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# I. INTRODUCTION

## Background

The City of Huntington Park is one of the cities that makes up the Gateway Cities district of southeastern Los Angeles County. The City is three square miles, bounded by the unincorporated community of Florence-Graham to the west, the City of Vernon to the north, three Gateway Cities to the east, and the City of South Gate to the south. Huntington Park is surrounded by major highway connections with Interstate 5 and 10 to the North, I-710 to the east, I-105 to the south, and I-110 to the west.

Since its incorporation in 1906, Huntington Park has been known for its central location and easy access to nearby cities. Located approximately six miles south of Downtown Los Angeles, 15 miles northeast of Los Angeles International Airport Huntington Park, and with proximity to major highways, Huntington Park is well-situated for regional connectivity. Huntington Park originally developed as a streetcar suburb for industrial workers in the early 1900s. The Gateway Cities region was largely developed amid a boom in manufacturing that focused Los Angeles County's industrial production in areas southeast of Downtown Los Angeles. The city of Huntington Park and surrounding cities became home to much of the County's industry sector, as well as a home to those working-class industry workers that serviced this economy. Like many Gateway Cities, Huntington Park's proximity to historical and current industrial activities has left a legacy of pollution, and the city experiences a higher pollution burden than the rest of the region and the state.

Huntington Park is a majority Hispanic/Latino community. U.S. Census data shows that over 90 percent of the city's population speaks a language other than English at home. Furthermore, some data sources show that up to 25 percent of the City's population is undocumented, which could mean that the City's population data may not fully count all residents of the city. Undocumented status can contribute to housing instability and a household's ability to access services. The city's population is disproportionately cost-burdened, meaning that households spend more than 30 percent of their income on rent. Huntington Park is one of the densest cities in the country, and high housing costs and low inventory have contributed to overcrowded housing conditions disproportionate to the region.

The city is nearly entirely built out, with very little vacant or underutilized land available for development. This Housing Element's Site Inventory consists of sites in several opportunity areas—the Downtown Specific Plan area along Pacific Boulevard, and the areas around three planned LA Metro stations at Slauson Avenue and Long Beach Avenue, Pacific Boulevard and Randolph Street, and Florence Avenue and Salt Lake Avenue.

## Housing Element Purpose and Content

Pursuant to Government Code Section 65302, the General Plan must include the following elements: land use, housing, circulation, noise, safety, conservation, open space, and environmental justice. As mandated by California Government Code Section 65581, the Housing Element is the only element required to be updated on a routine basis, every eight years. The Housing Element is a comprehensive strategy for providing safe, decent, and affordable housing for all residents. The Housing Element must include:

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- Identification and analysis of existing and projected housing needs, resources, and constraints;
  - Identification of adequate sites for housing to meet the existing and projected needs of all economic segments of the community; and
  - Goals, policies, quantified objectives, and scheduled programs for preservation, improvement, and development of housing.

The Housing Element helps the City determine how to address existing and future housing needs and plan for future growth by establishing actions and priorities for housing programs. This Housing Element was prepared for the planning period of October 2021 to October 2029, and represents the 6<sup>th</sup> Housing Element cycle.

## Relationship to Other General Plan Elements

Huntington Park’s General Plan was adopted in 1991 and consists of the Land Use, Housing, Circulation, Open Space and Conservation, Safety, Noise, Public Facilities, and Urban Design elements. All elements bear equal weight, and no element has legal precedence over another. California Government Code Section 65583(c) requires the Housing Element to maintain internal consistency with other General Plan Elements.

Two other elements have recently been updated or are being updated at the time of publishing this Housing Element, as required by state law.

- Senate Bill (SB) 1000 (2016) amended Government Code Section 65302 to require that cities and counties that have disadvantaged communities to incorporate environmental justice policies into their general plans, either in a separate environmental justice element or by integrating related goals, policies, and objectives throughout the other elements upon the adoption or next revision of two or more elements concurrently. The City prepared a stand-alone Environmental Justice Element, which was adopted November 15, 2022.
- Safety elements must be updated during each update of the Housing Element if additional information relating to climate adaptation or resilience becomes available. The City’s Safety Element update is in progress at the time of publishing this Housing Element update.

## Summary of Public Participation

The Housing Element update process began in early 2021, with a draft first released for public review July 9 to August 6, 2021. The California Department of Housing and Community Development reviewed that draft and a subsequent draft, and provided comments necessitating additional data collection, public input, and analysis. This draft addresses the comments from HCD and reflects the additional analysis, and a summary of the additional community outreach follows.

The Housing Element must reflect the values and preferences of the community. Accordingly, community participation is an important component of the development of this Element. Government Code Section 65583(c)(8) states that the local government must make “a diligent effort to achieve public participation of all economic segments of the community in the development of the housing element.” This process not only includes community members, but also participation from local agencies and housing groups, community organizations, and housing developers.

In 2021, the City released a housing survey, held two community workshops, and a study session with the City Council and Planning Commission. In 2022, as part of revisions to the City's Housing Element draft originally released in 2021, the City re-engaged the community to solicit more input from stakeholders and community members. Community engagement events in 2022 included meetings with the City's Environmental Justice Advisory Committee, stakeholder interviews with service providers and housing developers, community pop-up events, a project-specific website, in-person and virtual community workshops, and study sessions with decision makers. A complete record of the public engagement program is available in Appendix A.

## Public Noticing

To reach the largest and broadest spectrum of community members and stakeholders, Huntington Park utilized the following notification methods throughout the Housing Element update process:

- Regular posts to the City's social media accounts, including Facebook, Twitter, and Instagram, announcing community workshops, study sessions, and public comment periods.
- City staff developed email and mailing lists of community and advocacy groups, non-profits, faith-based organizations, and school-based organizations to provide outreach and regular updates about the Housing Element, Environmental Justice Element, and Safety Element Updates.
- The interested parties email list was regularly maintained and included community members who had signed up on the project website, at community pop-up events, and at community workshops.
- The City developed flyers in English and Spanish advertising the project. City staff handed out flyers at community pop-up events. See Appendix A for example flyers.

## Advisory Committee

An advisory committee was established to discuss and obtain input primarily on environmental justice issues. The advisory committee consists of the following 12 community members:

- Laura Cortez, East Yard Communities for Environmental Justice
- Eileen Garcia, Tree People
- Dr. Wilma Franco, Southeast Los Angeles Collaborative
- Carol Xochimitl, HUB Cities
- Laura Avila, Human Services Association
- Areli Caballero, College Student (Environmental Science Major)
- Mia Calderon, Youth Resident
- Miguel Vargas, Community Resident
- Chris Aguilar, Community Resident
- Ana Michel, Small Business Owner/Resident
- Ricardo Barbosa, Planning Commissioner
- Alicia Rodarte, AltaMed

While the committee was formed to support development of the City's Environmental Justice Element (adopted November 15, 2022), the members also provided valuable insight on affirmatively

furthering fair housing issues and policy development at its July 12, 2022, August 13, 2022, and September 13, 2022, meetings. Members also received a presentation on the ongoing Safety Element Update and provided input on climate vulnerability issues to inform the development of the Safety Element.

The advisory committee reviewed the proposed sites inventory, initial AFFH findings, and proposed policies addressing AFFH issues and provided the following comments related to housing:

- Concerns about concentrating lower-income housing in any one area of Huntington Park, i.e., a preference to distribute lower-income housing throughout the city.
- Concerns with constructing housing near areas with high pollution and contamination, specifically sites around the planned Slauson/Long Beach and Pacific/Randolph transit stations due to contamination and pollution from industrial uses in the area.
- Identified six sites in the downtown specific plan (DTSP) for development to provide lower-income housing.
- Support of programs related to inclusionary housing and rent control.
- Identified higher concentration of people with disabilities in downtown area because of public transportation that runs through that area creating more opportunities for access for people who cannot drive.
- Identified higher educational outcomes in certain areas because of concentration of charter schools, which put a lot more emphasis on STEM education. Also, identified high education attainment located on the westside because two high schools are located there, so educational attainment scores could be related to school access.
- Concerns about the affordability of living in Huntington Park and how it leads to overcrowding. There should be programs to help address the cost and subsidize it.
- Support for a rent escrow program to help keep landlords and property managers accountable.

## Stakeholder Interviews and Focus Group Meetings

As part of the outreach process, the City reached out to various stakeholder representatives, service providers, and housing developers to inform the organizations about the Housing Element Update. Staff asked that the organizations participate in a stakeholder interview to share their organization's experience with affordable and attainable housing in Huntington Park and other Los Angeles gateway communities.

In August 2022, the City met with representatives from the following community-based organizations and/or service providers:

- Advocates for Human Potential, an organization that advises local governments on accessing funding and developing strategies around housing and homelessness.
- Hub Cities Consortium, which provides job training and placement to residents of the Gateway Cities, with some specialized programs for people transitioning out of homelessness.
- Southeast Community Development Corporation, which has community and technology centers in nearby Bell and Cudahy, and provides education for children and adults on technology, and new programs to educate first-time homebuyers on the homebuying process.

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- Gateway Cities Council of Governments, the subregional government for the Gateway Cities, with a number of housing-related Regional Early Action Planning Grant-funded programs to help Gateway Cities meet their housing needs.

These interviews covered the following topic areas:

- The housing issues faced by the organization's clientele
- What the City of Huntington Park is doing well to address housing issues
- What solutions other similar or nearby cities have developed that have been effective at addressing housing issues in the region

The City met with affordable and market-rate housing developers including BRIDGE Housing, National CORE, NewStart Housing, and Warmington Residential. Not all developers had worked in Huntington Park, so the questions focused on development processes and regulations generally. Discussion topics included:

- Potential for building in Huntington Park
- Parking standards, open space requirements, density, and other development standards
- The value of a by-right development process vs. a discretionary process
- Developers' experience using new state streamlining laws to help speed up the process of development
- Examples of processes or new regulations implemented by similar or nearby cities that have been effective at increasing housing production
- Challenges in redeveloping formerly industrial and/or contaminated land
- Challenges in developing smaller, nonvacant, and/or infill sites common in Huntington Park

### **Focus Group Meeting with Communities for a Better Environment**

On Monday, August 29, 2022, the City met with Communities for a Better Environment (CBE) to present and discuss key components of the Housing Element Update, including housing constraints, affirmatively furthering fair housing, and developing the housing sites inventory. The presentation was translated in Spanish verbally and written form. At the end of the presentation, attendees were able to provide the following comments and questions:

- What will be the City's process for environmental cleanup before development? We want to encourage environmental cleanup before development.
- What other efforts besides the Downtown Specific Plan are there to develop housing? How much affordable housing will the City require for each of these projects?
- Because there are three transit sites, does that mean the City will create a transit-oriented development? For the amount of housing that is required, we are concerned about prioritizing the very low income and low income when there are four income levels, when the City does not have a TOD policy.
- How does the City meets its regional housing needs assessment for moderate income and above? Why is the City prioritizing these income levels when the community needs more affordable housing for low income and very low income?
- What is the City doing to ensure housing is available for other vulnerable populations, such as seniors and those with disabilities? What about transitional housing and senior supportive housing?

- We know that residents lack access to parks and green spaces. What is the City’s plan to ensure that residents will have access to parks and green spaces when building new housing?
- What has the City done to address lead and asbestos contamination in housing? What other programs are the City trying to address these issues and maintain poor quality housing? We need it.
- A comment on what we have seen other cities doing. Bell Gardens passed rent control up to four percent cap. We would like to see a similar policy in Huntington Park.

## Community Pop-Up Events

The City hosted an informational booth at the City’s farmers market to distribute flyers, advertise upcoming community workshops, and gather input from the community on housing needs, fair housing issues and climate vulnerabilities. The City’s farmers market is a well-attended and reliable community event held every Wednesday. The pop-up events were held from 8:30 am – 1:30 pm on August 17, August 31, and September 7, 2022. Two of the community pop-up events included interactive posters and a raffle giveaway to incentivize participation and to collect community input for updates to the Housing Element and Safety Element. All materials at the pop-up events were provided in both English and Spanish. Also Spanish facilitation was utilized to prevent language barriers in participation. Informational flyers about the housing element, focused general plan updates and upcoming events were distributed and included a QR code so participants could conveniently access the project website from their cell phones for additional information. The following summarizes the input received from the three interactive pop-up events. See Appendix A for the interactive posters, pictures, and public comments collected.

### August 17, 2022 Farmers Market

The City set up a booth at the farmers market on August 17, 2022. The objective of this pop-up event was to distribute flyers advertising upcoming workshops and collect public comments related to housing, safety, and environmental justice. An email sign-up sheet was available to expand the interested parties’ email list. Open-ended comment cards were available, and the following comments were collected:

- School traffic is causing public safety issues for residents.
- I would like them to take action on Randolph and Milles Street, especially that [drivers] do not double park, respect driveways and do not block pedestrian pathways.
- Illegal body shop on Newell and Gage Street; paint cars and they do not have adequate security. In front there are a lot of cars that they don’t serve, and this is unsafe for our kids that walk through there from school.

### August 31, 2022 Farmers Market

The City set up a booth at the farmers market on August 31, 2022 with two interactive posters available to spark conversation about and gain input for the Housing and Safety element updates. Once participants gave feedback, their name was entered into a raffle, a total of four names were drawn and each person received a \$50 gift card. The team also distributed flyers advertising the two study sessions as well as an educational flyer on the overall General Plan update. Based on the input from the interactive posters and conversations with participants, the main themes for each element were:

### *Housing*

- Rent is too high, and housing is unaffordable.
- Rent control is needed.
- Residents have experienced poor housing conditions, paying too much, and overcrowding.
- More programs are needed to support homeownership, housing repairs, and renters rights/rent control/rent assistance.

### *Safety*

- Worsened air quality is the biggest climate concern.
- Power often goes out and many people experience fatigue during heat waves.
- Want education on how to protect yourself from heat and climate change.
- More education opportunities on placing solar panels in homes.
- Better and safer public transit.

## **September 7, 2022 Farmers Market**

The September 7<sup>th</sup> farmers market pop-up event included the same interactive posters and a raffle activity as the August 31<sup>st</sup> event. The intent was to continue to collect community input regarding housing needs, fair housing, and climate vulnerabilities. Based on the input from the interactive posters and conversations with participants, the main themes for each element were similar to the August 31<sup>st</sup> event. For housing these included the high cost of rent and housing affordability, poor housing conditions including overcrowding; and suggestions to support more programs for homeownership, repairs, and renter's rights. For safety these included worsening air quality and increased heat waves. The following summarizes some of the additional input provided by the community:

### *Housing*

- Poor housing quality and limited code enforcement.
- Concerns about homelessness and public safety in neighborhoods.
- Suggested housing programs included first-time homebuyer programs, lowering rents, landlord-renter mediation services, and education regarding affordable housing and home ownership as well as educational programs for youth.

### *Safety*

- Health risks associated with heat waves for children and adults, including heat sickness, nausea, dizziness, blood pressure issues.
- Suggested programs included cooling areas, tree planting and shade programs, energy/electricity programs, community outreach, programs and activities for seniors (e.g., swimming programs for seniors).

## **Project Website**

The City's website hosted and created a separate dedicated project website. The project website served as a key information hub where residents could see all events listed, find links to join meetings, and various other ways to get involved. The project website provided detailed background information on the Housing Element, Environmental Justice Element, and Safety



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Element updates including the purpose of each element, informational videos, and links to the City's previous educational websites.

- The City's housing element website is available at [www.hpca.gov/787/Housing-Element](http://www.hpca.gov/787/Housing-Element).
- The City's new housing element website (described below) is available at [www.huntingtonparkgpupdates.com](http://www.huntingtonparkgpupdates.com).

Project materials associated with each element were updated regularly on the websites, including information for upcoming events, and virtual workshop PowerPoint presentations and video recordings. A form on the website enabled people to sign up for project email updates and provide comment at any time throughout the project process. The City's housing element web page and the dedicated project website were available in English and Spanish.

## Community Workshops

### Workshops Hosted in 2021

In 2021, the City hosted two educational community workshops. On July 1, 2021, the City explained its past non-compliance with Housing Element requirements, new requirements and the 6<sup>th</sup> Cycle Housing Element update, and the Regional Housing Needs Allocation (RHNA) requirements. On August 2, 2021, the City hosted a second workshop to provide information about resources and opportunities in Huntington Park, constraints to development, and the housing action plan. Both workshops provided the opportunity for community members to ask questions.

### Workshops Hosted in 2022

In 2022, workshops for the Housing Element were held both virtually and in person during the month of August. These workshops were hosted on two formats to encourage broader community engagement of community members and prioritize safety of those who are not able to attend in-person events due to the COVID-19 pandemic. The workshops held on August 23 and 24, 2022, focused on the Housing Element update process, key concepts related to fair housing, the Safety Element update, and opportunities for community members to stay involved in the process. Attendees had the opportunity to answer pre-written polling questions and questionnaires on housing needs and conditions. Due to low attendance at the workshops, the virtual workshop presentations were also posted to the project website, described above. There were forms on the project website also by which community members could submit comments and provide feedback.

## Survey

In June 2021, the City circulated a survey to ask stakeholders and community members questions regarding housing needs and current conditions. Survey questions focused on satisfaction with their current housing, physical conditions of their housing, satisfaction with housing options in Huntington Park, housing types, community amenities, home ownership barriers, rezoning, housing concerns, and demographic questions. There were 130 responses to the survey.

## City Council and Planning Commission Study Sessions

The City held study sessions with the City Council as well as public hearings with the Planning Commission and City Council following release of the Draft Housing Element.

### *May 13, 2021 – City Council and Planning Commission Study Session*

The City hosted a joint study session with the City Council and Planning Commission that was open to the public on May 13, 2021. The presentation described existing challenges and Housing Element requirements, including special needs housing and the RHNA. All material was translated into Spanish. The presentation concluded with the opportunity for decision makers and community members to ask questions and provide comments.

### *August 31, 2022 – Planning Commission Study Session*

The City hosted a study session with the Planning Commission that was open to the public on August 31, 2022. At this study session, the City explained the objectives and requirements for the Environmental Justice Element, including current conditions in Huntington Park; the Housing Element, including fair housing practices and sites inventory; and the Safety Element, including current hazard conditions and potential climate change impacts. The presentation was given in person and via Zoom and Spanish translation services were provided.

### *September 6, 2022 – City Council Study Session*

The City hosted a study session with the City Council that was open to the public on September 6, 2022. At this study session, the City explained the objectives and requirements for the Environmental Justice Element, including current conditions in Huntington Park; the Housing Element, including fair housing practices and sites inventory; and the Safety Element, including current hazard conditions and potential climate change impacts. The presentation was given in person and via Zoom and Spanish translation services were provided.

## **Draft Housing Element Available for Public Input**

The draft Housing Element was first released for public review from July 9, 2021, to August 6, 2021. The draft Housing Element was posted to the City’s website and a notice was emailed to interested parties.

### **September 15, 2023 Draft**

After revisions that were required to address comments from HCD, the draft Housing Element was released for public review September 15, 2023, for the minimum statutorily required seven days. The Housing Element was posted on the project website, and a notice was emailed to all interested parties.

Two comments were received. Both comments expressed support for housing strategies, policies, and programs that provide opportunities for home ownership. Section V, Housing Action Plan, provides policies and programs to balance the need for rental housing with the need for for-sale housing (both of which were substantiated by a review of demographic data and community input). Policy 1.1 supports existing and potential new programs that support home ownership (financial assistance and policies to increase the supply of affordable for-sale housing). Program 1 contains a number of actions to promote, augment, and continue existing financial assistance programs for first-time homebuyers. Program 5, Preservation of At-Risk Units, contains actions through which the City will explore the feasibility of tenant opportunity to purchase programs, which could expand opportunities for lower-income households to purchase existing rental units. Inclusionary requirements for for-sale projects referenced in Policy 1.1 may be adopted under Action 11-3,

which would build on subregional inclusionary studies and strategies done by the Gateway Cities Council of Governments.

One comment letter from Communities for a Better Environment (CBE), the Public Interest Law Project, and Disability Rights California was received after the public comment period had closed, on October 17, 2022. This comment letter was considered in the preparation of the subsequent draft and by HCD as a third-party comment.

The draft was submitted to HCD for review on September 27, 2023, and a letter of findings from HCD was received November 10, 2022.

**January 10, 2023 Draft**

A draft addressing public comments and findings from HCD’s review was published for the statutorily required seven days on January 10, 2023. The Housing Element was posted on the project website, and a notice was emailed to all interested parties.

One comment letter from CBE et al was received on January 17, 2023. The following changes were made to address comments in the January 17 CBE et al letter:

Comment	Response
<p>The advisory group committee mentioned on page I-3 was not an advisory committee formed for the explicit purposes of commenting on the Housing Element, but rather for commenting on the creation of the Environmental Justice Element, that the City was required to complete. Only one meeting was set aside to discuss the Housing Element explicitly and that meeting was not attended by the majority of the Environmental Justice Advisory Committee.</p>	<p>Clarified the purpose of the Advisory Committee and the specific meetings at which the Housing Element was discussed. (Page I-3)</p>
<p>On page I-9, the last public review of the Housing Element draft dated, September 15, 2023, refers to the 7 days that was set aside for public comment as required. A 7 day comment letter period is not the requirement but rather the minimum amount, “[f]or any subsequent draft revision, the local government shall post the draft revision on its internet website and shall email a link to the draft revision to all individuals and organizations that have previously requested notices relating to the local government’s housing element at least seven days before submitting the draft revision to the department.”</p>	<p>Clarified that the seven-day public review period is the minimum statutorily required review period. (Page I-9)</p>
<p>There is no mention on pages I-9 and I-10 of our letter dated October 17, 2022 and sent to Mr. Steve Forster, Director, Department of Community Development. Please see Attachment 1 for further reference.</p>	<p>Added reference to comment letter from CBE et al on September 15, 2023, draft. (Page I-10)</p>
<p>Concern that there is no homeless shelter in the City of Huntington Park and the City does not administer a homeless prevention program. Under SB 2 (effective January 2008) amended the California’s Housing Accountability Act (HAA) to require local governments to take specific zoning actions to encourage the development of emergency shelters and transitional and supportive housing. Suitability of a zone for emergency shelter uses is determined by examining what other uses are permitted in that zone, and whether those uses are generally compatible with residential and shelter use. On pg. IV-14 “[e]mergency shelters with up to 30 beds are permitted by right in the Industrial/Manufacturing Planned Development (MPD) zone and emergency shelters with more than 30</p>	<p>The City provides funding to nonprofits to support homelessness programs, described in detail in Chapter 2, Housing Needs Assessment. Chapter 2 and Chapter 3, Constraints, describe in detail the need for emergency shelters, and transitional and supportive housing to serve the City’s homeless population and the barriers to developing those facilities. Program Housing Element Program 7 contains provisions to modify the zoning code to facilitate emergency shelters and seek funding for the development and operation of emergency shelters. Emergency shelters will also be allowed in the new Transit-Oriented Development Overlay District, and a clarifying statement has been added to Action</p>

Comment	Response
<p>beds are conditionally permitted in the C-G (General Commercial) zone,” this proposed zoning raises concerns as it is noted that there are many industrial uses in the City that are sources of pollution that may impact public health. It would be inappropriate to site emergency shelters in these zones by right as it is likely to pose health risks.</p>	<p>10-5. Programs 7 and 13 contain provisions to modify the zoning code to facilitate transitional and supportive housing and seek funding for the development and operation of such facilities.</p>
<p>Concerns over developers’ statement that “required open space often goes unused, and can constrain their ability to achieve the maximum density allowed.” While the City’s RHNA will likely amount to more density, we do not feel that development of units should sacrifice open space. The City is park poor and admittedly very dense and in order to provide residents some open space developers should be asked to incorporate open space design elements in their projects. Open space and green space have shown to provide positive health impacts to communities.</p>	<p>The Housing Element acknowledges (consistent with the Environmental Justice Element adopted November 15, 2022) that the increased provision of open space is crucial to creating more equitable access to resources throughout the city. The Housing Element does not commit to reducing open space requirements, only that those requirements will be the subject of ongoing outreach to determine the most effective way to provide open space in new development while ensuring projects develop at densities that will meet the City’s obligations under the Housing Element. The provision of open space throughout the City will be addressed comprehensively through Program 14.</p>
<p>We appreciate the acknowledgment that Slauson/Long Beach and Pacific/Randolph “have high pollution exposure” and that soil remediation may be required. However, given that a proposed TOD ordinance might create streamlined, administrative approval for qualifying projects how exactly will the City ensure safeguards from vapor intrusion, soil contamination, air emissions, etc. for projects sited in these areas.</p>	<p>Policy 4.7 in the January 9, 2023, HCD Review Draft of the Housing Element requires environmental remediation for development of all properties near or with on-site contamination.</p>
<p>Creating Green City Ordinance is a positive step, but we would like to see the City adopt a “Building Decarbonization” ordinance. The City has the opportunity to encourage all new buildings that come online to be completely electrified. As a City that has been negatively impacted by a multiple sources of pollutions for decades ensuring that new buildings are built with electrification in mind can help reduce indoor pollution that comes from burning gas stoves and gas heaters. Furthermore, encouraging electrification in new building can help reduce Green House Gas emissions originating from buildings.</p>	<p>The City may consider a building electrification ordinance in the future. However, it is recommended that this be done more holistically and in concert with a more comprehensive carbon reduction strategy. The preparation of a future ordinance should consider additional cost burden or displacement risk to vulnerable communities, the phasing of implementation, funding strategies, regulatory barriers, and coordination with utility providers and other agencies.</p>
<p>Concerns over the proposed Action 13-1, Protecting Existing Residents from Displacement. This draft Housing Element covers how many residents are in fact rent burdened and many families would qualify for being considered Very Low Income and Extremely Low Income, however there is no discussion anywhere in this Housing Element on Rent Control or Just Cause Evictions. The City is aware that many of its proposed sites for development would create projects in the Downtown area but it does not acknowledge how such development can cause gentrification and in turn cause displacement. Having programs such as rent control and just cause eviction protections can help with community stability. It is not enough to do tenants workshop, right of return requirements if tenants are unable to pay the current rent. A rent control ordinance can help protect tenants from land speculators and unjust rent increases. Furthermore, just cause eviction protections will dissuade unsubstantiated unlawful detainer filings.</p>	<p>The language in Action 13-1 has been modified to clarify that the City will adopt local regulations aimed at protecting existing residents from displacement, examples of which are listed in Action 13-1. Based in this comment, a rent control or just cause eviction ordinance has been added to the list of local regulations that will be considered. Action 13-5 has been added as an interim measure to provide residents with information about statewide regulations and Action 13-6 has been added to commit the City to adopt a local relocation plan that complies with and implements state law.</p>
<p>Action 13-2. Homeless Services and Housing. Rather than invest in the City of Huntington Park Police Department participating in SERMET, it may be better to create an actual team of specialists that can help with mental health crises. Historically, police departments</p>	<p>SERMET is a successful regional program that the Huntington Park Police Department participates in along with police departments from other southeast Los Angeles cities, together with the Los Angeles County Department of Mental Health.</p>

Comment	Response
<p>are not the best equipped in mental health and homeless outreach. Working with different County services maybe be a better partnership than allowing for the police to manage these sensitive cases.</p>	<p>Action 13-2 contains other provisions to support homelessness programs, emergency housing assistance, and the development and operation of housing for people experiencing homelessness.</p>

The draft was submitted to HCD for review on February 7, 2023. An additional comment letter from CBE et al was received by the City and HCD on March 3, 2023. This letter was considered by the City in the preparation of the subsequent draft, and by HCD as a third-party comment. A letter of findings from HCD was received March 24, 2023.

The following changes were made to address comments in the March 3 CBE et al letter:

Comment	Response
<p>...Given the increase in homelessness within the City, the element should include a complete analysis of characteristics of persons experiencing homelessness including by protected characteristics such as race and ethnicity, familial status, and persons with disabilities. [page 1]</p>	<p>Using all available data including qualitative data from City staff and service providers, the homelessness analysis has been updated.</p>
<p>The element still lacks analysis and evaluation on the displacement pressures on existing residents for specific areas such as the Downtown Specific Plan area and TOD overlay and programs with specific actions, metrics, and milestones to address both displacement risk and environmental risk. [page 2]</p> <p>... while the City commits to evaluating antidisplacement policies, it must commit to programs as well, with concrete methods and timelines. Additionally, rent control requires a just cause eviction ordinance to be effective, so the City should have a program regarding both types of ordinances, rather than one “or” the other. [page 2]</p>	<p>The draft Action 13-1 was modified to commit to adopting one of the listed strategies and added milestones (page VI-21).</p>
<p>...despite the revisions since the last draft Housing Element, it is still unclear that the City has considered how to ensure that additional housing capacity is created in moderate-resourced tracts. [page 3]</p>	<p>The Sites Inventory identifies 635 total units in moderate-resource census tracts, or about 25 percent of the total units. The Housing Action Plan contains a number of programs to increase investment in lower-resource areas (including but not limited to Action 10-3, Action 10-5, Action 13-4, Action 14-3, Action 14-4).</p>
<p>Because more than 50 percent of the City’s identified sites are non-vacant it is presumed that existing uses will impede residential development of the non-vacant sites until finds based “on substantial evidence that the use is likely to be discontinued during the planning period.” Government Code section 65583.2(g)(2) these non-vacant site. The analysis contained in the February Draft (p. V-26). does not satisfy the requirements of Government Code section 65583.2(g)(2). [page 4]</p>	<p>Additional analysis was added to “Suitability of Nonvacant Sites” in Section V.</p>
<p>While we agree that requiring a Phase I Environmental Site Assessment for all residential projects within 500 feet of sites that are active or have historical pollution (Policy 4.7) would address environmental constraints on sites, the City should require this analysis for all vacant and nonvacant sites in the City which could be developed for residential use during the planning period. [page 4]</p>	<p>Policy 4.7 was modified to apply to all residential projects in the city.</p>

Comment	Response
<p>...Policy 4.7 should extend to all sites in the City to ensure a proper evaluation for lead and other contaminants that may be on the site. [page 5]</p>	
<p>The ability to have assistance in retrofitting homes with air filtration is well received, however, more specific programs to decrease in-home pollution must be added.</p>	<p>References to Environmental Justice policies to address pollution were added to the Assessment of Fair Housing (page II-106).</p>
<p>Given the likelihood of contamination in the community there must be some safeguard for streamlined projects in the City. [page 4]</p>	<p>Policy 4.7 addresses contamination issues outside of the CEQA process to ensure contamination is addressed for projects allowed by-right, other processing or CEQA streamlining provisions.</p>
<p>Lastly, it is still unclear whether the sufficient existing or planned water, sewer, and other dry utilities to accommodate the City's regional housing needs for the planning period. [page 5]</p>	<p>The availability of infrastructure is discussed in Section III, and Program 14 addresses deficiencies in the current systems.</p>
<p>In analyzing the threat of displacement in the sites inventory analysis it would be helpful to concretely name those preventative actions. [page 5]</p>	<p>Program 13 has been revised to specify the measures the City commits to analyzing and adopting.</p>
<p>City residents ask for a commitment to developing homes that would include family-size units and providing goals for developments of such units in the site inventory analysis would guide development in the City. [page 5]</p>	<p>Action 7-4 states that the City will modify local density bonus regulations to allow bonuses for "family housing." Added "family-sized housing" for clarification.</p>
<p>City-owned sites must go through a Surplus Lands Act (SLA) notification process prior to being disposed by the City. The sites inventory assumes that some of the properties will not be sold under the SLA and they would be used for above moderate-income housing. Even if that is the case, the Surplus Land Act requires that sites that can accommodate 10 or more residential units in the property must have no less than 15 percent of the total number of residential units developed sold or rented as affordable housing as defined Section 202(c)(1)....These sites should properly account for the affordable housing required under the SLA. [page 5-6]</p>	<p>The City formulated assumptions about affordability based on HCD guidelines and Housing Element Law. City-owned sites did not meet the criteria to count toward the City's share of the lower-income RHNA. Action 10-4 has been edited to clarify that the City will follow the Surplus Land Act in the development and disposition of those sites, including any affordability requirements.</p>
<p>...The TOD overlay would serve better use if more than 30 percent, preferably 50 percent, of the available units are allocated for very low- and low-income RHNA categories. [page 6]</p>	<p>The City applied assumptions for affordability as outlined in the Sites Inventory.</p>
<p>However, the City should be able to estimate total fees for multifamily developments of different sizes and compare those fees to what neighboring cities charge. [page 6]</p>	<p>The fees analysis was updated to include fees charged for actual projects.</p>
<p>Action 7-2 commits to "[m]odify the required findings for Development Permits (Section 9-2.1007) to remove subjective language." Draft, VI-13. However, the Draft does not acknowledge that finding 2 ("harmonious and compatible") is also subjective, and Action 7-2 does not identify the subjective language to be removed or amended. Draft, IV-23, VI-13. Further, the Draft does not analyze the possibility of allowing some or all multifamily housing by-right in some or all residential zones, despite acknowledging that single-family homes are allowed by-right in multiple zones. [page7]</p>	<p>The program commits to Finding 3, 5, and 7. Finding 2 is not subjective ("the proposed development is consistent with the General Plan"). The TOD Overlay Zone will allow multifamily housing by-right. Modifications to the Development Permit process would remove subjectivity for all multifamily housing.</p>
<p>Similarly, the Draft acknowledges that the City's subjective design review process constrains housing development. Draft, IV-27. However, the only program that addresses this requirement, Action 7-2, is vague, committing only to "[c]reate processes that allow</p>	<p>Action 7-2 was edited to specify actions the City will take to reduce subjectivity in housing development review.</p>

Comment	Response
<p>projects with an affordable component to proceed along a faster entitlement path, that would avoid discretionary review” sometime in 2023. That Housing Element should commit to specific amendments to the design review and development permit processes that will, by a specific date, eliminate discretionary permit requirements for affordable housing developments. [page 7]</p>	
<p>Further, while HCD’s group home guidance indicates that cities may require conditional use permits for licensed residential care facilities serving more than six residents, it goes on to explain: “Local governments must still provide flexible and efficient reasonable accommodations in these permitting processes. This means that some requests for exceptions to permitting processes should be resolved through reasonable accommodation procedures instead of conditional use procedures.” HCD, Group Home Technical Advisory (Dec. 2022), 26 (emphasis added). In contrast, the Draft, in describing the City’s reasonable accommodation ordinance, states: “A reasonable accommodation cannot waive a requirement for an entitlement (e.g., Conditional Use Permit, Development Permit, General Plan Amendment, Zoning Amendment, Subdivision Map) when otherwise required or result in approval of uses otherwise prohibited by the City’s land use and zoning regulations.” Draft, IV-19. The Draft does not commit to amending this aspect of the reasonable accommodation ordinance. [page 8]</p>	<p>Action 7-2 commits to allowing the Reasonable Accommodation process to allow an exception to the requirement for a CUP for large group homes.</p>
<p>The February Draft fails to describe or analyze requests to develop housing at densities lower than those projected in the site inventory as it did in previous versions as well. [page 9]</p>	<p>This analysis is included and is located on page IV-11.</p>
<p>While the February Draft now commits to removing the CUP requirement for SROs, as well as the prohibition against conversion of hotels and motels into SROs, it does not analyze the City’s other restrictions on SROs as constraints. [page 9]</p>	<p>Analysis of the City’s SRO standards has been expanded in Section IV, and additional actions to address constraints added to Action 13-3.</p>
<p>Action 2-3. Affordable Accessory Dwelling Units: Revise this program to detail what grants and financial incentives will be available and how the City will promote homeowner participation in the HCV program. Please clarify whether the grants and incentives will be available to low income households attempting to rent an ADU or to homeowners who rent their ADU to a lower income family or individual. Also, clarification is needed about when will the City begin to monitor the affordability levels of permitted ADU’s and what point in the planning period will the City determine if the projections are incorrect and whether additional incentives or rezoning are necessary Revisions should commit to making this determination by 2025 [page 9-10]</p>	<p>Action 2-3 was modified to include additional specific actions and timeframe for actions. Clarified that incentives would be offered to lower-income households for building new ADUs or legalizing existing ADUs.</p>
<p>Action 3-2. Rental Inspections: The rental inspection ordinance should prohibit rent increases within a year of requested repairs to ensure that cost of repairs is not passed on to tenants in addition to making owners aware of resources to make repairs. [page 10]</p>	<p>Action 3-2 includes referrals to the Fair Housing Foundation to ensure tenants are not adversely affected by the inspection process and any required repairs.</p>
<p>Action 7-1. Zoning Changes to Achieve Consistency with State Law: In addition to the changes listed in this program, the zoning code must be amended to allow by-right development if more than 20% of the units are affordable to lower income households on sites rezoned to accommodate the RHNA from the 5<sup>th</sup> cycle (Government Code section 65583.2(h)). [page 10]</p>	<p>Policy 4.4 and state law establish this requirement.</p>

Comment	Response
Action 10-1. Lot Consolidation: Revise the program to identify whether fee waivers or deferrals will be available, and if both are possible clarify who will decide which is available for a particular project and what criteria will be used to decide between the two incentives. [page 10]	Action 10-1 modified to specify that the City will offer fee deferrals in all cases.
Action 10-5. Transit-Oriented Development Overlay District To partially address displacement due to increased development pressures on properties included in the TOD Overlay, the zoning code should allow by-right development when more than 20 percent of the units are affordable. Also, review the zoning code and commit to any needed changes to the code in order to comply with Government Code section 65583.2(h)(allowing 100% residential use in the mixed-use zone and permitting residential development by-right in the mixed-use zone if the proposed development requires at least 20% of the units to be affordable to lower income households). This program should also include efforts to support locally owned business remain in the neighborhoods where they are located. [page 11]	Existing programs to support local businesses described in Section II. (page II-101) Action 13-7 was added to address displacement of local businesses.
Action 12-2. Housing Choice Voucher Program Promotion This program is focused on making tenants aware of the Housing Choice Voucher (HCV) Program. Los Angeles County already has a years' long waiting list of families and individuals who desperately need a housing subsidy. In order for the program to be effective more landlords are needed to participate and accept vouchers. To increase mobility and to address families overpaying rent, the City should revise this program to do outreach to landlords to: 1) encourage their participation in the HCV, and 2) educate landlords about the state law prohibiting discrimination against voucher holders. [page 11]	Action 12-2 was modified to include these recommended actions.
Action 13-1. Protecting Existing Residents from Displacement While it is commendable that this program now commits to adopting an antidisplacement measure, it is unclear if one of example measures listed in the program will be adopted, or if the "example" language would allow the City choose a strategy not listed in the program. Please revise the program to state that "One of the following strategies will be evaluated." Also, the timeline for adoption should be moved back to 2025 so that the strategy is in place before the displacement pressures are insurmountable. [page 11]	The draft Action 13-1 was modified to commit to adopting one of the listed strategies and added milestones (page VI-21). The City met with CBE during the development of the subsequent draft, and CBE submitted additional written comments on this program. The City considered these comments and incorporated some of CBE's recommendations into the draft, including consideration of additional tenant protections.
Action 13-2. Special Needs Housing Include outreach to landlords to participate in the HCV program and educate landlords about the state prohibition against refusing to rent to voucher holders. Also, this program should commit the City to remove any limitation on unlicensed group homes of more than 6 people. [page 11]	See edits to Action 12-2.
Action 13-6. Relocation Requirements Revise the program to indicate that replacements units are required if rent controlled units, units with deed restricted rents, or units that are or were occupied by lower or very low-income households must be replaced. [page 11]	Added clarifying language from the statute to Action 13-6.



**May 2023 Draft**

A draft addressing public comments and findings from HCD’s review was published for the statutorily required seven days on May 8, 2023. The Housing Element was posted on the project website, and a notice was emailed to all interested parties.

One comment letter from CBE et al was received on May 16, 2023. Comments and the City’s responses incorporated into this draft are summarized as follows:

Comment	Response
<p>Commenters noted that programs (Actions 13-4, 14-3 and 14-4) to address investment in lower-resources areas of the city are not in the Housing Element.</p>	<p>Action 13-4 (Placemaking), Action 14-3 (Open Space Planning), and Action 14-4 (Active Transportation Planning) are in the Housing Element Housing Plan. Program actions to address investment in lower-resources areas include, but are not limited to, Action 13-4, Action 14-1 (General Plan Update), Action 14-3, and Action 14-4.</p>
<p>Commenters asked that analysis of feasibility of non-vacant sites “indicate why similar projects would be feasible in Huntington Park if Huntington Park does not have its own track record of converting non-vacant sites to residential development.”</p>	<p>Section V, Sites Inventory, contains a detailed analysis of example projects in the Gateway Cities area and their relevance to inventory sites in Huntington Park. The Housing Element analyzes transit areas similar to the future transit areas in Huntington Park, brownfield redevelopment sites similar to those in Huntington Park, and declining commercial or industrial areas similar to those in Huntington Park.</p>
<p>Commenters asked that the City include a program to establish “just cause tenant protections and a vacant property tax, and create a separate program to address the after effects of displacement.” Commenters also requested additional displacement analysis. Commenters also request that the City commit to adopting all four strategies outlined in Program 13-1, adopting rent control, and adding clarification to strategies in Program 13-1.</p>	<p>The City met with CBE et al to discuss previously expressed concerns regarding the Draft Housing Element’s displacement analysis and the City’s proposed anti-displacement strategies. The City made numerous changes to the draft Housing Element to address commenters’ concerns regarding displacement of local businesses, programs addressing replacement housing, strategies such as rent control and just cause evictions. Commenters previously asked for clarification regarding the strategies proposed in Program 13-1 and that has been added to the program language.</p>
<p>Commenters clarified prior remarks regarding affordability of future Transit-Oriented Overlay District projects and asked that affordability requirements be included in the TOD regulations. Commenters also asked that multi-family development be allowed by right in more zoning districts than the TOD overlay district.</p>	<p>The Draft Housing Element includes numerous programs to encourage and prioritize affordable housing through permit streamlining, density bonus programs, and ministerial, objective review processes. Adding affordability requirements to a new zoning district may act as a constraint to development in a city which has not experienced much multifamily development in recent years, and which has an obligation to provide housing at all income levels. Under Action 7-5, the City will monitor its progress toward meeting its share of the RHNA for every income level and make zoning changes as appropriate to keep pace and encourage affordable housing development.</p> <p>With changes to existing regulations in programs 7 and 10, multi-family development in the R-M, R-H, C-P, C-G, and all DTSP zones would be allowed by right, with a Development Permit approved administratively. The approval process would not include discretionary review.</p>
<p>While noting that the City has addressed prior concerns with group home regulations, commenters asked that Housing Element analyze the City’s definition of “family” as a constraint to group homes.</p>	<p>Commenters state “zoning ordinances sometimes restrict or limit group homes in single-family residential zones through definitions of single housekeeping units or single-family homes.” The City’s zoning ordinance contains provisions for group homes noted by commenters to be modified through Program 7. The City’s definition of family is analyzed as a constraint on page VI-18. The definition does not exclude group homes. The development of group homes</p>

Comment	Response
	is not constrained by this definition. Local group home regulations do not rely on the definition of “family” to regulate group homes.
Commenters asked that the analysis provide “information as to why developers are requesting lower densities than those projected in the site inventory.”	As noted elsewhere in the Housing Element and by commenters, there have been few multi-family projects approved in the City. There have been no requests to develop housing at lower densities than those anticipated in the sites inventory. Clarification has been added to this analysis (page IV-11). Nonetheless, Housing Element programs 10 and 11 would address future requests by establishing minimum densities in the Downtown Specific Plan area and the new TOD Overlay District.
Commenters asked that specific ADU-related grants and incentives be identified in Action 2-3.	Potential sources of funding were added to Action 2-3.
Commenters request an anti-harrassment ordinance, no fault eviction protection, temporary relocation assistance, or mandatory relocation assistance be incorporated into Action 3-2, Rental Inspection.	Under Action 3-2, Code Enforcement staff will connect property owners with rehabilitation assistance to maintain the affordability of a unit requiring repairs, and connect tenants with fair housing resources to ensure tenants are not displaced or priced out of the housing units once repaired. Other anti-displacement strategies are discussed and addressed in Action 13-1.
Commenters noted that a timeframe and objectives were missing from Action 13-2, and asked for additional analysis regarding displacement of small businesses.	A timeframe and objective has been added to the action related to small businesses, Action 13-7. Additional details regarding small business outreach and potential sources of funding were added to Action 13-7.
Commenters noted that Action 12-2 does not include objectives related to landlord outreach and participation or enforcement of source of income protections.	Objectives regarding landlord participation and the Fair Employment and Housing Act were added to Action 12-2.
Commenters requested Action 13-6 include references to other relocation requirements (Density Bonus Law and sites inventory requirements).	References to and details about replacement requirements in Density Bonus law and Housing Element Law (sites inventory) have been added to Action 13-6.

The draft was submitted to HCD for review on June 7, 2023. An additional comment letter from CBE et al was received by the City and HCD on July 12, 2023. Comments and the City’s responses incorporated into this draft are summarized as follows:

This letter was considered by the City in the preparation of the subsequent draft, and by HCD as a third-party comment. A letter of findings from HCD was received July 21, 2023.

Comment	Response
<u><b>Displacement.</b> The May 2023 Draft continues to lack the analysis of displacement pressures as indicated in our prior comments. We do note the changes to Program 13-1 do include a commitment to enact a specific action after the stakeholder process completes.</u>	<u>Comment noted and previously responded to.</u>
<u><b>Housing capacity in moderate resource areas.</b> We appreciate the clarification about Actions 13-4, 14-3 and 14-4 in the June 2023 Draft. Looking back at the May 2023 Draft it appears that Action 13-1 was titled Placemaking but in the June 2023 Draft it is Action 13-4. Our mistakes about the numbering, lack of numbering, or incorrect numbering aside, the focus of our comments was to inquire whether there are programs intended to increase housing capacity in moderate resource areas as well as in lower resource areas, which is the focus of Actions 13-4, 14-3, and 14-4.</u>	<u>Comment noted and previously responded to.</u>

Comment	Response
<p>The City should add programs to increase housing capacity in all areas of the City including areas identified as having moderate resources.</p>	
<p><b>Additional evidence of the feasibility of non-vacant sites.</b> The City provides information about the conversion of non-vacant sites into residential development in this planning period by pointing to examples in other communities. This analysis should indicate why similar non-vacant sites would be feasible in Huntington Park. Government Code section 65583.2(g)(1) requires the City to explain its methodology to support the feasibility of non-vacant sites development potential. The statute requires particular factors to be part of the methodology, including the City's past experience "converting existing uses to high density residential development." The City relies on the redevelopment activity of neighboring communities to demonstrate how the non-vacant sites in Huntington Park will also have redevelopment potential. If the City is allowed to rely on the development patterns in other cities to demonstrate the redevelopment potential in its own city, the analysis must include additional information comparing Huntington Park's development standards, available incentives and funding to these neighboring cities in order to demonstrate that the sites in Huntington Park have the same redevelopment potential as the sites in these neighboring communities.</p>	<p>A new section ("Development Standards," page V-20) was added comparing the development standards of Huntington Park's Downtown Specific Area Plan and the new TOD Overlay District with the example projects and comparable station area plans that informed the sites inventory analysis.</p>
<p><b>Displacement Prevention.</b> We appreciate that the City met with us and amended Program 13-1 to include greater certainty in what actions it will take to address displacement once it has already occurred. The City should create a Program focused on displacement prevention actions, such as just cause tenant protections and a vacant property tax, and create a separate program to address the after effects of displacement.</p>	<p>Comment noted and previously responded to.</p>
<p><b>TOD Affordability.</b> We renew our request for affordability requirements in the TOD overlay as it would help to ensure that residents subject to displacement pressure around transit centers can find affordable housing in their community. Our comments were not intended to suggest that all developments in the TOD be 100 percent affordable but that requiring some affordability in the TOD would guarantee a variety of housing types for a variety of income levels. Based on the development pressure near affordable transportation options it would not act as a constraint on development.</p>	<p>The rezone program (Action 10-5) complies with Government Code Section 65583.2(h) and (i), which requires that projects on rezone sites that allow by-right development include a minimum of 20 percent affordable units.</p>
<p><b>Reasonable Accommodation for Group Homes.</b> We note the City's commitment through Program 7 to amend the Zoning Code to remove constraints for group homes. The June 2023 Draft finds that City's definition of "family," does not pose a constraint on the development of group homes. Because the City currently requires a CUP for large group homes when the City's removes this requirement as outlined in Program 7, we want to ensure that group homes do not face greater scrutiny or opposition based on whether they fit within the confines of the City's definition of a family. The City's definition of family, specifically the requirement that "family" be a "single non-profit housekeeping unit," is overly restrictive and risks violating not only state housing laws, but the California Constitution's protections of the rights of unrelated persons to live together in communal housing.</p> <p>The City defines "family" as living as a single housekeeping unit, but does not define single housing keeping unit. It also specifies that a family is a single non-profit housekeeping unit, which excludes for profit businesses. In general, localities should avoid including provisions in definitions of shared housekeeping units, single-family homes, or other single residential dwellings that automatically exclude group homes that are owned by for-profit businesses or that pay a house manager or resident to help manage a home's operations. These are well-established models for group homes. See HCD's</p>	<p>Action 7-2 now commits the City to clarifying the meaning of "housekeeping" and removing the reference to "nonprofit" in the definition of "family."</p>

Comment	Response
<p><u>Group Home Technical Advisory 2022 at 23-24. The City should develop an inclusive definition of “housekeeping unit”, or explicitly state in its zoning code that group homes meet the definition of “family.”</u></p>	
<p><b>Rental Inspections.</b> <u>To ensure that the costs of repairs are not passed on to tenants through this program, the program should also include temporary relocation assistance to tenants who are temporarily displaced due to code violations and mandatory owner paid relocation assistance if tenants are permanently displaced due to code violations. Referrals to Fair Housing organizations are not meaningful for code violations because the failure to make repairs is not necessarily related to discriminatory practices.</u></p>	<p><u>Comment noted and previously responded to.</u></p>
<p><b>Air Pollution Mitigation and Green Space Design.</b> <u>There are no programs to address high levels of air pollution or increase air filtration use and availability for residents, although previous drafts did include discussion of air pollution conditions. In addition, there is no mention of integrating green space in design features for housing in the City which would address both housing and environmental justice element goals.</u></p>	<p><u>Comment noted and previously responded to.</u></p>
<p><b>Policy 4.7. Require Phase I Environmental Site Assessments and, if required, subsequent remediation, to be completed for all residential projects.</b>  <u>Under CA Health and Safety Code §78090: “Phase I environmental assessment” means a preliminary assessment of a property to determine whether there has been, or have been, a release of a hazardous substance based on reasonably available information about the property and general vicinity. A phase I environmental assessment may include, but is not limited to, a review of public and private records, current and historical land uses, prior releases of a hazardous material, database searches, reviews of relevant files of federal, state and local agencies, visual and other surveys of the property and general vicinity, interview with current and previous owners and operators, and review of regulatory correspondence and environmental reports. Sampling or testing is not required as part of a phase I environmental assessment. Instead, the City should adopt a policy to require a Phase II Environmental Assessment as well as a Preliminary Endangerment Assessment. These additional tests and requirements should take place in known environmental justice communities, such as Huntington Park.</u></p> <p><b>Action 10-3. Brownfields Program.</b> <u>The City needs to maintain a balance between the City’s need for housing and also its need for open space. Action 10-3 should be modified to prioritize open space as well as residential purposes when seeking funding and assistance to remediate brownfields. New residential sites should be developed at least 1,600 feet from industrial sites and at least 3,200 feet from oil and gas producing sites. Due to the level of contamination that has been found throughout the City we ask that the highest amount of environmental assessment is undertaken. For example, all remediation to previously contaminated land should include a Phase I and Phase II environmental assessment as well as a preliminary endangerment assessment.</u></p>	<p><u>If the results of a Phase I site assessment resulted in findings that would warrant a Phase II assessment, a Phase II assessment would be required.</u></p> <p><u>Reducing and mitigating the negative impacts of exposure of residents to hazardous materials and environmental pollution existing industrial land uses is a primary focus area of and addressed by the Environmental Justice Element.</u></p>
<p><b>Program 6. Energy Conservation Program.</b> <u>In addition to the actions included in Program 6, the City should include additional action items such as ensuring new developments are built without extending gas lines. The City would also benefit from a building decarbonization ordinance. And last, we recommend that all new buildings that come online should be electric only.</u></p>	<p><u>Comment noted and previously responded to.</u></p>
<p><b>Action 10-7. Reuse of Site with Existing Uses.</b> <u>This Action item should be modified to ensure that it is aligned with the standards forth in AB 2011</u></p>	<p><u>The City will comply with state law in review of all projects.</u></p>

Comment	Response
<p><u>(Wicks). AB 2011, the Affordable Housing and High Road Jobs Act of 2022, authorizes a development proponent to submit an application for a housing development that meets specified objective standards and affordability and site criteria, including being located within a zone where office, retail, or parking are principally uses, and would make the development a use by right.</u></p>	
<p><b>Action 10-5. Transit-Oriented Development Overlay District.</b> <u>The City will accommodate its inventory shortfall through the TOD overlay that will allow greater densities than the underlying zoning permits. It is unclear from the program’s description if the underlying density still permitted on these sites is less than 20 units/acre. It is clear that the Overlay would have a minimum density of 20 units/acre but the clarification would be to describe what density the underlying zoning permits. The program also anticipates completion by June 2023 and this deadline should be amended if the deadline has already passed.</u></p>	<p><u>Comment addressed on page V-11, and the timeframe for program completion has been updated.</u></p>
<p><b>Action 13-1 Protecting Existing Residents from Displacement.</b> <u>We appreciate that the City has incorporated some of our prior comments into the first action under Program 13, including the addition of references to a tenant protection ordinance and just cause eviction protections. However, we encourage the City to commit to adopting all four of the identified strategies rather than limiting itself to one of the identified strategies. We also urge the City to include rent control in this Action, to clarify the subparts under “Community benefit zoning” and to clarify when and where replacement requirements will apply. Given the severe risk of displacement, the City should clarify this program to ensure, not only that the City will comply relocation and replacement requirements of applicable state laws but also that it will adopt its own relocation, replacement, and tenant protection policies that maximize protections for lower-income tenants at risk of displacement.</u></p>	<p><u>Comment noted and previously responded to.</u></p>

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