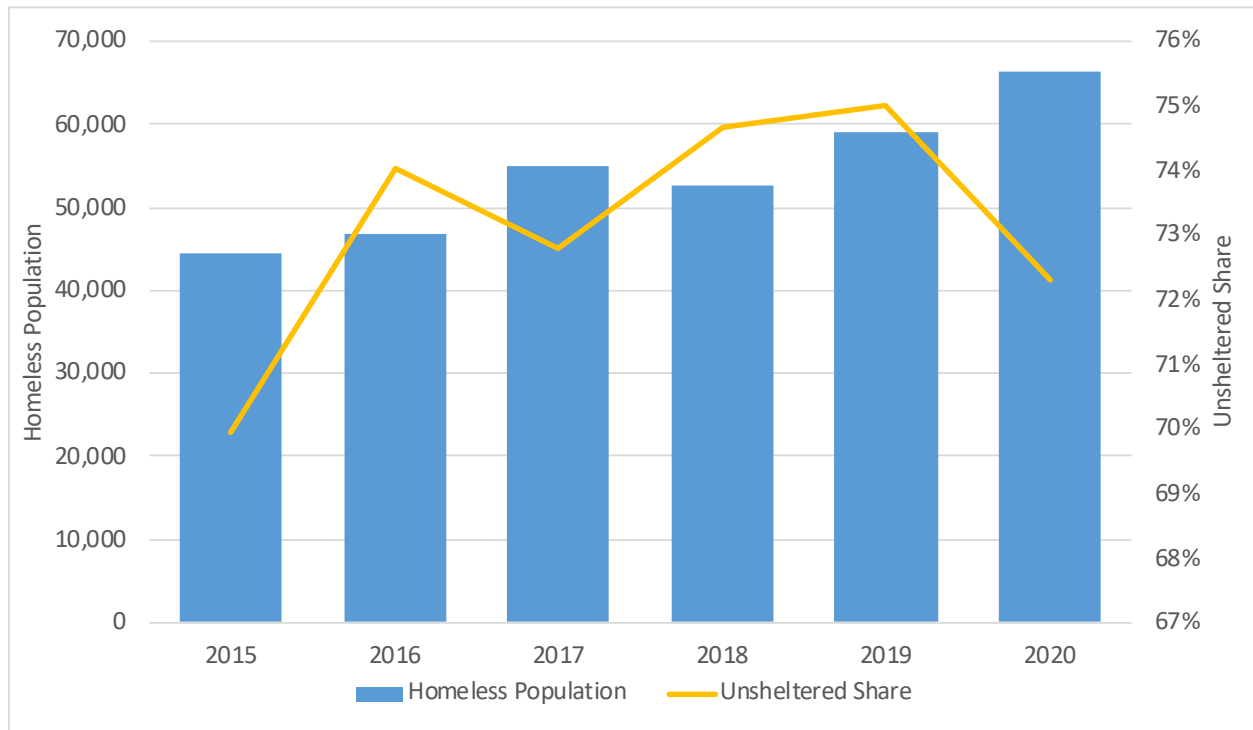
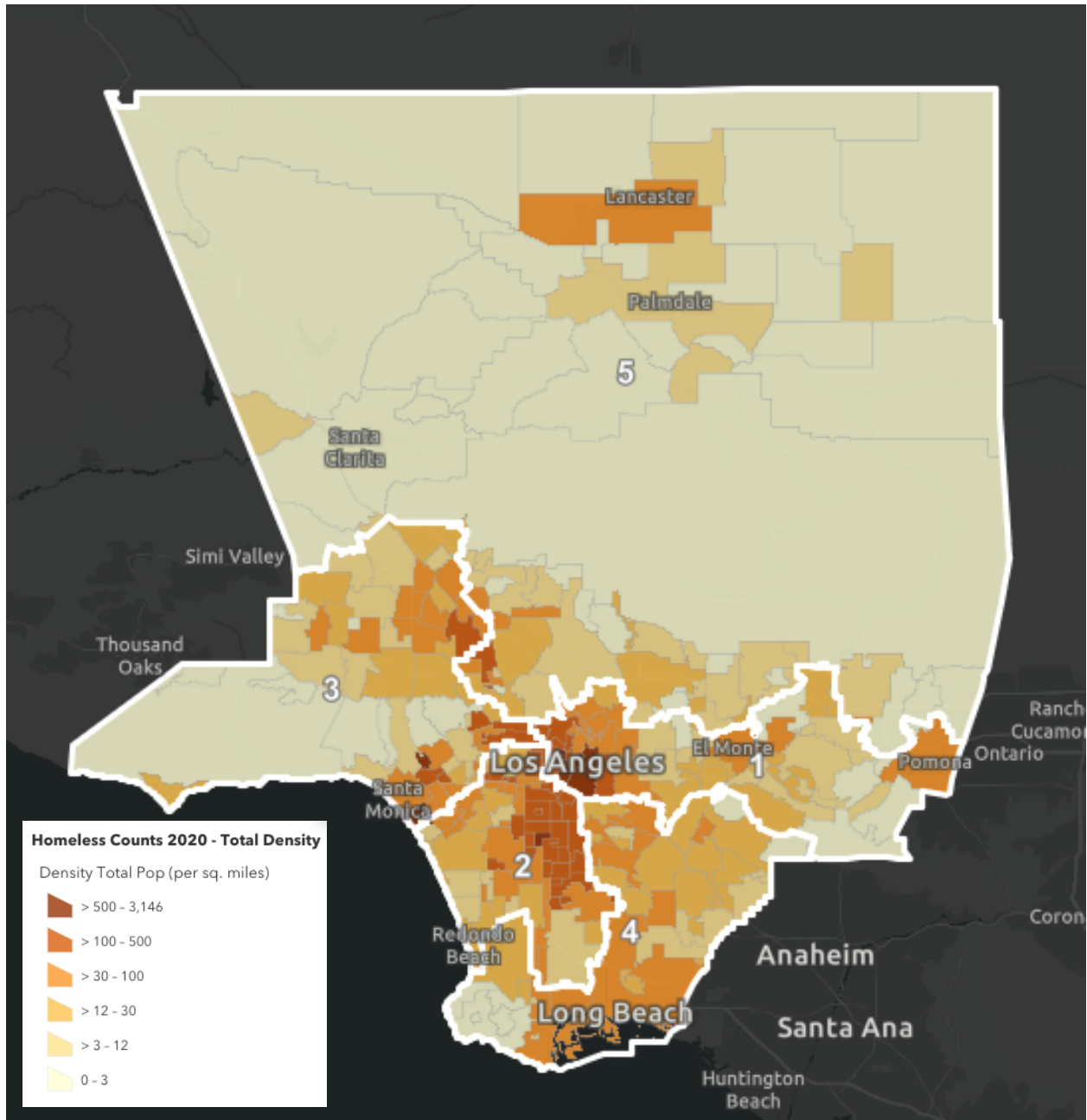


Figure 99 below displays the density of the homeless population across Los Angeles County. Los Angeles County jurisdictions located near the central city have the highest density of persons experiencing homelessness. This would be expected given the concentration of resources in this portion of the region.

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Figure 99: Los Angeles County Homeless Count Density (2020)

Source: Los Angeles County Homelessness & Housing Map



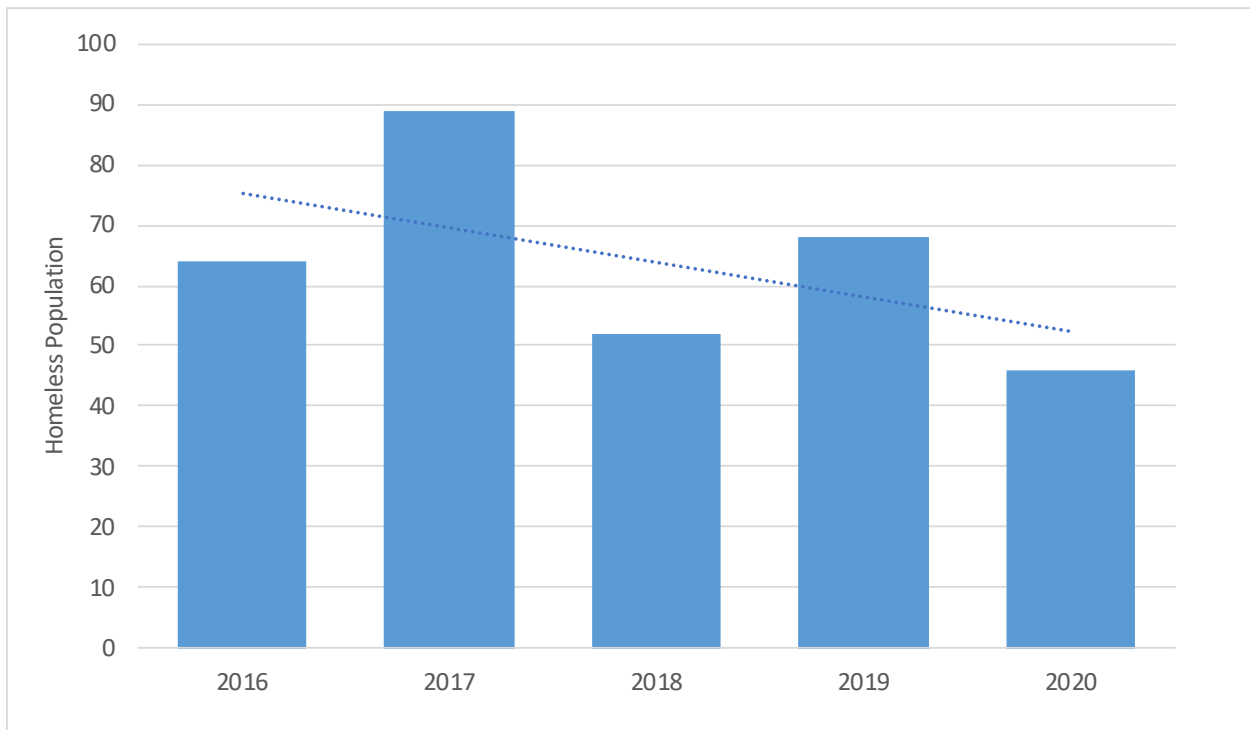
Local Trend

The City of Alhambra is part of the Los Angeles Continuum of Care (CoC), which is a regional planning body funded by HUD that coordinates housing and services funding across its partner jurisdictions.

LAHSA can provide homeless services to all individuals requiring support within Alhambra. According to the PIT count there were an estimated 46 persons experiencing homelessness in Alhambra in 2020. The number of people experiencing homelessness in Alhambra has been on a downward trend in recent years, with the 2020 count down 49 percent from a 2017 peak.

Figure 100: Alhambra Homeless County (2020)

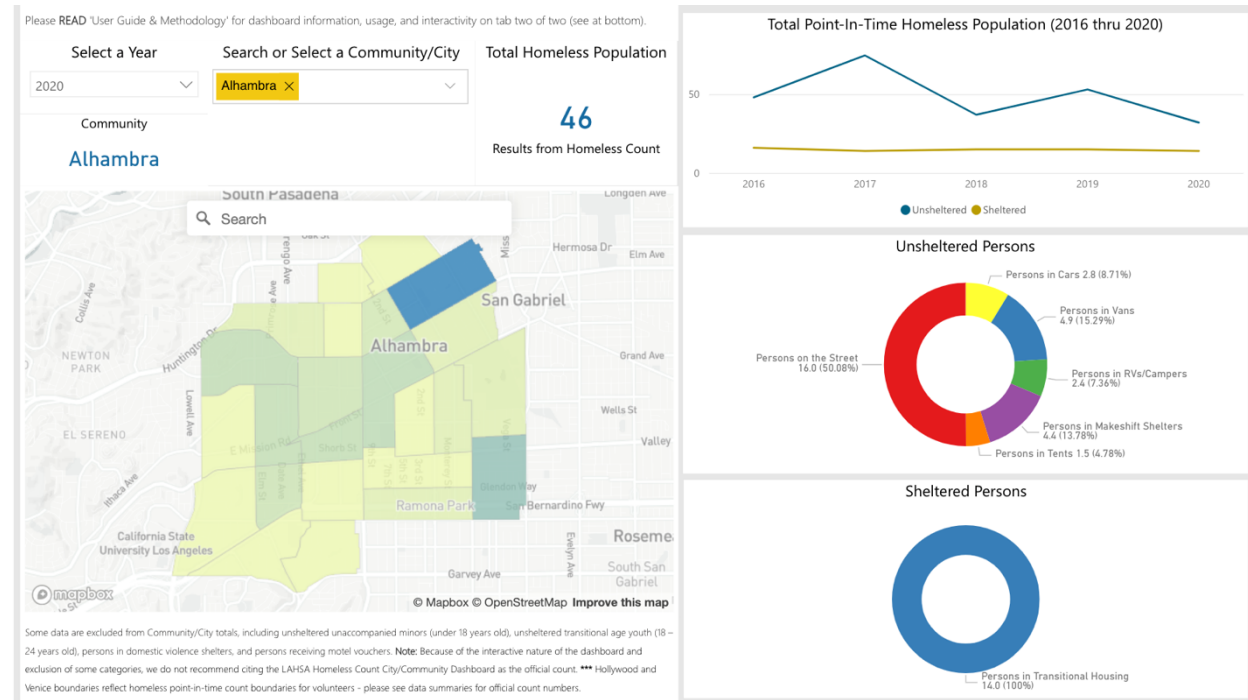
Source: LAHSA



A summary of the homeless population in Alhambra is summarized below. This data is derived from LAHSA’s homeless population dashboard by city. The data shows that 30 percent (14 individuals) of Alhambra homeless population was unsheltered in 2020. The homeless population is generally dispersed throughout the community, with slight concentrations on the north side of East Main Street near downtown and in the southeast corner of the city near the Crawford’s Corner Shopping Center. Over half of unsheltered persons were living on the streets with the remaining persons living in miscellaneous vehicles, makeshift shelters, or tents.

Figure 101: Characteristics of Alhambra’s Homeless Population (2020)

Source: LAHSA



Historic Trends and other Relevant Factors

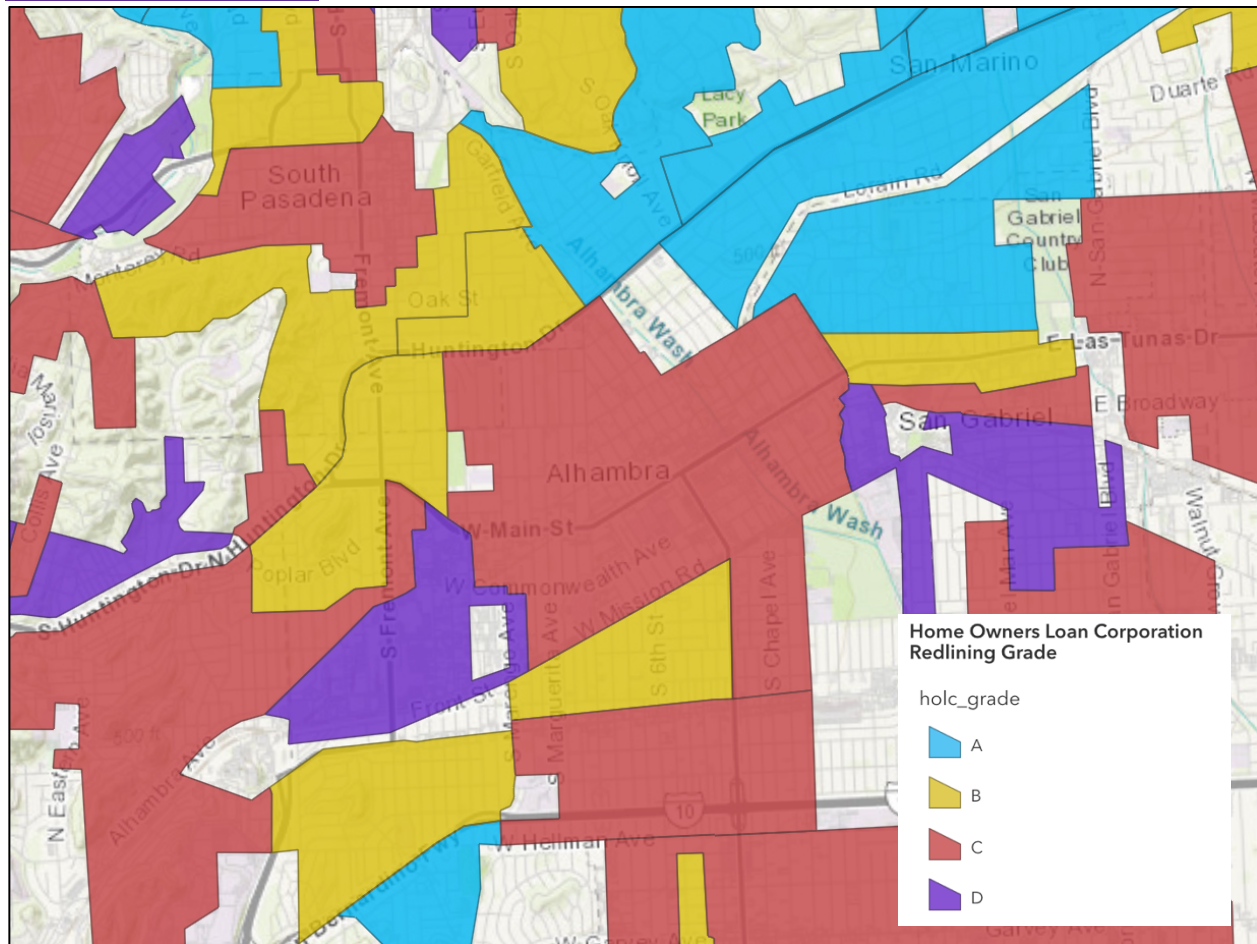
History of Redlining

The Home Owners’ Loan Corporation (HOLC), formed in 1933 under the New Deal Program, established the County’s first red-lining maps. Redlining maps established under the National Housing Act of 1934 ranked neighborhoods from A-rated (green), indicating the community “represented the best investment for homeowners” to D-rated (red), indicating the least desirable neighborhoods, where minority communities typically lived³⁹. A key factor that influenced HOLC grades was race. A racially homogenous population was considered desirable, but only so long as that race was white and non-immigrant. Communities with African American, Asian, Native American and Latino residents typically received, at best, a C grade and, more commonly, a D grade. Figure 102 presents historic redlining areas in Alhambra and the surrounding area. It shows that the majority of Alhambra was a C-rated community and considered “in decline”. At the time over 70 percent of the population was considered “foreign”.

³⁹ KCET. (2017). Segregation in the City of Angels: A 1939 Map of Housing Inequality in L.A.

Figure 10293. Historic Redlining Map

Source: HCD AFFH Data Viewer



Structural Factors Zoning and Land Use

The Federal Advisory Committee on Zoning was established in 1921. This committee was responsible for establishing the first model zoning ordinance. The characteristics of this model ordinance encouraged exclusionary zoning^{40 41}. In the 1970s, local no-growth movements permeated throughout the San Gabriel Valley. These themes led to a high proportion of land dedicated to larger lots allowing only single-family zones. Today Alhambra's R-1 zone accounts for over 65 percent of residential land area. Housing units in R-1 zones are predominately single-family, which by extension are also primarily ownership units. This has created a barrier to access in areas where R-1 zoning exists.

The areas of single-family zoning is aligned with higher median incomes, home values, and other factors that are similarly associated with the highest-resource designation in the TCAC/HCD opportunity map.

Under existing conditions, housing is allowed outright in the R-1, R-2, and R-3 zones. Housing is allowed conditionally in some commercial zones. However, development standards and

⁴⁰ Knack, Ruth. (1996). *The Real Story Behind the Standard Planning and Zoning Acts of the 1920s*.

⁴¹ Rothstein, Richard. (2017). *The Color of Law: A Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation.

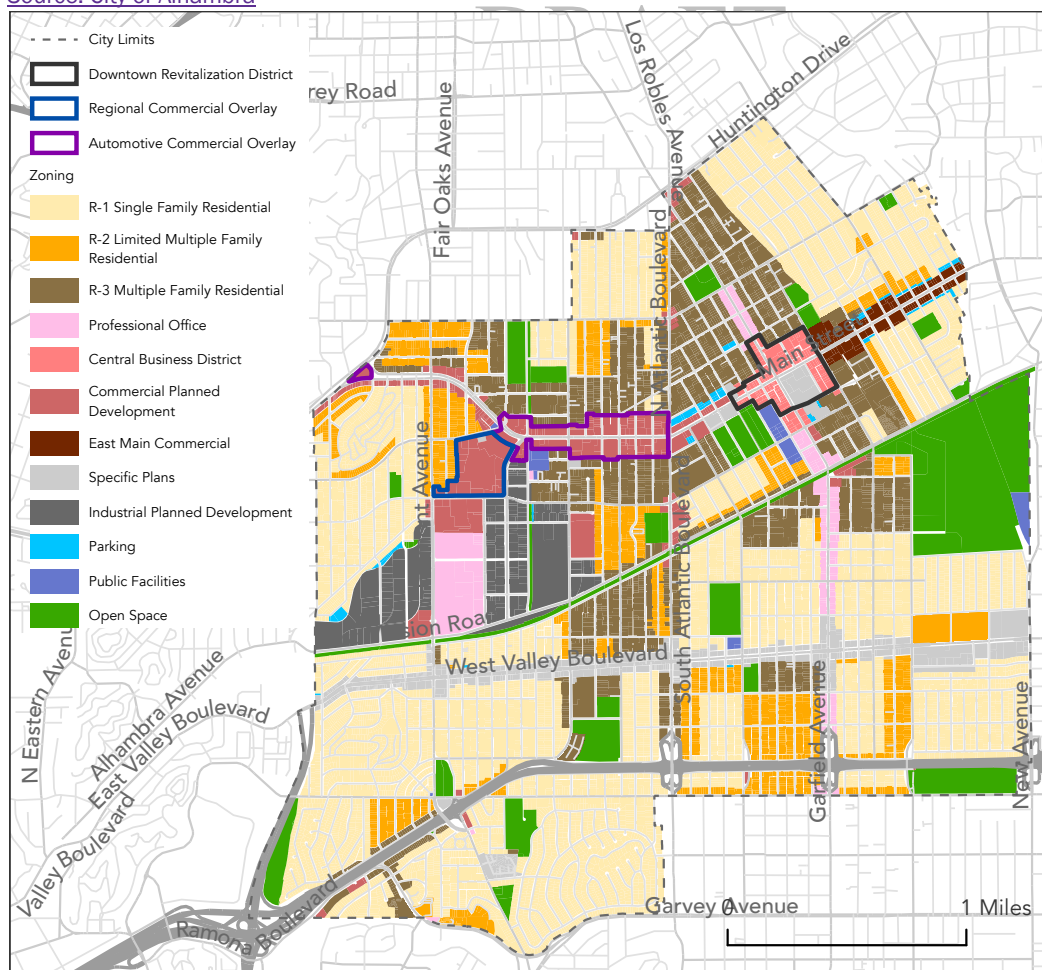
commercial requirements have limited the feasibility of more affordable housing types in commercial zones. Additionally, housing is not currently allowed in:

- EMC Zone (along the East Main Corridor)
- PO Zone (along the Garfield Corridor)
- Valley Boulevard Specific Plan (along the Valley Boulevard Corridor)⁴²

Existing zoning has prevented residential development and access to housing along three of Alhambra’s highest resource corridors. Valley Boulevard specifically is among Alhambra’s highest quality transit corridors. The barrier created to housing by the Valley Boulevard specific plan has limited accessibility to transit resources.

Alhambra also serves a role as a regional auto commercial hub that is concentrated along West Main Street. The stretch of the West Main Corridor from North Palm Avenue to North Atlantic Boulevard includes the Auto Commercial Overlay Zone, which was adopted in the 1980s. This land use pattern led to many of Alhambra’s largest tracts to be held by car dealerships.

Figure 103. Existing Zoning Map
Source: City of Alhambra

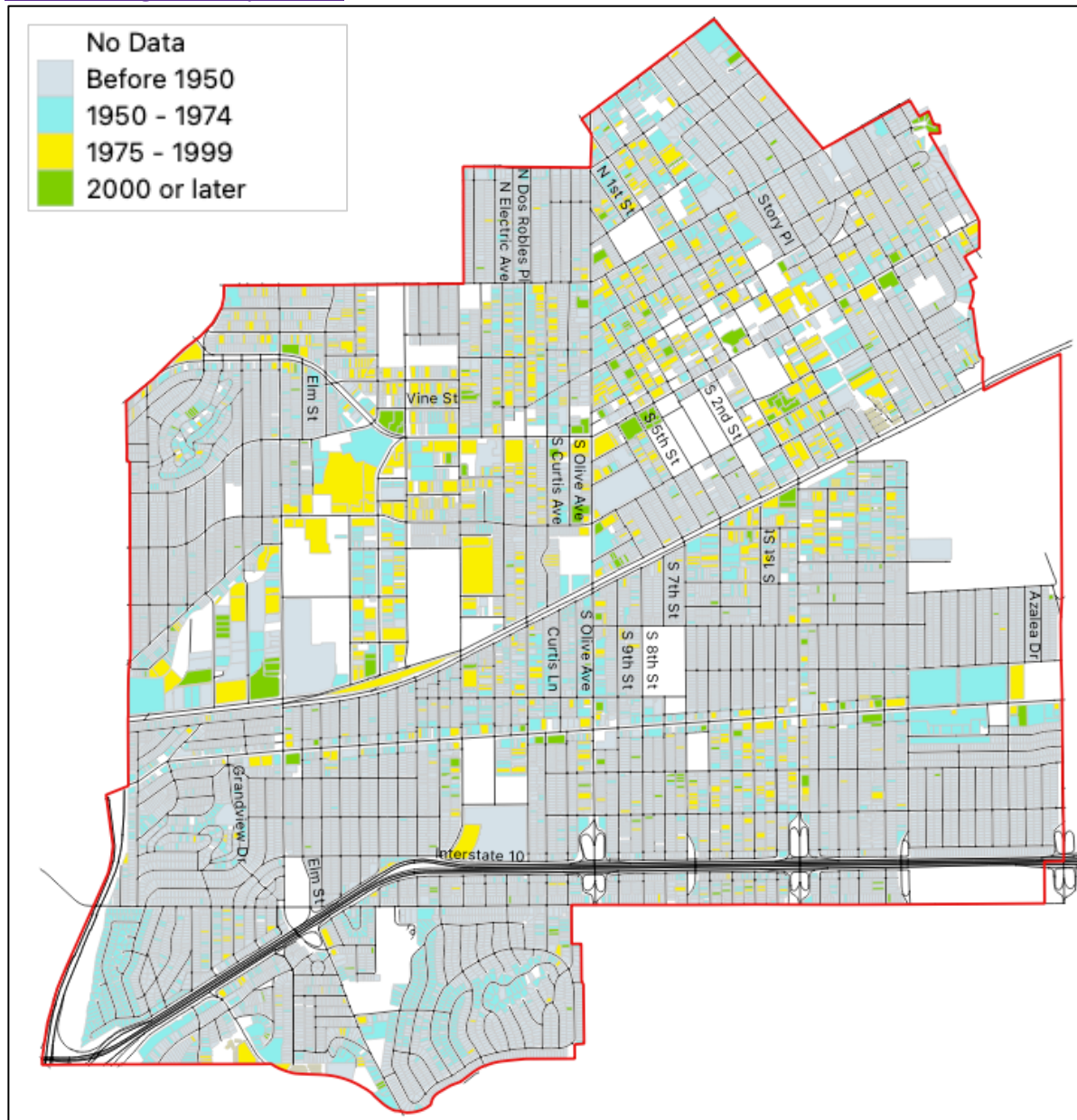


⁴² Housing is technically allowed on some parcels that meet certain criteria, but standards applied to these parcels make redevelopment along Valley Boulevard effectively infeasible. This is discussed in detail in the constraints section of the Housing Element

Impacts of Historic Development Pattern

Alhambra was largely built out in the early 20th Century. According to LA County Assessor’s data, over 62 percent of all existing structures were built before 1950 and 77 percent were built before 1975. The historic development pattern driven by a WWII era boom that preceded modern zoning designations resulted in a small lot parcelization pattern, even in today’s higher density zones. For example, the median lot size in today’s R-3 zone is only 7,600 square feet and only six percent of R-3 lots are greater than a half-acre. This historical development pattern has resulted in an environment where even in today’s commercial areas and high-density residential areas, development of housing in high opportunity areas is fundamentally challenged.

Figure 104. Historic Development Pattern, Year-Structure Built
Source: Los Angeles County Assessor



Homeownership and Lending Patterns

The homeownership rate in Alhambra is 40 percent compared to 46 percent in Los Angeles County. However, in Alhambra access to homeownership is not equal across racial and ethnic groups. The white racial group has a higher homeownership rate than all other racial and ethnic groups. The city’s two largest racial groups, Asians and Hispanic/Latino have homeownership rates of 43 percent and 33 percent, respectively. The City’s Black and African American population has the lost rate at 15 percent.

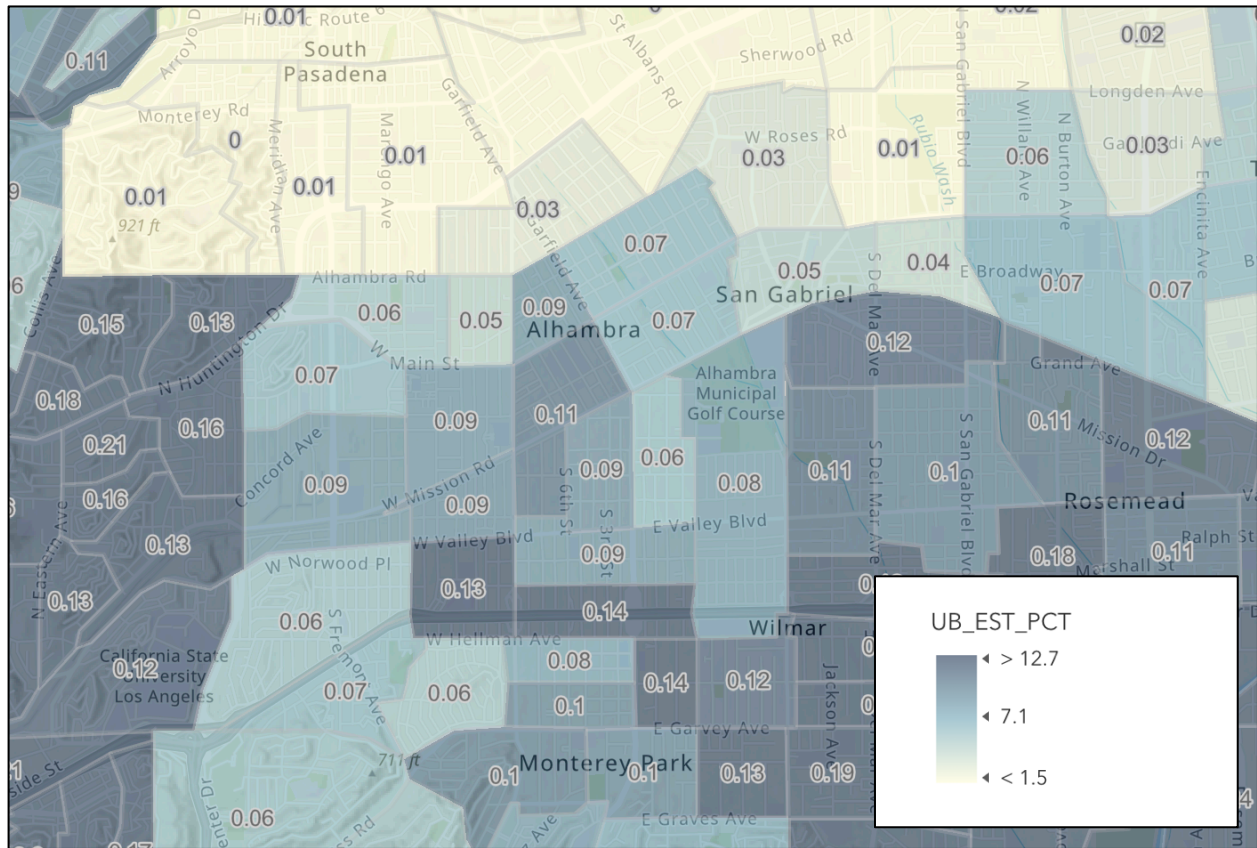
Figure 10594. Housing Tenure by Race/Ethnicity, Alhambra
Source: ACS 2019 5-year Estimates, Table S2502

Race	Total Occupied Units	Owner Occupied	Renter Occupied	Home Ownership Rate
White alone, not Hispanic or Latino	3,574	1,708	1,866	47.8%
Black or African American	558	85	473	15.2%
American Indian and Alaska Native	204	93	111	45.6%
Asian	15,247	6,641	8,606	43.6%
Native Hawaiian and Other Pacific Islander	37	8	29	21.6%
Some other race	5,387	1,384	4,003	25.7%
Two or more races	668	260	408	38.9%
Hispanic or Latino origin	9,872	3,264	6,608	33.1%
Total	29,771	11,898	17,873	40.0%

Access to credit remains a barrier to homeownership in Alhambra. An analysis of lending patterns in Figure 10594 above found that denial rates for moderate- and middle-income Black and Hispanic/Latino applicants were higher than those for whites. Denial rates for Asians were lower than whites across all income categories. Also, the Federal Financial Institutions Examination Council (FFIEC) provides Community Reinvestment Act data on access to banking. The CRAMap 2021 data and “Unbanked Index” created by RPM consulting estimates the number of households by census tract lacking access to the primary banking system.

Figure 10695 presents estimates of the share of households in Alhambra and the surrounding region that lack access to banking. Generally, three to fourteen percent of households in Alhambra lack access to banking. This is an above average rate that aligns with racial composition in the community. The census tracts with the highest rates of Hispanic/Latino and Asian composition also have the highest unbanked rate.

Figure 10695. Percent of Households Without Access to Banking or Credit, 2021
 Source: FFIEC CRAMap 2021 Spatial Data



Historical Investment Patterns

The pattern of investment in a community can influence access to housing and opportunity. Communities that habitually invest in existing high-resource areas risk perpetuating the divide between neighborhoods that foster mobility and those that do not. Data on Alhambra’s historically pattern of investment is sparse, ranging from oral record to recent and planned investments. We evaluated available information including recent Capital Improvement Plans, interviews with long-time city staff, and new and media records detailing announced investments. Key findings include:

Alhambra has historically invested in its park infrastructure. Alhambra has a low rate of parks and open space per capita relative to the region. The built-out nature of the land use pattern makes new park development very costly, so Alhambra invests in improving and enhancing its existing parks. With the exception of Emery Park, Alhambra’s existing parks are in high resource areas but are also generally located adjacent to areas zoned for higher density housing. Also, the City conducts analysis using data from Placer.ai to understand who is benefiting from and using existing parks. A recent analysis from 2022 found that 81.1 percent of visitors at Alhambra Park and 85.3 percent of users at Emery Park and non-white. Frequent visitors also trend toward lower income residents, with the median income of visitors to

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Alhambra Park coming in at \$57,000 and Emery Park at \$52,000 annually⁴³. This is indicative that Alhambra’s existing parks are accessible to lower income families in the community.

Figure 107 shows recent and planned park investment. Figure 108 displays Alhambra’s parks alongside TCAC opportunity areas. Between 2014 and 2018, Alhambra spent \$1.8 million on capital parks projects. Over the next five years the city will invest over \$5 million.

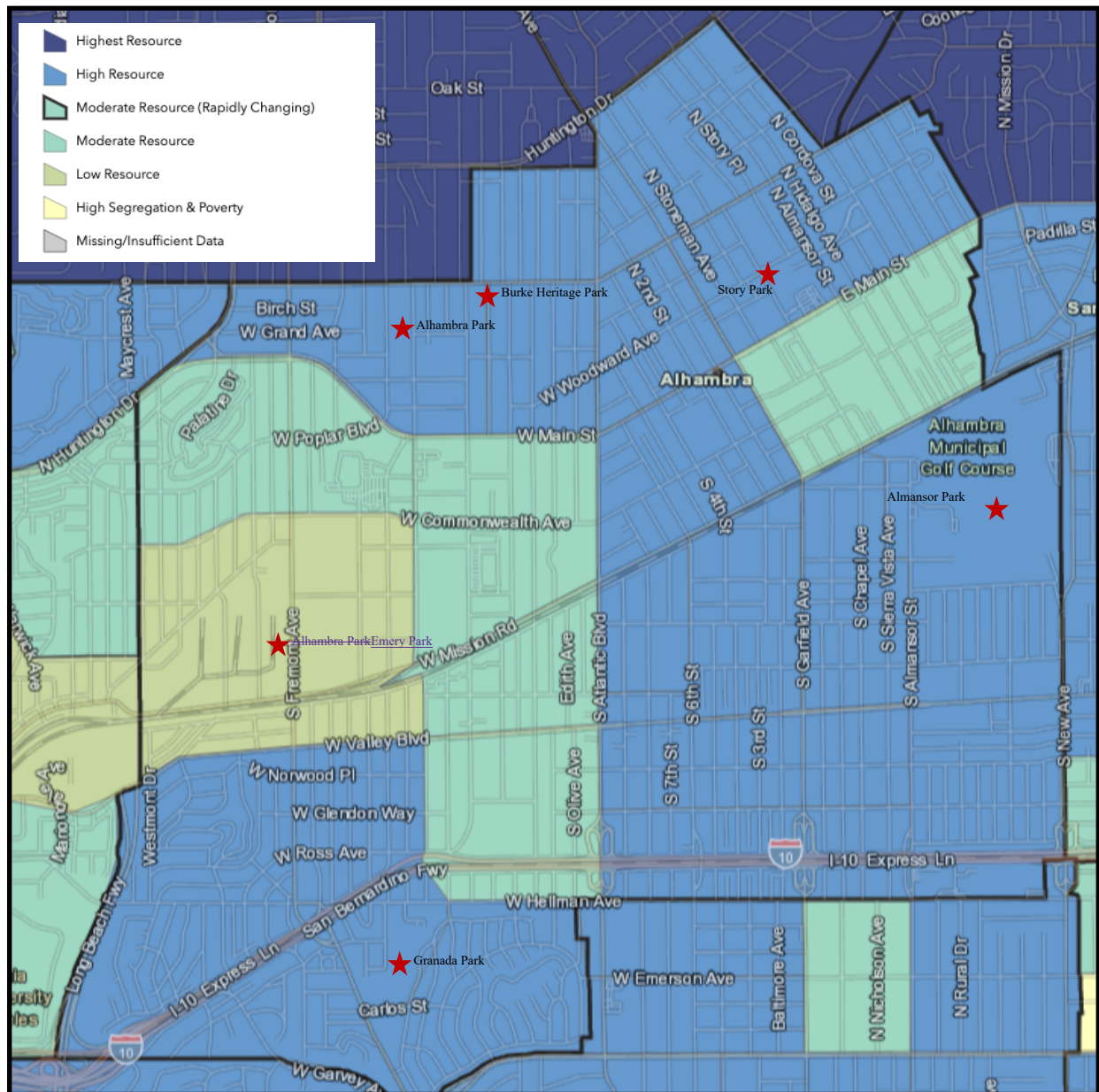
Figure 107. Recent Capital Investments in Parks Infrastructure

Source: City of Alhambra

<u>YEAR</u>	<u>AMOUNT</u>	<u>PROJECT</u>	<u>LOCATION</u>
<u>2014</u>	<u>\$203,880</u>	<u>Alhambra Picnic Shelter Replacement</u>	<u>Alhambra Park</u>
<u>2015</u>	<u>\$71,650</u>	<u>Granada Gym Flooring</u>	<u>Granada Park</u>
<u>2015</u>	<u>\$156,620</u>	<u>Almanson Gym HVAC</u>	<u>Almanson Park</u>
<u>2015</u>	<u>\$90,939</u>	<u>Almanson Park Picnic Shelter Replacement</u>	<u>Almanson Park</u>
<u>2015</u>	<u>\$76,900</u>	<u>Granada Gym Equipment</u>	<u>Granada Park</u>
<u>2016</u>	<u>\$52,850</u>	<u>Granada Restroom</u>	<u>Granada Park</u>
<u>2017</u>	<u>\$59,000</u>	<u>Almanson Jogging Trail</u>	<u>Almanson Park</u>
<u>2017</u>	<u>\$67,960</u>	<u>Almanson Jogging Trail Light</u>	<u>Almanson Park</u>
<u>2017</u>	<u>\$85,000</u>	<u>Almanson Playground Rubberized Surface</u>	<u>Almanson Park</u>
<u>2017</u>	<u>\$199,400</u>	<u>Alhambra Pool Re-Plaster</u>	<u>Alhambra Park</u>
<u>2017</u>	<u>\$179,039</u>	<u>Almanson Restroom</u>	<u>Almanson Park</u>
<u>2017</u>	<u>\$268,907</u>	<u>Emery Park Playground Replacement</u>	<u>Emery Park</u>
<u>2018</u>	<u>\$276,108</u>	<u>Almanson Field Light</u>	<u>Almanson Park</u>
<u>2018</u>	<u>\$90,155</u>	<u>Alhambra Park Fitness Project</u>	<u>Alhambra Park</u>
<u>2022-2027</u>	<u>\$250,000</u>	<u>Burke Heritage Park Improvements</u>	<u>Burke Heritage Park</u>
<u>2022-2027</u>	<u>\$850,000</u>	<u>Story Park Improvements</u>	<u>Story Park</u>
<u>2022-2027</u>	<u>\$700,000</u>	<u>Alhambra Park Restroom</u>	<u>Alhambra Park</u>
<u>2022-2027</u>	<u>\$960,000</u>	<u>Alhambra Park Pool</u>	<u>Alhambra Park</u>
<u>2022-2027</u>	<u>\$275,000</u>	<u>Alhambra Park Playground</u>	<u>Alhambra Park</u>
<u>2022-2027</u>	<u>\$230,000</u>	<u>ALMANSOR Gym Window Replacement</u>	<u>Almanson Park</u>
<u>2022-2027</u>	<u>\$410,000</u>	<u>GRANADA Park Playground</u>	<u>Granada Park</u>
<u>2022-2027</u>	<u>\$500,000</u>	<u>Dog Park</u>	<u>N/A Almanson Park</u>
<u>2022-2027</u>	<u>\$500,000</u>	<u>Granada Pool Mechanical</u>	<u>Granada Park</u>
<u>2022-2027</u>	<u>\$500,000</u>	<u>Alhambra Pool Mechanical</u>	<u>Alhambra Park</u>

⁴³ Data derived from Placer.ai, retrieved for the 2022 calendar year.

Figure 108. Location of City Parks in Relation to TCAC Resource Areas
 Source: City of Alhambra and TCAC



History of Redevelopment Agency Investment. Prior to the dissolution of redevelopment agencies in California, Alhambra utilized redevelopment funds to invest in its downtown and in affordable housing, including all existing deed restricted affordable units in the city. For example, in the late 1990s, Alhambra embarked on an aggressive downtown revitalization plan that included purchase and renovation of existing properties, street and storefront improvements, and investments to catalyze redevelopment⁴⁴. At the time, Downtown was an underinvested part of town, and has historically been classified as an area of high segregation

⁴⁴ <https://www.latimes.com/archives/la-xpm-1998-nov-09-me-40890-story.html>

and poverty. A review of “completed projects” from the 2005-2009 implementation plan include⁴⁵:

- Storefront, tenant improvements support for several businesses along Main Street
- Completion of the 45,000 square foot Alhambra Civic Center Library
- Creation of a “one-stop” Streamlined Permit Process.

Alhambra has also prioritized downtown investment through adoption of several specific plans and the West Main Corridor Master Plan, which has resulted in mixed-use redevelopment in downtown.

Street Quality and Improvements. Figure 109 shows the 2020-2025 street improvement plan alongside street quality scores across the city. We observe a correlation between lower opportunity areas, areas where multifamily rental is allowed/feasible, and lower quality streets. This is indicative of a historical pattern of underinvestment in these areas. However, we also find that Alhambra’s investment priorities also correlate to areas that are most underinvested. For example, in Figure 110, Alhambra’s 2020-21 project map shows investment in the Alley Rehabilitation Project and other street rehabilitation along Valley Boulevard, which includes moderate resource areas, concentrations of persons with protected characteristics, and is historically Alhambra’s Asian business district.

⁴⁵ <https://www.cityofalhambra.org/DocumentCenter/View/520/Alhambra-Redevelopment-Agency-Five-Year-Implementation-Plan-2010-2014-PDF>

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Figure 109. 2020-2025 Street Improvement Plan and Current Street Quality Scores
 Source: City of Alhambra

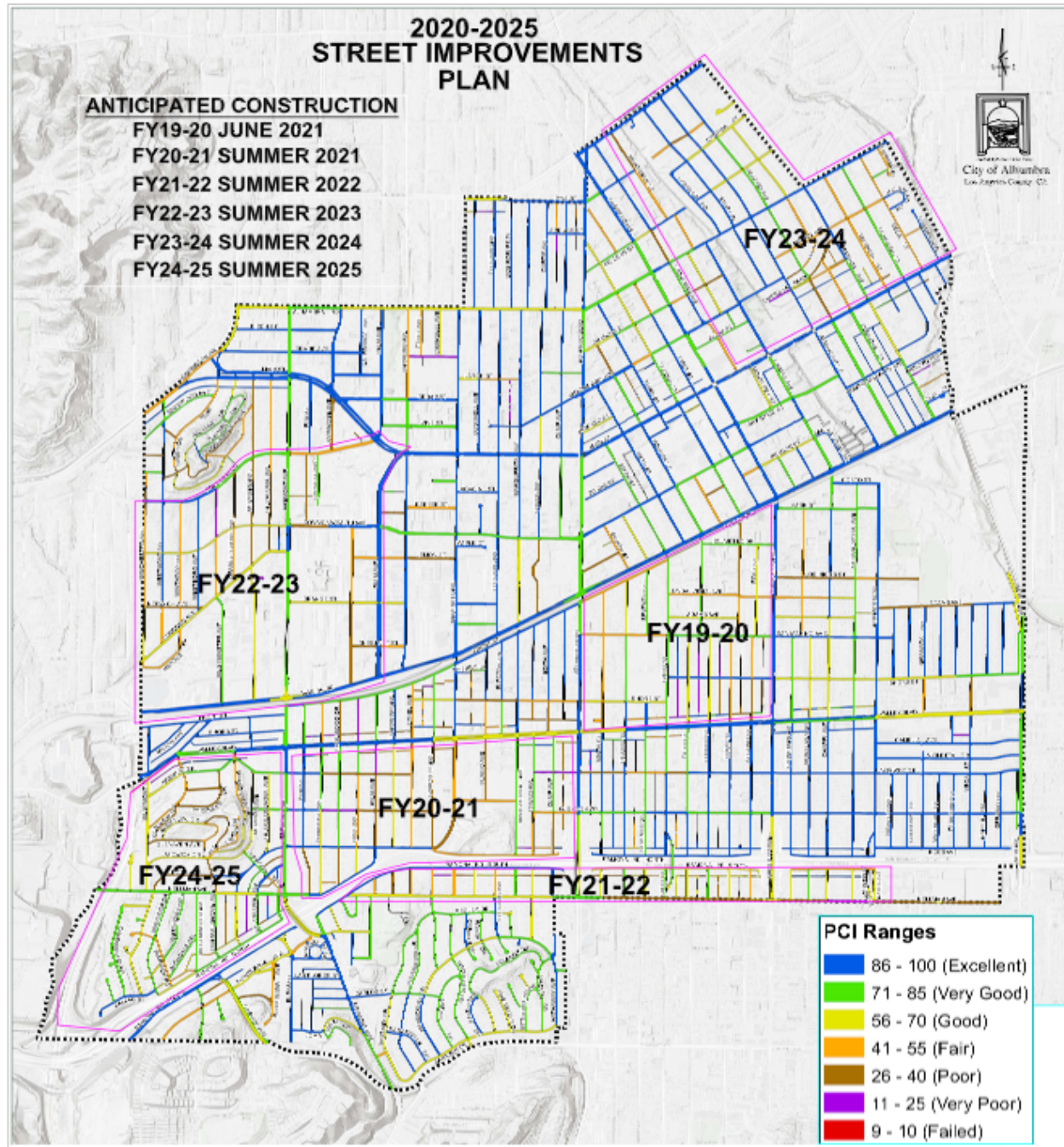


Figure 110: 2020-2021 Public Works Projects, City of Alhambra
Source: City of Alhambra



Findings

Alhambra has historically invested heavily in downtown where fair housing challenges have historically been most common. Downtown has slowly transitioned from an area of high segregation and poverty to a high resource area. However, evidence suggests some areas correlated to concentrations of households with protected characteristics have exhibited disinvestment (Valley Boulevard, south of downtown). The current Capital Improvement Plan is prioritizing investments in these underserved areas. However, it is important that the City is proactive in ensuring that its investment mitigate historically inequitable investment patterns. Program 30 include guidance to for the Community Development Department to cooperate with Public Works in developing a process to include an assessment of fair housing characteristics in developing future capital improvement plans.

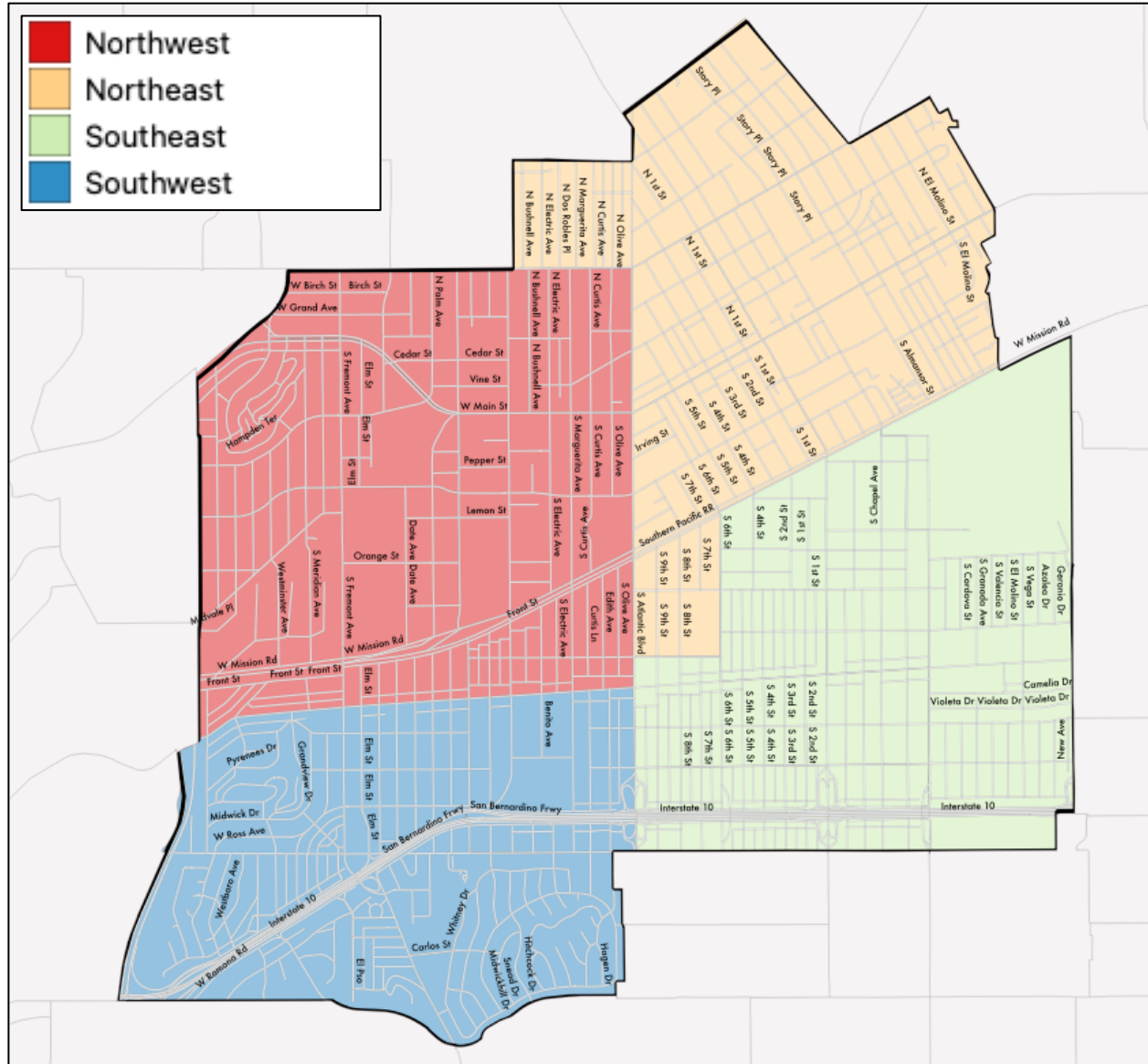
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Analysis of Sites

In this analysis we evaluate RHNA allocation by census tract and general region throughout the city. We define regions as quadrants generally aligning with major north-south (Atlantic Boulevard) and east-west (Mission Road) arterials. This delineation also aligns with census tract boundaries.

Figure 111: Map of Alhambra Quadrants for AFFH Sites Analysis
Source: ECONorthwest



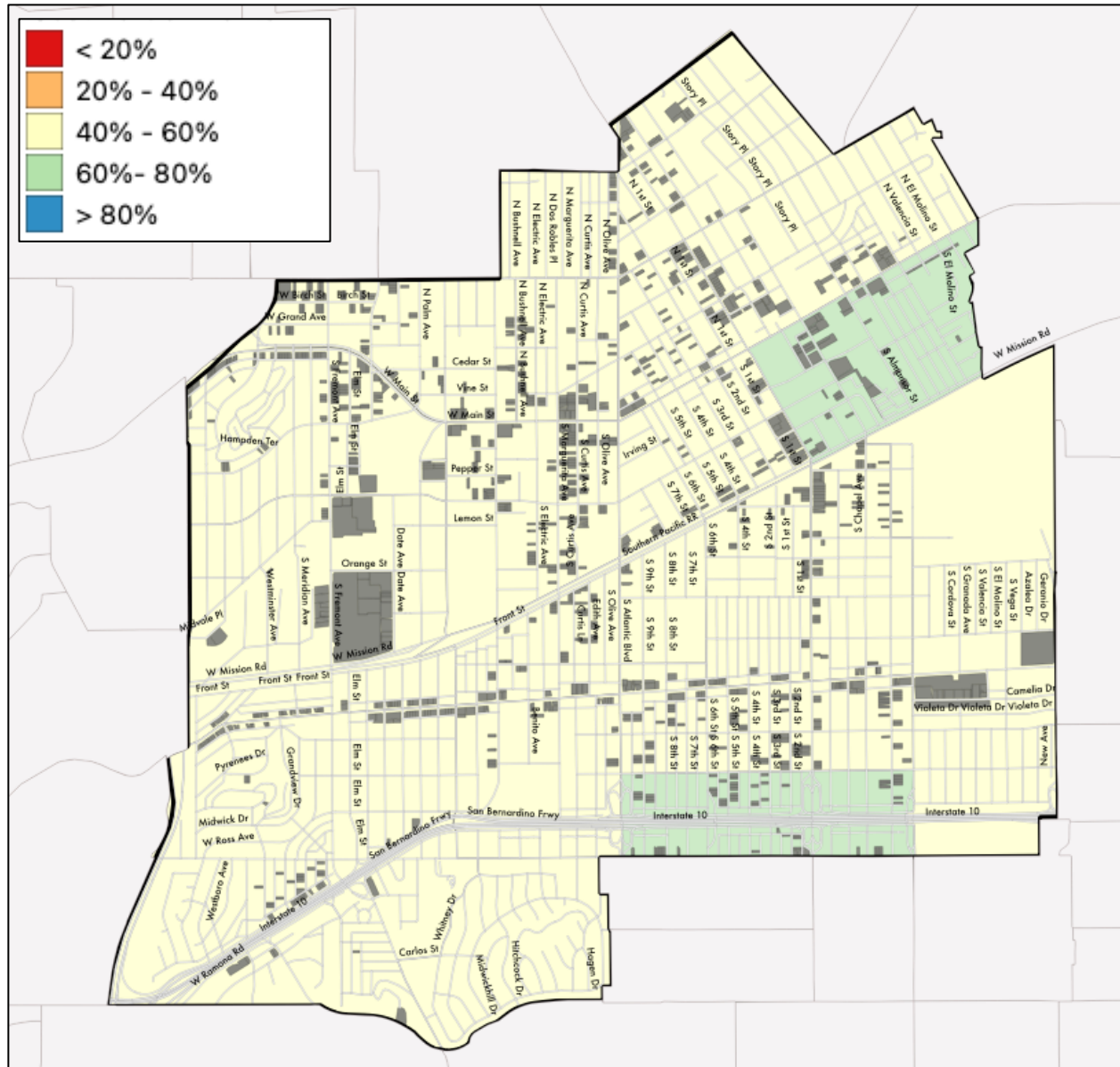
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Renter Cost Burden

Most census tracts have a renter cost burden between 40 and 60 percent. Two census tracts with an elevated cost burden rate include 8 percent of total RHNA capacity and 6 percent of lower income RHNA capacity.

Figure 112: Renter Cost Burden with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer; 2021



Access to Opportunity

Alhambra's low and moderate resource census tracts are located in the western portion of the city. Alhambra's strategy of a combination of upzoning and rezoning to meet its RHNA obligation was in part designed to provide access to new and existing neighborhoods. Alhambra's constrained land supply and parcelized nature contribute to limited sites that meet the criteria necessary to support lower-income housing development. In the site inventory, **nearly all sites that met minimum criteria** (between .5 and 10 acres and density at a minimum of 30units/ac) were required to be used to meet lower income obligations. This constraint limits the city's ability to be strategic about the location of lower-income site allocation. However, Alhambra only has one Census Tract that is classified as a low resource area according to the TCAC/HCD opportunity analysis. The major contributor to this classification is the tract's environmental score because it includes large portions of the city's industrial area. This tract scores high on both economic and education factors. Figure ~~11496~~ below shows **that 60 percent of lower income capacity is in high resource areas and 85 percent is in high or moderate resource areas. This ~~87% percent of identified Lower Income capacity is in moderate or high resource areas~~ and** should serve to improve access to higher opportunity areas, mitigate displacement, and unwind concentrations of poverty.

Identified site capacity across all income levels is well-distributed along corridors and in medium and high-density zones throughout the community. Site inventory capacity was further prioritized by transit access. Alhambra is generally a high transit access city. Nearly all capacity located west of Chapel is located in a SCAG designated 2016 High Quality Transit Area (HQTA) and **86 percent of all capacity is located within ¼ mile of a transit stop.**

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Figure 114:96- Lower Income RHNA Allocation and Composite TCAC Opportunity Score: Alhambra, CA
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021 and ECONorthwest

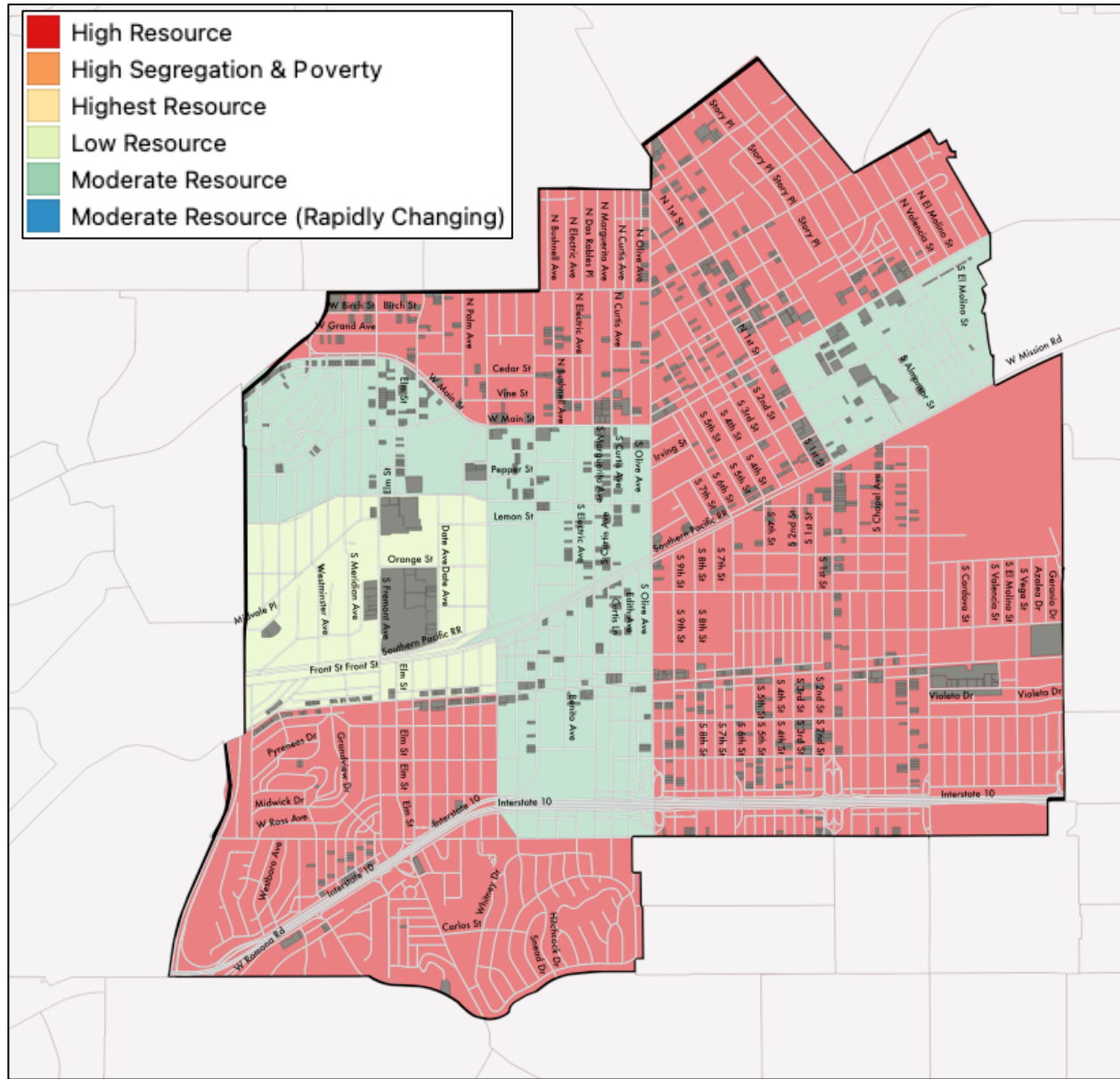


Figure 115:97 Unit Capacity by Composite TCAC Opportunity Score and Income Level: Alhambra, CA⁴⁶
 Source: HCD AFFH Data Viewer; 2021, TCAC 2021 and ECONorthwest

Income Level	High Resource	Moderate Resource	Low Resource
Lower Income	1,681	716	409
Moderate Income	678	295	139
Above Moderate Income	1,655	934	664
Total	4,013	1,946	1,212

⁴⁶ Sites only, excludes capacity in proposed projects

Displacement Typology

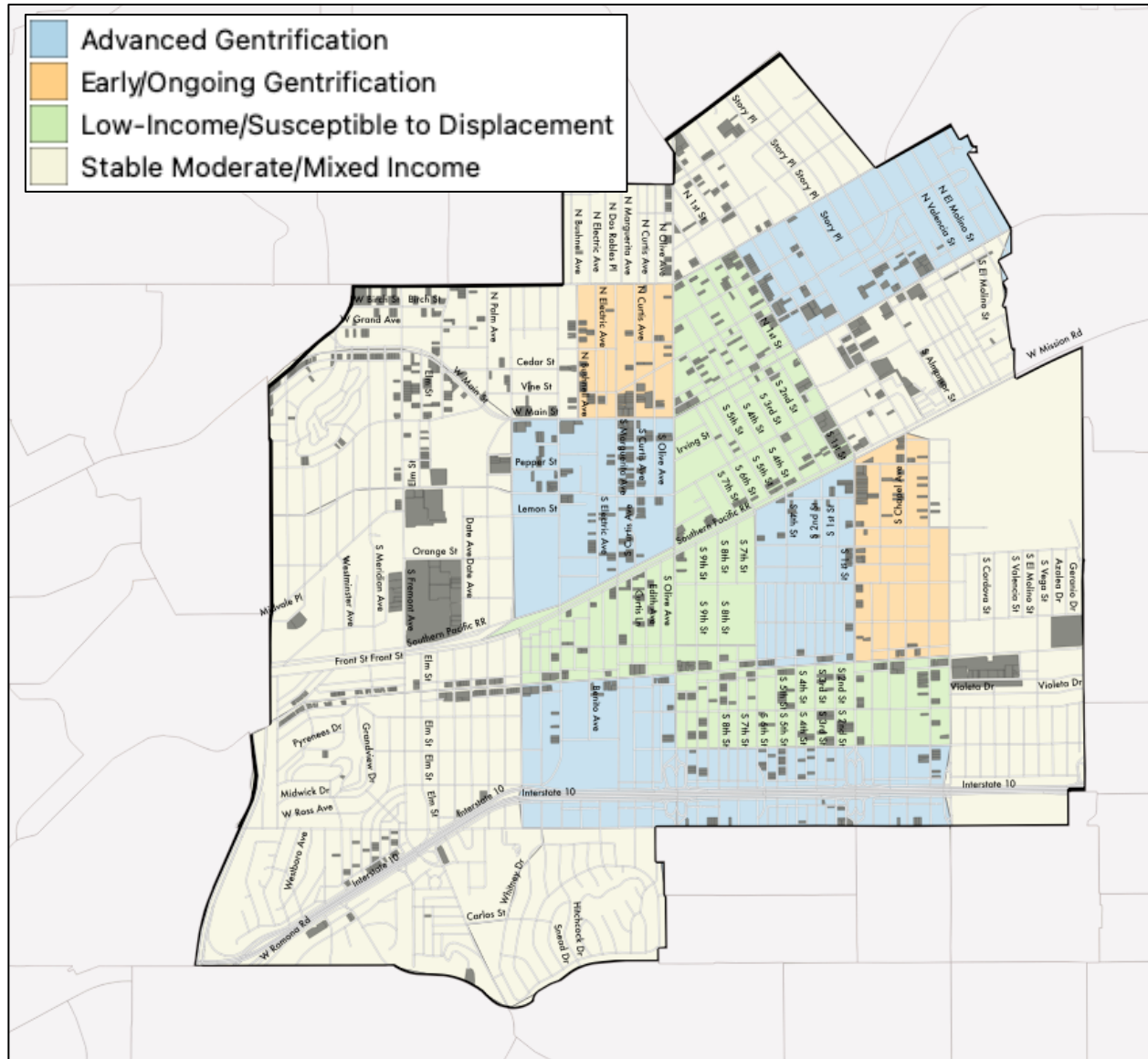
According to the Urban Displacement Project, the City of Alhambra’s twenty census tracts has five tracts that are experiencing advanced gentrification, two that are in the early stages of gentrification, and four that are vulnerable to displacement due to gentrification, with the other nine being stable moderate/mixed income. Gentrification pressures are most pronounced in the central and southern portion of the City. The majority of RHNA capacity (57 percent) is located in areas of displacement stability. Roughly 17 percent (497 units) of lower income capacity is located in areas of early or advanced gentrification. **Areas of advanced gentrification also correlated to areas of elevated cost burden.**

Figure 116:98 Site Capacity by Income Level and UDP Displacement Typology, City of Alhambra
 Source: UDP Displacement Typology, Los Angeles 2018, ECONorthwest

<u>Typology</u>	<u>Lower</u>	<u>Moderate</u>	<u>Above Moderate</u>
<u>Advanced Gentrification</u>	<u>266</u>	<u>166</u>	<u>459</u>
<u>Early/Ongoing Gentrification</u>	<u>231</u>	<u>116</u>	<u>286</u>
<u>Low-Income / Susceptible to Displacement</u>	<u>696</u>	<u>261</u>	<u>618</u>
<u>Stable Moderate /Mixed Income</u>	<u>1,613</u>	<u>569</u>	<u>1,890</u>

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Figure 117:99 UDP Displacement Typology with Sites Inventory: Alhambra, CA
Source: HCD AFFH Data Viewer; 2021, UDP 2021, and ECONorthwest



Effects of Patterns of Segregation

A comparison of the site inventory against areas of concentrated low to moderate income households and Racially and Ethnically Concentrated Areas of Poverty (R/ECAP) areas are indicative of the direction of patterns of segregation in the community.

Low to moderate Income Concentration

Census tracts in Alhambra range from 38.2 percent to 72.1 percent concentration of low to moderate income households. Over 55 percent of the sites in the inventory are located in census tracts at the median LMI concentration or lower. Sites designated to accommodate lower income are more broadly dispersed because a higher percentage of sites with higher maximum densities are appropriately located within the downtown revitalization district.

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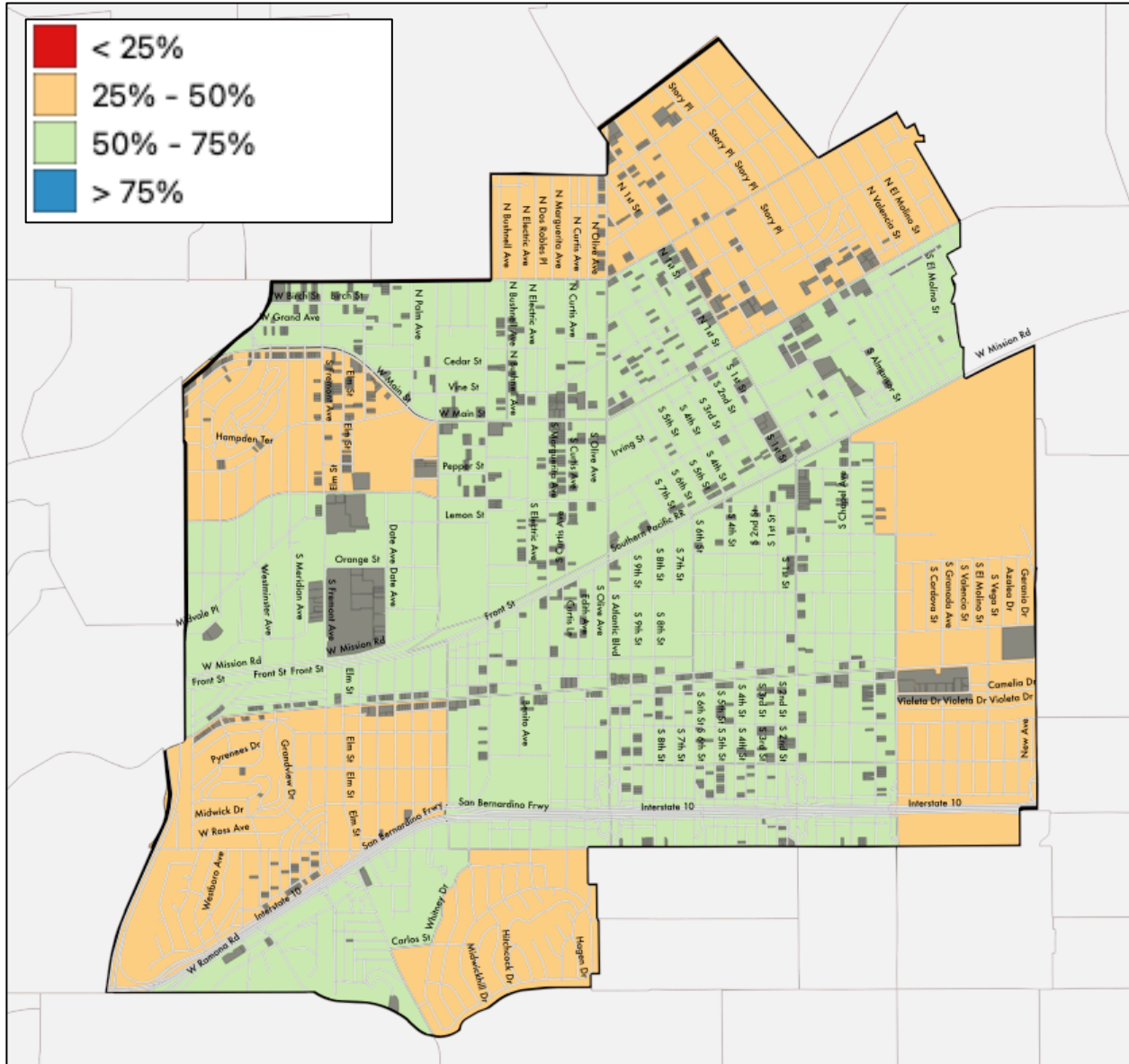
Figure 118: 100 Number of Sites by LMI Share, City of Alhambra

Source: HCD Data Viewer Data, Low-Moderate Income Population Tracts, HUD; US Census Bureau Tracts, ECONorthwest

Percentage LMI (Quintile)	Lower	Moderate	Above Moderate	Total
25% to 50%	881	316	760	1,957
50% to 75%	1,925	796	2,493	5,214

Figure 119: 104 Low-to-Moderate Income Population with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer 2021, and ECONorthwest



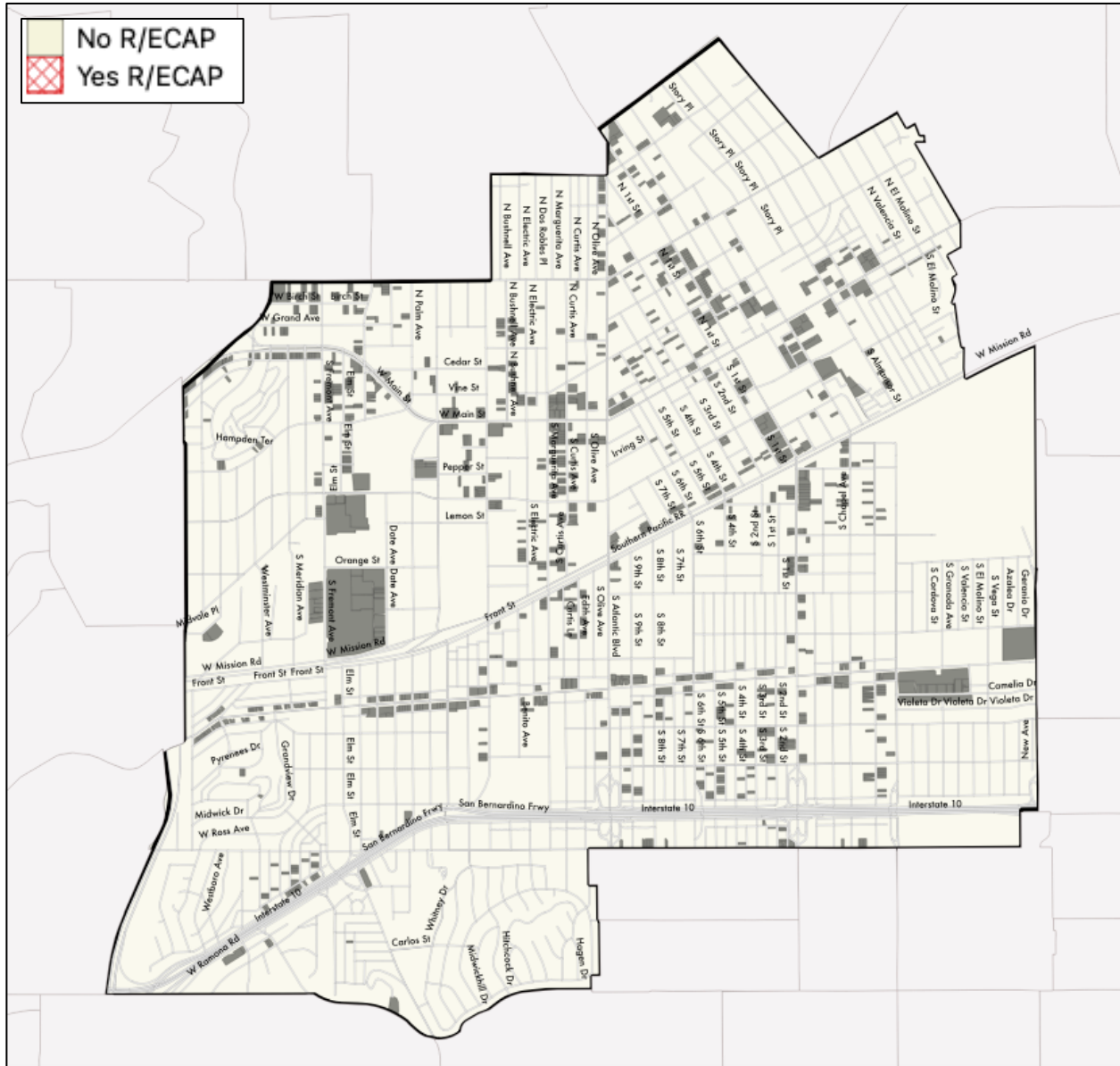
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R/ECAP Areas

Alhambra does not have any R/ECAPs within its boundaries. All sites in the inventory are not within a R/ECAP area.

Figure 120: R/ECAP Areas with Sites Inventory: Alhambra, CA

Source: HCD AFFH Data Viewer 2021, and ECONorthwest



Sites Analysis Summary

Figure 121 and 122 below summarizes data covering RHNA capacity alongside nine key AFFH indicators by census tract and quadrant area defined in Figure 111 above. Key findings in this analysis include:

Northwest

The Northwest Area has the highest share of capacity at 44 percent. This largely impacted by two large opportunity sites in the Northwest quadrant, including the proposed Villages project. The Northwest has below average rates of cost burden and is mostly moderate and high resource. However, it does include the only low resource tract in the city.

Northeast

The Northeast area includes 32 percent of lower income capacity and 30 percent of all capacity. It has the lowest rate of minority population (still high at 87.8 percent) and the lowest rate of owner cost burden and overcrowding. It is mostly a high resource areas with a few pockets of potential susceptibility to displacement.

Southeast

The Southeast is the highest resource area in the city. All tracts in this area are high resource. This area include 22 percent of lower income capacity and 21 percent of total capacity. It also has lowest rate of female headed households with children and the lowest poverty rate. Four out of five tracts in this area have displacement vulnerability.

Southwest

The Southwest Area is a completely built-out and include the greatest share of single-family homes. The majority of its capacity to accommodate future growth (six percent of capacity) is concentrated in opportunity sites along Valley Boulevard. The area has mostly stable displacement typologies with the exception of one moderate resource tract showing advanced gentrification.

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Figure 121: RHNA Capacity and AFFH Indicators by Tract and Area (part 1), City of Alhambra

Census Tract	Total HHs	Capacity			AFFH Indicators				
		Lower	Moderate	Above Mod.	Minority %	LMI Share	Renter Cost Burden	Owner Cost Burden	Overcrowding
NORTHWEST AREA									
6037480802	1,132	409	139	664	94.9%	57.8%	41.8%	28.1%	12.1%
6037480803	1,244	274	93	241	88.8%	40.0%	55.1%	59.2%	4.5%
6037480804	1,811	117	50	144	93.0%	57.0%	46.5%	40.7%	10.2%
6037480303	1,552	123	56	131	92.7%	58.5%	58.2%	67.9%	13.9%
6037480901	1,680	163	87	242	94.0%	62.2%	45.6%	55.7%	11.8%
6037480902	1,382	64	37	86	95.1%	63.9%	59.0%	59.9%	8.4%
Total	8,801	1,151	462	1,508	93.1%	57%	51%	52%	10.3%
NORTHEAST AREA									
6037480400	2,146	43	50	128	82.8%	39.9%	45.6%	25.6%	9.0%
6037480304	1,875	193	90	208	93.9%	72.1%	54.1%	50.5%	8.4%
6037480302	1,770	244	70	164	81.4%	49.8%	45.2%	35.3%	6.4%
6037481002	2,062	177	55	303	93.4%	66.5%	62.7%	50.7%	6.2%
6037481001	1,761	249	62	133	87.4%	56.6%	57.3%	43.5%	8.0%
Total	9,614	906	327	936	87.8%	56.7%	53.0%	40.9%	7.6%
SOUTHEAST AREA									
6037481604	1,406	56	44	105	90.2%	69.6%	53.2%	36.3%	8.0%
6037481603	1,147	108	61	155	95.9%	62.9%	54.3%	63.8%	6.8%
6037481500	1,596	264	62	108	94.6%	47.7%	48.4%	42.3%	5.1%
6037481606	1,627	190	73	192	95.1%	68.4%	58.1%	57.0%	11.8%
6037481605	1,046	9	10	49	94.7%	63.5%	60.4%	27.8%	21.0%
Total	6,822	627	250	608	94.0%	62.1%	54.5%	46.0%	10.0%
SOUTHWEST AREA									
6037480903	1,106	37	24	63	95.2%	53.6%	51.9%	39.4%	12.7%
6037481901	2,036	55	41	120	84.3%	45.5%	44.9%	38.9%	2.6%
6037481902	1,035	29	9	18	92.3%	52.1%	56.9%	59.7%	13.7%
6037481800	883	0	0	0	83.9%	38.2%	43.5%	32.3%	1.7%
Total	5,060	122	74	201	88.2%	47.4%	48.6%	42.1%	6.9%

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Figure 122: RHNA Capacity and AFFH Indicators by Tract and Area (part 2), City of Alhambra

Census Tract	Total HHs	Capacity				AFFH Indicators			
		Lower	Moderate	Above Mod.	Total RHNA	Female Headed HHs w/Children	Poverty Status	TCAC Resource (2021)	Displacement Type
NORTHWEST AREA									
6037480802	1,132	409	139	664	1,212	7.2%	4.3%	Low Resource	Stable
6037480803	1,244	274	93	241	608	13.5%	6.0%	Moderate Resource	Stable
6037480804	1,811	117	50	144	312	18.0%	5.4%	High Resource	Stable
6037480303	1,552	123	56	131	310	44.9%	5.1%	High Resource	Early Gentrification
6037480901	1,680	163	87	242	493	23.6%	7.1%	Moderate Resource	Advanced
6037480902	1,382	64	37	86	187	25.1%	7.5%	Moderate Resource	Low Income/Suseptible
Total	8,801	1,151	462	1,508	3,120	22.9%	6.0%	Mod and High	Mixed
NORTHEAST AREA									
6037480400	2,146	43	50	128	221	4.9%	4.1%	High Resource	Stable
6037480304	1,875	193	90	208	490	38.2%	6.2%	High Resource	Low Income/Suseptible
6037480302	1,770	244	70	164	478	7.7%	4.0%	High Resource	Stable
6037481002	2,062	177	55	303	535	9.3%	9.6%	Moderate Resource	Stable
6037481001	1,761	249	62	133	444	20.7%	4.5%	High Resource	Low Income/Suseptible
Total	9,614	906	327	936	2,169	15.7%	5.7%	Mixed	Mixed
SOUTHEAST AREA									
6037481604	1,406	56	44	105	205	13.4%	3.0%	High Resource	Advanced
6037481603	1,147	108	61	155	323	18.4%	6.3%	High Resource	Early Gentrification
6037481500	1,596	264	62	108	434	14.3%	3.2%	High Resource	Stable
6037481606	1,627	190	73	192	455	4.9%	5.5%	High Resource	Low Income/Suseptible
6037481605	1,046	9	10	49	69	17.1%	5.6%	High Resource	Advanced
Total	6,822	627	250	608	1,485	13.0%	4.6%	Mod and High	Mixed
SOUTHWEST AREA									
6037480903	1,106	37	24	63	124	18.5%	9.3%	Moderate Resource	Advanced
6037481901	2,036	55	41	120	217	2.6%	2.6%	High Resource	Stable
6037481902	1,035	29	9	18	56	25.9%	6.9%	High Resource	Stable
6037481800	883	0	0	0	0	14.8%	2.9%	High Resource	Stable
Total	5,060	122	74	201	396	13.0%	5.0%	Mod and High	Mixed

Priorities and Contributing Factors

The most meaningful and prevalent fair housing issues in Alhambra are based on the analysis above. These factors are prioritized cardinally through the findings of the AFFH assessment.

Priority 1: The most important fair housing issue is disproportionate housing needs, including housing need for persons with disabilities. This is based on its applicability to the broadest spectrum of residents. The primary factors contributing to disproportionate housing need include:

Factor 1.1. Displacement of residents due to economic pressures. Alhambra has a high incidence of census tracts with high risk of gentrification and displacement.

Factor 1.2. Availability of units in a range of sizes. Alhambra is exhibiting a trend of out-migration among female-headed households with children and a high prevalence of cost burden and overcrowding.

Priority 2: The second most prevalent housing issue is disparities in access to opportunity. While Alhambra has seen improvements in TCAC opportunity scores overtime, environmental scores in the western part of the city continue to present health hazards. The primary factors contributing to disparities in access to opportunity include:

Factor 2.1. Location of Environmental Health Hazards. Alhambra generally has good component opportunity scores for access to education and economic factors, but environmental scores are low in West Alhambra and along the I-10 freeway.

Factor 2.2. Location and Type of Affordable Housing. Alhambra has only a handful of subsidized affordable housing projects available to low-income households. A large share of even seasoned housing stock in the city rents at rates above lower income affordability levels.

Factor 2.3. Access to Financial Services. The analysis found that discrepancies in access to financial services by racial category could be contributing disproportionate access to home ownership and housing mobility.

Factor 2.4. Lack of Investments in Specific Neighborhoods. Alhambra has historically invested throughout the city. It's investments in downtown have resulted in a transition to higher resource scores. But it has also disproportionately invested in parks and other infrastructure that are concentrated in higher resource areas; and the city lacks a process for considering AFFH factors in Capital Improvement Planning.

Priority 3: A third fair housing issue that should be prioritized is fair housing enforcement and capacity. Alhambra has an above average percentage of the population that does not speak English at home or have access to a computer with internet service. Many residents are unaware of resources available in the community.

Factor 3.1. Lack of Fair Housing Outreach and Enforcement. During the outreach process with residents, the city found that while it has a broad range of fair housing services available through its contract with the Housing Rights Center, many residents, specifically people of color and low income residents, do not know how to access these services.

Factor 3.2. Lack of Language Access. Nearly one-in-six households in Alhambra speak a language other than English at home. Language barriers exist in accessing marketing and informational materials as well as participating in public processes.

Factor 3.3. Community Opposition. A cross-section of community members expressed considerable opposition to housing production, specifically affordable housing production.

Priority 4: Sites Inventory; Alhambra’s historic zoning and land use patterns alongside the historic pattern of private investment has led to a physical condition that makes housing challenging in some neighborhoods. Zoning has essentially excluded housing production on three of the city’s major corridors.

Factor 4.1. Zoning and Historic Land Use Pattern. The AFFH sites analysis found that exclusionary zoning along primary corridors aligns with a development pattern that has many single-family homes in existing high-density areas has prevented development in higher resource and higher income areas.

Goals

1. Expand Fair Housing Choice and Access
2. Expand Affordable Housing Opportunities
3. Maintain Safe and Green Neighborhoods
4. Mitigate Gentrification and Displacement

Fair Housing Program: Meaningful Actions and Outcomes

The city has an obligation to prevent and mitigate factors limiting fair housing access and barriers to equal opportunity in housing choice. The City adopted and updated a five-year Analysis of Impediments to Fair Housing Choice in April 2020. Affirmatively furthering fair housing requires that the city take meaningful actions to address the impediments identified in the AI and in this Housing Element Update.

Figure 123: identifies meaningful action the City will pursue to overcome identified patterns and trends from the AFFH assessment of contributing factors to fair housing issues.

Fair Housing Issue	Contributing Factor	Geographic Target	Meaningful Action	Metric	Milestones and Targets
<u>Fair Housing Enforcement and Outreach Capacity</u>	<ul style="list-style-type: none"> ▪ <u>Lack of language access</u> ▪ <u>Lack of Fair Housing Enforcement and Outreach</u> ▪ <u>Lack of awareness of fair housing laws and advocacy.</u> ▪ <u>Community opposition</u> 	<u>Citywide, tracts with highest non-English speaking population.</u>	<ul style="list-style-type: none"> ▪ <u>Continue to contract with the Housing Rights Center to provide fair housing services and education.</u> ▪ <u>By year-end 2023, develop a program to prioritize access to language access for housing and planning meetings.</u> ▪ <u>By year-end 2024, update citywide survey completed in 2021, offering in English, Spanish, and Traditional Chinese. Include survey questions assessing</u> 	<ul style="list-style-type: none"> ▪ <u>Number of cases served by the housing rights center.</u> ▪ <u>Community participation among non-English speaking residents.</u> 	<ul style="list-style-type: none"> ▪ <u>Target to serve 350 individuals annually through HRC programs.</u> ▪ <u>Include translated announcements in Spanish and Traditional Chinese for outreach on housing related issues.</u> ▪ <u>100% of announcements will be translated in Spanish and Traditional Chinese for participation from non-English speaking residents on housing related issues.</u>

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			<p><u>barriers to public participation.</u></p> <ul style="list-style-type: none"> ▪ <u>When holding community meetings, proactively outreach to a wide range of community groups.</u> 		<ul style="list-style-type: none"> ▪ <u>100% of participants will have access to translation services to encourage outreach and engagement by non-English speakers.</u> ▪ <u>City will track 100% of requests from non-English speakers seeking translation services for housing programs.</u>
<p><u>Disproportionate Need for Persons with Disabilities</u></p>	<ul style="list-style-type: none"> ▪ <u>Availability of units in a range of sizes.</u> ▪ <u>Displacement of residents due to economic pressures.</u> ▪ <u>Demographic factors driving needs for seniors with disabilities.</u> 	<p><u>Central City, Citywide</u></p>	<ul style="list-style-type: none"> ▪ <u>Begin educational programs that promote the positives of integrated income neighborhoods to change local attitudes about affordable housing (Program 28).</u> ▪ <u>Implement Program 5 (Inclusionary Housing).</u> ▪ <u>Establish siting requirements for SRO housing (Program 9)</u> ▪ <u>Implement an adaptive reuse program (Program 23) to encourage lower cost housing alternatives.</u> ▪ <u>Implement an aggressive Accessory Dwelling Unit Program (Program 26) to incent production in high resource single-family neighborhoods.</u> ▪ <u>Complete projects planned on City-owned land (Mariposa, Chapel) by year-end 2025</u> 	<ul style="list-style-type: none"> ▪ <u>Units built or dollars collected in in-lieu fees from inclusionary program.</u> ▪ <u>Affordable ADU production</u> ▪ <u>Success in adopting SRO requirements.</u> ▪ <u>Production of SRO units.</u> ▪ <u>Number of units built on city owned land.</u> 	<ul style="list-style-type: none"> ▪ <u>Target of one SRO housing project over the planning period.</u> ▪ <u>Construction of at least 92 lower income units on existing city-owned land.</u> ▪ <u>ADU units in R1 zones consistent with estimate of 60 units annually.</u> ▪ <u>Adoption of SRO ordinance by Summer 2023.</u>
<p><u>Disproportionate Housing Need</u></p>	<ul style="list-style-type: none"> ▪ <u>Displacement of residents due to economic pressures.</u> ▪ <u>Lack of Affordable Housing Units</u> 	<p><u>Citywide</u></p>	<ul style="list-style-type: none"> ▪ <u>Preserve the City's existing affordable housing stock for low- and moderate- income households (LMI) in the 0 to 80 percent of Area Median Income (AMI) category, with a focus on tracts with an above average concentration of LMI households.</u> ▪ <u>Continue to monitor and preserve affordable senior housing units for lower</u> 	<ul style="list-style-type: none"> ▪ <u>Number of units preserved.</u> ▪ <u>Completion of cost control report.</u> 	<ul style="list-style-type: none"> ▪ <u>Preservation of 215 units with expiring affordable housing covenants over the planning period.</u> ▪ <u>Present a report to City Council with alternatives for adoption of programs mitigating rent increases for lower income residents by 2025. As part of the study, evaluate and establish</u>

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			<p><u>income elderly households throughout the community.</u></p> <ul style="list-style-type: none"> ▪ <u>By year-end 2024, provide a report to City Council detailing alternatives for mitigating rent increases for lower income residents.</u> 		<p><u>appropriate metrics toward meaningful and significant mitigation of displacement risk.</u></p>
<p><u>Disparities in Access to Opportunity</u></p>	<ul style="list-style-type: none"> ▪ <u>Location of Environmental Factors</u> ▪ <u>Location and type of affordable housing and lack of affordable units</u> ▪ <u>Access to financial services</u> ▪ <u>Lack of investments in specific neighborhoods.</u> ▪ <u>Land Use and Zoning Laws</u> 	<p><u>Northeast Quadrant, Citywide</u></p>	<ul style="list-style-type: none"> ▪ <u>Implement density bonus program that expands on AB1763 into entire downtown revitalization district. Propose expanding program as an affordable housing overlay zone in high-resource areas (Program 12).</u> ▪ <u>Contract to provide housing mobility counseling services.</u> ▪ <u>By the next update to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in amenities in low and moderate resource areas.</u> ▪ <u>Programs to implement SB9 (Program 33) and target housing production in the R1 Zone.</u> ▪ <u>Place-based programs (Programs 35-38) to direct parks and public safety improvements in low and moderate resource areas.</u> 	<ul style="list-style-type: none"> ▪ <u>Trend in TCAC scores by census tract.</u> ▪ <u>Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary.</u> ▪ <u>Number of 100% affordable projects using density bonus under Program 12.</u> ▪ <u>Number of projects or dollars spent in low and moderate resource areas.</u> 	<ul style="list-style-type: none"> ▪ <u>Improvement of at least one census tract that is currently lower or moderate resource to a higher tier over the planning period.</u> ▪ <u>Target of at least four affordable housing projects utilizing the density bonus program.</u> ▪ <u>Spending on place-based programs consistent with actions outlined in Programs 35-38</u> ▪ <u>Target of 20 middle housing units per year in high resource R1 areas.</u>
<p><u>Site Inventory</u></p>	<ul style="list-style-type: none"> ▪ <u>Historic development pattern impact on location of feasible sites.</u> 	<p><u>R-3 zones. Zones that do not allow housing</u></p>	<ul style="list-style-type: none"> ▪ <u>Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary.</u> 	<ul style="list-style-type: none"> ▪ <u>Housing production on sites that did not previously allow housing.</u> ▪ <u>Lower Income Housing Production in high-resource areas.</u> 	<ul style="list-style-type: none"> ▪ <u>Development of at least 50 units in the EMC zone that will have a portion rezoned to allow housing by-right.</u> ▪ <u>Target of 20 middle housing units per year in high-resource R1 areas.</u>

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Housing Issue	Contributing Factor	Strategies	Meaningful Actions
Disproportionate Housing Needs	Displacement of residents due to economic pressures	Protecting Existing Residents from Displacement	<ul style="list-style-type: none"> ▪ Multi-lingual tenant legal counseling, ▪ Density bonus ordinances that expand on state replacement requirements. ▪ Encourage Preservation of Existing Rental Housing Stock
	Availability of units in a range of sizes	New Housing Choices and Affordability in Areas of Opportunity	<ul style="list-style-type: none"> ▪ Develop a campaign to combat local opposition ▪ Increasing opportunities for community ownership of housing ▪ Inclusionary requirements ▪ Accessory Dwelling Units ▪ Assess SRO Requirements ▪ Landlord education and outreach on source of income discrimination and voucher programs ▪ Adaptive Reuse Program
Disparities in Access to Opportunity		Housing Mobility Strategies	
	Location of Environmental Health Hazards	New Housing Choices and Affordability in Areas of Opportunity	<ul style="list-style-type: none"> ▪ Housing Sites Program implementation and rezoning.
	Location and Type of Affordable Housing	New Housing Choices and Affordability in Areas of Opportunity	<ul style="list-style-type: none"> ▪ Middle Housing program ▪ Dispose of city-owned land
	Access to Financial Services	Housing Mobility Strategies	<ul style="list-style-type: none"> ▪ Housing Mobility Counseling.
Fair Housing Enforcement Capacity	Lack of Fair Housing Outreach and Enforcement	Place-based Strategies to Encourage Community Conservation and Revitalization	<ul style="list-style-type: none"> ▪ Expand access to community meetings, including addressing language barriers, meeting times

Chapter 5: Evaluation of Accomplishments Under Adopted Housing Element

State law requires the Housing Element Update to evaluate the effectiveness and progress of the city's programs in meeting the community's housing goals and implementing the city's Housing Plan. Where possible, results should be quantified but may be qualitative where necessary. Programs are also assessed based on their appropriateness in further contributing to housing goals. A program-by-program review is included below. The city's programs are organized into six categories:

1. Maintain and preserve the existing affordable housing stock
2. Assist in the development of affordable housing
3. Identify adequate sites to achieve a variety and diversity of housing
4. Remove constraints to housing development
5. Promote equal housing opportunity
6. Housing element maintenance

The table below lists the 2013-2021 Housing Plan programs and policies, as well as a review of accomplishments and consideration for suitability going forward.

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Program	Objectives	Accomplishments
Goal #1: Maintain and improve the quality of existing housing and residential neighborhoods in Alhambra.		
<p>Program 1: Housing Rehabilitation Program</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Provide assistance to 5 households annually, to assist a total of 40 households during the 2013-2021 planning cycle. ▪ Continue to allocate CDBG and HOME funding for this program annually. ▪ Continue to permit funding from the single-family rehabilitation programs to be used towards room additions to alleviate overcrowded conditions. ▪ Promote energy efficiency improvements to households participating in rehabilitation programs. ▪ Continue to advertise the Housing Rehabilitation Programs through brochures available at the Development Services Department and information on the city's website. Include a yearly advertisement or notice in the Chamber's city's newsletter, Around Alhambra, providing information on the available Housing Rehabilitation Programs. 	<p>The Housing Rehabilitation Program is available to income-qualified Alhambra homeowners to assist them in completing minor and major repairs. Eligible improvements consist of building/property deficiencies that bring the property up to health and safety standards, to correct code violations, and work necessary to preserve or protect the dwelling unit and/or ADA accessibility requirements. In 2019 the program includes minor rehabilitation deferred loans utilizing CDGB funds for projects where total improvements and softs are costs below \$50,000. The major rehabilitation deferred loan program utilizes HOME funds and may fund projects where total costs exceed \$50,000. Over the planning period the city has assisted 54 households through this program. The City continues to allocate CDBG and Home funds for this program and permits funding to promote energy-efficient improvements. The city partners with CHDO, a non-profit organization to act as a developer or project sponsor. The program continues to be advertised through the city's website, the Around Alhambra newsletter, and social media platforms.</p>
Assessment and Recommended Action:		
<p>The program has been effective in preserving the deterioration of housing stock in Alhambra. It has been utilized by residents at a rate consistent with program objectives. The program continues to be appropriate and is included in the 2021-2029 Housing Element.</p>		
<p>Program 2: Code Enforcement</p>	<ul style="list-style-type: none"> ▪ Continue to implement the Code Enforcement program to bring substandard housing units into 	<p>As a part of the city's code correction efforts, the Code Enforcement Staff connects eligible households to the city's Housing</p>

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Program	Objectives	Accomplishments
<p>Responsible Agency: Development Services Department—Code Enforcement Division</p>	<p>compliance with city building and property maintenance codes.</p> <ul style="list-style-type: none"> ▪ Mail property maintenance tips flyers out with all ten-day notices to abate. Refer 500 potentially eligible housing projects to the Housing Division for possible assistance using newly created flyers written in English, Spanish, and Chinese. 	<p>Rehabilitation program for assistance. In the 2019-2020 fiscal year, the city investigated 913 code violations, 54 percent of these were located in low- and moderate-income areas. Code enforcement staff made 506 referrals to the Housing Rehabilitation Program for assistance. Over the entire planning period 54 households being assisted through the program. The city updated its Housing Rehabilitation Program Flyer in 2020 and it is translated into English, Spanish, and Chinese.</p>
<p>Assessment and Recommended Action:</p> <p>The program has been effective in addressing code violations for owner-occupied households and acting as a pipeline for the Housing Rehabilitation Program. However, the city has emerging concerns about substandard housing among rental properties. This program will be expanded in the 2021-2029 Housing Element to address rental housing concerns.</p>		
<p>Program 3: Preservation of At-Risk Rental Housing</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Annually monitor the status of the 234 affordable housing units that are at risk of converting to market-rate during the 2013-2021 Housing Element. ▪ Monitor Section 8 legislation and provide technical assistance to nonprofit property owners as necessary. ▪ Continue to pursue partnership opportunities with non-profits to preserve and expand affordable housing in the city. 	<p>The city continues to monitor the 234 units of affordable housing inventoried in the 2013-2021 Housing Element. These units are included in three projects. These projects are all owned by non-profits and all had covenants extended during the planning period. Among these projects, only one, Wysong Plaza (94 units) has covenants that could potentially expire during the 2021-2029 planning period. Long-term affordability is fairly secure for these projects as this is consistent with the non-profits’ mission to provide affordable housing for the low-income elderly. The California Housing Partnership now also identifies an additional affordable 110 units at Plaza on Main. Over the planning period the city has added the East LA Community Corporation (ELACC) to its network of affordable housing non-profit organizations.</p>

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Program	Objectives	Accomplishments
<p>Assessment and Recommended Action:</p> <p>The city has been successful in preserving its affordable housing stock and continues to work with property owners and pursue partnership opportunities with non-profits. The city will continue to maintain this program in the 2021-2029 Housing Element.</p>		
<p>Goal #2: Assist in the provision of adequate housing to meet the needs of the community. Establish a balanced approach to meeting housing needs that includes the needs of both renter- and owner-households.</p>		
<p>Program 4: First-Time Homebuyer Program</p> <p>Responsible agency: development services department—housing division</p>	<ul style="list-style-type: none"> ▪ Provide homeownership opportunities to residents through down payment assistance. ▪ Provide homeownership assistance to one lower income household annually, for a total of eight households during the 2013-2021 planning period. ▪ Annually evaluate market conditions and determine the affordability gap for first-time homebuyers and adjust the maximum assistance accordingly. ▪ Continue to advertise the First-Time Homebuyer Program through brochures available at the Development Services Department and information on the city’s website. Include a yearly advertisement or notice in the city’s newsletter, Around Alhambra, providing information on the city’s First-Time Homebuyer Program. 	<p>This program offers down payment assistance to Alhambra residents with an income of 80 percent or below the Los Angeles area median. Over the planning period the program provided assistance to 12 low-income households. The City has continued to promote the program through its Website and its community newsletter (Around Alhambra). The city contracts with a housing consultant to provide an annual analysis of market conditions. The most recent market analysis was completed in August January 2021.</p>
<p>Assessment and Recommended Action:</p> <p>The program was effective in surpassing its objective of serving eight households during the cycle by serving nine households. However, market conditions have driven prices in Alhambra considerably higher, and the program is no longer cost-effective in providing adequate down payment assistance. In 2020 the HCDA committee recommended discontinuing the First Time Homebuyer program. This program is no longer appropriate and will be removed from the 2021-2029 Housing Element.</p>		
<p>Program 5: Affordable Housing Development</p>	<ul style="list-style-type: none"> ▪ Continue to provide financial incentives through HOME funds, as well as regulatory incentives, including but not limited to density bonuses and flexible development 	<p>The city continues to use Housing Assets funds for the purchase, CHDO funds for rehabilitation, and disposition of properties. Over the planning period the city purchased</p>

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Program	Objectives	Accomplishments
<p>Responsible Agency: Development Services Department—Planning Division, Housing Division</p>	<p>standards, to developers to increase the supply of affordable housing.</p> <ul style="list-style-type: none"> ▪ Continue to exempt new affordable housing developments from the public art and new construction impact fees. Focus a portion of financial assistance toward rental projects that meet the needs of extremely low, very low, and low-income renters, large families, and persons with disabilities (including persons with developmental disabilities). 	<p>two properties that were renovated and sold through the first-time homebuyer program. The 50-unit Mariposa project currently proposed on a city-owned site will be 100 percent affordable at supportive and very low-income levels. American Family Housing and National CORE were selected to develop the project through a bid process. The city continues to investigate options including site purchase and disposition to utilize available housing funds remaining following the dissolution of the Redevelopment Authority. Financial and discretionary incentives continue to be offered on a discretionary basis. In 2020, the city adopted an inclusionary housing ordinance (IHO) to facilitate the development of affordable housing. The IHO includes scaled set-aside requirements by affordability level and flexible alternative means of meeting the requirement such as land donation, off-site units, and in-lieu fees.</p>
<p>Assessment and Recommended Action:</p> <p>Promotion of affordable housing remains a priority for the city’s Housing Plan and this program remains appropriate. In light of limited affordable housing development over the planning period and new ordinances, this program will be amended and expanded to include monitoring of inclusionary housing policies in the 2021-2029 Housing Element.</p>		
<p>Program 6: Section 8 Housing Choice Voucher Program</p> <p>Responsible Agency: Housing Authority of the County of Los Angeles,</p>	<ul style="list-style-type: none"> ▪ Support the County's efforts to maintain, and possibly to increase, the current number of Housing Choice Vouchers, and direct eligible households to the program. ▪ Coordinate with the Housing Authority of the County of Los Angeles to promote the use of vouchers to extremely low-income households. ▪ Annually provide information and referrals to landlords regarding 	<p>As of June 20021, 533 Alhambra residents were receiving Section 8 Housing Choice Vouchers, and as of November 2019 LACDA’s closed its Housing Choice Voucher waitlist. With limited funding and a long waitlist, LACDA is not able to estimate the length of wait, according to information posted on its website.</p>

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Program	Objectives	Accomplishments
Development Services Department—Housing Division	participation in the Housing Choice Voucher Program. Provide information on the Housing Choice Voucher Program at the city’s annual fair housing training facilitated by the Housing Rights Center.	<p>Assessment and Recommended Action:</p> <p>This program has been effective in providing affordable housing in the city and will remain in the 2021-2029 Housing Element.</p>
<p>Goal #3: Identify adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the city’s share of regional housing needs.</p>		
<p>Program 7: Adequate Sites for Regional Housing Needs Allocation</p> <p>Responsible Agency: Development Services Department—Housing Division</p>	<ul style="list-style-type: none"> ▪ Continue to provide appropriate land use designations and a density incentive to consolidate lots in the R-3 zone. ▪ Facilitate the assembly and recycling of underutilized properties in the R-3 zone for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives and provision of the list of sites available for residential development to local real estate agents and developers. ▪ Provide processing assistance to projects initiating a lot of consolidation. Assistance will include, but is not limited to, counseling applicants on the lot consolidation process; presenting and explaining alternative lot consolidation processing methods and determining the appropriate method to expedite lot consolidation and the review process. ▪ Maintain an inventory of suitable sites for residential development. Update the vacant and underutilized residential sites 	<p>The city continues to provide a density incentive in the R-3 zone that incentivizes lot consolidation. Over the planning period the city has had 12 lot consolidations. The city continues to provide technical assistance consistent with the objectives of this program. The city maintains records of development activity on all sites through assessor and planning records. The Planning Department website prominently displays recently completed, approved, and proposed projects that are of significant scale. The city’s 2013-2021 Housing Element remains its only site inventory.</p> <p>Assessment and Recommended Action:</p> <p>The program will continue to be appropriate in the 2021-2029 planning period. This program will be amended and expanded to include policies and objectives that reflect new state regulations requiring that the city maintain its inventory at all income levels through the planning period and that it presents the site inventory in a standardized format to HCD.</p>

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Program	Objectives	Accomplishments
	inventory every two years to maintain accurate information.	
<p>Program 8: Residential Development in Central Business District (CBD)</p> <p>Responsible Agency: Development Services Department— Planning Division</p>	<ul style="list-style-type: none"> ▪ Continue to facilitate the construction of residences in the CBD zone. ▪ Encourage lot consolidation for mixed-use developments. Facilitate the assembly and recycling of underutilized properties in the CBD for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives, and the provision of the list of sites available for residential development to local real estate agents and developers. ▪ Continue to waive the new construction and public art fees for affordable housing projects. ▪ Annually evaluate development activity in the CBD to gauge development interest, inquiries, and progress towards mixed-use development. <p>Assessment and Recommended Action:</p> <p>The CBD will remain an important district in accommodating the city’s share of regional housing need. Given limited development activity and identified barriers, this program will be amended and expanded in the 2021-2029 housing element.</p>	<p>Five of the City’s Specific Plan areas with residential components are located adjacent to the CBD zone and/or within the Downtown Specific Plan overlay or the Downtown Revitalization District. Over the planning period three of these areas developed totaling 402 units (the other two areas developed prior to the 5th Cycle planning period). The CBD is largely built out and future development will be contingent on lot consolidations. The city continues to promote redevelopment and lot consolidations through a density bonus and technical assistance. The city continues to waive new construction tax and public art fees for affordable housing projects. However, due to the dissolution of redevelopment in California along with diminished housing funds from the State and Federal levels, Two 100% affordable projects are currently proposed on city lots. The city will continue to pursue affordable housing opportunities in the CBD but without redevelopment funds, the city is not likely to offer significant financial incentives for affordable housing. The city has identified through discussions with developers that density limits in the district may be a barrier to development.</p>

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Program	Objectives	Accomplishments
<p>Program 9: Residential Development in Valley Boulevard Specific Plan Area</p> <p>Responsible Agency: Development Services Department – Planning Division; Housing Division</p>	<ul style="list-style-type: none"> ▪ Pursue residential development in conjunction with commercial development and continue to provide flexible development standards for residential development within the Valley Boulevard Corridor Specific Plan area. ▪ Facilitate the assembly and recycling of underutilized properties in the Valley Boulevard Corridor Specific Plan Area for new affordable housing construction through technical assistance to developers and property owners. Technical assistance includes land development counseling by city planners, the creation of a marketing brochure that provides information on available development incentives, and the provision of the list of sites available for residential development to local real estate agents and developers. ▪ Continue to waive the new construction and public art fees for affordable housing projects. 	<p>The Valley Boulevard Corridor Specific Plan (VSP) was adopted in 1990. The plan includes a range of land uses including the Residential Specific Plan (RSP) designation that allows residential density up to 43 units per acre. While residential may be conditionally permitted in other land use designations, the RSP is not broadly distributed in the plan area. While the city continues to pursue mixed-use development and offer flexible development standards, The plan area has not seen any residential development during the planning period.</p> <p>Assessment and Recommended Action:</p> <p>This program was not effective at facilitating development over the previous planning period. This program will be removed and replaced with a more comprehensive set of policies and programs to promote redevelopment in the plan area.</p>
<p>Program 10: Second Units</p> <p>Responsible Agency: Development Services Department – Planning Division</p>	<ul style="list-style-type: none"> ▪ Provide information on second units at Development Services counters and on the city's website. ▪ Monitor the trend of second unit construction and assess the appropriateness and effectiveness of second unit requirements. 	<p>The city's ADU ordinance took effect in January 2018. Subsequent amendments have been made to clarify lot area and setback requirements. The city's ordinance was nullified by changes in State ADU laws that took effect on January 1, 2020. The city is currently applying the default State ADU laws in processing ADU applications. The city has a draft ADU ordinance approved by the Planning Commission that meets or exceeds the State's minimum requirements. The draft is pending adoption by the City Council. The city has continually tracked ADU applications and development. The city's 2020 ADU status report shows</p>

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Program	Objectives	Accomplishments
		<p>that since 2017 the city has received 108 ADU applications. A total of 16 units have been completed and an additional 37 have had building permits issued. An additional 44 ADUs are pending approval. The city continues to promote ADUs through flyers and on the city’s website.</p>
<p>Assessment and Recommended Action:</p> <p>ADUs will continue to play an increasing role in meeting the city’s share of regional housing needs. This program will be amended and expanded to reflect new state requirements and strengthen policies to promote ADU development to meet housing need.</p>		
<p>Goal #4: Mitigate potential governmental constraints to housing production and affordability.</p>		
<p>Program 11: Flexible Development Standards</p> <p>Responsible Agency: Development Services Department— Housing Division</p>	<ul style="list-style-type: none"> Continue to use flexible development standards to facilitate the development of affordable housing through promotion of maximum development densities in the R-3 zone. 	<p>The City of Alhambra has three residential zones: R-1, R-2, and R-3. R-1 is designated a single-family while R-2 and R-3 are designated multifamily. The R-3 zone allows for high density residential development of a maximum of 43 units per acre. To encourage high density multifamily developments, the city offers several variations to projects in order to achieve better building design and contribute to better overall development. These variations that the city offers through the flexible development standards include three variations for each of the following: R-3 zone regulations, development standards, and design standards. The city continues to use flexible development standards along with density bonuses to promote the development of affordable housing.</p>
<p>Assessment and Recommended Action:</p> <p>Flexible development standards will continue to play an important role in reducing governmental constraints to housing production, feasibility, and affordability. This program will be amended and expanded to reflect state density minimum requirements and strengthen policies to promote affordable housing development to meet housing need.</p>		

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Program	Objectives	Accomplishments
<p>Program 12: Density Bonuses</p> <p>Responsible Agency: Development Services Department—Planning Division</p>	<ul style="list-style-type: none"> ▪ Make available information at the Development Services Department counter outlining affordable housing incentives, including density bonuses. Information will be provided at the city’s annual fair housing training facilitated by the Housing Rights Center. 	<p>The City of Alhambra continues to provide density bonuses to affordable housing projects consistent with the requirements of the California Government Code. During the planning period one (currently proposed) project utilized the density bonus program to deliver low-income affordable housing units. The city continues to contract with the Housing Rights Center to communicate this program to residential developers. Density bonuses coupled with flexible development standards help reduce constraints to housing production and aid to further increase the city’s affordable housing supply. Density bonuses, flexible development standards, and other incentives will play an increasing role in conjunction with the city’s recently adopted inclusionary housing ordinance.</p>
<p>Assessment and Recommended Action:</p> <p>Density bonuses will continue to play an increasing role in meeting the city’s share of regional housing needs and increasing the number of affordable housing units. This program will be continued in the 2021-2029 Housing Element.</p>		
<p>Program 13: Extremely Low Income and Special Needs Housing</p> <p>Responsible Agency: Development Services Department – Planning Division</p>	<ul style="list-style-type: none"> ▪ Amend the Zoning Ordinance to facilitate housing opportunities for extremely low-income persons and persons with special needs (including seniors and persons with disabilities) by establishing definition, performance standards, and siting regulations for single-room occupancy housing (SRO). ▪ Prioritize project review/processing and funding for affordable housing projects that set aside units for extremely low-income households and persons with special needs. Support funding applications for affordable housing projects that set aside units for extremely low- 	<p>The city continues to make progress in amending the zoning code to facilitate housing opportunities for extremely low-income persons and persons with special needs. In addition, prioritization of projects with affordable housing projects continues to be an objective for the city toward increasing extremely low-income and special needs housing.</p> <p>Assessment and Recommended Action:</p> <p>Increasing housing opportunities for extremely low-income and special needs housing continues to be an</p>

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Program	Objectives	Accomplishments
	<p>income households and persons with special needs, provided the projects are consistent with the city's General Plan.</p>	<p>objective for the city. This program will be updated and maintained in the 2021-2029 Housing Element.</p>
<p>Program 14: Zoning Ordinance Amendments</p> <p>Responsible Agency: Development Services Department – Planning Division</p>	<ul style="list-style-type: none"> ▪ Amend the Zoning Ordinance to accurately reflect the residential uses that are permitted and conditionally permitted in all zones. ▪ Amend the Zoning Ordinance to meet the provisions of the California Employee Housing Act. ▪ Amend the Zoning Ordinance to permit transitional and supportive housing in all zones where residential uses are permitted, subject to the same development standards and permitting processes as the same type of housing in the same zone. <p>Assessment and Recommended Action:</p> <p>The city has made great progress in aligning its zoning code to reflect new state legislation requirements. This program will be removed from the 2021-2029 Housing Element and replaced with a new program that will maintain a focus in amending the Zoning Code to meet state requirements as well as new requirements for sites in the city's Housing Element sites inventory.</p>	<p>The city has successfully amended the zoning code to allow transitional and supportive housing in all zones and for the zoning code to accurately reflect the residential uses permitted and conditionally permitted. The city is currently contracted with a consultant for a comprehensive zoning code update. The city continues to make progress in this program toward meeting the provisions of the California Employee Housing Act.</p>
<p>Goal #5: Goal: Promote equal housing opportunity for all residents.</p>		
<p>Program 15: Fair Housing Program</p> <p>Responsible Agency: Development Services Department – Housing Division; Housing Rights Center</p>	<ul style="list-style-type: none"> ▪ Assist approximately 400 persons annually, for a total of 3,200 persons during the 2013- 2021 Housing Element planning period. ▪ Continue to contract with a qualified fair housing service provider to provide fair housing services and landlord-tenant counseling services to residents, landlords, management companies, and others involved in the provision of housing and housing services. ▪ Implement actions identified in the 2013 Analysis of Impediments to Fair Housing Choice related to fair housing, including increasing education to residents and 	<p>The city continues to contract with the Housing Rights Center. In 2020 this contract was awarded through 2027. In the 2019-2020 fiscal year, the city assisted 318 households through its Fair Housing Program, the city has made considerable progress alleviating impediments identified in the 2013 Analysis of Impediments and updated these implementation actions in 2020 to reflect new conditions and objectives.</p> <p>Assessment and Recommended Action:</p> <p>Promotion of fair housing remains an objective for the city and this program has been effective in</p>

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Program	Objectives	Accomplishments
	landlords regarding fair housing laws.	meeting fair housing objectives. This program will be updated to reflect new objectives and maintained in the 2021-2029 Housing Element.
Goal #6: Goal: Ensure that City housing goals are met.		
<p>Program 16: Housing Element Maintenance</p> <p>Responsible Agency: Development Services Department – Planning Division; City Manager’s Office</p>	<ul style="list-style-type: none"> ▪ Prepare an Annual Review Statement, per Section 65588 of the Government Code, to evaluate the progress made in implementing housing element policies and programs and in meeting the city's housing goals. ▪ Monitor progress of Community Development Block Grant (CDBG) and HOME-funded projects through the Consolidated Annual Performance Evaluation Report (CAPER). 	<p>The city has annually prepared and submitted its Annual Review Statement and Progress Report. The 2019 APR was adopted in March 2020. The city continually monitors CDBG and HOME-funded projects. The city’s fiscal year 2019-2020 CAPER was completed in September 2020.</p> <p>Assessment and Recommended Action:</p> <p>This program continues to be appropriate and will be included in the 2021-2029 Housing Element.</p>

Summary of Quantified Objectives

State Housing Element law requires the development of quantified objectives with respect to new construction, rehabilitation, and conservation/preservation activities in the city’s Housing Plan. Figure 12403 summarizes the city’s quantified objectives from the 2013-2021 Housing Element and the progress identified through this review.

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Figure 10243- 2013-2021 Quantified Objectives and Progress

Source: City of Alhambra, ECONorthwest

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
New Construction (RHNA)						
Objectives	190	190	224	246	642	1,492
Progress	0	0	2	3	297	302
Rehabilitation						
Objectives	5	10	25	0	0	40
Progress	N/A	N/A	N/A	N/A	N/A	54
Homebuyer Assistance						
Objectives	0	4	4	0	0	8
Progress	N/A	N/A	N/A	N/A	N/A	11
At-Risk Housing Units to be Conserved						
Objectives	167	167	0	0	0	234
Progress	167	167	0	0	0	234

New Construction

Through the city's 2020 Annual Progress Report, the city had issued permits for 302 units. The majority of these were for above moderate-income households. The city currently has six projects totaling 1,155 units pending approval in addition to 44 ADU units pending approval. These projects are expected to be approved during the 2013-2021 planning period. The majority of these planned units are also likely to be above moderate income. If approved, the city will come close to meeting its total construction target but would maintain shortfalls at lower income levels.

Rehabilitation

The city's Home Rehabilitation program includes minor rehabilitation deferred loans utilizing CDGB funds for projects where total improvements and softs are costs below \$50,000. The major rehabilitation deferred loan program utilizes HOME funds and may fund projects where total costs exceed \$50,000. So far in the planning period the city has assisted 54 households through this program. The city continues to allocate CDBG and Home funds for this program and permits funding to promote energy-efficient improvements.

Conservation

The city's quantified conservation objective included the preservation of 234 "at-risk" affordable units within three projects that were identified in the Housing Element. All of these units had covenants extended through the planning period and none were converted to market rate.

Other

Increasing homeownership has been an important city goal. The city's Homebuyer Assistance Program set out to assist eight lower-income households achieve homeownership. Through 2019 a total of 11 households were assisted through the program.

Effectiveness in Addressing Special Housing Needs

Like most communities, special housing need in Alhambra exceeds the financial capacity of the city to comprehensively address this need. This funding deficit was made all more prevalent with the elimination of redevelopment in California. Therefore, in the 5th Cycle, Alhambra's

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objectives to address special housing need emphasized removing barriers to housing production of units suitable for extremely low-income households. This was set to be achieved by amending the zoning code to facilitate housing opportunities for extremely low-income households and persons with disabilities. Other priorities were to prioritize project review/processing and funding for affordable housing projects with units set aside for households with special needs. Specific progress has included:

- Continued prioritization of processing requests for reasonable accommodations. Over the planning period the city received five applications for reasonable accommodations. All five were processed.
- The city is currently in the process of completing a comprehensive zoning code update. The establishment of siting regulations for single-room occupancy housing (SRO) is a priority in that project.
- Coordination with the Los Angeles County Development Authority to expand Section 8 Housing Choice Vouchers in Alhambra. As of 2019 57 percent of voucher holders were seniors, 46 percent were people with disabilities, and 74 percent were female-headed households.
- The city employed a full-time mental health clinician to assist with field officers assisting or responding to homeless population needs and assist in connecting with local service providers and in finding appropriate shelter.
- The city began a pilot Homeless Outreach Services Program in 2017. The city expanded funding in FY 2020 with \$250,000 in Housing Successor Agency Funds and \$200,000 from the San Gabriel Valley Council of Governments. Since its inception in 2017, the program has moved 99 individuals to crisis housing, referred 13 individuals to rapid re-housing, 43 individuals to permanent housing, and permanently housed 22 formally homeless individuals.
- The city identified a city-owned parcel suitable for affordable housing at 38 S 2nd Street. The "Mariposa" project has been approved through an expediated permit process aligned with funding and grant milestones. The project will deliver 50-units with 24 units at ELI or VLI, 25 units at LI, and one manager's unit. The contributed \$5,840,000 to the project through land dedication (\$1,840,000) and a housing asset loan (\$4,000,000).

Chapter 6: Housing Plan

This Chapter provides the Housing Action Plan which is a required component of the housing element update. HCD requires the following:

“Each jurisdiction must identify specific programs in its housing element that will allow it to implement the stated policies and achieve the stated goals and objectives. Programs must include specific action steps the locality will take to implement its policies and achieve its goals and objectives. Programs must also include a specific timeframe for implementation, identify the agencies or officials responsible for implementation, describe the jurisdiction’s specific role in implementation, and (whenever possible) identify specific, measurable outcomes.”

As this is an update of Alhambra’s prior Housing Element, the programs and policies listed herein build on those listed in the 2013-2021 Housing Element. Edits to past programs, as well as new programs come from the following documents and sources:

1. City of Alhambra staff edits and feedback on the “Chapter 5 Evaluation of Accomplishments under Adopted Housing Element”
2. Results and recommendations offered in the *Analysis of Impediments to Fair Housing Choice* (2020)
3. Findings from “Chapter 3 Constraints Analysis”
4. Changes needed to accommodate all the sites included in “Appendix A: Adequate Sites Inventory”
5. Changes needed to adhere with new state laws
6. Changes based on best practices from other cities and guidance from HCD

Alhambra Housing Goals and Policies

The City of Alhambra’s long-term housing goal is to facilitate and encourage housing that fulfills the diverse needs of the community. This Chapter identifies long-term housing goals and shorter-term policies to address the identified housing needs. The goals and policies are implemented through a series of housing programs. Programs identify specific actions the city will undertake toward putting each goal and policy into action. Quantified objectives identified in particular programs are estimates of assistance the city will be able to offer, subject to available financial and administrative resources.

The goals, policies, and programs build upon the identified housing needs in the community, constraints confronting the city, and resources available to address the housing needs. This Plan will guide city housing policy through the 2021-2029 planning period.

Goal 1: Preservation and improvement of the existing supply of housing and prevention of displacement among existing tenants.

Preserving the existing housing stock in Alhambra is a high city priority. Continued maintenance of the existing housing stock helps to ensure that housing is safe and habitable and helps to ensure Alhambra has high-quality neighborhoods. Housing activities that help achieve these goals include rehabilitation of single- and multifamily housing units, code enforcement, and the preservation of publicly supported housing units that may be at risk of converting to market-rate housing. Through code enforcement, neighborhood, and home improvement programs, the city maintains the condition of existing housing units.

Policy 1.1: Pursue state and federal funding to support local housing programs that provide housing assistance in the rehabilitation and preservation of the existing housing stock.

Policy 1.2: Provide rehabilitation and home improvement assistance to lower-income households, seniors, and the disabled.

Policy 1.3: Cooperate with interested individuals, nonprofit housing providers, and developers in the acquisition, rehabilitation, and maintenance of housing in need of rehabilitation to maintain long-term housing for lower-income households.

Policy 1.4: Promote increased awareness among property owners and residents of the importance of property maintenance to long-term affordable housing. Ensure that property owners are aware of city programs to promote improvements to rental housing and encourage continued maintenance, repair, and rehabilitation.

Policy 1.5: Enforce the building, safety, and housing codes through active code enforcement efforts.

Policy 1.6: Encourage and support creative strategies for the rehabilitation and adaptation and reuse of residential, commercial, and industrial structures for housing.

Policy 1.7: Encourage the preservation of naturally occurring and restricted affordable rental housing.

Policy 1.8: Work to preserve existing affordable low-income housing in the city that is considered at risk of converting to market-level rents.

Policy 1.9: The city shall ensure the replacement of lower-income multi-unit housing that is demolished, consistent with State Law.

Policy 1.10: Within established neighborhoods, the city shall promote residential development that respects existing neighborhood character.

Goal 2: Assist in the maintenance and production of a wide range of housing types to meet existing and future housing needs in the community.

Alhambra encourages the development of housing units affordable for all segments of the population. The city facilitates the production of affordable for-sale and rental housing through the provision of both financial and regulatory incentives

Policy 2.1: Encourage the production of housing affordable to extremely low, very low, low, and moderate-income households through continued focus of available resources, such as

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city-owned land and financial resources to assist nonprofit housing providers and for-profit developers develop housing consistent with the city's housing needs.

Policy 2.2: Support partnerships with new and existing organizations and nonprofit groups to explore new funding sources to facilitate housing affordable to extremely low, very low, low, and moderate-income households and households with special needs.

Policy 2.3: Support the passing of federal, state, and local legislation to provide funding to assist in affordable housing production and pro-housing programs.

Policy 2.4: Use financial and/or regulatory incentives where feasible to encourage the development of affordable housing.

Policy 2.5: Streamline and speed up the permitting and review processes for affordable housing developments.

Policy 2.6: Encourage housing development throughout the city that meets a broad range of special housing needs, including single parents, large families, multigenerational households, large families, the elderly, veterans, and the unhoused.

Policy 2.7: Continue to support regional efforts to address homelessness.

Policy 2.8: Encourage the development of a variety of missing middle-density housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) housing types.

Policy 2.9: Explore innovative pro-housing programs to assist in the production of a variety of housing types.

Goal 3: Identify adequate housing sites through appropriate land use, zoning, and specific plan designations to accommodate the city's share of regional housing needs.

Meeting the housing needs of all residents of the community requires the identification of adequate sites for all types of housing. Appendix A of the Housing Element identifies the inventory of sites identified to meet the 2021-2029 Regional Housing Needs Assessment. The city of Alhambra will update its Zoning Code to ensure that the sites identified in the RHNA have the appropriate zoning designations as suggested in the inventory. By capitalizing on the allowances of the current Zoning Ordinance and continuing to maintain an inventory of potential sites, the city will assure that adequate residentially-zoned and mixed-use sites are available.

Policy 3.1: Maintain an adequate supply of residential land in land use designations to accommodate the city's RHNA production targets by income category throughout the planning period, consistent with State Law.

Policy 3.2: Promote infill development, commercial redevelopment, and higher density residential development where feasible.

Policy 3.3: The city shall allow housing developments with at least 20 percent affordable housing by-right on lower-income housing sites that have been counted in previous housing element cycles, consistent with Government Code Section 65583.2(c).

Policy 3.4: Implement rezoning and changes in development standards identified in the city's Comprehensive Zoning Code Update.

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Policy 3.5: Facilitate parcel assemblage in areas zoned for high-density residential development consistent with the Land Use Element of the General Plan.

Policy 3.6: Support the development of accessory dwelling units (ADUs) and junior accessory dwelling units (JADUs) by working with applicants to integrate ADUs into existing development patterns of the neighborhood, consistent with state law provisions related to lot size, parking, height, setbacks, and minimum/maximum ADU size requirements.

Policy 3.7: The city will respond to opportunities to acquire surplus government land and underutilized commercial, industrial, or properties owned by religious institutions for development of affordable housing.

Goal 4: Develop regulations and strategies that mitigate potential governmental and nongovernmental constraints to housing production and affordability.

Market and governmental factors pose constraints to the provision of adequate and affordable housing. These factors tend to disproportionately impact lower and moderate-income households due to their limited resources for absorbing the costs. The city is committed to removing governmental constraints that hinder the production of housing and offers a “one-stop” streamlined permitting process to facilitate efficient entitlement and building permit processing. In addition to the density bonuses and flexible development standards already in place, the city proposes revisions to the Zoning Ordinance to encourage housing opportunities for extremely low-income households and special needs persons.

Policy 4.1: Periodically review city regulations, ordinances, permitting processes, and residential fees to ensure that they do not constrain housing development and are consistent with State Law.

Policy 4.2: Coordinate with developers, lenders, consultants, and other entities to monitor trends in nongovernmental factors that could influence the feasibility of housing production.

Policy 4.3: Offer financial and/or regulatory incentives, where feasible, to offset or reduce the costs of developing affordable housing.

Policy 4.4: Continue to make efforts to streamline the review process for extremely low, very low, and low-income housing development and special needs housing.

Policy 4.5: Ensure the Zoning Code is user-friendly, streamlined, and flexible to accommodate new housing development.

Goal 5: A community that provides equitable housing access to all neighborhoods and provides housing opportunities for all persons regardless of race, sex, marital status, religion, color, national origin, disability color, or family status.

To fully meet the community’s housing needs, the city must ensure that housing is accessible to all residents.

Policy 5.1: Continue to support fair housing laws prohibiting discrimination in the building, financing, selling, or renting of housing.

Policy 5.2: Provide fair housing services to Alhambra residents and ensure that residents are aware of their rights and responsibilities regarding fair housing.

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Policy 5.3: Partner with local community organizations to engage in outreach strategies that raise awareness of fair housing laws.

Policy 5.4: Enforce the housing code to eliminate and prohibit unsafe, unsanitary, and illegal conditions.

Policy 5.5: Ensure that extremely low, and very low-income housing may be located in any zone that allows housing and should be dispersed throughout Alhambra and not concentrated in one geography or zone.

Policy 5.6: In its housing programs and activities, the city shall affirmatively further fair housing and promote equal opportunities for all social and economic segments of the community.

Policy 5.7: Continue to provide reasonable accommodations to support persons with disabilities in accessing housing units that have been designed to be accessible or adaptable to meet their needs.

Policy 5.8: Promote access to neighborhoods that offer proximity to jobs, transportation services, high-performing schools, and healthy environments—particularly in areas that have historically excluded segments of the population.

Policy 5.9: Provide support to local agencies that ensure the provisions of federal and state laws that prohibit housing discrimination are enforced.

Goal 6.0 A community that has a balance of employment and housing in proximity to one another and offers opportunities for access to affordable housing near employment concentrations.

Policy 6.1: Encourage higher density housing in proximity to commercial and civic services, public transportation, and employment centers.

Policy 6.2: Promote mixed-use development where housing is located adjacent to jobs, shopping, schools, transportation services, and amenities.

Policy 6.3: Promote economic development strategies to grow living wage jobs in Alhambra in proximity to housing opportunities.

Policy 6.4: Continue to work with the Alhambra Chamber of Commerce and other business organizations to recruit businesses to Alhambra and expand and diversify the economic base.

Goal 7.0 Ensure that the City's housing goals are met, and its housing policies are consistent with State law and the General Plan

Policy 7.1: Monitor state housing legislation and evaluate the potential impacts on the city's Housing Element policies and programs.

Policy 7.2: Conduct a mid-cycle review of progress toward meeting the city's regional housing needs allocation and the city's policies and programs.

Implementation Programs

The implementation programs outlined in this section reflect seven broad categories that align with the goals and policies outlined in the above. Each program may address the implementation of one or more policy objectives.

Housing Rehabilitation and Preservation

Program 1: Housing Rehabilitation Program

The older housing stock in Alhambra suggests that repairs and rehabilitation will be required to maintain quality structures and living spaces. The city addresses this need through housing rehabilitation assistance. A high priority is given to conserving and improving affordable housing stock, including addressing lead-based paint hazards. The Housing Rehabilitation Program is separated into two components:

- Minor Rehabilitation Deferred Loan: This program utilizes CDBG funds and is available for rehabilitation projects where the total costs of improvements and "soft costs" associated with the rehabilitation to the property are less than \$50,000.
- Major Rehabilitation Deferred Loan: This program utilizes HOME funds and is available for rehabilitation projects where the total development costs for the improvements to the property exceed \$50,000.

Other program elements include:

- Promote energy efficiency improvements to households participating in rehabilitation programs.
- Explore the feasibility of purchasing foreclosed or auctioned properties for the acquisition and rehabilitation program. This would allow the city to sell these properties to mission-oriented affordable housing providers at below-market rates to reduce the cost of supplying affordable housing.
- Continue to advertise the Housing Rehabilitation Programs through brochures available at the Community Development Department, information on the city's website, and through the City's social media accounts. For example, the city could include advertisements or notices in the Chamber's newsletter, *Around Alhambra*, to provide information on the available Housing Rehabilitation Programs.

Objective: Quantified objective of six households under Minor Housing Rehabilitation component and three households under the Major Housing Rehabilitation component.

Timeframe: ~~Ongoing, as homeowners apply~~ Advertising efforts quarterly, Target of two minor and one major rehabilitation loans annually as homeowners apply.

Responsible Agency: Community Development Department – Housing Division

Funding Sources: HOME; CDBG

Program 2: Code Enforcement

Code enforcement is essential to ensuring housing conservation and rehabilitation. The Code Enforcement Division is responsible for providing uniform enforcement regarding a variety of municipal, state, and county codes regulating property maintenance, zoning, land use, and other health and safety concerns. The primary goal of regulation is to provide reasonable controls for the maintenance, rehabilitation, preservation, and conservation of existing commercial and residential properties.

Objectives:

- Continue to implement the Code Enforcement program to bring substandard housing units into compliance with city building and property maintenance codes.
- Mail property maintenance tips flyers out with all ten-day notices to abate.
- Refer 500 potentially eligible housing projects to the Housing Division for possible assistance using newly created flyers written in multiple languages.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Code Enforcement Division

Funding Sources: Departmental Budget; CDBG

Program 3: Preservation of At-Risk Rental Housing

To meet the housing needs of persons of all economic groups, the city is committed to guarding against the loss of housing units reserved for lower-income households. According to data provided by the California Housing Partnership, SCAG (using the HCD pre-approved data), and the City of Alhambra, there were six properties in Alhambra in 2020 providing 366 affordable housing units to lower-income households. Over the next ~~teneight~~ years (2021-2029), three properties that provide 215 affordable units have expiring affordability restrictions: 11 units at 17. S. Olive Ave., 110 units at Plaza on Main, and 94 units at Wysong Plaza. However, all three of these properties are owned by established mission-driven organizations and covenants are unlikely to convert. City staff reports that there are other affordable ownership units in the community built in the last 20-years with unknown covenant expirations that could be at risk over the planning period. An example of this is the Alhambra Regency project at 500 West Main Street that has 16 owner-occupied affordable units.

Program actions include:

- Monitor the status of the 215366 affordable housing units that are at risk of converting to market-rate during the 2021-2029 Housing Element.
- Identify funding sources and/or other organization and partnership strategies to acquire units at risk if they become available.
- Contact property owners of units at risk of converting to market-rate housing within three year of covenant expiration to discuss extending covenants or other preservation alternatives.
- Continue to pursue partnership opportunities with nonprofits to preserve and expand affordable housing in the city.

- Work with tenants to provide education regarding tenant rights and conversion procedures and regulations.
- Explore financing opportunities to offer loans with generous or flexible terms (such as grants, forgivable loans, below-market interest rates, deferred interest payments, interest-only loans, cash flow dependent loans) to reduce the borrowing costs associated with buying or developing a home. This can also be by enhancing partnerships with mission-oriented funders and lenders already working in the area.

Objective: Annually monitor the city's supply of at-risk units and apply for funding for preservation activities where available.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Departmental Budget

Addressing Affordable and Special Housing Need

Program 4: Section 8 Housing Choice Voucher Program

The Los Angeles County Development Authority (LACDA, formerly known as the Housing Authority of the County of Los Angeles) administers the Housing Choice Voucher Program for most County residents, including Alhambra residents. The program extends rental subsidies to very-low-income households, as well as elderly and disabled persons. As of June 30, 2021, 553 households in Alhambra received Housing Choice Vouchers. The city shall continue to advocate for Section 8 funding and pursue funding to expand voucher programs.

Objectives:

- Maintain voucher programs to preserve the 553 households receiving vouchers in Alhambra to ensure housing choice across all income levels.
- Expand the number of households receiving vouchers through tenant and landlord engagement.

Timeframe: Ongoing

Responsible Agency: Los Angeles County Development Authority; Alhambra Community Development Department – Housing Division

Funding Sources: HUD

Program 5: Inclusionary Housing Requirement for Residential Development

To facilitate the construction of affordable housing across the entire community, the city established an Inclusionary Housing Ordinance in 2020. The ordinance includes a maximum 15-percent affordability requirement at low- and moderate-income levels for all projects with seven or more units. Credit is given for including a larger number of units at progressively lower income levels.

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For all applicable projects, the ordinance will require a total of fifteen percent (15%) of all newly constructed dwelling units to be offered for sale or for rent to low- and moderate-income households comprising of:

- 3) Nine percent (9%) of all required inclusionary units to be sold or rented to low-income households (80% of LA County area median income or AMI); and,
- 4) Six percent (6%) of all required inclusionary units to be sold or rented to moderate-income households (120% of LA County AMI).

The Housing Element's review of the inclusionary ordinance found that the policy is in-line with peer cities and should not be a constraint on development. In accordance with state law, the city has also updated the ordinance to include alternatives including an in-lieu fee. The in-lieu fee was set at a graduated scale with a lower fee for smaller projects and rental projects to protect against adversely impacting feasibility. Projects with fewer than 5 units do not have an inclusionary requirement or fee. As a part of the approval process, the city will require developers to provide proof of good faith effort to make inclusionary units available to the public. The city will also encourage developers to work with affordable housing providers and advocates to place households in inclusionary units. The City will continue to evaluate the effectiveness of the inclusionary ordinance in facilitating affordable housing development through integrated mixed-income development or resources for affordable housing development through in-lieu fees. If the program is found to be a constraint on development the city will make appropriate amendments and modify the policy as needed. This will include consideration of added incentives such as a density bonus, fee reduction, or flexible parking and development standards.

Objectives:

- Continue to implement the inclusionary housing program to facilitate affordable housing production.
- Ensure the program does not constrain development.

Timeframe: Ongoing, biennial review of program effectiveness

Responsible Agency: Alhambra Community Development Department – Housing Division, Planning Commission, and City Council

Funding Sources: Department Budget

Program 6: Unit Replacement Program for Residential Demolitions (new law)

In accordance with California Government Code Section 65583.2(g), the city will require replacement housing units subject to the requirements of Government Code section 65915, subdivision (c)(3) on sites identified in the site inventory when any new development (residential, mixed-use, or nonresidential) occurs on a site that is identified in the inventory meeting the following conditions:

- Currently has residential uses or within the past five years has had residential uses that have been vacated or demolished, and
- Was 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

Objective: Maintain the city's inventory of affordable units and mitigate displacement risk

Timeframe: Ongoing, replacement requirement will be enforced immediately during project review and processing.

Responsible Agency: Alhambra Community Development Department – Planning Division,

Funding Sources: Department Budget

Program 7: Low Barrier Navigation Centers as a By-Right Use (new law)

Amend the city's zoning regulations to add low-barrier entry practices to the city's Navigation Housing use and permit them by right in areas zoned for mixed-use and nonresidential zones permitting multifamily uses if the center meets certain statutory requirements consistent with SB48 changes to California Government Code Section 65583.

Objective: Ensure that the city's regulations and are in conformance with State Law

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division,

Funding Sources: Department Budget

Program 8: Supportive Housing Zoning Amendment (new law)

Amend the zoning code to allow for the approval of 100 percent affordable developments that include a percentage of supportive housing units in all zoning districts where multifamily and mixed-use development is permitted consistent with AB2162 changes to California Government Code Section 65583.

Objective: Ensure that the city's regulations and are in conformance with State Law

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 9: Meeting Special Housing Needs

The City will continue to develop internal policies and coordinate with housing providers to address special housing needs for persons with disabilities, seniors, large families, single-parent households, and extremely low-income households. The city will utilize a combination of revisions to zoning standards, regulatory incentives, outreach and service programming to address these needs. Specific actions will include:

- Establish siting regulations and expand allowance of single-room occupancy housing.

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- Adopt zoning code amendments to remove barriers to developing housing for households with special housing needs including emergency shelters, transitional and supportive housing, and low-barrier navigation centers.
- Continue the City's Homeless Outreach Services Program.
- As part of the Zoning Code Update, Chapter 23.59 PROCEDURES FOR REQUESTING REASONABLE ACCOMMODATIONS PURSUANT TO FAIR HOUSING LAW, will be modified to streamline the application process. Currently, Section 23.59.020(D)(3)(e) requires as part of the application, a 10-day written notice to all adjacent property owners within a 100-foot radius of the subject property so that their input may be received. The updated Zoning Code will remove this Section so that notice and adjacent owner input are no longer required.
- As a part of the city's comprehensive zoning code update (Program 27) and program to remove development constraints (Program 29), create a proposal to reduce parking requirements for projects serving seniors or persons with disabilities.
- As a part of the Zoning Code Update project, the code will be amended to group homes for seven or more persons by right in any residential zone.
- Alhambra has many religious institutions with the potential for excess property. To facilitate opportunities for development of housing for households with special needs, the city will conduct direct outreach with these institutions to inform property owners of AB 1851 and other incentives aligned affordable housing development.

Objective: Ensure equitable access to housing for persons with special housing needs.

Timeframe:

- Establish siting recommendations for SRO housing, adopt zoning code amendments, propose parking reductions, revise reasonable accommodations ordinance revise code to allow large family care homes by-right within one-year.
- Homeless Outreach Program; ongoing/continuation
- Religious institution outreach; within one-year

Responsible Agency: Community Development Department – Housing Division, Housing Rights Center

Funding Sources: Departmental Budget, CDBG Funds

Program 10: Local Hire Program

The use of local skilled labor for housing development can have positive economic and environmental impacts. The city will assess the feasibility of, and develop a proposal for, a Local Hire Program for residential projects that meet specific criteria so long as it does not result in a constraint on development or housing production. This program will be designed to encourage the use of local workers for subsidized affordable housing projects. It will also offer flexibility, opt outs, and alternative options to ensure that the program is not a constraint on affordable housing production.

Objective: Balance housing with economic development and provide opportunities for local residents to generate wealth. Mitigate displacement risk of local residents.

Timeframe: Within two years of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 11: Workforce Housing Program

Alhambra’s moderate-income households that earn between 60% and 120% of Area Median Income are facing increasing susceptibility to displacement risk due to economic and market pressures. These households commonly earn too much to qualify for subsidized housing and too little to afford market rate rents in the communities that they work in. Alhambra’s inclusionary housing program is calibrated to deliver workforce housing and Program 24 will work to promote missing middle housing types. In addition to these efforts, the City will develop a proposal for a Workforce Housing Program that may include coordination with major employers to create Employer Assisted Housing, identification of financial resources specific to workforce housing, or other incentives and actions to preserve and produce workforce housing.

Objective: Provide housing opportunities and mitigate displacement risk for Alhambra’s middle-income workforce, including teachers, public health and safety workers, and other essential middle-income occupations.

Timeframe: Within two years of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 129: Expanded Density Bonus in the Downtown Revitalization District

Provisions enacted under AB1763 allows housing development located within one-half mile of a major transit stop and meeting specific affordability requirements to receive a height increase of up to three additional stories and a density bonus of 80%, exempting the housing development from any maximum controls on density. The city will apply the provisions of AB1763 across the entire Downtown Revitalization District. The city will conduct outreach with affordable housing developers and partners to raise awareness of density bonuses and other incentive programs. Based on the use and effectiveness of this program, the city will also consider expanding this incentive through an Affordable Housing Overlay Zone along other high resource areas.

Objective: Encourage and facilitate affordable housing development in the downtown revitalization area

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 130: Cooperation with Affordable Housing Developers and Providers

The city will conduct outreach and cooperate with affordable housing providers and developers in the region. The city will offer financial and regulatory incentives consistent with Programs 152 through 174 to assist in the acquisition of land, rehabilitation of housing stock, or the redevelopment of housing affordable to extremely low-, very-low-, low-, or moderate-income households.

Objective: Strengthen coordination with affordable housing developers and operators to meet the City's affordable housing RHNA targets.

Timeframe: Provide site inventory on city's website upon adoption of Housing Element in 2022 and update when the zoning code update is complete; notify affordable housing developers of site inventory status annually. Initial outreach within two years of adoption, annually each subsequent year Ongoing

Responsible Agency: Alhambra Community Development Department – Housing Division

Funding Sources: Department Budget

Program 141: Expand Affordable Housing Funding

The city will continue to monitor the federal, state, and local funding landscape to identify and expand on funding sources available. The city will support affordable housing by development applying, facilitating, or directly placing financial resources for the construction, rehabilitation, and/or preservation) of extremely low, very low, low, and moderate-income households. Through this program the city will explore opportunities to:

- Utilize city-controlled funding sources such as the Inclusionary Trust Fund or the Alhambra Housing Asset Fund.
- Continue to support the San Gabriel Valley Housing Trust Fund
- Support developers' applications for State and Federal affordable housing funding.
- Direct application for available federal and state funding sources.
- Explore the feasibility of local funding sources including real estate transfer taxes, public service sales taxes, affordable housing linkage fees, and other mechanisms available to local governments.
- Work with, and encourage, local financial institutions to help meet the credit needs of residents in low- and moderate-income neighborhoods.

Objectives:

- Strengthen coordination with affordable housing developers and operators to meet the city's affordable housing RHNA targets.
- Increase local financial resources to support housing production

Timeframe: Ongoing Study of funding alternatives within one-year of adoption. Annually evaluate notices of funding availability; submit at least one grant application every two years.

Responsible Agency: Alhambra Community Development Department – Housing Division,

Funding Sources: Potential funding sources include: The San Gabriel Valley Housing Trust Fund, the Alhambra Housing Asset Fund, HOME, CDBG, or other California HCD funding programs that become available.

Incentives for Housing Production

Program 152: Update Density Bonus Ordinance to be Consistent with State Law and Continue to Promote as a Housing Production Incentive (new law)

The city will update the density bonus ordinance to ensure consistency with changes to California Government Code 65915 and integration with the city's land use system and other incentives. The city commits to review and approve eligible requests so that projects that are eligible to benefit from the bonus are allowed to develop and entitled densities. The city will also promote its own new density bonus developed under Program 129 that extends the provisions of the AB1763 density bonus throughout the Downtown Revitalization District. The city will also implement AB2097 in its density bonus ordinance to reflect parking requirements within a half-mile of Alhambra's two AB2097 eligible intersections at Atlantic and Main and Atlantic and Valley.

Objective: Ensure consistency with State Law and facilitate affordable housing production

Timeframe: Concurrent with Adoption of the city's Comprehensive Zoning Code Update

Responsible Agency: Alhambra Community Development Department – Planning Division

Funding Sources: Department Budget

Program 163: Flexible Development Standards

The city allows for flexible development standards in the R-3 zone to promote higher quality multifamily residential development; to encourage innovative design, efficient use of land, and consolidation of parcels; and to permit developments to be judged on individual merits. The flexible development standards provision allows for variation from up to three of the development/design standards required by the R-3 zone. In addition, flexible parking standards may be requested and are subject to approval by the Planning Commission. Flexible development standards are restricted to lots 40,000 square feet and larger. The city will continue to use this flexible development standards to facilitate the development of large-scale multifamily housing, including housing for special needs groups (large households, seniors, and persons with disabilities, including persons with developmental disabilities).

Objective: Encourage lot assemblage and assist in the facilitation of large-scale multifamily housing

Timeframe: Ongoing

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Program 174: Developer Fee Assistance Program ~~(recommended)~~

Through Program 5 in the city's 5th Cycle Housing Element, the city had previously committed to discretionary exemption of affordable housing from public art and some construction impact fees. This program will commission a study of the feasibility and effectiveness of a developer fee assistance program that provides deferrals or exemptions from select fees for targeted housing types, which could include lower-income development, ADUs, or missing middle housing types.

Objective: Evaluate the effectiveness of a fee incentive program to assist in supporting development of targeted housing types

Timeframe: Ongoing

Responsible Agency: Community Development Department – Planning and Housing Divisions

Funding Sources: LEAP Grant, General Fund

Adequate Site Strategies and Requirements

Program 185: Rezone Sites Used in Previous Housing Element Inventories (new law)

The City of Alhambra will rezone to allow developments by right pursuant to Government Code section 65583.2(i) when 20 percent or more of the units are affordable to lower-income households on sites identified as subject to AB1397 in Appendix A to accommodate the lower-income RHNA that was previously identified in past housing elements. Specifically, the city will rezone the nonvacant sites previously identified in the 5th cycle housing element. The city will amend parking requirements consistent with AB2097 for sites within a half-mile of the City's two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.

Objective: Create an opportunity for housing production for units suitable for lower-income households

Timeframe: Concurrent with Adoption of the city's Comprehensive Zoning Code Update or within one year of Housing Element Adoption.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Department Budget

Program 196: Rezone and Upzone Strategies to Meet RHNA Targets and Buffers

The City of Alhambra has a Regional Housing Need Allocation of 6,825 units. Of these, 2,810 units are for sites suitable for lower-income households. At the same time, Alhambra only has 5.5 acres of vacant land capable of accommodating 58 units. Alhambra is also built out to a moderate level of existing density along corridors and in high-density zones. To meet its RHNA targets, Alhambra has identified nine rezoning and upzoning strategies that increase allowed densities in most existing residential and commercial areas that allow housing. Further, all or portions of all zones that currently do not allow housing will be rezoned to allow housing at a range of densities. Identified strategies include:

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- Upzone by increasing the maximum allowed density in the R-2 zone from 12 to 18 units/ac. This change is complemented by Program 241 to encourage middle housing types.
- Upzone by increasing maximum density in the R-3 zone to 24 units/ac for sites under 10,000 feet and increasing maximum density up to 43 units/ac for sites larger than 10,000 square feet.
- Removing density “step down” reductions in the R-3 zone for “proximity⁴⁷” to the R-2 zone.
- Upzone by increasing maximum density in the CPD zone outside of the Downtown Revitalization District from 30 units/ac to 48 units/ac.
- Upzone by increase maximum density in the geographic area bounded by Atlantic Blvd., W. Woodward Ave., W. Commonwealth Ave., and Chapel Ave. from 43 to 64 units/ac.
- Rezone to allow housing in the EMC zone on sites west of Granada Ave. at a maximum density of 30 units/ac.
- Rezone to allow housing in the PO zone along Garfield Blvd. consistent with the R-3 zone.
- Rezone to repeal the Valley Boulevard Specific Plan and replace with a new zone and development standards allowing housing along the corridor at a maximum density of 43 units/ac.
- Rezone to allow limited housing types in the IPD zone at a maximum density of 43 units/ac.

Collectively, these changes reflect an increase in “theoretical capacity” of 23,491 units. However, this capacity should reflect the realistic development potential of sites given information available. Table 100 of the Adequate Sites Inventory Analysis identifies the specific parcels and assemblages of parcels that exhibit the greatest redevelopment potential⁴⁸. This analysis takes into consideration existing uses, and discounts capacity based on physical characteristics of existing Novant, sites. This process resulted in amounting to 5,55671 units of realistic capacity, or less than 25 percent of potential zoned capacity.

The strategies in this program will work in connection with many of the other programs designed to further housing production. Specifically, Program 40 commits to a mid-cycle review and a commitment to further rezoning and upzoning if appropriate. Further, the City has committed through Program 2017: to complete within two years of housing element adoption a detailed Development Feasibility Study of nonvacant site redevelopment potential for identified nonvacant sites. The City commits to further measures, including rezoning, within six month of completion of that study based on findings and the observed effectiveness of nonvacant site redevelopment over that two year period. Development Feasibility Study exists to provide greater clarity around the realistic redevelopment capacity among identified sites. Program 274 directs the city to monitor development standards and to adjust where appropriate to allow development to reach targeted densities. Finally, Program 18-21 directs the city to adopt the ongoing Comprehensive Zoning Code Update Project in 2022, which will implement the strategies of this program.

⁴⁷ See Municipal Code Section **§ 23.20.050** for methodology of calculating density adjustments for lower zone proximity.

⁴⁸ See section 7 for methodological approach to this determination.

Lower Income RHNA Shortfall. To accommodate the lower-income RHNA shortfall of 2,339 units, as a subset to this rezoning program the city is required to identify and rezone sites with a minimum density of 20 units per acre and density of at least 30 units per acre by October 15, 2024. These rezoned sites will permit owner-occupied and rental multifamily units by right pursuant to Government Code §65583.2(i) for developments in which 20 percent or more of the units are affordable to lower income households. Rezoned sites shall allow 100 percent residential uses and require residential uses to occupy at least 50% of the floor area of a mixed-use project. Each rezone site must have capacity to accommodate a minimum of 16 units and have access to utilities within the planning period. To protect against inconsistent application of this requirement, the city will rezone all identified lower income sites (not just shortfall sites) to meet these criteria.

Objective: Provide adequate sites to meet the city's RHNA targets across all income categories.

Timeframe: Concurrent with Adoption of the city's Comprehensive Zoning Code Update or within the statutory obligation at the time of adoption, whichever is sooner.~~one year of Housing Element Adoption.~~

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Department Budget

Program ~~2017~~: Development Feasibility Study (recommended)

The city shall conduct a study exploring in detail the feasibility of residential redevelopment along corridors and in high-density residential areas. The study will use a pro forma based approach to explore site-specific redevelopment potential and impediments on identified nonvacant sites for lower-income and market-rate development. The output of this study will be used to prioritize sites with the greatest redevelopment potential for acquisition, assemblage, and promotion to the development community. It will also be used to make amendments to the site inventory where assumed achievable densities are found to be less financially feasible. Considering new legislation passed in September 2021 that will take effect in January 2022, this study will also explore the potential capacity available under SB10 to inform the city if an SB10 ordinance would have meaningful impact on housing capacity. It will also estimate the potential for SB9 uptake in single-family zones.

Objective: A comprehensive understanding of the redevelopment potential in the city and a prioritization of sites to inform investment decisions

Timeframe: Completion within two years of Housing Element Adoption

Responsible Agency: Community Development Department – Planning Division

Funding Sources: LEAP Grant/General Fund

Program ~~2118~~: Adopt the Comprehensive Zoning Code Update

Code Alhambra is an ongoing effort to complete a comprehensive update to the city's municipal zoning code. Early findings of the Code Update and the findings of the Housing Element Constraints Analysis determined the existing code is antiquated, difficult to use, and includes development standards that may be constraining development potential. This program directs the city to implement and adopt upzoning and rezoning strategies identified in Program ~~196~~ along with the code update's recommended changes to development standards to achieve assumed

densities as a part of the Code Alhambra Comprehensive Zoning Code Update. If the analysis of Code Alhambra determines that assumed densities in the adequate sites inventory cannot be achieved through adjustments in development standards, if necessary, the city will adjust the sites inventory to reflect realistic capacity as needed. This program will also include amendments to previous errors in the General Plan Land Use Map that mis-classified a section of East Main Street from Chapel to Almansor as Central Business District instead of General Commercial.

Objective: Improvement in the usability of the zoning code and adoption of amendments necessary to achieve realistic zoned capacity to meet the city's RHNA targets across all income categories.

Timeframe: Adoption in 2023~~2~~

Responsible Agency: Community Development Department – Planning Division

Funding Sources: SB2 Planning Grant/General Fund

Program 2219: Prioritize Affordable Housing Production on City-Owned Land (recommended)

Offering publicly owned land for affordable housing development can be a useful way to reduce development costs and increase the supply of affordable housing. The city will inventory and assess the city's publicly owned land, and publicly owned land from other public agencies for appropriateness to accommodate affordable housing development. The city will update this inventory on a two-year cycle. This program will:

- Complete transaction for the development of the city-owned 2nd street site for the Mariposa Project with a target for 2023.
- Complete development on the city-owned Chapel site with a target of 2024-25
- Development of the city-owned Water Lots by 2025-26
- Within one-year of the expiration of the current lease at the Alhambra Golf Course, the city will conduct an evaluation of development opportunities at the site. This evaluation may include an assessment of current market conditions, discussions with developers, and community engagement. Development potential will be limited due to existing deed restrictions required by Los Angeles County for the site to remain as open space in perpetuity. Furthermore, the site may also be impacted due to the fact that the site was a former landfill and additional studies would be required.- The current lease has an expiration date of 2039 which falls outside of the current Housing Element cycle. It will be important for the city to evaluate the balance of opportunities to meet housing needs and provide open space in the community. The City will continue to monitor the potential for housing development on the Alhambra Golf Course as lease constraints change.
- Engage with the San Gabriel Valley Regional Housing Trust to look for ongoing opportunities to develop sites for affordable housing development in Alhambra.
- Conduct annual outreach with developers and/or brokers to identify sites that are or could be coming available to the market in Alhambra.

Objective: ~~Increased land supply to accommodate affordable housing production~~Development of 92 housing units on city-owned land over the planning period.

Timeframe: Ongoing, [Specific actions by site addressed in program actions](#)

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, [San Gabriel Valley Regional Housing Trust](#), [Housing Asset Fund](#)

Program 230: Adaptive Reuse of Commercial and Industrial Buildings for Residential Use (recommended)

The city shall encourage and incentivize the adaptive reuse of existing commercial or industrial space for residential uses. The city shall explore flexibility in parking standards, building code, unit size, and open space requirements. The city shall also explore funding opportunities to subsidize seismic upgrades and retrofit requirements, where appropriate.

Objective: Increase existing land efficiency and reuse of underutilized structures for residential use.

Timeframe: [Policies and development standards adopted commensurate with the completion of the Zoning Code Update \(Program 21\)](#) Ongoing

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, [Other-Other](#)

Program 241: Zoning for Missing Middle Housing Types (recommended)

The city shall review and amend the Zoning Code and applicable design guidelines to encourage and promote a mix of dwelling types and sizes, specifically missing middle-density housing types (e.g., duplexes, triplexes, fourplexes, courtyard buildings) in the R-2 and R-3 zones to create housing for middle- and moderate-income households. [This program is combined with Programs 32 and 33 to encourage missing-middle housing types in the R1 Zone.](#)

Objective: Increase existing land efficiency and reuse of underutilized structures for residential use.

Timeframe: Within three years of adoption of the Housing Element

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, LEAP/REAP Funding

Program 252: Lot Consolidation and Assemblage

Alhambra's development pattern is highly parcelized with limited nonvacant underutilized parcels of the scale necessary to facilitate affordable housing production. To increase opportunities for redevelopment of affordable housing and ensure a sufficient supply of land to meet lower income RHNA targets, within its legal capacity, the city will help facilitate lot consolidations to combine small lots with larger development sites. [Including:](#)

- [As a part of the Comprehensive Zoning Code Update,](#) ~~t~~The city will ~~explore actions and~~ adopt incentives for lot consolidation including, but not limited to, fast-tracking applications, developer outreach, ~~flexible development standards,~~ [and additional density bonus.](#)

- Expand and revise the flexible development standards incentive for lots over 40,000 square feet. Identify opportunities to expand the incentive beyond the R-3 zone in commercial zones along corridors and in the Downtown Revitalization District. Consider a revision to the size threshold to expand the number of sites eligible for the incentive. and
- Subject to available funding, the city will continue identify property acquisition opportunities and land subsidies such as write-downs for affordable housing. ~~seeking funding for land banking and site acquisition. The city will~~ Continue the city's partnership with the San Gabriel Valley Regional Housing Trust to identify opportunities for affordable housing site assemblage.
- The city will publish the site inventory on its website identifying which parcels are most economical for consolidation. This will be informed and updated by the City's development feasibility study (Program 20). Th city will distribute to affordable housing developers. Subject to available funding, the city will continue to explore property acquisition opportunities and land subsidies such has write-downs for affordable housing.

Objective: Facilitate parcel assemblage to increase supply of feasible sites for affordable multifamily housing

Timeframe: ~~Ongoing as feasible during the planning period~~ Adoption of incentives commensurate with adoption of the Zoning Code Update (Program 21). Annual assessment of acquisition opportunities.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: General Fund, Alhambra Housing Asset Fund, Inclusionary Housing Trust Fund

Program 263: Accessory Dwelling Unit Program

The city shall develop a comprehensive ADU program to assist in the facilitation of ADU production in the city. This program will amend the city's regulations and zoning code to be consistent with recent updates to state law. The city shall evaluate and adjust ADU requirements to promote ADU construction, including parking, height, unit size, allowed ADUs per lot, and setbacks. The ADU program shall also include:

- An ADU Amnesty program for property owners to bring unpermitted ADUs up to code.
- An affordable ADU incentive program offering fee waivers, reductions, deferrals, or streamlined processing for ADUs offered for lower-income households.
- Create and maintain a set of pre-approved building plans to support ADU development and streamline the plan check process for ADUs.
- Expanding on current education and outreach by developing a formal homeowner outreach program.
- A continuation of the city's ADU monitoring program that produces a report annually at a minimum on ADU production and applications and development. Expand this program to include a method for tracking ADU affordability levels consistent with requirements of Annual Progress Reporting. ~~where information is available.~~ This report will continue to be published on the City's website.

- Consistent with language in Program 40: Housing Element Maintenance, the city will continue to monitor ADU production and affordability. If within two years ADUs are not tracking within 25% of assumed capacity with respect to affordability and production, the city will commit to adding site capacity equal to 150% of the observed shortfall within 180 days.

Objective: Update the city’s ADU ordinance to be in compliance with State Law. Approve up to 75-60 ADUs per year over the planning period.

Timeframe: Within two years of Adoption of the Housing Element, every two years thereafter.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget, LEAP/REAP Funding

Mitigation of Potential Development Constraints

Program 274: Reduce Development Constraints for Affordable Housing

Through its ongoing Comprehensive Zoning Code Update, the city will review and amend the code to remove potential constraints to housing production. initially address identified constraints in the zoning code and development regulations, including development standards, review procedures, and design standards. Strategies may include: These include:

- Establishing objective design standards
- Revise thresholds for Planning Commission review along with Program 296
- Establishing appropriate development standards (parking, height, setbacks, FAR) to ensure that projects could achieve maximum densities assumed in the Housing Element. This process will be refined by the City’s Development Feasibility Study in Program 20 to empirically identify specific standards that present the greatest barriers. This will include implementation of parking requirements consistent with AB2097 for sites within a half-mile of the City’s two AB 2097 eligible intersections at Atlantic and Main and Atlantic and Valley.
- ~~Consider amendments to height, FAR, parking, and open space requirements to allow for development to better achieve maximum allowed densities.~~
- Provide annual education on land use and development for elected officials including the City Council and Planning Commission.
- Review and revise development standards for Accessory Dwelling Units to improve compatibility with local characteristics.
- Repeal the Valley Boulevard Specific Plan that limits residential development to only a few blocks and to sites greater than 40,000 square feet. Replace with a new zone that allows residential densities consistent with other commercial corridors.
- Revise commercial zones to allow 100 percent residential projects.
- Remove the bedroom tie-in to density calculations for multifamily uses in the zoning code.

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- As a part of the zoning code update in Program 21, improve code usability through organization, styling, removing complexity, and developing more clearly defined metrics.
- Establish siting regulations and expand the allowance of Single Room Occupancy (SRO) housing.
- Along with Program 7 and Program 8, the city will assist in the development of housing for extremely-low income households by:
 - Amending the zoning code to remove or modify any subjective requirements for emergency shelters and amend its emergency shelter ordinance to be compliant with state law (completed as a part of the zoning code update expected to be adopted August 2023).
 - Amend the zoning code to clarify and expand the allowance of transitional and supportive housing consistent with state law.
 - Amend the zoning code to allow Low-Barrier Navigation Centers by-right in all residential zones, areas zoned for mixed-uses, and nonresidential zones permitting multifamily uses.

Along with Program ~~4030~~, the city will evaluate its zoning code, development standards, and fees mid-Housing Element cycle to identify and address constraints to development of housing.

Objective:

Reduce development constraints for market-rate and affordable housing projects by increasing achievable maximum densities within the zoning code, reducing the total cost of development, or speeding up the development review process.

Timeframe: ~~Ongoing~~ Commensurate with adoption the Zoning Code Update (Program 21), Consider and revise again at mid-cycle.

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Program 285: Housing Production Education Program

Community input into planning and approval processes is a necessary and important function. However, Community opposition to new housing production and development was identified in the constraints analysis as a nongovernmental constraint. One of the tools the city can implement to improve community interactions with development processes is an education and outreach program that demonstrates the role of new housing production to mitigate existing housing problems (such as cost burdening, displacement, homelessness, and properties falling into disrepair) that were identified as important to the community. The city will work with the community to achieve support for housing across income levels. The city will provide information to residents about local housing needs, changes in state law, and other planning and housing-related topics. This program should engage with the established Housing and Community Development Citizen Advisory Committee (HCDA) or other committee as a liaison in crafting community outreach and communication strategies.

Objective: Improve community understanding of the importance of housing production

Timeframe: ~~Ongoing~~ Initial program within two years, annual outreach thereafter

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Departmental Budget

Program 296: Development Streamlining

The City's Residential Planned Development Permit (RPD) requires Planning Commission review of nearly all residential construction. In 2020 the city amended this process to allow administrative review of applications in the R-1 zone. The constraints analysis identified the RPD as a significant constraint on development. The city will continue to find opportunities to streamline the permitting process to remove unnecessary barriers, without compromising public health and community character. The city shall review its development review procedures for compliance with state law and potential constraints on development. The city shall adopt new streamlining procedures to expedite the permitting and design review of certain housing projects. It will also maintain consistency with the Housing Crisis Act and utilize the state's standard preliminary application checklist to facilitate project review. Within the first ~~one to two~~three years of the planning period the city will ~~further explore~~:

- ~~Eliminate the Residential Planned Development Permit process.~~
- ~~Develop~~ Implement a pProcesses to streamline development review and objective standards for 100% affordable projects. Along with program 129, this will ~~create a explore~~ developing a new Affordable Housing Overlay Zone.
- ~~Develop~~ Implement a written procedure for processing projects eligible for streamlined review and approval under SB35.
- ~~As a part of the zoning code update, develop~~ Establish/Implement objective design and development standards as a part of the zoning code update to comply with SB330. This effort will have evaluated and addressed subjective standards and findings required for approval in the city's zoning code and design guidelines.
- ~~Draft a proposal to the planning review process, specifically the RPD permit. Meaningful actions should include:~~
 - Increase the term of expiry of approved permits to two years ~~or more~~ to reduce the reliance on one-year extensions.
 - ~~Develop~~ Implement a process to monitor and evaluate actual processing times and continually identify opportunities to streamline the process.
 - Continue to identify opportunities to streamline processing procedures, including identifying additional exemptions to the Residential Planned Development Permit process for project's that meet objective criteria.

Objective: Remove regulatory barriers to housing production

Timeframe: ~~Ongoing~~ Within one to two years

Responsible Agency: Community Development Department – Planning Division

Funding Sources: Departmental Budget

Affirmatively Furthering Fair Housing (AFFH)

Program ~~3027~~: Affirmatively Furthering Fair Housing

Equal access to housing is fundamental to each person in meeting essential needs and pursuing personal, educational, employment, or other goals. To identify and address impediments to fair housing in the City of Alhambra, the city completed an update to its analysis of impediments to fair housing in 2020. This analysis in conjunction with the Housing Element Analysis of AFFH set the framework for programs and policies to reduce barriers to housing and mitigate displacement risk. Specific actions and objectives of this program include:

Community Education

- Revise practices to improve access to public meetings by conducting meetings at reasonable times, selecting locations that are accessible near transit, and consider other resources such as childcare, food services, and translation services.
- Continue to broadly distribute public announcements through a variety of mediums including social media, websites, community events, e-blasts, city newsletters, and through community partners.
- Actively monitor stakeholder participation and seek stakeholders from underrepresented groups in public engagement processes.
- Include resources to educate the public about Alhambra's Inclusionary Housing Ordinance including maintaining an inventory of inclusionary units.
- Continue to actively promote and expand on fair housing resources on the city's webpage including the Housing Rights Center, Stay Housed LA, and the Los Angeles County Housing Resource Center.

Housing Mobility and Improving Access to Opportunity

- Evaluate opportunities and partnerships to expand housing services to include housing mobility counseling.
- Establish siting recommendations and expand allowance of Single Room Occupancy (SRO) housing (part of Program 27).
- Remove barriers to housing for persons with special housing needs by amending the zoning code to remove or modify any subjective requirements for emergency shelters, expand the allowance of transitional and supportive housing, and allow Low-Barrier Navigation Centers by right (programs 7 and 8).
- Continue to monitor and enforce the City's Inclusionary Housing Ordinance to promote mixed-income development throughout the city and in areas of opportunity. Consider incentives to promote deeper affordability levels in high opportunity areas.
- Amend the city's Reasonable Accommodations Ordinance to streamline the process by removing the notification process. Continue to promote and process reasonable accommodation requests.

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- Continue to use development incentives, density bonuses, financial resources, inclusionary housing policies, and the zoning code to encourage affordable housing that is dispersed throughout the community in areas of high opportunity.
- By the next updated to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in amenities in low and moderate resource areas. The city will prioritize future investments in infrastructure, parks, public art, and open space in low and moderate resource census tracts.
- The city will also coordinate with local and regional agencies to mitigate the impacts of air quality along I-10, exploring opportunities for roadside barriers (sound walls, vegetation).
- State law requires rental property owners to accept Housing Choice Vouchers (HCV) as a source of income for housing payments. The City will organize education materials regarding laws prohibiting the rejection of HCVs and other public assistance programs.

Displacement Risk

- Continue and expand on the City's efforts to encourage preservation of the existing affordable housing stock. (Program 3).
- Implement a unit replacement program for residential demolitions consistent with State Law. (Program 6). Consider incentives to encourage replacement at greater set aside levels.
- Continue to monitor and enforce the City's Inclusionary Housing Ordinance to promote mixed-income development throughout the city and in areas of opportunity.
- As a part of the community education programs, the city will annually create communication materials specifically relating to tenant's rights, available resources, and displacement risk. These materials will be multilingual. The city will concentrate distribution efforts in areas at-risk of displacement and coordinate with local organizations to facilitate access to distribution.

Also refer to the AFFH Housing Program below, reproduced from Figure 123 for specific commitments to other meaningful actions as a part of this program.

<u>Fair Housing Issue</u>	<u>Contributing Factor</u>	<u>Geographic Target</u>	<u>Meaningful Action</u>	<u>Metric</u>	<u>Milestones and Targets</u>
<u>Fair Housing Enforcement and Outreach Capacity</u>	<ul style="list-style-type: none"> ▪ <u>Lack of language access</u> ▪ <u>Lack of Fair Housing Enforcement and Outreach</u> ▪ <u>Lack of awareness of fair housing laws and advocacy.</u> ▪ <u>Community opposition</u> 	<u>Citywide, tracts with highest non-English speaking population.</u>	<ul style="list-style-type: none"> ▪ <u>Continue to contract with the Housing Rights Center to provide fair housing services and education.</u> ▪ <u>By year-end 2023, develop a program to prioritize access to language access for housing and planning meetings.</u> ▪ <u>By year-end 2024, update citywide survey completed in 2021, offering in English, Spanish, and</u> 	<ul style="list-style-type: none"> ▪ <u>Number of cases served by the housing rights center.</u> ▪ <u>Community participation among non-English speaking residents.</u> 	<ul style="list-style-type: none"> ▪ <u>Target to serve 350 individuals annually through HRC programs.</u> ▪ <u>Include translated announcements in Spanish and Traditional Chinese for outreach on housing related issues.</u> ▪ <u>100% of announcements will be translated in Spanish and Traditional Chinese for participation</u>

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			<p><u>Traditional Chinese. Include survey questions assessing barriers to public participation.</u></p> <ul style="list-style-type: none"> ▪ <u>When holding community meetings, proactively outreach to a wide range of community groups.</u> 		<p><u>from non-English speaking residents on housing related issues.</u></p> <ul style="list-style-type: none"> ▪ <u>100% of participants will have access to translation services to encourage outreach and engagement by non-English speakers.</u> ▪ <u>City will track 100% of requests from non-English speakers seeking translation services for housing programs.</u>
<p><u>Disproportionate Need for Persons with Disabilities</u></p>	<ul style="list-style-type: none"> ▪ <u>Availability of units in a range of sizes.</u> ▪ <u>Displacement of residents due to economic pressures.</u> ▪ <u>Demographic factors driving needs for seniors with disabilities.</u> 	<p><u>Central City, Citywide</u></p>	<ul style="list-style-type: none"> ▪ <u>Begin educational programs that promote the positives of integrated income neighborhoods to change local attitudes about affordable housing (Program 28).</u> ▪ <u>Implement Program 5 (Inclusionary Housing).</u> ▪ <u>Establish siting requirements for SRO housing (Program 9)</u> ▪ <u>Implement an adaptive reuse program (Program 23) to encourage lower cost housing alternatives.</u> ▪ <u>Implement an aggressive Accessory Dwelling Unit Program (Program 26) to incent production in high resource single-family neighborhoods.</u> ▪ <u>Complete projects planned on City-owned land (Mariposa, Chapel) by year-end 2025</u> 	<ul style="list-style-type: none"> ▪ <u>Units built or dollars collected in in-lieu fees from inclusionary program.</u> ▪ <u>Affordable ADU production</u> ▪ <u>Success in adopting SRO requirements.</u> ▪ <u>Production of SRO units.</u> ▪ <u>Number of units built on city owned land.</u> 	<ul style="list-style-type: none"> ▪ <u>Target of one SRO housing project over the planning period.</u> ▪ <u>Construction of at least 92 lower income units on existing city-owned land.</u> ▪ <u>ADU units in R1 zones consistent with estimate of 60 units annually.</u> ▪ <u>Adoption of SRO ordinance by Summer 2023.</u>
<p><u>Disproportionate Housing Need</u></p>	<ul style="list-style-type: none"> ▪ <u>Displacement of residents due to economic pressures.</u> ▪ <u>Lack of Affordable Housing Units</u> 	<p><u>Citywide</u></p>	<ul style="list-style-type: none"> ▪ <u>Preserve the City's existing affordable housing stock for low- and moderate- income households (LMI) in the 0 to 80 percent of Area Median Income (AMI) category, with a focus on tracts with an above average</u> 	<ul style="list-style-type: none"> ▪ <u>Number of units preserved.</u> ▪ <u>Completion of cost control report.</u> 	<ul style="list-style-type: none"> ▪ <u>Preservation of 215 units with expiring affordable housing covenants over the planning period.</u> ▪ <u>Present a report to City Council with alternatives for adoption of programs mitigating</u>

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			<p>concentration of LMI households.</p> <ul style="list-style-type: none"> Continue to monitor and preserve affordable senior housing units for lower income elderly households throughout the community. By year-end 2024, provide a report to City Council detailing alternatives for mitigating rent increases for lower income residents. 		<p>rent increases for lower income residents by 2025. As part of the study, evaluate and establish appropriate metrics toward meaningful and significant mitigation of displacement risk.</p>
<p><u>Disparities in Access to Opportunity</u></p>	<ul style="list-style-type: none"> Location of Environmental Factors Location and type of affordable housing and lack of affordable units Access to financial services Lack of investments in specific neighborhoods. Land Use and Zoning Laws 	<p>Northeast Quadrant, Citywide</p>	<ul style="list-style-type: none"> Implement density bonus program that expands on AB1763 into entire downtown revitalization district. Propose expanding program as an affordable housing overlay zone in high-resource areas (Program 12). Contract to provide housing mobility counseling services. By the next update to the Capital Improvement Plan, develop a program to provide an update of AFFH factors by census tract to other departments in CIP planning to target investments in amenities in low and moderate resource areas. Programs to implement SB9 (Program 33) and target housing production in the R1 Zone. Place-based programs (Programs 35-38) to direct parks and public safety improvements in low and moderate resource areas. 	<ul style="list-style-type: none"> Trend in TCAC scores by census tract. Implement Program 21 (Zoning Code Update) to allow housing in zones that were previously exclusionary. Number of 100% affordable projects using density bonus under Program 12. Number of projects or dollars spent in low and moderate resource areas. 	<ul style="list-style-type: none"> Improvement of at least one census tract that is currently lower or moderate resource to a higher tier over the planning period. Target of at least four affordable housing projects utilizing the density bonus program. Spending on place-based programs consistent with actions outlined in Programs 35-38 Target of 20 middle housing units per year in high resource R1 areas.
<p><u>Site Inventory</u></p>	<ul style="list-style-type: none"> Historic development pattern 	<p>R-3 zones. Zones that do</p>	<ul style="list-style-type: none"> Implement Program 21 (Zoning Code Update) to allow 	<ul style="list-style-type: none"> Housing production on sites that did 	<ul style="list-style-type: none"> Development of at least 50 units in the EMC zone that will

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	<u>impact on location of feasible sites.</u>	<u>not allow housing</u>	<u>housing in zones that were previously exclusionary.</u>	<u>not previously allow housing.</u> <ul style="list-style-type: none"> ▪ <u>Lower Income Housing Production in high-resource areas.</u> 	<u>have a portion rezoned to allow housing by-right.</u> <ul style="list-style-type: none"> ▪ <u>Target of 20 middle housing units per year in high-resource R1 areas.</u>
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The city will implement its recent Analysis to Impediments to Fair Housing Choice (April 2020) to address disparities in housing needs and access to opportunity for all persons.

The 2020 Analysis of Impediments and the Housing Element AFFH Analysis identified barriers to fair housing based on local and regional data and local community insights. Actions the city may take to address identified barriers include:

- ~~Convene with peer jurisdictions to identify regional barriers and develop fair housing strategies that may benefit from regional coordination~~
- ~~Continue to recruit a diverse and multilingual staff and continue to provide language translation services where it is appropriate and cost feasible~~
- ~~Continue to provide reasonable accommodations in compliance with the Fair Housing Act~~
- ~~Continue to use development incentives, density bonuses, financial resources, inclusionary housing policies, and the zoning code to encourage affordable housing that is dispersed throughout the community in areas of high opportunity~~
- ~~Utilize state, regional, and local data sources to monitor areas of high opportunity and prioritize affordable housing investments in areas that provide access to opportunity~~
- ~~Utilize available data sources to consider displacement risk and explore strategies to mitigate displacement~~

The city will also market the availability of housing programs through brochures and fliers, newsletter announcements, social media, and other public information sources. This city will provide focused promotion of housing programs in neighborhoods with concentrations of housing problems.

Objective: Ensure equitable access to opportunity for all persons in the community

Timeframe: Ongoing with timing commitments listed in meaningful actions listed above.

Responsible Agency: Community Development Department – Housing Division, Housing Rights Center

Funding Sources: Departmental Budget, CDBG Funds

Program 3128: Fair Housing Programs

The city contracts with the Housing Rights Center to provide fair housing services and landlord-tenant counseling services to residents of Alhambra. A variety of issues are addressed, including evictions, security deposits, rent increases, repairs, and lease/contract issues. As needed, referrals to other agencies and/or appropriate pieces of literature are also distributed regarding fair housing information. The city will continue to contract with the Housing Rights Center or other qualified fair housing service providers to provide fair housing services and landlord-tenant

counseling services to residents, landlords, management companies, and others involved in the provision of housing and housing services.

Objective: Education of tenants and landlords of their rights and responsibilities under fair housing laws. Assist approximately 400 persons annually, for a total of 3,200 persons during the 2021-2029 Housing Element planning period.

Timeframe: Ongoing

Responsible Agency: Community Development Department – Housing Division; Housing Rights Center

Funding Sources: CDBG Funds

Program 32: Provide New Housing Choices and Affordability in High Opportunity Areas Through Incentives for SB9 Units in R1-Zone Neighborhoods

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

Objective: Increase middle-housing options in high resource areas and the R1 zone consistent with targets in Program 33.

Timeline: By October 2023

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 33: Establish Target to Increase Housing Production in R1 Zones and Include Mid-Cycle Monitoring

The City shall aim to issue at least 20 building permits per year for additional housing units and types in R1 zones. Review progress towards targets by December 31, 2025 and if targets are not being met, adjust land use strategies as necessary and appropriate within one year.

Objective: Permitting of 20 additional middle-housing housing units per year in the R1 zone.

Timeline: Assess progress by December 31, 2025

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 34: AFFH Monitoring and Review Program

The City will evaluate the progress of the Housing Element programs on an annual basis as part of the Housing Element Annual Progress Report process. Additionally, the City will conduct a comprehensive evaluation of program implementation and effectiveness in 2025 as a mid-cycle assessment. The evaluation, among other items, will address actions to affirmatively further fair

housing and zoning on identified sites, including multifamily zoning on sites with residential uses. The City will commit to adjusting programs as necessary based on the results of the evaluation, including but not limited to rezoning, increasing allowable densities, incentives, modifications to development standards or other actions.”

Objective: Ensure the effectiveness of progress toward AFFH goals

Timeframe: Annual APR update and midcycle evaluation in 2025. Adjustments to programs as necessary within one year of evaluation.

Responsible Agency: Community Development Department—Planning Division

Funding Sources: Department Budget

Program 35: Place-Based Community Improvements - Park Renovations

The City will develop programs and strategies to create place-based investments in areas of concentrated segregation and poverty and lower and moderate resource areas, including investments in infrastructure, services, etc. that contribute to community revitalization.

The City will focus investments and programs in existing parks that are predominately used by BIPOC populations (80.1%) to facilitate revitalization and healthy living conditions. Revitalization and improvements include a minimum of \$4.9 million of investment undertaking renovations and improvements at Burke Heritage Park, Story Park, Alhambra Park, Almansor Park, Emery, and Granada Park. Revitalization and improvements shall be implemented by prioritizing capital improvement projects for these efforts during the annual budgeting process.

Objective: Improve amenities, programming, and quality of life in parks accessible to all residents in the community. Invest a minimum of \$4.9 million in park renovations.

Timeline: From 2022 through 2027

Responsible Agency: Community Development Department, Parks and Recreation Department

Funding Source: General Fund, Grants as available

Program 36: Place-Based Community Improvements – Emery Park

Emery Park is in Alhambra’s only low resource census tract. It is developed with amenities including a 2,532 square foot, activity center with a gym, small kitchen facility, storage room, and interior restrooms. There have been some recent improvements. The exterior restrooms were rehabilitated in (2018). The open park area provides picnic table rentals and the City’s first all-inclusive playground built in 2017.

The City will continue to provide recreational activities and programs for Pre-K at the Emery Park Youth Center to provide classes related to promote fun activities and social play as well as parenting skills and techniques. Such programs include but are not limited to “Ages and Stages”, “Fun with Toddlers”, and Two Too Much”. Classes will continue to be advertised in the City’s annual Leisure Guide published twice a year (Winter/Spring and Summer/Fall).

The City will also develop a strategy for place-based improvements of the Emery Park Youth Center. Specific actions include:

- Repaint in the interior and exterior of Emery Park Youth Center – to be completed by December 2028
- Commence rehabilitation of the Emery Park Youth Center restrooms for a Request for Proposals within the interior of the building – start of project Dec. 2027.

Objective: Place-based investments in lower resource areas

Timeline: Ongoing, annually.

Responsible Agency: Parks and Recreation Department

Funding Source: Los Angeles County Regional Park and Open Space District (Measure A Funds), Department Budget

Program 37: Place-Based Community Improvements – Streetscape and Right of Way Improvements

The City will develop programs and strategies to create place-based improvements through investments in the public right-of-way and public safety improvements in high-traffic areas near transit and in moderate and low resource areas. Specific actions include:

- Installation of lit crosswalk traffic control devices at major intersections that currently have uncontrolled crosswalks. Pedestrian crossing control equipment at the intersections may include flashing beacons (standard beacons per CA-MUTCD or Rapid Rectangular Flashing Beacons (RRFB) or in-road flashing lights along crosswalk lines. Targeted intersections are located along corridors that include or are adjacent to moderate or lower resource areas, or areas that include sites targeted for lower income housing. Targeted intersections include:
 - Main/Meridian
 - Valley/Monterey
 - Main/Marguerita
 - Chapel/Elgin
 - Main/Curtis
 - Valley/Date
 - Main/Vega
 - Main/Olive
 - Valley/Primrose
- Implementation of a new Bike and Pedestrian Transportation Plan. A stated goal of the plan is to “create a methodology for prioritizing projects including identifying need in disadvantaged areas.” The City has already commenced outreach for this project. Input is being gathered from the community on preferred bike lane routes with the intent to connect them to bike paths in adjacent cities and nodes of employment and recreation.
- Eliminate the existing series street lighting distribution system within the Airport Tract neighborhood and convert the lighting to a multi-volt distribution system that will allow the streetlights within the Airport Tract to be converted to LED luminaires.

- Work collaboratively on the implementation of multi-jurisdictional First-Last Mile Improvements for the Valley/Fremont Bus Mobility Hub as recommended in the 710 Mobility Hubs Plan. First- and last-mile improvements within one-quarter mile of bus mobility hubs are a crucial element in ensuring the hubs remain accessible and safe for everyone walking and biking. The improvements associated with the Valley/Fremont Bus Mobility Hub can include:
 - Added pedestrian lighting
 - Added street trees
 - Added/improved pedestrian crosswalks
 - Improved bus stops
 - Added wayfinding
 - Added traffic calming

Alhambra will need to ensure this Mobility Hub location and relative features are in alignment with the City's Bike and Pedestrian Improvement Plan and proposed bike network. The Bike/Ped Plan is expected to be completed in the Fall of 2023. Following the completion of the Bike/Ped Plan, it will be incumbent on the City to secure funding for both the Bike/Ped Plan recommendations and the Mobility Hub at Valley/Fremont (if appropriate).

Objective: Improve public safety and access to resources in lower resource areas

Timeline: Ongoing, Bike and Pedestrian Plan to be completed in 2023, phased crosswalk improvements over the planning period prioritized at intersections in low and moderate resource areas as appropriate. Conversion of street lighting systems from 2023 to 2027.

Responsible Agency: Public Works

Funding Sources: General Fund, Department Budget.

Program 38: Place-Based Community Improvements – Valley Boulevard Multimodal Improvements:

The City will invest in multimodal improvements along the entire length of the Valley Boulevard Corridor. This Corridor includes over 22% of lower income capacity estimated in the Adequate Sites Inventory. These investments will promote non-motorized uses with attractive, convenient active transportation infrastructure including pedestrian and bike enhancements and bus stop improvements. This will include the conversion of public transit stops to more attractive environments with benches, shelters, trashcans, lighting, and bike parking to increase transit use as viable alternatives to automobile travel by improving access to local and regional transit facilities. Together, these features support closing existing gaps to mobility on Valley Boulevard and improving local and regional connectivity. Each site will be measured with recommendations provided for new shelters, furniture, and trash receptacles.

Objective: To improve public safety and transit access in low and moderate resource areas and areas and higher resource areas that are planned for future lower income housing.

Timeline: 2024-2025

Responsible Agency: Public Works

Funding Sources: Prop C funding, secured federal grant of \$1.2 million

Housing Element Maintenance

Program 3929: General Plan Updates

The city completed an update of the General Plan in 2019. However, upzoning and rezoning strategies along with other programs will require further updates to ensure internal consistency of the 2021-2029 Housing Element with other elements of the General Plan. The city will address updates to the Land Use, Circulation, Safety, and Environmental Justice elements, and other elements of the General Plan where appropriate.

Objective: Ensure ongoing internal consistency of the General Plan

Timeframe: Within one year of Housing Element Adoption

Responsible Agency: Community Development Department – Housing and Planning Divisions

Funding Sources: Department Budget

Program 4030: Housing Element Maintenance

City staff will report to the City Council annually on the progress in implementing the Housing Element. Staff will prepare an Annual Review Statement, per Section 65588 of the Government Code, to evaluate the progress made in implementing housing element policies and programs and in meeting the city's housing goals. Department staff will also monitor progress of Community Development Block Grant (CDBG) and HOME-funded projects through the Consolidated Annual Performance Evaluation Report (CAPER).

This program will also include a mid-cycle Housing Element review. This review will assess production at income levels on inventory sites, ADU production, SB9 production not included in capacity estimates, and existing buffers to ensure RHNA no-net-loss. At this review, if the city is not meeting its housing production goals, it will review and revise Land Use policy, development standards, and review processes. By state law, the City will rezone new sizes or upzone inventory sites to accommodate capacity shortfalls. This mid-cycle review will also assess the effectiveness and implementation of Housing Element Programs, pending and approved projects and identified sites and adjust where appropriate ~~and possible.~~

An annual review of ADU production is also included in Program 263 and a biennial review of the city's IHO program is included in Program 5.

Because the project referred to as the "The Villages at the Alhambra" is represents a sizable share of progress toward RHNA, -if the project is not approved within two years of adoption, within 180 days the city will make alternative sites available of equivalent capacity at appropriate densities and affordability and reclassify the project as a potential nonvacant redevelopment site. The ssite will not be utilized for the purposes of no net loss law.

Finally, the mid-cycle review will evaluate the effectiveness of programs and provide a summary of metrics identified in the AFFH program to determine progress made and recommendations for additional actions and expansion of programs where necessary.

Objectives:

- Evaluate and understand housing production by type and affordability.
- Proactively make zone changes to ensure a stable availability of sites to accommodate the city’s Regional Housing Needs across all income levels.
- In accordance with Government Code §65589.7, the city will deliver to all public agencies or private entities that provide water or sewer services to properties within Alhambra a copy of the 2021-2029 Housing Element. The city will ensure that it has adopted policies and procedures to prioritize utility hook-ups to developments that include units meeting the needs of lower-income households.
- Ensure that RHNA obligation through pending or proposed projects is realized or alternative sites are made available.

Timeframe: Housing Element distribution on adoption, Mid-cycle review within four years. Annually ADU assessment. Proposed project assessment within two years.

Responsible Agency: Community Development Department – Housing Division

Funding Sources: Departmental Budget

Summary of Quantified Objectives

Figure 12594 summarizes the city’s quantified objectives for the 2021-2029 planning period. Many of the city’s programs list specific actions with associated objectives and outcomes. Some programs include quantified objectives relating to unit capacity. These objectives have been aggregated by type consistent with State Housing Element Law. In addition to these quantified objectives, the city plans to assist 3,700 households through code enforcement and fair housing services.

Figure ~~125:104~~. Summary of Quantified Objectives

Source: City of Alhambra ~~and ECONorthwest~~

Objectives	Income Levels					Total
	ELI	Very Low	Low	Moderate	Above Mod.	
Production Objective ^A	840	8401,680	96681	980	2,029	5,65570
Rehabilitation Objective	0	5	2	0	0	7
Conservation/Preservation Objective	0	899		0	0	899
Total	840	2.7123,567		980	2,029	6,56476

^A The City of Alhambra is not responsible for physically constructing units. The City’s responsibility is to create a regulatory environment through land use, zoning, incentives, and programs to encourage the private market to develop units across a variety of housing types.

Production Objective. This objective reflects the City’s remaining RHNA after considering current projects approved.

Rehabilitation Objective. This objective is an outcome of the City’s Housing Rehabilitation Program (Program 1). The objective is split between very low and low-income households.

Conservation Objective. This objective refers to the preservation of 366 units of affordable housing units at risk and the maintenance of the current level of assistance from the Section 8 Voucher program (533 vouchers).

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Chapter 7: Sites Inventory Summary and Methods

The residential sites inventory identifies land available for new housing development and compares this “capacity” to the city’s Regional Housing Need Allocation (RHNA). California’s Government Code requires the Housing Element to include this inventory demonstrating “adequate sites” that are or will be made available during the planning period to accommodate housing production targets. Jurisdictions are further required to demonstrate that zoning and infrastructure are available or planned to be available to support housing development.

Summary of Alhambra’s Regional Housing Need

To meet its RHNA for the 2021-2029 planning period, the city of Alhambra must show capacity for a minimum of 6,825 units. Among these, approximately 41 percent must be appropriate for lower-income (very low, low) households.

Figure ~~126:105~~. Summary of Alhambra’s Regional Housing Need Allocation

Source: SCAG

Income Level	Number	Percentage
Very Low	1,774	26%
Low	1,036	15%
Moderate	1,079	16%
Above Moderate	2,936	43%
Total	6,825	100%

Site Inventory Organization

While over 52 percent of Alhambra’s gross land area is zoned for residential use, Alhambra is a built-out community with very little vacant land. Alhambra’s 6th Cycle RHNA allocation represents 21.4 percent of the current housing stock, nearly all of which will need to be met by redevelopment and infill capacity. In the 5th Cycle, Alhambra identified 102 sites with capacity for 1,530 units⁴⁹. It is clear that under existing zoning, Alhambra falls well short of having zoned capacity to meet its allocated share of regional housing need for the 2021-2029 planning period. Therefore, we organize the city’s inventory into categories representing existing and potential candidate residential capacity.

Existing Site Capacity

Represents capacity from sites available under existing zoning and policy conditions.

- 1) Projects planned, proposed, or entitled that are expected to be delivered during the planning period.
- 2) Capacity identified within Existing Specific Plan/Master Planned Areas with the potential to be delivered during the planning period.

⁴⁹ Excludes planned and proposed projects

- 3) Vacant sites with zoning that allows for residential development.
- 4) Nonvacant, underutilized sites identified in the 5th Cycle Housing Element that remain undeveloped, have zoning that allows for residential development, and meet our current criteria for exhibiting demonstrated potential for redevelopment at higher density/greater intensity⁵⁰

Potential Candidate Site Capacity

Represents capacity that results from rezoning, upzoning, and other policy and program changes to support and facilitate housing production. Potential candidate capacity includes:

- 1) Projected Accessory Dwelling Unit Capacity.
- 2) Vacant and/or underutilized sites that are not currently zoned to allow for residential uses and will be rezoned to allow residential uses.
- 3) The marginal change in capacity resulting from actions to increase allowed and realized density (upzoning, changes in development standards, incentives) on sites that currently allow residential uses, including existing capacity on sites carried over from the 5th Cycle Sites inventory.

Assumptions and Methodology

Alhambra Zoning Code

The City of Alhambra is in the process of completing a comprehensive zoning code update. We expect that potential candidate site capacity that will be made available through rezones or other zone amendments will be adopted as a part of the code update project. It is expected that this process will be completed sometime in 2022, early in the planning period. Land-use changes that occur at the beginning of the planning period (in contrast to the three-year window that is allowed by State Law) are more likely to have an impact on development and increase the likelihood of redevelopment during the planning period.

Existing Allowed Density

Alhambra's zoning code does not have a minimum density and allows densities up to maximum thresholds. In the Low-Density Residential Zone (R-1) one unit is allowed per lot. In the Medium-Density Residential Zone (R-2), the maximum is 12 units per acre. In many of Alhambra's commercial zones, residential uses are allowed conditionally consistent with the city's High-Density Residential Zone (R-3). This includes the Central Business District (CBD), the Parking Zone (P), and Commercial Planned Development (CPD) zones. The R-3 Zone is designed to facilitate subtle transitions between lower density zones and to facilitate lot aggregation. Allowed densities in R-3 range from 12 to 43 units per acre depending on site size and proximity to lower density zones.

⁵⁰ Some previously identified sites were removed from consideration because they do not meet our definition of having redevelopment potential or they were partially developed, and the remnant portion of the site is not likely to be redevelopable on its own.

Figure 12706. Allowed Densities in High-Density Zones

Source: City of Alhambra

Allowed Density	Condition
12 units per acre	For any parcel located on Curtis or Electric Lane without frontage on any other street.
18 units per acre	All parcels within 50 feet (less street and alley right-of-way) of properties designated as low Density Residential in the General Plan.
24 units per acre	All parcels within 50 feet (less street and alley right-of-way) of properties designated as Medium Density Residential in the General Plan
24 units per acre	Parcel size less than 20,000 square feet and not within 50 feet (less street or alley right-of-way) of properties designated as low or Medium Density Residential in the General Plan
30 units per acre	Parcel size 20,000 square feet or greater and not within 50 feet (less street or alley right-of-way) of properties designated as Low or Medium Density Residential in the General Plan
43 units per acre	Parcel size 20,000 square feet or greater (within areas bounded by Woodward Avenue, Chapel Avenue, Commonwealth Avenue and Atlantic Boulevard or within Central Business District) and not within 50 feet (less street or alley right-of-way) of properties designated Low or Medium Density Residential in the General Plan

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The city’s high density zoning structure presents both practical and analytical challenges in the context of size and density requirements for meeting lower-income RHNA. Analytically, determining if a parcel is within 50 feet of a lesser zone, considering street and alley right-of-way is an arduous task in a citywide inventory. Where applicable, any parcel directly adjacent or across the street from a lower zone is classified at the lower allowed density. This will result in the most conservative allowed density assumption⁵¹.

Density and Size Requirement for Meeting Lower Income RHNA

California Housing Element law recommends that sites identified as suitable to accommodate lower-income RHNA be zoned at a minimum density of 30 units per acre and be between 0.5 and 10 acres in size unless local development patterns suggest otherwise.

The city does not have an exhibited trend from the 5th Cycle demonstrating the scale and density at which lower-income affordable housing is being developed. However, Alhambra has two projects in the pipeline that are 100% affordable projects on city-owned sites. Both projects are utilizing density bonuses to achieve densities well above the base zone and are located on sites that are less than 0.5 acres in size. Examples of similar projects in peer cities are included in Figure 12807.

Alhambra’s 6th Cycle sites inventories rely on the 30 units per acre default density. AllThe majority of lower-income sites are greater than 0.5 acres. However, Figure 12807 demonstrates that in the region, 100% affordable projects at 60% AMI or lower are feasible on sites less 0.5 acres at densities consistent with what could be achieved in Alhambra

Site Size

Sites smaller than half an acre or larger than 10 acres are considered inadequate to accommodate lower-income housing need without demonstrative evidence that such development is realistic and feasible.

Density and Income

Government code section 65583.2(c)(3) establishes a default density of 30 units per acre for Alhambra. This density is deemed appropriate to accommodate lower-income RHNA.

⁵¹ Recommended changes to increase capacity include removing the scaled zoning between the R-3 and R-2 zones.

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within the Downtown Revitalization District's proposed standards or in conjunction with the State density bonus. Two of the regionally identified projects in Figure 12807 are in Alhambra, but some sites may be less than 0.5 acres where other factors are optimal.

Figure 12807. Affordable Housing Projects on Sites Less than a Half-Acre

Source: CoStar

Address	City	Units	Stories	Built	Land Area	Density	Developer
143 Mar Vista Ave	Pasadena	20	3	2016	0.47	43	Westport Construction
236 S Ramona Ave	Monterey Park	31	2	2016	0.31	100	LINC Housing Corporation
1311 N San Fernando Rd	East LA	68	3	2014	0.38	179	McCormack Baron West Coast Development
3348 Tyler Ave	El Monte	20	3	2013	0.35	57	Domus Development, LLC
4260 Eagle Rock Blvd	East LA	56	4	2015	0.45	124	WORKS
3638 Center Ave	El Monte	53	4	UC	0.31	171	The Cesar Chavez Foundation
452-458 Milford Street	Glendale	15	2	Proposed	0.30	50	J P Allen Co
Main & 2nd (Mariposa)	Alhambra	50	5	Proposed	0.42	119	National CORE
Chapel Lot	Alhambra	44	5	Proposed	0.32	138	Related California
400 N Maryland Avenue	Glendale	28	3	Proposed	0.48	58	N/A
11016 Ramona Boulevard	El Monte	50	4	Proposed	0.46	109	Newport Partners

Lot Assemblage

The City of Alhambra is characterized by a highly parcelized land pattern with smaller sites. Sites along most corridors are narrow and, in many cases, are adjacent to low-density residential uses. Under existing zoning, many high-density sites are also adjacent to low-density residential uses and currently require a step-down in maximum allowed density to maintain a subtle form transition that is emphasized in the Land Use Element of the General Plan. Under existing zoning, of all parcels in the city, only 3.8 percent are greater than 0.5 acres in size. Of those, 2.5 percent are zoned to allow residential use, and only 1.1 percent have densities greater than 30 units per acre. These calculations include all parcels regardless of existing development. Much of the land area on larger parcels have productive uses that are not likely to redevelop. Examples include Costco, Home Depot, Kohls, private schools, new car dealerships, and existing condominium development. These calculations underscore the necessity of lot assemblage to achieve sites that have the scale to efficiently deliver new housing, especially affordable housing. The City of Alhambra will promote aggressive policies and programs that directly and indirectly facilitate lot assemblage. Program 252 directs the city to play an active role in lot assemblage. This is an extension of the city's policy in the 5th cycle that saw 15 development applications with capacity for over 1,700 units on sites with multiple parcels.

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Figure 12908. Share of all Parcels by Size and Density Threshold, City of Alhambra

Source: ECNorthwest

	Total of all parcels	Parcels > .5 acres		
		Total	Residential allowed (includes commercial)	Residential allowed (includes commercial) @>30/ac.
Parcels	15,597	593 (3.8%)	395 (2.5%)	178 (1.1%)
Acres	3,873	1,333 (34.4%)	553 (14.3%)	272 (7.0%)

Values in parentheses represent share of all parcels/land area

Assumption of Achievable Density

When conditions are optimal, sites can develop at or near the maximum allowed density, but this is not always the case. To establish an assumption of the rate of maximum density that development is achieving, Figure 13009 includes a survey of recent and planned development in Alhambra. This inventory includes 17 projects that were completed through 2020. These were all market rate developments, and 17 additional projects that are currently under construction or proposed. An additional four projects are included separately because they are partial redevelopments and data available to calculate density was incomplete.

Projects in the survey have developed on average at a rate of 105% of allowed density. This reflects projects that have or are planned to receive density bonuses. Both the Mariposa project and the 103 N Chapel Ave project are on city-owned sites with development commissioned through a developer RFP. The Mariposa project is 100% affordable and is currently under planning commission review. It is within ½ mile of a major transit stop and qualifies for a density bonus under AB1763. The city recently selected a developer proposal for the Chapel project. This project is located within the Downtown Revitalization District. To further promote affordable housing development downtown proximate services and transit, the city is currently working to extend AB1763 density bonus standards across the entire Revitalization District. This is reflected in Program 129.

Development Pattern on Sites Allowing Non-residential Uses. Over the 2013-2021 planning period, the city approved 22 developments on commercial zoned properties. Six of these developments were mixed-use projects that included residential. The lack of residential-only development is the result of commercial zones only allowing residential in conjunction with a commercial use. Program 21 directs the city to adopt the comprehensive zoning code update. This process will remove the requirement that residential development in non-residential zones be in conjunction with commercial uses, allowing 100% residential uses in commercial zones. The city will also incentivize residential development for lower income households in commercial zones by offering incentives and concessions in a manner similar to how incentives and concessions are available for density bonus projects.

Omitting projects that received density bonuses for affordable development, projects completed and proposed are building to an average density of 96 percent of allowed density. Based on these findings, the sites inventory assumes sites can achieve on average **90 percent of allowed density. The assumed rates are slightly lower than observed trends.** For smaller sites that are less than a half-acre (not lower income sites, no lower income sites less than a half-acre were included) where infill or refill potential was identified, an average of 70 percent of allowed density was assumed to conservatively reflect the challenges of small site development.

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Figure 13009. Recent Development History and Pipeline, City of Alhambra⁵²

Source: ECONorthwest

Address	Zoning	Acres	Allowed Density	Allowed Units	Units	% of Allowed	Year/status ⁵³	RHNA5 Site
1008 N Monterey St	R-3	0.63	30	16	15	94%	2014	No
210 N Monterey St ⁵⁴	R-3	0.79	43	34	42	124%	2015	97
700 N Atlantic Ave	R-3	0.42	24	9	9	100%	2015	105
798 S Stoneman Ave	R-3	0.67	30	20	18	90%	2015	44
822 N Monterey St	R-3	0.34	18	6	6	100%	2015	No
518 Howard St	P	0.41	30	9	9	100%	2015	No
88 S Garfield Ave	SP	10.6	43	260	260	100%	2016	11
115 E Mclean St	R-3	0.29	24	6	6	100%	2017	13
1203 N Monterey St	R-3	0.38	24	9	8	89%	2017	No
800 N Garfield Ave	R-3	0.49	30	14	14	100%	2018	109
825 S Sierra Vista Ave	R-3	0.21	24	4	4	100%	2019	2
101 N 3rd St	R-3	0.52	43	22	14	64%	2019	No
101 Palmetto Dr	R-3	0.21	24	5	4	80%	2019	No
108 E Mclean St	R-3	3.04	30	91	79	87%	2020	13
117 N Palm Ave	R-3	0.37	24	8	7	88%	2020	71
719 S Stoneman Ave	R-3	0.66	24	15	10	67%	2020	51
1116 N Monterey St	R-3	0.33	24	7	7	100%	2020	No
201 E Bay St	CBD	1.44	43	62	62	100%	UC/Prop.	No
(Mariposa) No Address ⁵⁵	CBD	0.42	24	10	50	400%	UC/Prop.	No
123 S Chapel Ave	CBD	0.93	43	39	37	95%	UC/Prop.	83
101-107 S Chapel Ave	CBD	0.65	43	28	28	100%	UC/Prop.	83
110 S Chapel Ave	R-3	0.91	30	27	24	89%	UC/Prop.	No
510 N 3rd Street	R-3	0.19	24	4	5	125%	UC/Prop.	99
300 E Alhambra Rd	R-3	0.28	18	6	6	100%	UC/Prop.	No
727 S Sierra Vista	R-3	0.21	24	4	4	100%	UC/Prop.	47
123 S Marguerita Ave	R-3	0.17	24	4	4	100%	UC/Prop.	No
1720 Acacia St	R-3	0.23	24	5	5	100%	UC/Prop.	No
749 S Stoneman Ave	R-3	0.45	24	10	10	100%	UC/Prop.	41
103 N Chapel Ave ⁵⁶	CBD	0.32	43	13	44	338%	UC/Prop.	No
234 S Marguerita Ave	R-3	0.54	30	16	11	69%	UC/Prop.	No
720 S Stoneman Ave	R-3	0.30	24	7	7	100%	UC/Prop.	50
1501 S 2nd St	R-3	0.23	24	5	5	100%	UC/Prop.	No
209 Monterey St	R-3	0.41	24	9	9	100%	UC/Prop.	No
1416 Benito Ave	R-3	0.32	24	7	7	100%	UC/Prop.	15
			Total	791	830	105%		
Other Development								
2400 Freemont	SP							RHNA5 Site 10. Specific Plan development of 70 SF Homes
1118 N Stoneman	R-3							RHNA5 Site 114. Expansion of memory care facility adding 38 beds.
1412 S Marengo Ave	Split							RHNA5 Site 17. Expansion of existing skilled nursing facility, redevelopment of a site with 125 new townhomes and office space.
1000 S Fremont	PO							RHNA5 Site 24. Proposed redevelopment of a parking lot and office space to include 790 units in buildings up to 5-stories.

⁵² [Highlighted projects are 100% affordable developments at 60% AMI or below.](#)

⁵³ UC/Prop. = Under Construction or Proposed

⁵⁴ 55+ Senior Restricted

⁵⁵ AB1768 Density Bonus

⁵⁶ Proposed density assumes Alhambra revised density program in Downtown Revitalization District

Pattern of Redevelopment

The pattern of redevelopment in Alhambra over the last cycle can help inform estimates of how redevelopment may occur in the future. However, Alhambra is proposing zoning amendments in the 6th Cycle designed to increase redevelopment likelihood considerably.

The recent development pattern in Alhambra has been largely characterized by densification and redevelopment of underutilized sites in existing high-density residential areas. The magnitude of the increase in densification or densification potential (the number of units built or allowed compared to existing units on a site) is an important indicator of redevelopment likelihood in residential areas. Among recent development or proposed projects surveyed, 25 projects were residential redevelopments. The average project redeveloped at a 3:1 ratio, however, 40 percent of projects redeveloped as low as 2:1.

Figure ~~13140~~. Densification of Residential Redevelopment, City of Alhambra (2014-current)

Source: ECONorthwest

	Projects	Existing Units	New Units	Densification Factor
Developed/Under Construction	12	40	110	2.75
Proposed	13	36	132	3.60

The inventory in Alhambra's 5th Cycle Housing Element did a reasonable job at identifying redevelopment potential. Over half of the projects identified in Figure ~~13009~~ were on sites that were identified in the previous inventory. The 5th Cycle inventory included 13 proposed projects, 4 vacant sites, and 98 nonvacant sites. Of the 13 proposed projects, 9 redeveloped at or higher than rates expected. Among the proposed projects that did not move forward, we estimate that three of these projects should not have been included as proposed projects⁵⁷:

- RHNA5 Site 8. R-1 site with an existing structure would not have increased the number of units because only 1 unit is allowed per lot in R-1.
- RHNA5 Site 9. Listed the full build-out of the Atherton Baptist assisted living community's master plan. This is a long-term master plan the full build-out should not have been counted.
- RHNA5 Site 14. City staff reports that this was a mixed-use project based on initial technical conversations with the city. The site is in an industrial zone (IPD) that did not, and currently does not allow housing. The 5th Cycle Housing Element did not include a program to rezone this site to allow for housing. As a vacant site along a strong commercial corridor, this would be a viable site with provisions to provide appropriate entitlements.

RHNA5 sites 8 and 9 are not included in the 6th Cycle Housing Element Inventory because they are not suitable sites. Adjusting for these sites, all but one proposed project moved forward, and **80 percent of the unit capacity on proposed sites developed.**

⁵⁷ Refer to the City of Alhambra 2013-2021 Housing Element Update for site references

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For vacant and nonvacant sites in the 5th Cycle inventory, five sites were identified that should not be included in a sites inventory. An example is RHNA5 Site 49, which included capacity from an internal parking access for the Zen Terrace condominium development. These five sites are not included in the 6th Cycle inventory. Adjusting for these sites, 19 of the remaining 93 developed or have development currently planned or proposed. These 19 sites redeveloped at 124% of their capacity identified in the 5th Cycle. In addition to sites in the 5th cycle inventory, redeveloped occurred or is proposed on 18 additional sites that were not in the previous inventory. Taken together, redevelopment occurred or is proposed on 37 sites. Realized or planned development on these sites is 1,503⁵⁸ units.

Market Context

Alhambra is an inherently built-out community with very little vacant land. Whether through existing residentially zoned sites or zoning amendments to allow housing in more areas, the majority of housing need in the community will be met through redevelopment of existing sites.

Land scarcity, escalating home prices and rents, and low inventories of available units are all factors that collectively result in a market environment that is conducive to redevelopment. Strong redevelopment interest has emerged in Alhambra in recent years, and this section further outlines the extent to which market conditions are likely to support further redevelopment and reuse potential.

Vacant Land Scarcity

A vacant site for the purpose of the Housing Element is defined as a site without any houses, offices, buildings, or other significant improvements on it. Improvements are generally defined as development of the land (such as a paved parking lot, or income production improvements such as crops, high voltage power lines, oil-wells, etc.) or structures on a property that are permanent and add significantly to the value of the property. Alhambra only has 11 parcels totaling 5.5 acres allowing residential uses that meet these criteria. Nine of these parcels are low density (R-1) infill sites with capacity of nine units. According to CoStar, there are no vacant residential sites available for sale in the city⁵⁹.

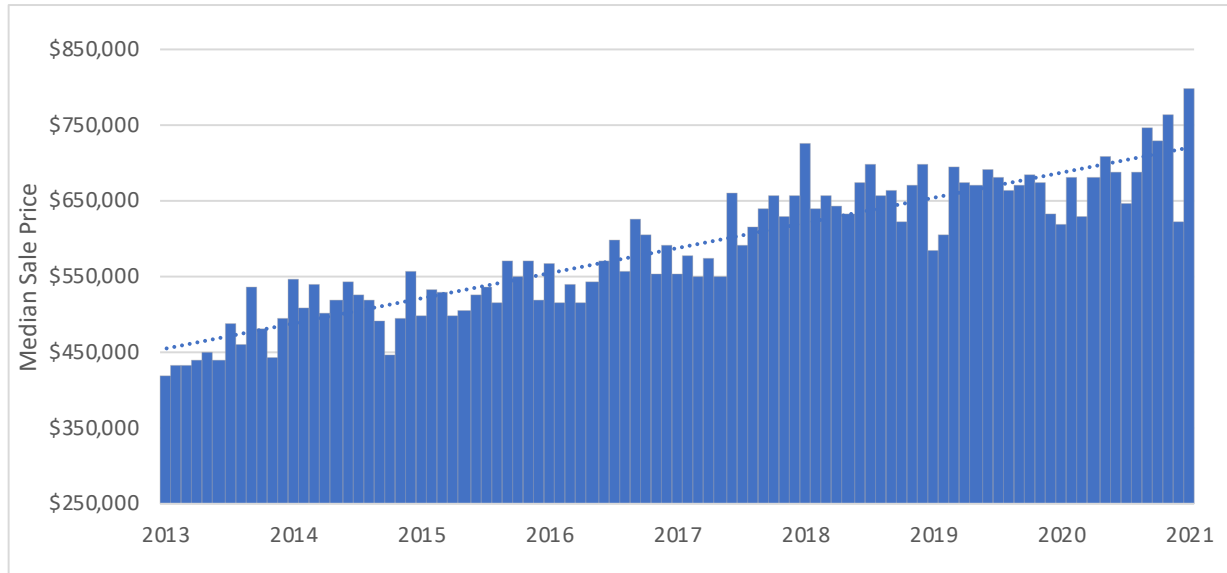
Escalating Residential Prices

For-sale home prices have been increasing rapidly in recent years. Between January 2013 and 2021, median home values have increased by 90 percent. The current median is \$800,000.

⁵⁸ This includes currently proposed projects that are included in the 6th Cycle Housing Element.

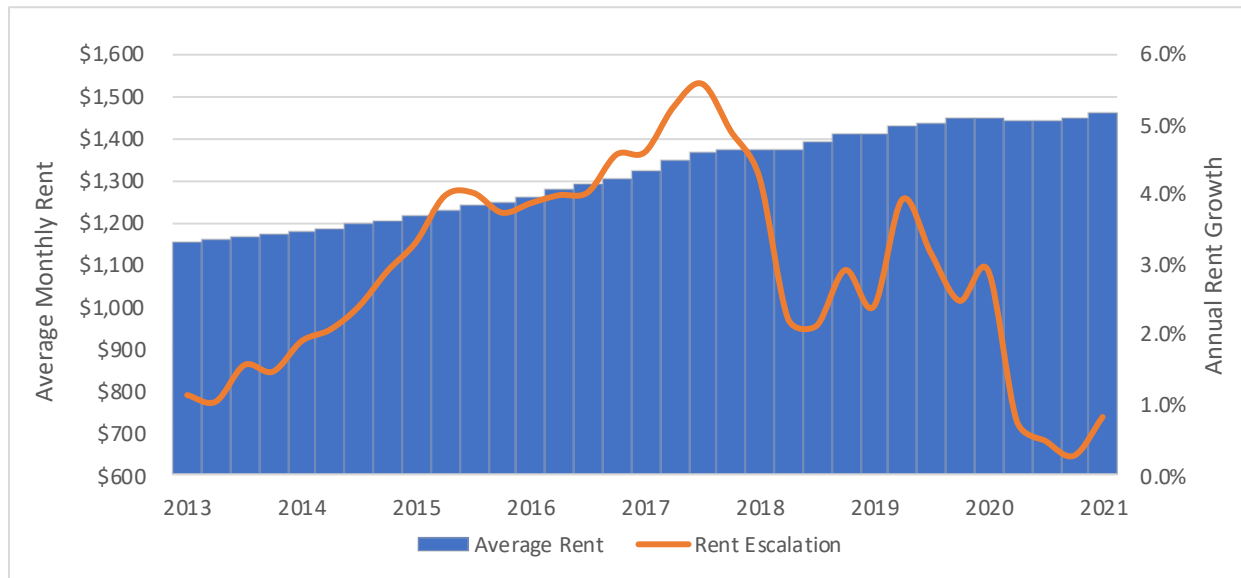
⁵⁹ As of July 2021

Figure 13211. Median Sale Price Growth, City of Alhambra
Source: Redfin



In the rental residential market, survey data from CoStar inventories 82 rental properties in Alhambra totaling 8,422 units across all property classes. Since 2013, average unit rental rates have increased by 27 percent. Rent growth stagnated in 2020 during the COVID-19 pandemic. Forecasts estimate that annual rent growth returns to 2 to 3 percent by 2023.

Figure 13312. Average Monthly Rent Growth, City of Alhambra
Source: CoStar



Low Inventories

According to Redfin, a national leader in housing data, for-sale housing inventory in Alhambra was at 2.0 months in January 2021. This means that if no additional homes were put on the market, there would be no homes left to sell in 2 months. Inventory below 5 months is representative of a tight market and indicative of future price escalation.

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In the rental market, despite negative impacts of the COVID-19 pandemic, the rental vacancy rate in Alhambra was 4 percent in the first quarter of 2021, according to CoStar. Rental vacancy was below 3 percent prior to the pandemic.

Land Costs

A sample of land sales reported by CoStar since 2016 is included in Figure 13413. Most of the properties in this inventory had existing underutilized uses but were sold for the value of land. Land prices are high in Alhambra, ranging from \$2.8 to \$7.0 million per acre or \$65 to \$162 per square foot with an average around \$85 to \$90 per square foot. This finding is consistent with an In-Lieu Fee Study conducted as a part of its Inclusionary Housing Ordinance⁶⁰.

Figure 13413. Recent Example Land Sales, City of Alhambra

Source: CoStar

Address	Sale Price	Size (acres)	Sale Date	\$/ Acre	\$/ Sq. Ft.
1412 S Marengo Ave	\$4,538,500	1.11	Dec-20	\$4,088,738.74	\$93.86
747 S Stoneman Ave	\$2,600,000	0.44	Oct-20	\$5,909,090.91	\$135.65
1428 S Marengo Ave	\$32,500,000	8	Jul-18	\$4,062,500.00	\$93.26
229 S 5th St	\$720,000	0.17	Mar-18	\$4,235,294.12	\$97.23
305-315 N Monterey St	\$2,750,000	0.52	Dec-17	\$5,288,461.54	\$121.41
1825 Cedar St	\$1,550,000	0.22	Oct-17	\$7,045,454.55	\$161.74
15 S Chapel Ave	\$1,650,000	0.28	Sep-17	\$5,892,857.14	\$135.28
2400 S Fremont Ave (Midwick)	\$27,316,000	8.8	Feb-17	\$3,104,090.91	\$71.26
1215-1237 E Main St	\$5,500,000	1.2	Dec-16	\$4,583,333.33	\$105.22
107 S Chapel Ave	\$651,000	0.23	Aug-16	\$2,830,434.78	\$64.98
TOTAL	\$79,775,500	20.97		\$3,804,268.00	\$87.33

Existing Capacity

Projects Planned or Proposed

There are currently 19 projects in Alhambra at various stages of planning and entitlement. Among these projects nine are under construction or have received building permits, three are in plan check and five others have been approved. All are expected to become available during the planning period. These projects are reported in Figure 135. Where the number of units available by income level is known or estimated by the developer, we use this number as a default allocation. Where the allocation is unknown, we assume that units will be available at moderate or above moderate-income levels. Based on the stages of the planning and entitlement process, staff projects a very high likelihood that all of these projects to become available during the planning with the exception of the 1000 Fremont project (AKA "The Villages"). This project was denied by council in October 2021 due to concerns over the project's approach to environmental mitigation. However, the Planning Commission has stated that it still considers the project, or a project viable with the appropriate mitigating investments. Alternatively, the project would still have a path toward approval through SB35 or, as a previously used nonvacant site in the 5th Cycle, through by-right approval with qualifying lower income units. Therefore, the city assumes

⁶⁰ Keyser Marston Associates. Inclusionary Housing Ordinance: In-Lieu Fee Analysis. January 2021

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70% of previously identified capacity for this project to reflect a lowered likelihood of delivery within the planning period.

Taken together, these projects with the noted adjustment represent 9261,163 units, of which 20021 will be available for lower-income households. A brief description of larger projects is also included.

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Figure 13514. Planned and Proposed Project Inventory, City of Alhambra⁶¹

Source: City of Alhambra

Address	Status	APN	Size	Zoning	Income Level ⁶²			
					VL	LI	MI	AM
201 E Bay St	Under Construction	5345004040, 5345004050, 5345004051, 5345004052, 5345004055	62,833	CBD	0	0	0	62
(Mariposa) No Address	Approved May '21; not submitted for plan check	5344026915	18,399	CBD	50	0	0	0
123 S Chapel Ave	Permits issued August '21	5345004033	40,358	CBD	0	0	0	37
101-107 S Chapel Ave	Permits issued August '21	5345004006, 5345004007, 5345004049	30,379	CBD	0	0	0	28
110 S Chapel Ave	Approved June '20; not submitted for plan check	5345015003	40,476	R-3	0	0	0	24
510 N 3rd Street	In plan check	5337013011	8,402	R-3	0	1	0	4
300 EN Alhambra Rd	Under Construction	5337001001	12,390	R-3	0	0	0	6
727 S Sierra Vista Ave	Under Construction	5347021003	9,001	R-3	0	0	0	4
123 S Marguerita Ave	Under Construction	5343010016	7,500	R-3	0	0	0	4
1720 Acacia St	Under Construction	5342026005	10,000	R-3	0	0	0	5
747 - 749 S Stoneman Ave	Under Construction	5347014002, 5347014001	19,424	R-3	0	0	0	10
103 N Chapel Ave	In Planning	5337026907	13,750	CBD	44	0	0	0
234 S Marguerita Ave	Approved August '20; not submitted for plan check	5343017026, 5343017003, 5343017005, 5343017004	38,654	R-3	0	0	0	11
720 S Stoneman Ave	In plan check	5347017020	12,985	R-3	0	0	0	7
1501 S 2nd St	Under construction	5357008020	10,064	R-3	0	0	0	5
209 Monterey St	In plan check	5337022030	17,940	R-3	0	0	0	9

⁶¹ Highlighted projects have affordable units by deed-restricted covenants. Other estimates based on statements from developers.

⁶² VL=Very Low Income;

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1416 Benito Ave	Approved October '21, not submitted for plan check	5356009004	13,750	R-3	0	0	0	7
1000 Fremont	Denied by City Council October '21	5342001006, 5342001007, 5342001008, 5342001009, 5342001010, 5342001019, 5342001021, 5342001022, 5342001023, 5342001024, 5342001025, 5342001026, 5342001027	897,771	PO	0	5074*	3347*	470672*
625 Commonwealth	Master Plan approved	N/A	N/A	R-3	0	55	0	0
TOTAL:					94	10627	3347	693895

* [Estimates for this project are 70% of planned development to reflect potential likelihood of timing during the planning period.](#)

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The projects identified in Figure 92 have a very high likelihood of being developed over the planning period. A brief summary of the major projects identified is included below for context.

The Villages at The Alhambra



The proposed project is a redevelopment of a 20.61-acre portion of The Alhambra with residential uses and structured parking to support the broader development. The project would retain 902,001 square feet of existing office space, demolish approximately 104,242 square feet of office, industrial and storage buildings, and construct 230 for-sale condominium units and 545 rental residential units. 75 rental units are planned to accommodate residents at the moderate-income level. [The project as proposed was recently denied by City Council over environmental mitigation concerns. The site remains a prime redevelopment candidate.](#)

Mariposa



In May 2021, the city approved a development proposal for the proposed Mariposa Affordable Housing Development. The project is a mix of 1- and 2- bedroom units for a total of 50 units in a 7-story building with on-site support services. The project is being developed by American Family Housing. The housing project will be located in downtown Alhambra between 1st and 2nd Street, south of Main Street immediately adjacent to the AT&T property. The project will sit on a 0.42 acre former parking lot. It qualifies for an AB1768 density bonus and will be developed at a density of 119 units per acre.

103 N Chapel Avenue (Related)



In April 2021, the city entered an Exclusive Negotiating Agreement with an affordable housing developer (Related California) for the development of an affordable housing project on a 0.32-acre city-owned site at 103 N Chapel Avenue. The proposed project will be 100% affordable and will include 44 units at low and very low-income levels. A total of 22 units are planned for large families, 11 units for persons struggling with HIV/AIDS, and 11 units for persons experiencing homelessness. The site will be developed at a density of 139 units per acre. This density is not currently allowed on the site, but the city is in the process of amending its zoning ordinance to allow density bonuses consistent with AB1763 throughout the Revitalization District.

Monterey Bay Square (201 E Bay Street)



Monterey Bay Square will be a mixed-use residential and commercial center located on a 1.45-acre site. The site was a consolidation of five separate parcels. The project consists of a six-story mixed-use building with 14,068 square feet of ground-floor retail (3,650 square foot retail and five floors of for-sale residential totaling 62 units). A second building will include a 7-level parking structure with 6,500 square feet of ground-floor retail. The project is developing at 100 percent of allowed density at 43 units per acre. It is expected to be completed in late 2021 or early 2022.

123 Chapel Avenue



The project is a redevelopment of an existing underutilized commercial building on a 0.93-acre site. The project is a commercial/residential mixed-use development that will consist of 3,212 square feet of ground-floor office, and 3 floors residential condos totaling 37 units. The project is developing at 40 units per acre.

101 – 107 Chapel Avenue



The mixed-use commercial/residential project will consist of a 1,000 square foot office area and a 492 square foot residential lobby. A total of 28 residential units will be built on the second, third, and fourth floors. The project site was a consolidation of three separate parcels totaling 30,397 square feet. This consolidation pushed the project over the city's 20,000 square foot threshold to qualify for additional density up to 43 units per acre. The site is developing at 40 units per acre.

Atherton Baptist Homes (625 Commonwealth Avenue)



Atherton Baptist Homes is a multi-life stage community offering independent living, assisted living, and skilled nursing facilities. Atherton's 20-year master plan includes plans to develop 220 additional units on the site. This capacity was included in the city's 5th Cycle Housing Element inventory, but no units were developed in the cycle. In 2017 Atherton amended its development agreement with the city to allow for greater flexibility in the phasing and timing of its site development (Ordinance 4716, 2017). Atherton intends to plan future development in response to market needs. We do not expect all 220 units to develop over the planning period. Given the uncertainty of future development, we assume only 25 percent of build-out capacity may develop over the planning period.

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Specific Plan Capacity

Specific Plans have been highly effective in facilitating development in Alhambra. Among Alhambra's 10 Specific Plans, nine have been fully developed. In addition, of four opportunity sites identified in the West Main Corridor Master Plan, three have fully developed. Alhambra has two plan areas, West Main Master Plan and Valley Boulevard Specific Plan, with remaining development capacity with the potential to develop/redevelop over the planning period.

West Main Corridor Master Plan (2006)

The West Main Corridor Master Plan identified four opportunity sites along the West Main Corridor between 5th Street and 2nd Street. Among these, the only remaining undeveloped site is Site 4. This 1.6-acre site was included as a proposed project in the 5th Cycle Housing Element inventory with a 90-unit capacity consistent with the plan. The site remains a viable redevelopment opportunity.

Valley Boulevard Specific Plan (1990)

The Valley Boulevard Specific Plan (VBSP) was developed in 1990 to guide development and redevelopment of the Valley Boulevard Corridor. The Plan extends along Valley Boulevard from Westmont Drive to New Avenue. It includes 413 parcels totaling 131.5 acres. The plan is divided into five districts and seven land use designations. Residential uses are allowed in the RSP designation, which allows residential development at 43 units per acre. Lot assembly is specifically encouraged in the VBSP:

"An important element of the land use policy is to encourage the assembly or "joining together" of smaller lots into larger parcels, thus discouraging sprawl or strip commercial. In this way, new development can more efficiently utilize the land contained within the planning area. For example,

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a larger development can benefit from the economy of scale, with increased setbacks, more efficient parking, better on-site circulation and better overall design.”

However, the RSP designation also has a 40,000 square foot minimum lot size for residential development. As it stands, only four blocks within the RSP have contiguous parcels capable of meeting the 40,000 square foot threshold, effectively making residential development highly unlikely along Valley Boulevard. This condition is in stark contrast to policies and programs in the city’s 5th Cycle Housing Element, which promotes housing development along Valley Boulevard.

Because the Valley Boulevard Specific Plan is antiquated and generally not supportive of housing production, Program 196 directs the city to conduct a new Specific Plan for Valley Boulevard or remove the existing Specific Plan and rezone the corridor to be more effective at promoting housing production. For this reason, the sites inventory does not include VBSP capacity here. Instead, housing capacity along Valley Boulevard is treated as potential candidate capacity.

The removal of VBSP from existing capacity estimates means that the only remaining specific plan capacity in the city is opportunity Site 4 in the West Main Corridor Master Plan.

Figure 13615. Existing Specific Plan Capacity

Source: City of Alhambra

ID	AIN	Lot Size	Zone/SP	Site Size	Allow. Den.	Existing Use	Real Cap. %	Assumed Capacity
SP.1	5338034901	7,637	WMCMP-P	64,451	43	Parking lot	90%	57
	5338034900	15,009	WMCMP-P		43	Parking lot		
	5338034016	6,387	WMCMP-CPD		43	Com. Storefront		
	5338034015	6,625	WMCMP-CPD		43	Com. Storefront		
	5338034014	6,948	WMCMP-CPD		43	Com. Prof. Building		
	5338034037	7,159	WMCMP-CPD		43	Com. Storefront		
	5338034036	3,099	WMCMP-CPD		43	Com. Storefront		
	5338034035	11,587	WMCMP-CPD		43	Com. Storefront		

Existing Vacant Site Capacity

The City of Alhambra has very little existing vacant land available for residential uses. There are only 11 vacant sites totaling 5.5 acres. Most of this capacity is on R-1 sites. At existing zoning, these sites have the capacity for 59 residential units.

Figure 13716. Existing Vacant Site Capacity

Source: ECONorthwest and City of Alhambra

ID	AIN	Zoning	Size	Max Density	Realistic Capacity	Realistic Units
V.1	5345017015	R-3	0.87	24	90%	41
	5345018901	R-3	1.03			
V.2	5352020006	R-3	0.14	24	90%	3
V.3	5351019028	R-1	0.16	1	100%	1
V.4	5351019027	R-1	0.16	1	100%	1

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V.5	5351021034	R-1	0.12	1	100%	1
V.6	5353013020	R-1	0.14	1	100%	1
V.7	5346015004	R-1	0.19	1	100%	1
V.8	5322008007	R-1	1.44	5	100%	5
V.9	5322008038	R-1	0.57	2	100%	2
V.10	5322008037	R-1	0.42	2	100%	2
V.11	5322008036	R-1	0.26	1	100%	1
		Total	5.5			59 units

A R-1 allows for one unit per lot. Density calculations reflect lot split potential consistent with neighboring lot sizes.

Existing Nonvacant Underutilized Site Capacity

These sites are those that were previously identified to meet the city's RHNA in the 5th Cycle but were not developed. Using available information, we did not identify any new constraints on these sites that were not previously identified. These sites were evaluated for their appropriateness to remain in the inventory under current conditions. Examples of sites that were removed include sites that do not meet current state criteria for redevelopment inclusion, remnant portions of sites that were part of an assemblage that was partially developed and are not likely to redevelop on their own, and sites that did not redevelop but did have some meaningful improvement that makes redevelopment less likely. This process removed all or portions of nine previously identified sites.

Taken together there are 64 sites that were previously identified and remain appropriate to include in the inventory. Under existing zoning these sites have the total theoretical capacity for 606 units. Among these, 277 are at densities suitable for lower-income units. In the 5th Cycle, all sites with lower income capacity were allocated to lower income units. In this cycle, lower-income is allocated only to a portion of lower-income sites to reflect the likelihood that mixed-income properties have better potential to deliver lower-income units.

Figure 13817. Summary of Existing Residential Capacity

Source: ECONorthwest and City of Alhambra

Category	Theoretical Capacity	Existing Units	Realistic %	Realistic Net-new Capacity ⁶³
RHNA5 Existing Capacity	606	145	90%	412

Lower Income Sites Identified in the Previous Housing Element

California Housing Element law states that a nonvacant site identified in the previous planning period and a vacant site that has been identified in the previous two consecutive planning periods cannot be used to accommodate lower-income RHNA unless the site is subject to a policy in the Housing Element that requires rezoning within three years of the start of the planning period to allow residential uses by right for projects where at least 20 percent of the units are made affordable to lower-income households.⁶⁴ Some sites designated for lower-income housing have been used in previous housing element cycles and are denoted as such in the inventory. Housing

⁶³ Calculated as the maximum achievable capacity on RHNA5 sites for determination of RHNA shortfall. Actual capacity included on RHNA5 site reported in Figure 103 includes the impact of upzoning on these sites as well as the calculation of development likelihood as described in the methodology below.

⁶⁴ Government Code Section 65583.2(c)

Element Program 185 commits the city to allow residential uses by right on these sites consistent with State law.

Potential Candidate Capacity

Existing residential capacity defined above falls well short of meeting the city's RHNA targets. Taken together, The city of Alhambra has existing capacity of 1,691 units with only 471 units allocated on sites suitable to accommodate lower-income development. **This leaves a residual shortfall of 5,134 units.**

Figure 13918. Summary of Existing Residential Capacity

Source: ECONorthwest and City of Alhambra

Capacity Type	Lower	Moderate	Above Mod.	Total
Proposed	20021	3347	693895	9261,163
Specific Plan	24	14	19	57
Vacant	0	19	40	59
Existing Nonvacant Capacity	226	83	103	412
Total	45071	14963	8551,057	1,4541,691
6 th Cycle RHNA	2,810	1,079	2,936	6,825
Residual Shortfall	2,36039	93016	2,0811,879	5,371134

Market conditions are conducive to redevelopment in Alhambra, but redevelopment is not occurring at a pace consistent with the city's RHNA target. The ratio of available zoned capacity relative to existing developed density is a contributing factor. In other words, the maximum value that could be created by redevelopment is commonly not sufficient to outperform the existing use. An increase in allowed capacity that translates into greater residual land values can improve this condition. Other governmental and nongovernmental constraints have also been identified.

Residential capacity defined in this section is reflective of actions the city will take to increase residential capacity and remove constraints through policies, programs, and land use amendments to promote redevelopment.

Accessory Dwelling Units (ADUs)

ADUs are an effective housing type that leverages existing infrastructure and can increase residential capacity in single-family neighborhoods that are typically located in high-resource areas. ADUs can be successful in eliminating overcrowding in existing households and serving multigenerational housing needs. ADU production has accelerated in California in recent years following State legislation in 2017 and 2019 that limited local restrictions on ADUs.

The City of Alhambra enforces State ADU guidelines and Program 10 of the 5th Cycle Housing Element directs the city to offer development assistance and monitor ADU trends. The city maintains a bi-annual report tracking ADU production. ADU interest and activity has accelerated in recent years. Between January 2017 and December 2020, the city received 170 ADU development applications. In 2020 it received 67 applications, an 87.5 percent increase in the annual rate from the previous years. The city's May 2020 status report shows that of the initial 104 applications between 2017 and 2019, 16 units had been completed, 37 were under construction, and 23 were in plan check. A total of 10 applications had expired or been withdrawn and the remainder were in planning review.

Estimated ADU Capacity

HCD allows jurisdictions to rely on a safe harbor calculation of projected ADU capacity where meaningful analysis supporting an alternative assumption cannot be provided. This calculation allows jurisdictions to project forward the local trend in ADU construction since 2018. ~~In 2018 Alhambra produced 7 ADUs and 30 in 2019. Data from 2017-2019 suggest that a maximum of 90 percent of applications move forward to a development permit. In 2020 the city received 67 applications, indicating an expectation of 60 ADUs per year under existing conditions. This data would result in a safe harbor calculation of 256 units. For this analysis The City evaluated and updated ADU reporting to HCD and its internal records. However, The city maintains its own biannual report of ADU applications and permitting activity⁶⁵. This data shows that in the two-year period from 2018 to 2019, the city received 67 unique ADU applications. In the subsequent two-year period, applications more than doubled to 158 applications. By year end in 2022 the city had received 227 application and permitted 109 ADUs. Extrapolated across a two-year period this would equate to 299 applications and 182 permitted ADUs in 2021 and 2022. Given this trajectory it would be reasonable to assume that Alhambra would receive at least 100 to 150 applications annually over the planning period considering an implementation of a strong ADU program detailed in Program 26. The city would have to convert 50 to 75 percent of applications to permits to achieve its ADU production target of 60 units per year.~~

~~Comparing applications to permitted units across any given year is challenging because an application received each year may not be permitted in the same year (for example, an application submitted in December 2020 would not be permitted until 2021.~~

~~this assumption omits a clear upward trend in ADU development. The increase in ADU applications more than doubled from 2019 to 2020. This trend has continued into 2021. According to the city’s most recent ADU Progress Report, the city received 122 ADU applications in the first six months of 2021. If only the first 6 months of 2021 are included, the safe harbor calculation from 2018 to 2021 would result in 413 units.~~

Figure 140. Summary of ADU Activity

Source: ECONorthwest and City of Alhambra

Year	Applications	Permitted ⁶⁶
<u>2018</u>	<u>36</u>	<u>27</u>
<u>2019</u>	<u>31</u>	<u>30</u>
<u>2020</u>	<u>86</u>	<u>19</u>
<u>2021</u>	<u>72</u>	<u>73</u>
<u>2022</u>	<u>227</u>	<u>109</u>

Over the 6th Cycle, Alhambra intends to redouble its efforts to promote ADU production in the 6th Cycle. Program 263 commits the city to updating its ADU ordinance and to study and implement a comprehensive ADU program to accelerate ADU production.

⁶⁵ <https://www.cityofalhambra.org/262/Accessory-Dwelling-Unit-ADU>

⁶⁶ Comparing applications to permitted units across any given year is challenging because an application received each year may not be permitted in the same year (for example, an application submitted in December 2020 would not be permitted until 2021.

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Combined with new programs, the development pattern in Alhambra is very suitable for ADU development. The characteristics of properties that saw ADU production in Alhambra between 2017 and 2019 were studied. This survey included 50 properties and revealed common characteristics of ADU sites in Alhambra:

- Sites with R-1 or R-2 zoning
- Existing improvements built prior to 1960
- Lots that were bigger than 6,000 square feet and less than 12,000 square feet
- Existing lot coverage between 15 and 45 percent
- Lots with a detached garage

We compared these characteristics to the universe of R-1 and R-2 sites in Alhambra to calculate that there are 7,396 qualified lots in Alhambra that meet all these criteria. This represents total ADU potential in Alhambra. Alhambra's ability to convert just 0.75 to 1.25 percent of these lots annually would result in 443 to 740 ADUs over the planning period, which is in line with trends under existing policies. It is reasonable to assume the city could expect to produce ~~600~~ 480 ADUs over the planning period.

We attempted to conduct a survey of ADU rental data in Alhambra to determine ADU affordability, but there were no meaningful observations. In lieu of local data, SCAG has produced a regional survey outlining ADU affordability levels that we use as a foundation.

Figure ~~119~~141. Summary of Estimated ADU Capacity

Source: ECONorthwest, SCAG, and City of Alhambra

	Extremely Low/Very Low	Low	Moderate	Above Mod.	Total	% of qualified lots
% ⁶⁷	17%	43%	6%	34%	100%	N/A
Units	18202	20658	306	162204	480600	8.16.5%

ADU capacity assumed in this sites inventory is reflective of stronger policies and programs to support ADU development. Given uncertainty of these impacts on actual production, **Program ~~263~~ commits the city to continue to conduct an annual ADU production survey and Program ~~3409~~ includes a mid-cycle evaluation of ADU production and an adjustment to its capacity estimates if ADU production falls well short of estimates.**

New Nonvacant Infill/Redevelopment Capacity

New redevelopment capacity is estimated as the result of proposed amendments to the city's zoning code to increase allowed density in existing residential areas and allow housing where it is not currently allowed. Program ~~196~~ commits the city to make these zone changes and study necessary amendments to development standards to achieve assumed densities as a part of its ongoing Comprehensive Zoning Code update. We expect that flexibility or changes in height limits, parking requirements, and FAR would be necessary to achieve higher redevelopment densities in some areas. Implementing these changes early in the planning period as a part of the Code Update increases the likelihood of redevelopment. Proposed amendments include:

⁶⁷ Allocations from SCAG survey of regional ADU affordability

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- 1) Increasing maximum density in the R-2 zone from 12 to 18 units/ac to encourage middle-housing typologies. This change is strengthened by Program 241 to encourage middle-housing.
- 2) Increase maximum density in R-3 to 24 units/ac for sites under 10,000 square feet. Allow density up to 43 units/ac for sites larger than 10,000 square feet.
- 3) Removing density reductions in the R-3 zone for adjacency to R-2. Preserve density reduction in R-3 for adjacency to R-1 at a maximum of 24 units/ac and density reduction to 12 units/ac along Electric Lane.
- 4) Increase maximum density in the CPD and P zones outside of the Downtown from 30 to 48 units/ac.
- 5) Increase maximum density in the area bounded by Atlantic Boulevard, West Woodward Avenue, West Commonwealth Avenue, and Chapel Avenue from 43 to 64 units/ac.
- 6) Allow housing in the EMC zone at a maximum density of 30 units/ac between Chapel Avenue and Granada Avenue.
- 7) Allow housing in the PO zone along Garfield Boulevard consistent with the R-3 zone.
- 8) Repeal the Valley Boulevard Specific Plan and replace with a new zone and development standards allowing housing along the corridor at a maximum density of 43 units/ac.
- 9) Allow limited housing types in the IPD zone at a maximum density of 43 units/ac.

Figure 14220. Summary of Proposed Land Use Changes

Source: ECONorthwest and City of Alhambra

Zone	Current Maximum Density	Proposed Maximum Density
R-2	12/ac	18/ac
R-3 (not include adjacent zone reductions)	24/ac (less than 20,000 sq. ft.) 30/ac (greater than 20,000 sq. ft.)	24/ac (less than 10,000 sq. ft.) 43/ac (greater than 10,000 sq. ft.)
CPD/P	24/ac (less than 20,000 sq. ft.) 30/ac (greater than 20,000 sq. ft.)	48/ac
CBD	43/ac	64/ac
EMC	Not allowed	30/ac
PO (Garfield)	Not allowed	24/ac (less than 10,000 sq. ft.) 43/ac (greater than 10,000 sq. ft.)
VBSP (RSP)	43/ac (greater than 40,000 sq. ft.)	43/ac
IPD	Not allowed	43/ac

Underutilized Nonvacant Site Capacity Model Methodology

Because larger sites are more flexible and allow for economies of scale, they tend to attract greater interest from housing developers and are more likely to redevelop. **Alhambra's zoning code also incentivizes larger site development through greater allowed densities and minimum project size for ownership product.** The parcelized nature of Alhambra's development pattern presents a challenge for redevelopment, and the assemblage of parcels into more scalable development sites will play a significant role in development moving forward.

To identify assemblage opportunities, the city developed an algorithmic spatial model to estimate capacity on nonvacant sites in the context of proposed zoning and programming actions.

This approach looks at land development the way a developer would, by identifying sites that maximize value, and looking to acquire or assemble adjacent only when it would the potential value of the development. Proposed rezoning allows for new capacity by allowing housing in more places. Proposed upzoning increases capacity in two ways. First, increases in allowed density increases capacity on sites that are currently market feasible. Secondly, the increase in density can create value that makes redevelopment more likely on sites that previously had lower redevelopment potential. The model considers current market conditions that are supportable for redevelopment and the city's efforts to promote lot consolidation through its policies and programs.

Modeling Framework

This process begins with the universe of parcels in Alhambra and excludes parcels from consideration, removing parcels with proposed projects, sites from the previous inventory, open space, public facilities, and R-1 parcels with existing residential. Within the model each parcel is spatially assembled with all its neighboring parcels (and its neighbors' neighbors, etc.) that are located on the same city block until all possible permutations of contiguous parcel assemblages have been created. Assemblages do not mix zones (e.g., an R-2 parcel will not be assembled with an R-3 parcel, even if they are touching), and must be contiguous (they do not cross from one city block to another).

This process creates tens of thousands of new hypothetical parcels and site assemblages, for which are calculated the new allowed density based on the assemblage's zoning designation (with proposed amendments) and its surface area. In order to more accurately align with housing market characteristics and promote sites with the greatest redevelopment likelihood, the model again filters to select *only* assemblages that:

- Omit parcels that were manually identified as having critical economic or other unique significance likely impediments that would make redevelopment very unlikely. Taken together 116 parcels totaling 164 acres were omitted outright.
- Have constituent parcels with improvements built before 2000. 94 percent of all parcels in the model had improvements built before 1980.

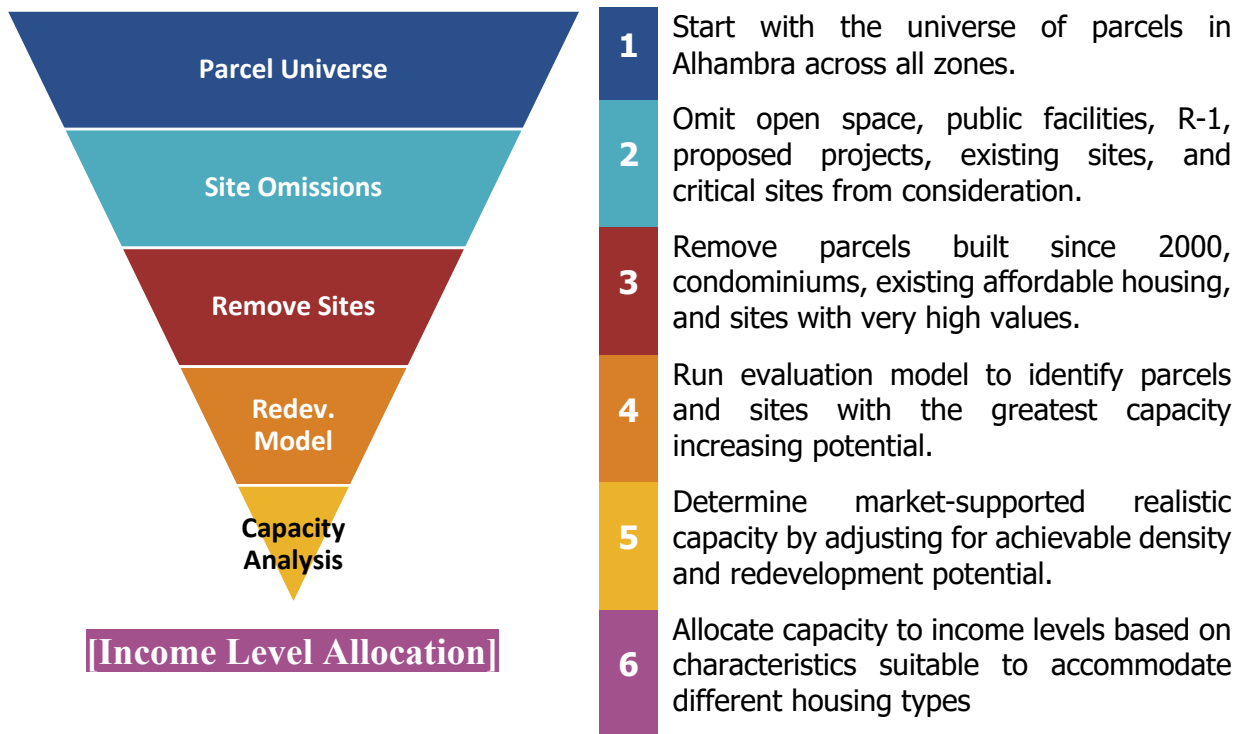
Efforts to Support Lot Consolidation

Under Goal 3.0 of the city's 5th Cycle Housing Element, Program 7 and Program 8 included program objectives to support lot consolidation through processing assistance, counseling, and technical assistance, and within the CBD, encouraging lot consolidation for mixed-use development and facilitate the assembly of land and recycling of underutilized properties. Support for lot consolidation is embedded in the city's zoning and development standards. As previously discussed, high-density residential zones have higher allowed densities for sites greater than 20,000 square feet. The city also requires for-sale condominium development have a minimum of six units. In the 6th Cycle Housing Element, the city is further strengthening its lot consolidation policy by Program 252.

- Limit the number of assembled parcels to four or less consistent with recent patterns⁶⁸. 93 percent of all assemblages has three or fewer parcels. [Parcels with assemblages factored into likelihood calculations.](#)
- For existing residential uses, including a redevelopment factor (increase in net units) of 2.5 or greater in the R-2 zone and 3.0 or greater in all other zones.

From the remaining assemblages, the model selects the most efficient assemblages (in terms of net new units) on each block that do not overlap with one another and calculates the total number of net-new units by zone, for each site. The effectiveness of this approach is an identification of optimal parcels or parcel assemblages that deliver the greatest increase in redevelopment capacity and realistic development likelihood. By deploying a model that identifies assemblages that optimize an increase in value, the site inventory can assist the city in identifying opportunities to facilitate lot consolidation and serve as a resource for the market. Taken together the model identified 1,300 unique sites or assemblages totaling 23,491 units of theoretical capacity. However, this calculation does not include the rate at which sites can develop to maximum density or the likelihood that redevelopment to residential uses could replace in-place value of an existing use.

Figure 14324. Candidate New Non-Vacant Site Identification Methodology
Source: ECONorthwest



⁶⁸ Subsequent manual amendments to sites was made manually on sites where greater assemblage was likely.

Capacity Analysis: Impediments and Redevelopment Likelihood

To further establish the realistic market-supportive capacity of sites identified in the model, we evaluated each site across a series of factors that are indicative of realistic capacity and redevelopment potential. These include:

1. Development Likelihood Adjustment

Existing uses are the primary impediment to redevelopment. Many of the sites with known impediments due to social, economic, and cultural factors were already removed from consideration (i.e., newly renovated structures, high-performing auto dealerships and shopping centers, historic buildings, institutional uses). Development likelihood is further determined based on the following factors:

Age of Existing Improvements. All tax lots where the primary structure was built within the last 20 years were omitted outright. Tax lots with older structures were considered more likely to redevelop.

Redevelopment Indicators. Common metrics that are indicative of redevelopment potential are land to improvement ratio (L: I) and total value per square foot. L: I measure the value of land relative to improvements. The greater the ratio the more likely development is to occur. Value per square foot calculates the assessed in-place value of both land and improvements per square foot of land. This rate is compared to thresholds observed in the market for what developers are paying for redevelopment sites. All sites were scored based on these criteria. Sites that score strongly in both metrics are considered the strongest candidates for redevelopment. Sites scoring poorly are not considered reuse sites.

Figure 14422. Redevelopment Factor Scoring

Source: ECONorthwest

L: I Ratio	Total Value Per-Square Foot of Land		
	< \$65	\$65 - \$90	>\$90
> 2.0	Strong	High	Medium
1.0 - 1.99	High	Medium	Low
< 1.0	Medium	Low	Weak

- For commercial zones, only sites with strong, high, and some medium redevelopment potential are eligible for inclusion as sites. Along with new standards that allow 100% residential in commercial zones, and weak market conditions for commercial office, this limits to the sample to the sites that are most likely to develop for residential uses. All low and weak scoring sites were not included at all.
- For residential zones (R-2, R-3), only sites in the strong and high categories were included. All other sites were not included.

Commercial Office Market

- Delivered only 40k sf in last decade
- Over 250k sf for sale or vacant
- Only two Class A buildings in the market
- Class A rents are 15 percent below the submarket average, 30 percent below regional average.

Source: CoStar (2022)

Residential Redevelopment Factor. As a baseline in the model, only residential sites that had the ability to increase capacity by 2.5x in the R-2 zone and 3.0x in the R-3 zone were included for consideration in the inventory. However, candidate sites were further limited to those with a 4.0x factor for R-3 sites and 3.0x factor for R-2 sites. For example, for an R-3 site to be considered at all, it must have the ability to accommodate a minimum of 4.0x the existing number of units on the site. R-2 sites are further constrained. We assume a 50% factor *of remaining sites* to account for lower rates of residential recycle.

Existing Use. Condominium development and existing affordable housing was omitted outright. To the extent data was available, non-residential uses considered the character and nature of the existing use. **Where available, site location, lease data, vacancy rates, recent transactions, tenant profile, improvement quality, and site utilization were also considered to manually revise site inventory where appropriate.**

1. Realistic Capacity Adjustment

Figure 13099 previously reported that development in Alhambra is currently able to build to 90% of maximum capacity on average. This rate is assumed in this analysis. However, a subset of sites identified are relatively small, irregular, or otherwise constrained that may limit the ability to reach higher maximum densities. **For sites that are smaller than a half-acre and have a maximum of 30 units/ac or more, realistic capacity is reduced to 70% of maximum.**

Figure 14523 includes some example capacity calculations based on these assumptions.

Figure 14523. Example Capacity Calculations

Source: ECONorthwest

Zone	Size (ac.)	Allowed units/ac	Max Capacity	Redev. Factor	Realistic Capacity	Redev. Strength	Assumed Capacity ⁶⁹	Notes
R-3	1.00	43	43.0	4.0	90%	High (80%)	31	Standard calculation for High
CBD	1.00	64	64.0	4.0	90%	Med (50%)	29	Standard calculation for Med
R-3	1.00	43	43.0	4.0	90%	Med (50%)	19	Standard calculation for High
R-3	1.00	43	43.0	3.5	90%	High (80%)	0	Redev. Factor < 4, site not included
R-3	0.45	43	19.4	4.0	70%	High (80%)	11	Lower realistic capacity for small size with high DUA
R-2	0.30	18	5.4	3.5	90%	High (80%)	2	Capacity reduced for R-2 residential recycle

Development Trends on Nonvacant Sites

Nonvacant sites selected for inclusion in the inventory according to the methodology described above have been chosen because they represent the best opportunities to add units to the city's housing stock based on criteria consistent with redevelopment potential. To exhibit how some of these criteria relate to historical development patterns and the range of potential future redevelopment opportunities, we include some example nonvacant redevelopment projects

⁶⁹ Rounded

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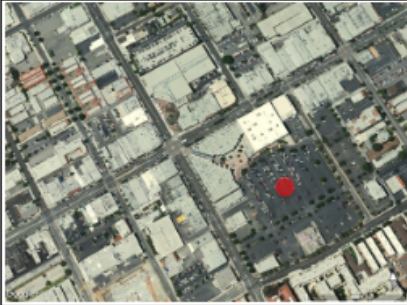
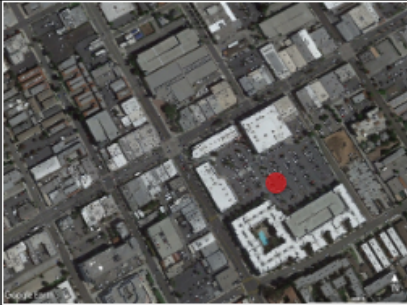

below. When interpreting this information, it is also important to recall that through the implementation of the Housing Plan in this Housing Element, the city will be making significant regulatory changes that will alter the historical development pattern and make development more feasible in many zones (i.e. increasing allowed densities, removing commercial space requirement in mixed-use zones, expanding flexibility in development standards, reducing parking requirements).

In the examples below, we use the best available information to demonstrate observed redevelopment trends on nonvacant sites and how factors present at successful redevelopment projects relate to those used to nonvacant candidate sites in the inventory. This exercise relied heavily on point-in-time observations from aerial photography and data from the Los Angeles County Assessor’s office. Below we present:




Previous Use. An evaluation of available information on the previous use of a redeveloped property.




New Use. Characteristics of the new use that the property was redeveloped to.

Inventory Example. An example of a site in the current inventory that has characteristics similar to the observed trend.


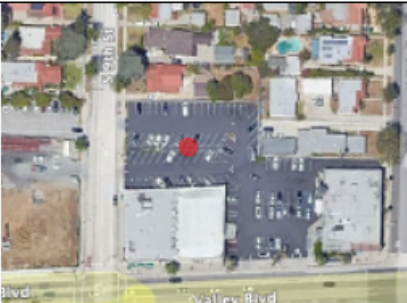
Example 1: Large-scale Commercial Redevelopment (88 S Garfield Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Underutilized shopping center (30-35 years old)	The project was redeveloped through a Specific Plan to a mixed-use development with retail and 260 residential units at 100% of allowed density.	Use: Underutilized shopping center (28 years old) high vacancy
Allowed Density: 43/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 1.0		Redevelopment: Land to improvement ratio above 1.0
Price: Sold at \$52 psf		Price: Assessed at \$29 psf
Commercial parcel assemblage: Yes		Commercial parcel assemblage: Yes



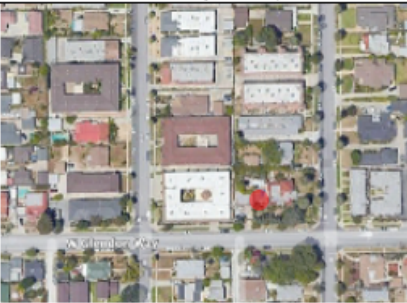
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Example 2: Excess Parking Lot Redevelopment, Irregular Lot (210 Monterey Street)		
Previous Use	New Use	Inventory Example
		
Use: Underutilized parking lot. Irregular parcel (0.79 acres)	The project was redeveloped into a 55+ senior housing center with 42 units.	Use: Underutilized parking lot. Irregular parcel (0.89 acres)
Allowed Density: 43/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0		Redevelopment: Land to improvement ratio above 2.0
Price: Assessed at \$47 psf		Price: Assessed at \$29 psf

Example 3: Small Lot Consolidation with Multiple Units (117 North Palm Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Two adjacent parcels with three units in single-family homes (100+ years old)	Redevelopment of two single-family lots into a seven unit condominium project.	Use: Two adjacent parcels with three units in single-family homes (100+ years old)
Two lot assemblage (0.37 acres)		Two lot assemblage (0.41 acres)
Allowed Density: 24/ac.		Allowed Density: 48/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; redev. factor = 2.6		Redevelopment: Land to improvement ratio above 2.0; redev. factor = 6.4
Price: Assessed at \$108 psf		Price: Assessed at \$28 psf




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Example 4: Excess Parking Infill (115 E Mclean Street)		
Previous Use	New Use	Inventory Example
		
Use: Storage and parking space adjacent to high-density residential uses. (40+ years old)	Redevelopment of a regular shaped lot with low value parking and storage improvements into a six unit residential development	Use: Parking space adjacent to high-density residential uses. (70+ years old)
Two lot assemblage(0.29 acres)		Single parcel (0.51 acres)
Allowed Density: 24/ac.		Allowed Density: 43/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0		Redevelopment: Land to improvement ratio above 2.0
Price: Assessed at \$63 psf		Price: Assessed at \$29 psf

Example 5: Multiple Lot Consolidation in R-3 Zone (800 N Garfield Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Three adjacent single family lots with three units (age unknown).	Redevelopment of three parcels, each with single family homes, into a 14-unit multifamily development at 100% of allowed density.	Use: Two adjacent single-family lots with two units (99 years old)
Three lot assemblage (0.49 acres)		Two lot assemblage (0.60 acres)
Allowed Density: 30/ac.		Allowed Density: 18/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 4.6		Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 5.5
Price: Assembled parcel sold for \$1.85 million (\$87 psf)		Price: Assessed at \$16 psf

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Example 6: Redevelopment of Underutilized Freestanding Commercial (201 E Bay Street)		
Previous Use	New Use	Inventory Example
		
Use: Parking lots along with a single-tenant freestanding commercial building (30 years old)	Redevelopment of a freestanding retail building (demolished) and parking lots into a 62 unit multifamily project and parking garage. Project is currently under construction.	Use: Parking lots along with a single-tenant freestanding commercial building (54 years old)
Five lot assemblage (1.44 acres)		Five lots (single owner) (2.2 acres)
Allowed Density: 43/ac.		Allowed Density: 64/ac. (proposed)
Price: Sold at \$130 psf in 2017		Price: Assessed at \$71

Example 7: Single lot Redevelopment of Single-Family (825 Sierra Vista Avenue)		
Previous Use	New Use	Inventory Example
		
Use: Single-family residence on a standard 0.21 acre lot (over 100 years old)	Redevelopment of the existing single-family residence (demolished) into four units.	Use: Single-family residence on a standard 0.21 acre lot (over 100 years old)
Standard single-family lot (0.21 acres)		Standard single-family lot (0.21 acres)
Allowed Density: 24/ac.		Allowed Density: 43/ac. (proposed)
Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 4.0		Redevelopment: Land to improvement ratio above 2.0; Redev. factor = 6.0
Assessed at \$22 psf		Assessed at \$45 psf

Summary of Potential Candidate Site Analysis

The combination of comprehensive rezoning and upzoning strategies identified in Program 1923 results in significant increases in realistic market supportive residential capacity in Alhambra. In total, changes resulted in 1,299 sites totaling 23,470 units of maximum theoretical capacity. **Only a share this capacity is located on sites with any potential to redevelop.** Our model identified 509 sites with theoretical capacity for 8,983 units, roughly 38% of total theoretical capacity. Many of these sites are small, or residential recycle sites in the R-2 and R-3 zones. Further adjustments to capacity were included to reflect realistic capacity and redevelopment potential. Taken together, adjusted capacity on these sites is 5,571 units.

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Site capacity is dispersed throughout zones across the city. Nearly all sites that met the minimum threshold for lower-income allocation (between .5 and 10 acres, minimum density of 30/ac) were necessary to address lower-income RHNA need.

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Figure 14624. Summary of Potential Candidate Nonvacant Sites

Source: ECONorthwest

	Sites	Parcels	Theoretical Capacity
In Model	1,299	2,742	23,470
On Potential Candidate Sites included in inventory	509	1,113	8,983
Share of Model	39%	41%	38%
Counted Capacity	5,55671		
Share of Site Capacity	62%		
Share of Model Capacity	24%		

Zone	Lower	Moderate	Above Mod.	Total
CBD/P	249	84	170	502
CPD	753	208	425	1,386
EMC	11025	32	65	20722
PO	274	94	204	571
Valley	689	223	470	1,389
IPD	140	31	54	225
R-2	23	61	344	428
R-3	123	222	512	871
Total	2,36075	954	2,243	5,55671

Adequacy of Site Inventory

Once proposed zoning amendments are in place for sites in the inventory to be rezoned, the city can meet or exceed its RHNA for the 2021-2029 planning period. Figure 14725 summarizes the sites inventory and RHNA status. Detailed information for each site is included in Appendix A.

Figure 14725. Site Capacity by Source and Income Level. RHNA Surplus/Shortfall

Source: ECONorthwest

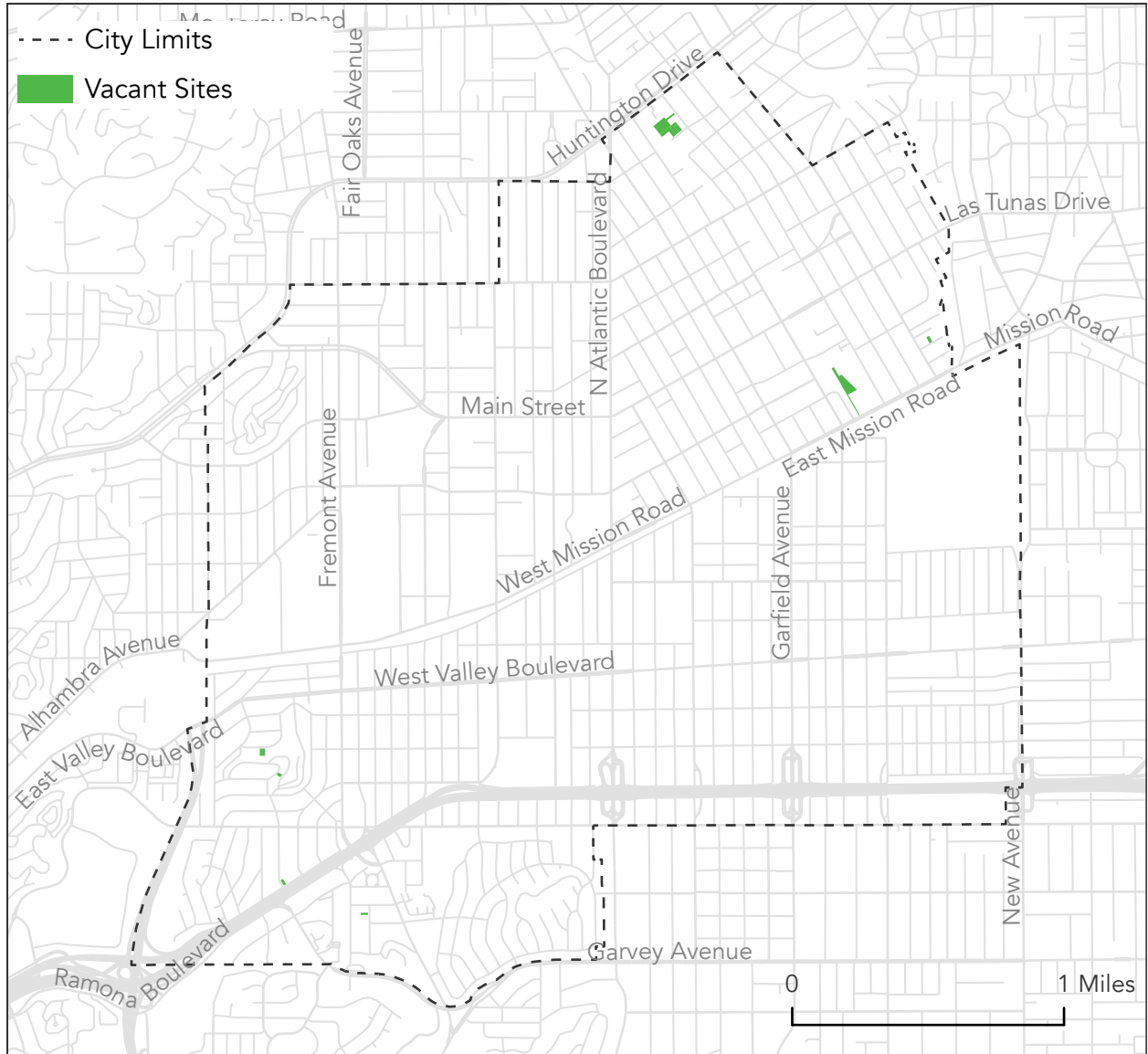
Site/Capacity Type	Income Category				Total
	Ex./Very Low Income	Low Income	Moderate Income	Above Mod. Income	
Proposed Projects	94	10655	3399	693907	9261,155
Specific Plan	0	24	14	19	57
Vacant	0	0	0	59	59
Existing Sites ^A	52	156	111	239	558
ADUs	141113	214267	114	14278	480600
New Sites	1,543	831	9514	2,23743	5,56271
Total Sites	1,8021,830	1,33133	1,076,192	3,3893,645	7,6428,000
2021-2029 RHNA	1,774	1,02136	1,079	2,936	6,81025
Surplus/Shortfall	2856	295297	41113	453709	8021,175

^A Includes capacity from increases in allowed density on existing sites

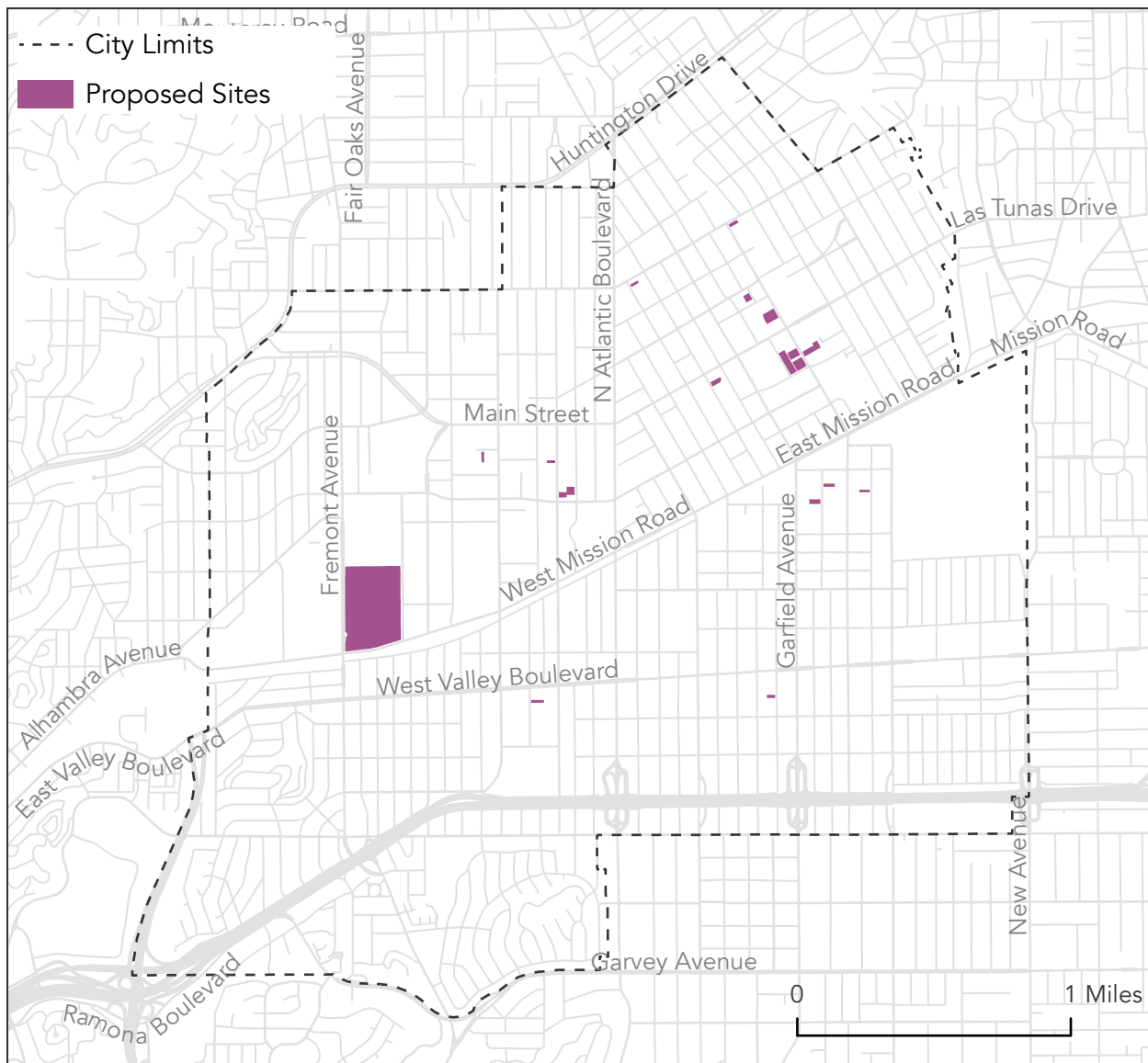
APPENDIX A
SITES INVENTORY

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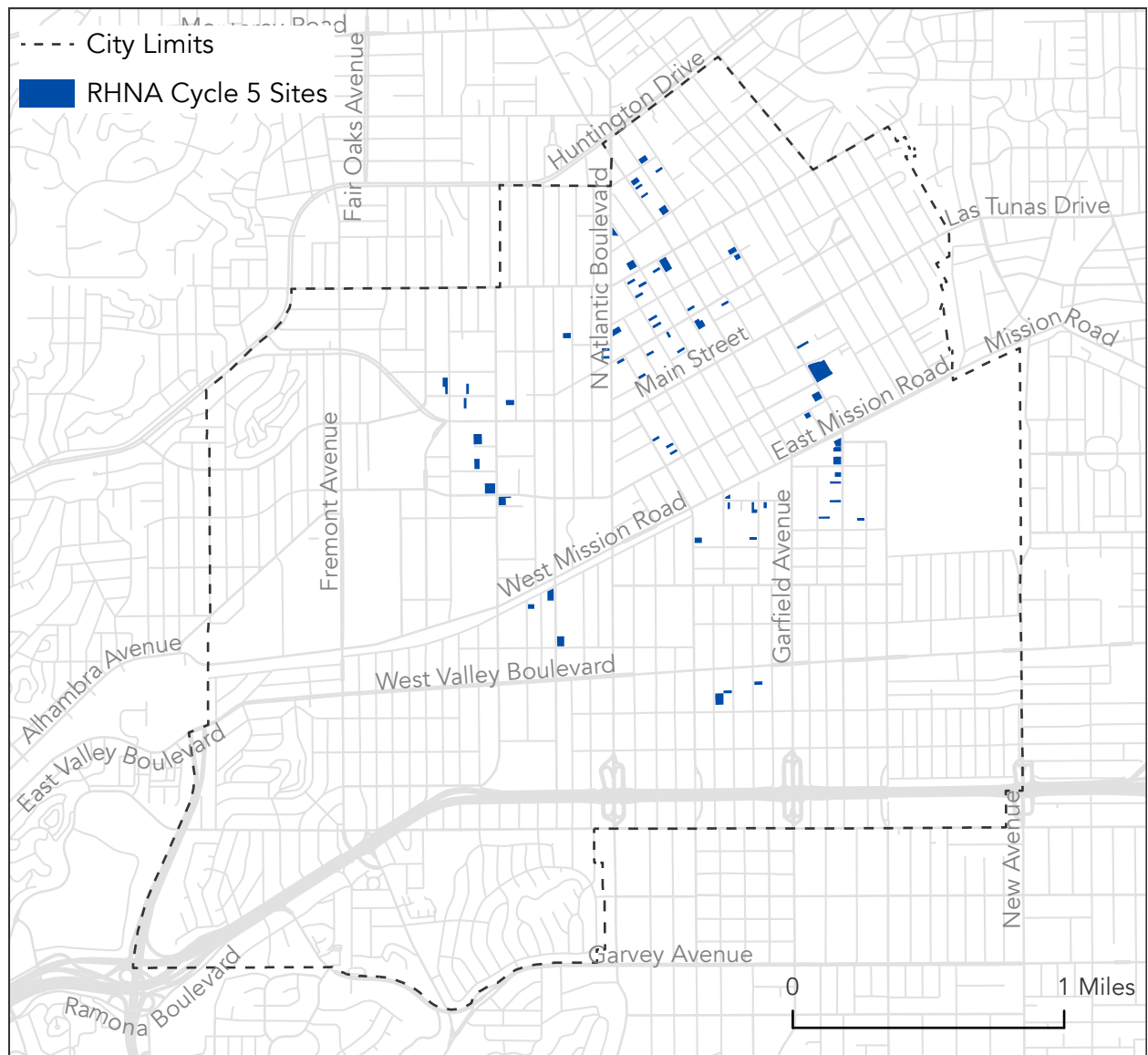
Map of Existing Vacant Sites



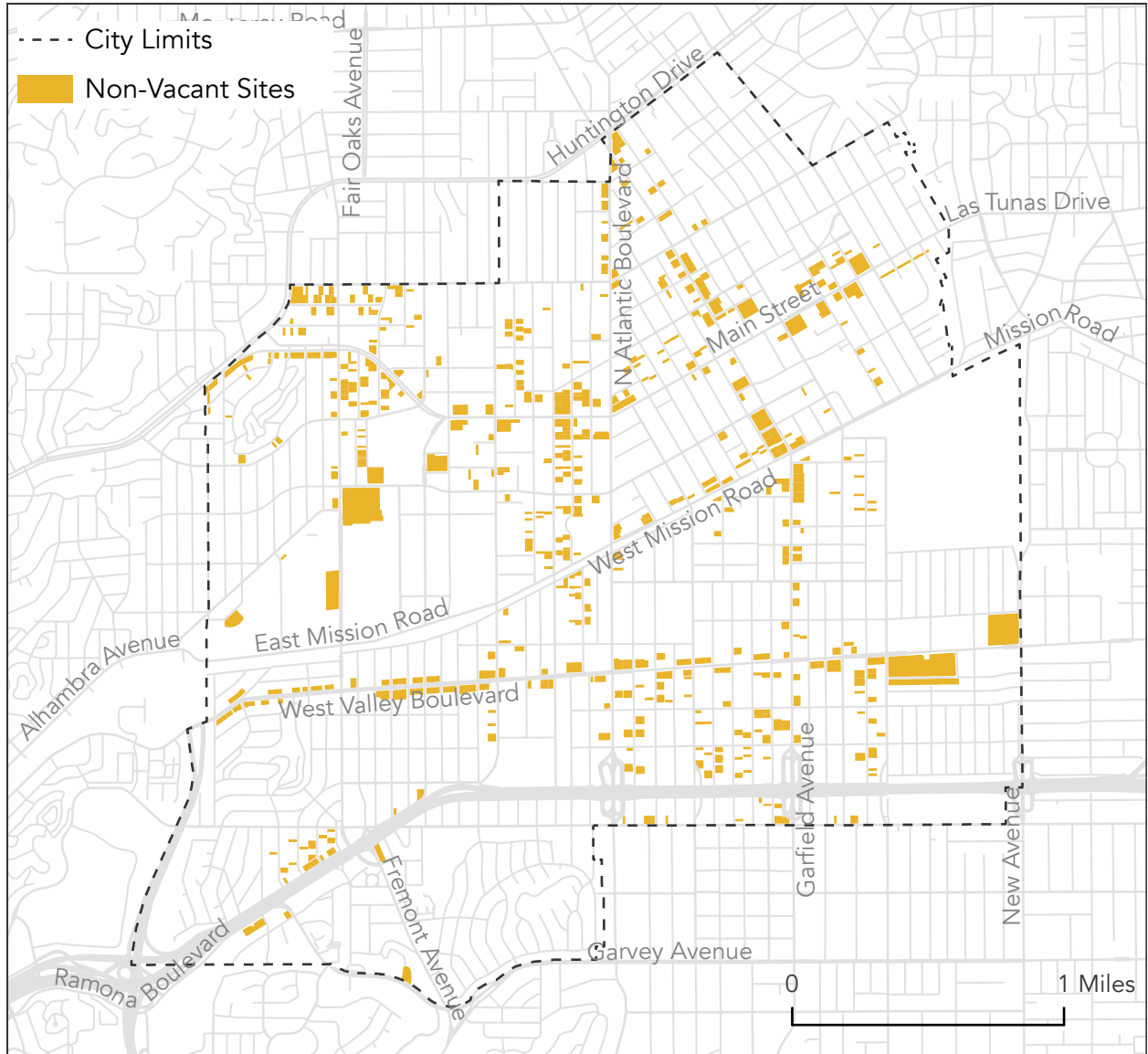
Map of Planned and Proposed Projects



Map of Existing Nonvacant Sites (from RHNA5 Inventory)



Map of New Nonvacant Sites



ATTACHMENT 8

LETTER FROM CITY OF ALHAMBRA
REQUESTING HCD TECHNICAL ASSISTANCE
AUGUST 24, 2023

City of Alhambra ATTACHMENT 8
Community Development Department



*Gateway
to the
San Gabriel Valley*

*111
South First Street
Alhambra
California
91801*

August 24, 2023

Paul McDougall (Paul.McDougall@hcd.ca.gov)
Department of Housing and Community Development (“HCD”)
Division of Housing Policy Development
2020 W. El Camino Avenue, Suite 500
Sacramento, CA 95833

Re: City of Alhambra Request for Technical Assistance in Connection with Housing Element and Rezoning

Dear Paul:

Thank you for your assistance during the City of Alhambra’s (“City”) Sixth Cycle Housing Element Update (“Housing Element”) process. Our City Council is currently scheduled to act on the Housing Element and associated Zoning Ordinance amendments on September 25, 2023. As we prepare for the City Council hearing, I write to request HCD’s technical assistance in connection with the City’s efforts to rezone properties to accommodate its regional housing needs allocation (“RHNA”) consistent with the Housing Element HCD has reviewed.

I. Issues Presented.

Once a site has been determined to be suitable to be included in the Housing Element’s inventory of site available to accommodate the RHNA for lower income households (“Site Inventory”), does subdivision (c) of Government Code Section 65583.2 allow the City to require housing development projects to be subject to a use permit?

Once HCD certifies that the Housing Element (including the Site Inventory) is in substantial compliance with State Housing Element Law (Gov. Code §§ 65580 – 65589.11), on what basis may the City deny a housing development project that is proposed on a property in the Site Inventory?

II. Background Facts.

The Housing Element includes multiple properties in the Site Inventory that either: (1) are residentially zoned at lower densities than would be presumed to be available for affordable housing; (2) are nonvacant and were included in previous Housing Element inventories and have not yet redeveloped; or (3) are not currently zoned for residential uses.

Some of the properties in the Site Inventory are currently designated as the Industrial Planned Development (IPD) zone and will require redesignation to allow residential uses. Given historical industrial uses, IPD properties may have known or unknown histories of environmental contamination. Moreover, as discussed in the draft

ATTACHMENT 8

Housing Element, much of the City north of Interstate 10 is located within a portion of the San Gabriel Valley Superfund Fund Site – Area 3, and other portions of the City have experienced groundwater contamination. However, some properties in the Site Inventory have already undergone cleanup efforts and received approval for redevelopment with residential uses from appropriate state oversight bodies, such as Department of Toxic Substances Control (“DTSC”) or the Regional Water Quality Control Board (“RWQCB”). Moreover, HCD has reviewed the Housing Element and the Site Inventory, and confirmed that the properties in the Site Inventory are appropriate to accommodate the City’s RHNA.

Consistent with the policies and programs identified in the draft Housing Element, City staff have prepared amendments to the City’s Zoning Code for the Planning Commission and City Council’s consideration. These amendments would make all “housing development projects” as defined by Government Code Section 65589.5(h)(2) that dedicate at least 20% of their units as affordable housing for lower income households a “use by right” as defined by Government Code Section 65583.2(i).

Members of the public have asserted that the proposed Zoning Code amendments are too permissive. Specifically, members of the public have said that subdivisions (a) and (b) of Government Code Section 65583.2 only allow the City to use “land suitable for residential development” in the Site Inventory with a description of environmental constraints. When read together with subdivision (c) of Government Code Section 65583.2, commenters have interpreted the State Housing Element Law as giving the City discretion to determine whether proposed housing development projects are on land suitable for residential development through a conditional use permit process.

In addition, the City has received public comments that focus on potential environmental hazards. Some comments have asserted that even if a proposed housing development project on property within the Site Inventory have received environmental clearance from DTSC or the RWQCB, the City retains discretion to require additional environmental mitigation or to deny the proposed project.

III. Analysis

City staff agrees with the public comments in that subdivision (a) of Government Code Section 65583.2 requires the City to identify “land suitable for residential development” to include in its Site Inventory, and subdivision (b) requires the Site Inventory to include a general description of environmental constraints to the development of housing.

However, once a property is included in the Site Inventory and the Housing Element is certified by HCD, City staff believes that the requirements of subdivisions (a) and (b) have been met. Subdivision (c) of Government Code Section 65583.2 would then require the City to rezone nonvacant properties in the Site Inventory that have been used in prior Housing Elements to “allow residential use by right for housing developments in which at least 20 percent of the units are affordable to lower income households.” In addition, any Site Inventory properties that must be up-zoned to meet the City’s lower income RHNA “shall be zoned to permit owner-occupied and rental multifamily

ATTACHMENT 8

residential use by right for developments in which at least 20 percent of the units are affordable to lower income households." (Gov. Code § 65583.2(h).)

Accordingly, City staff understands the State Housing Element Law to *require* the City to allow housing development projects on rezoned Site Inventory properties as a use by right, and any effort to require a conditional use permit would be *prohibited* by State Housing Element Law. **Is this correct, or may the City adopt rezoning that requires housing development projects to apply for and receive a conditional use permit?**

Finally, City staff interprets the Housing Accountability Act (Gov. Code § 65589.5) as limiting the City's discretion in connection with all housing development projects. In many cases, if a housing development project complies with the City's applicable, objective standards, the City may only deny the project if the project would "have a specific, adverse impact upon the public health or safety, and there is no feasible method to satisfactorily mitigate or avoid the specific adverse impact." Act (Gov. Code § 65589.5(d)(2).)

Regardless of whether a project is entitled to by right approval or requires a use permit, the City would not have the discretion to deny a project based on its own subjective assessment of public health or safety risks. To deny a project, the City would need evidence of "a significant, quantifiable, direct, and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions." (*Id.*) **If oversight agencies such as DTSC or the RWQCB have already certified that a formerly contaminated property may safely be redeveloped for residential use, does the City have discretion to determine otherwise?**

City staff have worked hard to incorporate HCD's feedback into the City's draft Housing Element and to prepare Zoning Code amendments that are consistent with the City's understanding of State Housing Element Law Requirements. The City appreciates HCD's consideration of this request for technical assistance, and we look forward to receiving your responses prior to our scheduled City Council meeting on September 25 regarding what State Housing Element Law requires in connection with rezoning and subsequent project review.

Sincerely,



Andrew Ho (andrewho@cityofalhambra.org)
Director of Community Development

cc: Melinda Coy (melinda.coy@hcd.ca.gov)

ATTACHMENT 9

LETTER FROM HCD
PROVIDING TECHNICAL ASSISTANCE
OCTOBER 4, 2023

**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



October 4, 2023

Andrew Ho
Community Development Director
City of Alhambra
111 South First Street
Alhambra, CA 91801

RE: Letter of Technical Assistance in Connection with Housing Element

Dear Andrew Ho:

The purpose of this letter is to provide technical assistance regarding the letter received from the City of Alhambra (City) dated August 24, 2023. The California Department of Housing and Community Development (HCD) understands that there are questions in connection with the City's efforts to rezone properties to accommodate its Regional Housing Needs Allocation (RHNA), and this letter is to provide assistance in answering the questions stated in the City's letter. HCD recognizes the challenge of interpreting ever-changing housing and land-use laws and appreciates the opportunity to provide technical assistance.

Questions and Answers

Does subdivision (c) of Government Code Section 65583.2 allow the City to require housing development projects to be subject to a use permit for sites that are included to accommodate lower income RHNA?

Sites that require rezoning to accommodate lower income RHNA are subject to by-right requirements consistent with Government Code Section 65583.2, subdivision (i). Therefore, if sites that are included in the housing element to accommodate lower income RHNA require rezoning, then the City cannot subject housing development projects to a use permit.

Once the Housing Element is found in substantial compliance on what basis can a City deny a housing development that is proposed on a property in the site inventory?

In order to deny a project, the City has to make appropriate findings pursuant to the Housing Accountability Act, Government Code Section 65589.5.

ATTACHMENT 9

City staff understands the State Housing Element Law to require the City to allow housing development projects on rezoned Site Inventory properties as a use by right, and any effort to require a conditional use permit would be prohibited by State Housing Element Law. Is this correct, or may the City adopt rezoning that requires housing development projects to apply for and receive a conditional use permit?

Yes, that is correct. As mentioned above, sites that are included in the housing element to accommodate lower income RHNA that require rezoning are subject to by-right requirements consistent with Government Code Section 65583.2, subdivision (i). Per Government Code 65583.2, subdivision (i) the phrase “use by right” shall mean that the local government’s review of the owner-occupied or multifamily residential use may not require a conditional use permit, planned unit development permit, or other discretionary local government review or approval that would constitute a “project” for purposes of Division 13 (commencing with Section 21000) of the Public Resources Code.

If oversight agencies such as DTSC or the RWQCB have already certified that a formerly contaminated property may safely be redeveloped for residential use does the City have discretion to determine otherwise?

This question is outside of HCD’s expertise.

Conclusion

HCD would also like to remind the City that HCD has enforcement authority of Housing Element Law, among other state housing laws. Accordingly, HCD may review local government actions and inactions to determine consistency with these laws. If HCD finds that a city’s actions do not comply with state law, HCD may notify the California Office of the Attorney General that the local government is in violation of state law (Gov. Code, § 65585, subd. (j)). If you have questions regarding the content of this letter or would like additional technical assistance, please contact Fidel Herrera, of our staff, at fidel.herrera@hcd.ca.gov with additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Melinda Coy', with a long horizontal stroke extending to the right.

Melinda Coy
Proactive Housing Accountability Chief